Volume III: Public Participation Report

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

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SIGNATURE PAGE

Volume III: Public Participation Report

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

0684401



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1. INTRODUCTION

Emvelo Wind Energy Facility (Pty) Ltd ('the Project Applicant') is applying for Environmental Authorization (EA) construct and operate the up to 260 MW Emvelo Wind Energy Facility (WEF) (the proposed Emvelo WEF) and its associated auxiliary infrastructure, which is includes one on-site substation, with capacity of up to 132 kV, to facilitate the connection between the WEF and the electricity grid. As well as an up to 132 kV over-head powerline of approximately 30 km (300 m corridor), traversing 35 land parcels, be constructed to connect the proposed WEF to the new Camden B substation. Environmental Resources Management Southern Africa (Pty) Ltd ('ERM') has been appointed to act as the independent Environmental Assessment Practitioner (EAP) to undertake the Scoping and Environmental Impact Assessment (S&EIA) process for Environmental Authorisation under Chapter 5 of the National Environmental Management Act, 1998 (Act 107 of 1998 - NEMA) as amended, for the Proposed Development

The Emvelo WEF, as accepted pursuant to the scoping report phase by the Department of Forestry, Fisheries and the Environment ("DFFE") by letter dated 19 November 2024 and signed by Ms. Masina Morudu[1], will now include properties that were assessed as part of the scoping process for the Emvelo WEF and the Rochdale WEF.

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

This Comments and Responses Report (CRR) forms Volume II of the Environmental Impact Assessment (EIA) submission for the proposed Emvelo Wind Energy Facility (WEF) and its associated infrastructure, located near Sheepmoor in the Mpumalanga Province. The CRR captures and addresses all comments received from Interested and Affected Parties (I&APs), including landowners, community members, relevant government authorities, and other stakeholders, throughout the Scoping and EIA phases. In the interest of procedural fairness and to ensure compliance with the EIA Regulations (Appendix 2 of GN R.982, as amended), a consolidated stakeholder engagement approach was adopted. All registered I&APs from the initially scoped Rochdale WEF application, which was later merged into the Sheepmoor WEF process, were incorporated into a single, unified stakeholder database alongside I&APs from the Emvelo and Sheepmoor applications. These I&APs were notified of the release of the second Draft EIA Reports for both the Sheepmoor and Emvelo WEFs through emails to all the interested and affected parties who were captured during the initial draft EIA PPP who were notified through newspaper notices (Mpumalanga News, 5 March 2025; The Highvelder, 7 March 2025) as well as targeted communications. This integrated engagement ensured that all stakeholders were kept informed of the project developments and afforded a fair opportunity to participate and submit comments.

[1] Ms. Morudu is the Designated Control Environmental Officer: National Integrated Authorisation, and at the behest of Dr. Sabelo Malaza the Chief Director: Integrated Environmental Authorisations in DFFE.

2. THE PUBLIC PARTICIPATION PROCESS

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

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

To ensure that all I&AP issues and comments are accurately recorded, addressed and documented in a Comments & Response Report. The Final Scoping Report (FSR) (ERM, October 2024) presented and assessed the initial proposed wind turbine layout and associated infrastructures of the Sheepmoor WEF and its associated infrastructure. In November 2024, the DFFE accepted the FSR. The results of the specialists' scoping assessments, DFFE comments on the FSR, and other technical and financial constraints for the proposed development site were taken into consideration and a revised 'preferred layout' was produced.

This Public Participation Report (Volume III) accompanies the Draft Environmental Impact Assessment Report (Volume I) and the Comments and Responses Report (Volume II). It provides a record of all stakeholder engagement activities undertaken throughout the S&EIA process, including both rounds of public participation carried out in support of the Draft EIA Report:

- First round (initial Draft EIAr) was conducted from 10 March to 10 April 2025, during which I&APs and regulatory authorities reviewed the initial Draft EIA Report and specialist studies.
- Second round (Revised Draft EIAr) was conducted following the updates to the EIA, particularly the inclusion of additional biodiversity assessments such as the Oribi Management Plan, Biodiversity Offset Report (BOR), and revised specialist studies the project applicant, Mulilo (Pty) Ltd, submitted a formal request to the Department of Forestry, Fisheries and the Environment (DFFE) for an extension to the submission deadline for the Final EIA Report. This request, submitted in terms of Regulation 3(7) of the 2014 EIA Regulations (as amended), was approved by the DFFE, granting an extension until 25 August 2025. In light of these material changes, a second round of public participation was undertaken from 15 July to 15 August 2025 to provide stakeholders and Interested and Affected Parties (I&APs) with an opportunity to review and comment on the revised Draft EIA Report and supporting documentation prior to finalisation and submission.

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

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

3. METHODOLOGY

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

3.1 IDENTIFICATION OF POTENTIAL INTERESTED AND AFFECTED PARTIES

The I&AP database (Appendix 1) was created by ERM, in consultation with the Applicant and was used as the baseline for the pre-identified I&APs list.

Pre-identified / Registered I&APs included:

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

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

It is important to note that whilst efforts are made to notify pre-identified I&APs, the contact details of people are not openly shared due to certain legal restriction prohibiting the unauthorized distribution of personal information in South Africa. To obtain a wide reach, we therefore undertake a robust notification exercise and invite and encourage I&APs to register with us to receive project updates.

3.2 INITIAL NOTIFICATION PHASE

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

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

The public notices and initial notification contained sufficient information on the proposed application and afforded pre-identified and interested I&APs the opportunity to submit their issues / queries / concerns and indicate the contact details of any other potential I&APs that

should be contacted and registered. The contact person at ERM, contact number and email details were clearly stated on the notifications.

3.3SCOPING PHASE

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

Notification regarding the availability of the DSR for public review and comment (Appendix 4) were sent to all registered I&APs (pre-identified key I&APs, I&APs registered during the initial period, as well as affected landowners, surrounding landowners and their occupiers) via e-mail. SMS notifications were sent to I&APs and / or land occupiers that have supplied mobile phone numbers and who did not have an email. The written notification also advised registered I&APs of the following:

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

The Emvelo WEF projects have previously undergone a Public Review and Comment process that ran from Friday, 19 July 2024 until the Tuesday, 20 August 2024 (both days inclusive). Due to the lapse of the previous application, the proposed development underwent a new application process.

Therefore, an additional 30-day scoping Public Participation period was undertaken from 22 August to 21 September 2024, to ensure compliance with the regulations and will augment the public participation process that was undertaken during the lapsed application process.

Furthermore, advertisements were placed in the Highveld Newspaper and the Mpumalanga News Newspaper in March 2025 to inform

The table below presents the respective locations the DSR was made available for public review and comment.

Location	Physical Address
Hard Copy Location	
Ermelo Public Library	Msukaligwa Municipality Civic Centre, corner of Church and Smuts street, Ermelo, 2350, Mpumalanga
CD copies were available upon request.	
Electronic Copy Locations	
ERM Website	https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/

Electronic Transfer	Interested and Affected Parties (I&APs) could request for copies to be shared via a One Drive folder.

3.3.2 SUBMISSION OF THE FINAL SCOPING REPORT (FSR)

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

- Written Notification was sent to all registered I&APs via e-mail.

4. ENVIRONMENTAL IMPACT ASSESSMENT (EIA) PHASE PP PROCESS

4.1 AVAILABILITY OF THE DRAFT EIA REPORT FOR PUBLIC REVIEW

Notification regarding the availability of the Draft EIA report for public review and comment (Appendix 6) were sent to all registered I&APs (pre-identified key I&APs, I&APs registered during the PP period, as well as affected landowners, surrounding landowners and their occupiers) via e-mail. SMS notifications was sent to I&APs and / or land occupiers that have supplied mobile phone numbers and who did not have an email / postal address. The written notification also advised registered I&APs of the following:

- How and where they could access the Draft EIA Report (electronic and hardcopy);
- The duration that the Draft EIA report was made available for public comment, and the date by when comments must be submitted; and
- It afforded I&APs the opportunity to submit their comment / questions / queries / concerns regarding the development and content of the Draft EIA report.

The table below presents the respective locations the Draft EIA report was made available for public review and comment from Monday, 10 March 2025 until Thursday, 10 April 2025 (both days inclusive):

Location	Physical Address
Hard Copy Location	
Ermelo Public Library	Msukaligwa Municipality Civic Centre, corner of Church and Smuts street, Ermelo, 2350, Mpumalanga
CD copies were available upon request.	
Electronic Copy Locations	
ERM Website	https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/

Electronic Transfer	Interested and Affected Parties (I&APs) could request for copies to be shared via a One Drive folder.

The commenting period was 30 days, as per the NEMA, 1998 EIA Regulations, 2014 (as amended).

Following the release of the Draft Environmental Impact Assessment (EIA) Report and the formal submission of the application for Environmental Authorisation. During this period, Interested and Affected Parties (I&APs) were invited to review and comment on the report. Notably, key regulatory authorities, including the Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs (MDARDLEA) and the Mpumalanga Tourism and Parks Agency (MTPA), raised significant concerns particularly with respect to potential impacts on biodiversity and the adequacy of proposed mitigation and management measures.

In response to these concerns, an additional biodiversity assessments were commissioned to strengthen the EIA. This included the preparation of an Oribi Management Plan, the development of a Biodiversity Offset Report (BOR), and the revision of relevant specialist studies. These additions, alongside further technical refinements, led to material changes to the project layout, including a reduced number of turbines, a revised configuration, and updated avoidance and mitigation strategies to address ecological sensitivities.

Due to the scope and significance of these changes, the project applicant, Mulilo Emvelo (Pty) Ltd, submitted a formal request to the Department of Forestry, Fisheries and the Environment (DFFE) for an extension to the statutory timeframe for submission of the Final EIA Report. This request was made in accordance with Regulation 3(7) of the EIA Regulations, 2014 (as amended), which allows for an extension where material changes to the scope of the EIA have occurred. The DFFE approved the extension, granting a revised submission deadline of 25 August 2025. A copy of the extension approval letter is included in Appendix C of the EIA Report.

In line with this extension and the principles of transparency and meaningful engagement under NEMA, a second round of public participation was conducted from 15 July to 15 August 2025. This additional 30-day commenting period provides all I&APs and stakeholders with a renewed opportunity to review and provide input on the revised Draft EIA Report, including the updated specialist studies and biodiversity management plans, prior to finalisation and submission of the Final EIA Report to the Competent Authority.

4.2 SUBMISSION OF THE REVISED DEIA REPORT

Notification regarding the availability of the revised Draft EIA report for public review and comment (Appendix 6) were sent to all registered I&APs (pre-identified key I&APs, I&APs registered during the PP period, as well as affected landowners, surrounding landowners and their occupiers) via e-mail using the database of all the registered I&APs from the initial DEIAr. SMS notifications will be sent to I&APs and / or land occupiers that have supplied mobile phone numbers and who did not have an email / postal address. The notification advised registered I&APs of the following:

- How and where they could access the Draft EIA Report (electronic and hardcopy);

- The duration that the Draft EIA report was made available for public comment, and the date by when comments must be submitted; and
- It afforded I&APs the opportunity to submit their comment / questions / queries / concerns regarding the development and content of the Draft EIA report.
- The table below presents the respective locations the Draft EIA report was made available for public review and comment from Thursday, 14 July 2025 until 15 August 2025.

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

The commenting period is 30 days, as per the NEMA, 1998 EIA Regulations, 2014 (as amended).

4.3 SUBMISSION OF THE FINAL EIA REPORT

- Written Notification (English and / or Afrikaans) regarding the submission of the Final EIA report for EA will be sent to all registered I&APs (pre-identified key I&APs, I&Aps registered during the PP period, as well as affected landowners, surrounding landowners and their occupiers) via e-mail;
- SMS notifications were sent to I&APs and / or land occupiers that have supplied mobile phone numbers and who do not have a postal or email addresses; and
- If written notification cannot be sent to an I&AP, notification will be provided telephonically.

5. DECISION AND APPEAL PHASE

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

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

- Via e-mail, which will include an attachment of the decision, reasons for the decision, and appeal procedure;
- Via SMS, which will be sent to I&APs and land occupiers that have supplied mobile phone numbers and who do not have a postal or email addresses. The SMS will advise the I&AP that access to the decision, reasons for the decision, and appeal procedure must be accessed from the ERM website: https://www.erm.com; and
- Courtesy telephone calls will be made to those who cannot be contacted by either of the above-mentioned methods to advise them of the decision made by the DFFE and to confirm if and / or how they wish to receive access to the decision, reasons for decision, and appeal procedure.

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

6. SUMMARY OF COMMENTS

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

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

During the DEIAR PPP comments were received from I&AP's. Follow-up e-mails were sent to all registered I&APs, stakeholders and authorities, and comments were received.

Responses to comments received during the public participation process are provided in Section 7, which captures all inputs received during the second round of public participation undertaken for the revised Draft Environmental Impact Assessment Report (DEIAr). Each comment is accompanied by an integrated response that reflects input from the Environmental Assessment Practitioner (EAP), relevant specialists, and the project applicant, as appropriate.

Comments and responses from the initial round of public participation (conducted for the original DEIAr) are provided in Section 8 of this report.

In addition, the full record of all original comments and detailed responses has been compiled and appended to the Public Participation Report, which will be submitted as part of the Final EIA Report (FEIR) package to the Department of Forestry, Fisheries and the Environment (DFFE) for decision-making.

7. COMMENTS AND RESPONSES REPORT FOR THE REVISED DRAFT EIA REPORT

This comments and responses section has been updated throughout the duration of the revised Draft EIAr and comments has been collated by thread and not by date. Responses have been formulated collaboratively by the Environmental Assessment Practitioner (EAP), in consultation with the relevant specialists and the project applicant, to ensure that the responses are informed, accurate, and reflective of the multidisciplinary inputs received during the assessment process.

TABLE 7-1~~1~~ COMMENTS FROM DFFE

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
	Ms Bathandwa Ncube DFFE	16 August 2025 Per Email	Revised Draft EIAr	The amended draft Environmental Impact Assessment Report (EIAr) dated July 2025 and received by this Department on 15 July 2025 refers. This letter serves to inform you that the following amendments and information must be included in the final EIAr	
a)	General Comments				
1.				The final EIAr must comply with all comments on the draft scoping report signed on 20 September 2024; conditions of the acceptance of the scoping report signed on 19 November 2024; the comments on the draft EIAr signed on 10 April 2025; as well as these comments on the amended draft EIAr, and must address all comments received for the DSR, FSR, draft EIAr and amended draft EIAr.	Noted. The final EIAr has been compiled to comprehensively address all comments received during the various stages of the EIA process, including the DSR, FSR, draft EIAr, and amended draft EIAr. A consolidated Comments and Response Report (CRR) is included in the final EIAr, detailing how each comment has been considered and incorporated.
2.				It is noted that the proposed ideal location of the activity is within the amended development footprint, which is still outside of the approved site as contemplated in the accepted scoping report. This results in the process being procedural flawed in terms of legislative requirements under EIA	The concern regarding changes to the development site post-Scoping Phase is noted. It is important to clarify that the proposed inclusion of portions of the original Rochdale WEF site into the revised Emvelo WEF application was necessitated by technical, environmental, and spatial considerations that emerged following the Scoping Phase. These

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				Regulations 2014, as amended. The concerns raised and recommendations in the email sent to you from this Department, dated 17 February 2025 still apply.	changes were made in accordance with the iterative nature of the EIA process, as recognised in the EIA Regulations, 2014 (as amended), which allows for refinement based on new information and specialist input. While 20% of the area now forming part of the proposed Emvelo WEF originates from the former Rochdale WEF, this area had previously undergone screening, scoping, and specialist assessment under that application. These reports were in the public domain, and Interested and Affected Parties (I&APs) were given the opportunity to engage with and comment on them. These I&APs were retained and notified of the changes and the opportunity to participate in the Draft EIAr review process. All previously registered I&APs across Rochdale, Emvelo, and Sheepmoor were consolidated into a single stakeholder list and were duly notified and engaged in accordance with the requirements of the EIA Regulations. Furthermore, the Department was formally consulted on the proposed approach. In an email dated 17 February 2025, Ms. Milicent Solomons of the Department noted that: “In terms of the EIA Regulations, 2014 (as amended), we do not see any prohibition of the proposed process, incorporating the 20% of the Rochdale site into the Emvelo application. The project scope and the relevant assessments will have to comply with all legislative requirements. The transcript of this correspondence is attached in appendix 9 of this report.

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
3.				The Avifaunal Specialist Assessment Report for the proposed Emvelo Wind Energy Facility has not been included as part of the amended DEIAr.	The Avifaunal Specialist Assessment Report has now been included in the final EIAr. The report incorporates revised survey data, cumulative impact considerations with Sheepmoor WEF, and detailed mitigation (e.g. turbine micro-siting, shutdown-on-demand protocols).
4.				Please ensure that all information is included, where the draft EIAr refers to missing information that will be included in the final EIAr or any information that will be confirmed in the final EIAr.	All previously missing or to-be-confirmed information referenced in the draft EIAr has been included and finalized in the final EIAr. This includes specialist studies, mitigation measures, and stakeholder correspondence.
5.				Should a specialist recommend specific mitigation measures, these must be clearly indicated.	All specialist-recommended mitigation measures have been clearly indicated in the final EIAr and incorporated into the EMPr. Each measure is linked to its respective impact and specialist report.
b)	Public Participation Process				
1.				Please ensure that comments from all relevant stakeholders are submitted to the Department with the final ElAr, including comments from the relevant sections of this Department.	All stakeholder comments, including those from relevant sections of the Department, have been compiled and submitted with the final EIAr. These are included in the CRR and supported by proof of correspondence.
2.				All issues raised and comments received during the circulation of the SR, draft EIAr and the amended draft EIAr from registered Interested and Affected Parties (I&APs) and organs of state, as listed in your I&APs Database, and others which have jurisdiction in respect of the proposed activity must be adequately addressed and included in the final EIAr.	All comments from I&APs and organs of state have been addressed in the CRR and included in the final EIAr. The I&APs database has been updated and verified to ensure completeness.
3.				Proof of correspondence with the various stakeholders must be included in the final	Proof of correspondence with stakeholders is included in Appendix E of the final EIAr. The

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				EIAr. This must indicate that this amended draft EIAr has been subjected to 30 days public participation process, stating the start and end date of the PPP.	amended draft EIAr was subjected to a 30-day public participation process from 10 March to 10 April 2025.
4.				Evidence that all identified and relevant competent authorities have been given an opportunity to comment on the amended draft EIAr for the proposed development must be provided with the final EIAr. Should you be unable to obtain comments, proof must be submitted to the Department of the attempts that were made to obtain comments.	Evidence of engagement with all relevant competent authorities is included in the final EIAr. Where comments were not received, proof of attempts to obtain them (emails, calls, follow-ups) has been provided.
5.				Copies of the original comments received from I&APs and organs of state, which have jurisdiction in respect of the proposed activity must be submitted with the final EIAr.	Copies of all original submissions (letters, emails) have been included as Appendices in the Final PPP Report. Personal information has been redacted in compliance with POPIA.
6.				In the final EIAr, the Comments and Response Report (CRR) must include all historical comments and issues raised to date.	The Final CRR provides a consolidated record of all comments since Scoping (Draft SR, Final SR, Draft EIAr, Amended Draft EIAr)
	General				
				Please also ensure that the final EIAr includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 3 of the NEMA EIA Regulations, 2014, as amended. You are further reminded to comply with Regulation 23(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: *"The applicant must within 106*	The requirements of Appendix 3 of the NEMA EIA Regulations, 2014 (as amended) have been fully incorporated into the Final Environmental Impact Assessment Report (EIAr). In compliance with Regulation 23(1)(a), the initial Draft EIAr (inclusive of specialist studies and the draft Environmental Management Programme) was

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				days of the acceptance of the scoping report submit to the competent authority - *(a) an environmental impact assessment report inclusive of any specialist reports, an EMPr, a closure plan in the case of a closure activity and where the application is a mining application, the plans, report and calculations contemplated in the Financial Provisioning Regulations, which must have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority."* Should there be significant changes or new information that has been added to the EIAr or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 23(1)(b) of the NEMA EIA Regulations, 2014, as amended, which states: *"The applicant must within 106 days of the acceptance of the scoping report submit to the competent authority – (b) a notification in writing that the documents contemplated in sub-regulation 1(a) will be submitted within 156 days of acceptance of the scoping report by the competent authority or where regulation 21(2) applies, within 156 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the documents, which changes or information was not contained in the original documents consulted on during the*	submitted to the Competent Authority within the required 106-day timeframe following acceptance of the Final Scoping Report. This Draft EIAr was subjected to a 30-day public participation process, conducted from 10 March to 10 April 2025, during which Interested and Affected Parties (I&APs) and relevant authorities were afforded the opportunity to comment. However, as a result of significant changes and the inclusion of new information notably the Oribi Management Plan, Biodiversity Offset Report, and updated specialist assessments the Applicant, Mulilo Emvelo (Pty) Ltd, formally notified the Department in accordance with Regulation 23(1)(b). This notification requested an extension to allow for an additional public participation process. The Department approved this request, thereby extending the submission deadline for the Final EIAr to 25 August 2025. In line with this approval, the revised Draft EIAr was circulated for a further 30-day public participation process, from 15 July to 15 August 2025, ensuring that all Interested and Affected Parties, as well as relevant authorities, had sufficient opportunity to review and comment on the updated information. The Final EIAr, submitted within the approved timeframe of 25 August 2025, consolidates all required components. These include the updated EIAr, the revised Environmental Management Programme (EMPr), the Oribi Management Plan, the Biodiversity

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				initial public participation process contemplated in sub-regulation (1)(a), and that the revised documents contemplated in sub-regulation 1(a) will be subjected to another public participation process of at least 30 days". Should you fail to meet any of the timeframes stipulated in Regulation 23 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.	Offset Report, and all specialist studies. A comprehensive Comments and Responses Report (CRR) has also been included, demonstrating how all comments received during the Scoping, Draft EIAr, and amended Draft EIAr phases have been addressed.
				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.	Both the EAP and the applicant are aware that no listed activity may commence without an Environmental Authorization in terms of Section 24F of NEMA. This condition will be strictly adhered to.

TABLE 7-2~~2~~ COMMENTS FROM DARDLEA

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
1.	Robyn Luyt DARDLEA	14 August 2025 Per Email	Revised Draft EIAr	The layout provided in the initial draft EIAR included 24 turbines. It was not explicit in the revised draft EIR, which now includes 22 turbines, but after scrutinizing the layout plan and the responses provided in the comments and response report (CRR), we have been able to ascertain the following changes: The removal of WTG 24; the movement of WTG 21 out of Emvelo and into the Sheepmoor site; and slight changes to the localities of WTGs 3, 7, 12, 13, 14, 19, 20, 22, 23 and	The layout was refined to avoid the most critical biodiversity features where feasible. Where turbines remain in sensitive areas due to technical constraints, mitigation measures including micro-siting, curtailment protocols, and biodiversity offsets have been incorporated. Applicant: No WTGs were moved between the two Wind Farms proposed. WTG 24 was removed from the layout as it was situated within areas confirmed by the terrestrial

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				25. None of the turbines that were moved or micro-sited have been moved into less sensitive areas. Sixteen (16) of the 22 turbines proposed in the current layout, all of which were flagged in our previous comments, are still located in sensitive areas. Given that the requirement to avoid impacts in accordance with the mitigation hierarchy has not been adequately addressed, these comments must be read in conjunction with our comments dated 10 April 2025, which still stand.	specialist to be of a high sensitivity, within Intact Grasslands and High Faunal sensitivity area. WTG 21 was moved out of an Intact Grassland and high faunal sensitivity area. WTG14, 19, 20, 22, 23 and 25 were all shifted away from the avifaunal buffer, reducing impact. Application of the mitigation hierarchy has been appropriately applied. The Emvelo WEF originally proposed 45 WTGs during the Scoping phase. This number has been halved. The layout has avoided all no-go areas advised by specialists. Furthermore additional mitigation is being applied where impacts cannot be fully avoided and the Biodiversity Offset Report (BOR) will address any residual impacts that still remain. The applicant has continuously displayed willingness to remove WTGs from the layout during the EIA phase (45 to 22), adopted multiple additional assessments, incorporated precautionary mitigation and shown commitment to addressing residual impacts with a comprehensive BOR.
2.				The proposed Emvelo Wind Energy Facility and associated grid infrastructure is located on a site comprising: CBA Irreplaceable and Optimal; Intact Grassland Patches; Key Biodiversity Areas; the Grasslands Important Bird Area (IBA); Ecological Support Areas; National Protected Area Expansion Strategy Areas (NPAES); Threatened Ecosystems - including Wakkerstroom Montane Grassland and Eastern Highveld Grassland; CBA: Aquatic Rivers; ESA: Strategic Water Source Area;	The sensitivity of the receiving environment, including the presence of Intact Grassland Patches, Critical Biodiversity Areas (CBAs), IBA, ESA, and National Protected Area Expansion Strategy (NPAES) focus areas, was recognised early in the planning process and guided the application of the mitigation hierarchy throughout project development. Multiple layout revisions, informed by input from the biodiversity and avifaunal specialists, to avoid and minimize impacts on sensitive habitats. Where avoidance was not technically feasible due to constraints such as wind resource optimization,

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				ESA: Wetlands and ESA: Important Subcatchments.	topographical limitations, safety buffers, and the recent exclusion zone related to the adjacent airstrip site-specific mitigation measures were developed in line with best practice and applicable guidelines. The relocation of some turbines into more sensitive areas was not undertaken lightly, but rather as part of a broader balancing exercise to avoid other constraints while minimizing biodiversity impacts as far as practically possible. These relocations were reviewed in consultation with the relevant specialists, and the updated layout was subjected to sensitivity overlays and field verification. The (EMPr) has been updated to reflect refined mitigation and monitoring actions. SPECIALIST: The terrestrial biodiversity assessment served to refine the mapping, which is the norm, where bioregional plans are often not up to date and/or reflect inconsistencies that require ground-truthing. This was presented in the terrestrial biodiversity assessment reporting accordingly, which is being ignored by the respective authorities. This was noted in the draft EIA comments but is still being overlooked. Applicant: The applicant acknowledges the environmental sensitivity and level of Biodiversity of the Project Area and Mpumalanga Province. Early development screening and specialist assessment was conducted on an area of approximately 25 000 Hectares. As advised by the appointed specialists, we avoided the most sensitive features and focused our efforts on areas whereby the Environmental Impact was informed to be less, and the Wind resource still economically viable. The current proposed project

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					area is approximately 6 700 Hectares with a disturbance footprint of only approximately 48 Hectares. The refined assessment and site sensitivity verification done by the appointed specialists indicated that the site is currently heavily impacted on, more than what is evident from the desk-based mapping. Although this is expected as the Mpumalanga Biodiversity Sector Plan (MBSP) refers to Land Cover data recoded in 2010, 15 years ago. Detailed multi-levelled mitigation measures have been developed and adapted to each sensitivity, these measures have been included in the EMPR to reduce the impacts on these sensitive areas and species to an acceptable level. According to a WhatsApp and email survey conducted by the applicant on 16 May 2025 among project landowners and occupiers, 100% of the area identified as having high sensitivity on the escarpment is currently being grazed by livestock. This extensive grazing has resulted in significant overgrazing of the grassland, adversely affecting the Oribi's ability to utilize the area as a viable food source. These findings are supported by the conclusions of the terrestrial specialists. Furthermore, 0.02% of the total area mapped as Intact Grasslands within the province are within the proposed development area. Of this 0.02%, only 0.2% is proposed to be disturbed. This means that only 0.0003% of the total areas mapped as Intact Grasslands would be disturbed.
3.				Furthermore, the proposed Emvelo WEF and associated grid connection is located in an area comprising a high fauna sensitivity,	Applicant: The applicant acknowledges the environmental sensitivity and level of Biodiversity of the Project Area and Mpumalanga Province. The

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				a high diversity of threatened bird species, and a high number of priority species for wind energy developments and power lines, including the following confirmed on site: African Grass Owl, African Marsh Harrier, Blue Crane, Cape Vulture, Denham's Bustard, Greater Flamingo, Grey Crowned Crane, Lanner Falcon, Martial Eagle, Secretary bird, Southern Bald Ibis, Sensitive Species 23, White-bellied Bustard, and Yellow breasted Pipit.	layout of the proposed facility and associated infrastructure has been severely reduced to avoid sensitivities, as informed by the specialists. The proposed facility is supported by all specialists subject to implementation of their recommendations and mitigations. Applicant: The applicant acknowledges the environmental sensitivity and level of Biodiversity of the Project Area and Mpumalanga Province. A detailed avifaunal impact assessment was conducted. This was advised by long term monitoring and extensive data collection including detailed wetland surveys and habitat modelling Specialist Response: Noted. The sensitivity of the site and area in general is noted and recognised in terms of the number of sensitive avifaunal species. The degradation of the landscape as a result of current unsustainable farming practices of overgrazing the grasslands and wetlands, as well as the alien tree infestation should be highlighted. The developer commits to implementing numerous mitigation measures and to embark on extensive land management issues to minimise anthropogenic impacts.
4.				According to the Avifaunal Assessment, a total of 253 bird species could potentially occur in the Broader Area where the Emvelo WEF and associated Grid Connection Infrastructure are proposed to be located. Of the 253 species, 38 species are classified as priority species for wind energy developments, of which 32 were recorded during pre-construction monitoring. Of the 253 species, 76 are considered power line sensitive species, 57 of which were recorded during the pre-construction monitoring.	
5.				DARDLEA is not supportive of development of WEFs (or any non-compatible land use) within Critical Biodiversity Areas and Key Biodiversity Areas, or within intact grassland patches. In respect of Intact Grassland Patches, it is important to note that the Mpumalanga Biodiversity Sector Plan (MBSP) specifically incorporated climate change into spatial priorities through the prioritisation of the	DARDLEA's concerns regarding the development within Critical Biodiversity Areas (CBAs), Key Biodiversity Areas (KBAs), and intact grassland patches are acknowledged. As part of early project planning, development screening and specialist assessments were conducted across an area of approximately 25,000 hectares. Based on the findings, the layout was refined to avoid the most environmentally sensitive features wherever feasible, and to focus development within areas where

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				connectivity of remaining intact grassland patches in the province, as they provide habitat for species to thrive, and allow for their dispersal. Intact grasslands are crucial for supporting threatened fauna and avifauna. This is verified in the faunal assessment whichstates that “any remaining Oribi sub-populations and any contiguous areas of intact grassland are considered as high conservation importance” and that “cumulative impacts may become more significant if added to existing or future impacts from other activities, such as otherrenewable energy projects in the area”. Intact Grassland Patches are important source areas in terms of metapopulation dynamics. The MBSP - adopted in 2023 (Provincial Notice 279 of 2023) - is a planning tool that has been developed to manage biodiversity resources of the province by setting strategic objectives to ensure that spatial biodiversity and climate change priorities are effectively incorporated into land-use and development planning, environmental assessments and authorisations, and natural resource management within Mpumalanga Province. The links to the various reports and shape files, including the MBSP Technical Report which details the scientific methods used to identify Intact Grassland Patches, can be accessed at	potential environmental impacts could be better managed while ensuring that wind resource potential remains economically viable. The current proposed project area has been reduced to approximately 6,150 hectares, with a total disturbance footprint of only ~48 hectares. Site sensitivity verification, conducted during fieldwork, revealed that the area is more heavily impacted than indicated by desktop-based mapping, which relied on outdated 2010 land cover data from the Mpumalanga Biodiversity Sector Plan (MBSP). This ground-truthing effort highlighted the extent of historic degradation and current land-use pressures, particularly from overgrazing. According to a WhatsApp and email survey conducted by the applicant on 16 May 2025 among project landowners and occupiers, 100% of the area identified as having high sensitivity on the escarpment is currently being grazed by livestock. This extensive grazing has resulted in significant overgrazing of the grassland, adversely affecting the Oribi’s ability to utilize the area as a viable food source. These findings are supported by the conclusions of the terrestrial specialists While it is acknowledged that intact grassland areas are of high conservation value, particularly for faunal species of conservation concern (SCC)—as stated in the Faunal Impact Assessment (FIA)—the layout has been revised to avoid intact grasslands and other key sensitivities where feasible. Where infrastructure remains in such areas due to geotechnical or engineering constraints, site-specific mitigation, biodiversity offset measures, and species management plans (e.g., for Oribi and priority avifauna) have been developed and incorporated into

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				https://mtpa.maps.arcgis.eom/sharing/rest/content/items/fc6d8f9e7ef84d2f87f86b91e8e9f87a/data).	the Environmental Management Programme (EMPr). The EMPr ensures alignment with provincial biodiversity planning tools and reflects a tiered and location-specific approach to mitigation. The high-sensitivity escarpment area described in the Final EIA as “likely of general importance for a range of faunal groups, representative of a large contiguous and ecologically intact area of mostly good-quality montane grassland” has been treated with particular caution. Informed by detailed habitat modelling and fieldwork, the project layout and mitigation hierarchy aim to ensure that residual impacts are reduced to acceptable levels, and that ecological connectivity and functionality are maintained or enhanced through offset and management interventions. SPECIALIST: The terrestrial biodiversity assessment served to refine the mapping, which is the norm, where bioregional plans are often not up to date and/or reflect inconsistencies that require ground-truthing. This was presented in the terrestrial biodiversity assessment reporting accordingly, which is being ignored by the respective authorities. This was noted in the draft EIA comments but is still being overlooked as it does not align with the agenda that serves to promote the Mpumalanga Bioregional Plan rather than acknowledge that there are shortcomings. The proposed project is not seeking to develop the entire intact grassland patch, only a very small footprint. The resultant loss is thus not deemed to be excessive as the area that will remain undeveloped (i.e. intact grassland) far exceeds the actual hard stand footprint of the project. Were it a mining or agricultural project that would result in the clearance of thousands of hectares of grassland the impact would be more significant.

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					The terrestrial biodiversity impact or risks to ecological processes associated with an access road and turbine footprint would not be deemed excessive within an already modified surrounding landscape (i.e. significant agricultural and mining related land transformation). Applicant: The applicant acknowledges the environmental sensitivity and level of Biodiversity of the Project Area and Mpumalanga Province. However, the applicant believes that wind energy development is a compatible land used, and will have a far lower impact than other land uses such as coal fired-power, coal mining, gas exploration, unsustainable farming and overgrazing etc. Early development screening and specialist assessment was conducted on an area of approximately 25 000 Hectares. As advised by the appointed specialists, we avoided the most sensitive features and focused our efforts on areas whereby the Environmental Impact was informed to be less, and the Wind resource still economically viable. Detailed multi-leveled mitigation measures have been developed and adapted to each sensitivity, these measures have been included in the EMPR to reduce the impacts on these sensitive areas and species to an acceptable level. Mapped “Intact Grassland” areas, cover 51% of the Mpumalanga province. Total avoidance of these areas by wind turbines will result in no or very little wind energy being developed in the province. We are strongly of the view that wind energy is a compatible land use in sensitive areas, if properly mitigated and managed.

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					Lastly, 0.02% of the total area mapped as Intact Grasslands within the province are within the proposed development area. Of this 0.02%, only 0.2% is proposed to be disturbed. This means that only 0.0003% of the total areas mapped as Intact Grasslands would be disturbed.
6.				While we acknowledge efforts to acquire GPS tracking data for Martial Eagle, the modelling of the data and the datasets must be subjected to additional independent peer-reviewed analyses in order to verify accuracy and confidence levels. In the absence of this, the precautionary approach, which is the application of sector-accepted buffers, must be applied.	Applicant: We appreciate DARDLEA's acknowledgement of our Martial Eagle tagging work. The avifaunal assessment was conducted by Albert Froneman, a leading SACNASP specialist for several WEFs in the broader region. His extensive experience with similar projects ensures that methodologies and mitigation measures are informed by a strong understanding of regional species behaviour and best practice. Given his expertise and the robust methods applied, a formal peer review at this stage is unnecessary and would delay our FEIAr submission. The findings are reliable for decision-making now, with peer review able to be considered post-authorisation if required for wider scientific purposes. FurthermoreFurthermore, is unclear what is meant by "sector-accepted buffers", as the applicant is not aware of the sector having accepted 5-6km hard circular buffers for this species. It is preferable to use real tracking data showing real usage to advise buffers (which are not circular) as well as possible mitigation measures. Specialist Response: Noted. The flight risk model and sensitivity zonation for Martial Eagle were developed using a combination of tracking data, focused field observations, and high-resolution environmental predictor variables. While the model incorporates GPS data from one adult (13 months, 6380 transmitted locations) and one juvenile individual (5 months, ~1450 transmitted locations) at the project site, it

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					also includes tracking data (12 months, ~5850 transmitted locations) from a second adult male Martial Eagle monitored at a comparable highland grassland site. This second dataset extended to approximately 12 months and exhibited a remarkably similar spatial use pattern, which is included in the figures reporting on space use. Together, these datasets provided a robust basis for assessing spatial flight activity in relation to nest proximity and landscape features. In addition to the tracking data, over 37 hours of direct Martial Eagle flight observations were recorded near the nest site during 60 hours of targeted pre-construction surveys. This effort produced a substantial dataset of localized flight behaviour, which was used to train a flight risk model (FRM) using an artificial neural network (ANN). The ANN was developed using a suite of predictor variables representing topography and focal site characteristics (distance from nest, perch sites, etc.). This enabled a data-driven approach to modelling spatial risk beyond traditional buffer methods. Regarding the delineation of high and medium sensitivity zones: the original high-risk zone (~80 km²) closely mirrors the area of a 5 km circular buffer recommended by BirdLife South Africa and EWT. However, based on the tracking and observation data showing that ~75% of recorded activity occurred within 3 km of the nest, a more precautionary Very High Risk zone (~31 km²) was delineated, within which no wind turbines will be permitted. The Medium Risk zone (~148 km²) now incorporates a more stringent mitigation regime than conventional practice, including both automated Shutdown-on-Demand (SDOD) and dynamic diurnal curtailment during periods of expected eagle activity.

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					Importantly, the risk classification framework was not adjusted to reduce turbine constraints, but rather to reflect biologically informed risk thresholds derived from empirical data. The risk model thresholds themselves remained unchanged; what changed was the delineation of more conservative spatial zones to better reflect the observed space use and mitigate risk more effectively. While we acknowledge the limitations inherent in working with a small sample size — which is a known challenge for this species — the modelling approach integrates multiple lines of evidence and has prioritized precaution in delineating turbine exclusion zones and mitigation areas. The intent is to implement a risk-responsive mitigation hierarchy that reduces potential collisions. In addition to the primary dataset, tracking data from another Martial Eagle - a male inhabiting a comparable environment - was incorporated to facilitate a comparative analysis. Notably, the behavioural patterns observed in this individual closely mirrored those documented at the current study site. Refer to Section 5.8.7.1 of the Avifaunal Specialist Report for additional information on Martial Eagle tracking data considered in this study.
7.				While we acknowledge the methodology applied to inform the Avifaunal Specialist's Sensitivity Zones (Very High, High and Medium) for Martial Eagle and Southern Bald Ibis, confidence in the methodology also requires testing through a broad, formal peer-reviewed analysis within the avifaunal sector, which is beyond the scope of an EIA. Until this is achieved, a precautionary approach is warranted, as follows:	
7.1				In accordance with BirdLife SA's Bird Monitoring Reports from Operational Wind Energy Facilities in South Africa (2025), a	Applicant: We note DARDLEA's view that the Martial Eagle tracking data should have been peer reviewed. However, this project has undergone three phases of

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				nest buffer of 6km is recommended for Martial Eagles (which report also states that that the available data suggests that this buffer will noteliminate the risk of collisions, and that it would be necessary to implement additionalmitigation measures outside of this area).	public participation (1 of Draft Scoping and 2 of Draft EIA), providing more than sufficient opportunity for stakeholders to review and analyse the methodology. The approach was led by Albert Froneman, a highly experienced avifaunal specialist, and was informed by on-site monitoring of Southern Bald Ibis and GPS tracking of Martial Eagles. This allowed for the development of tailored no-go areas and mitigation measures, such as curtailment, that are far more targeted and effective than applying arbitrary circular buffers. For example, the Southern Bald Ibis no-go area identified through this process is approximately 1,900 hectares — significantly more than the ±1,000 hectares that would result from applying the standard 1 km buffer recommended by BLSA. The shapes of these no-go areas accurately reflect actual bird movement patterns, reducing impact more effectively than large, generic buffers. Disregarding this site-specific dataset at this stage would undermine both the scientific integrity of the assessment and the quality of the mitigation measures proposed. A 6km no-go circular buffer has been recommended on various projects by specialist, however, this is usually without the need to have additional mitigation, such as SDoD. We believe that SDoD and curtailment, advised by tracking data,, with a no go area shaped to the birds actual usage, will be far more effective in reducing impacts than a circular no go buffer of 6km. Specialist Response: Noted. The specialist's response included in No 6 above refers. In addition, diurnal SDoD will be fully implemented on all authorized WTGs throughout the lifespan of the proposed WEF.
7.2				A minimum buffer of 1km from Southern Bald Ibis colonies.	

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					The Avifaunal Specialist Report includes the following compulsory mitigation measures as recommended for inclusion in the EMPr: • All wind turbine generators (WTGs) – located in both 'high risk zones' and 'medium risk zones' - must be subjected to SDoD, which must include Automated SDoD (camera and radar) to accommodate misty conditions and night flying species, as well as proactive curtailment based on environmental and weather conditions. • SDoD and radar technology must be in operation at the onset of commercial operation date (COD). • SDoD success must be monitored throughout the lifetime of the facility, where monitoring data during operation will continuously inform the SDoD needs for each turbine. • The Shut Down on Demand (SDoD) programme must be developed and included in the EMPr, post–EA (should such EA be granted) during the detailed design phase prior to construction. Specific details of the SDoD programme will be included in a comprehensive Biodiversity Management Plan (BMP) which will be developed and implemented prior to the commercial operational date of the facility. In addition, note that the SDoD implementation will entail systems capable of curtailing turbines during daylight hours based on species level identification. Also, all turbines will be subjected to several tiers of mitigation that include seasonal night time proactive curtailment for Species 23 (from dusk to dawn), daylight proactive curtailment at high-risk periods for specific turbines in relation to known high risk periods for Martial Eagle flight activity, and night time radar SDoD for nocturnal species such as flamingos. Blade

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					patterning will also be fully implemented on all approved WTGs. Note that Species 23 is now referred to as Species 41 according to SANBI and the National DFFE Screening Tool. Specialist Response: Noted. The delineation of the turbine exclusion (sensitivity) zones for Southern Bald Ibis (SBI) was based on a continuous flight risk surface derived from flight data and spatial modelling of flight behaviour around known roost and colony sites. To define the risk categories (High and Medium), we applied an empirical thresholding approach informed by observed flight density patterns. Specifically, the High Risk zone was delineated to encompass the core 70% of modelled flight activity, with a target of including at least 70% of all recorded SBI flight paths surrounding known roosts and colonies. The final High-Risk Zone achieved coverage of approximately 75% of all observed flights, slightly exceeding the target to ensure conservative spatial buffering around high-use areas. The Medium Risk zone was extended outward to capture a broader range of movements, aiming to encompass over 80% of recorded SBI flights. The final modelled zone covered approximately 79% of all flight data, offering a precautionary yet data-driven buffer beyond the colony locations. This tiered thresholding strategy attempted to reflect biologically meaningful space use given available recorded data. These zones were not arbitrarily defined but rather derived directly from spatial correspondence between observed flight patterns and modelled risk predictions that aligns with preferred grassland foraging areas in proximity to the colonies.

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
8.				Similarly, turbines and all associated infrastructure, including access roads as well as the upgrading of existing roads (which are currently seldom-used jeep tracks), must avoid Yellowbreasted Pipit habitat entirely, i.e. both “Very High" and “High" sensitivity zones. It is also concerning to note that in the initial draft EIA, the Avifaunal Specialist had designated the modelled Yellow-breasted Pipit habitat entirely as “Very High Sensitivity - No-go Zone”, but has in the revised report, incorporated a new “High Risk -Turbine exclusion zone” into the initial no-go zone, for, what it appears, the purpose of accommodating Collector networks and road networks. The Avifaunal Specialist does recommend moving Turbine 23 as it is located in the turbine exclusion zone, but as indicated above, infrastructure -including roads and collector networks within Yellow-breasted Pipit habitat is not supported.	Applicant: The routing of access roads was done in alignment with the bird specialist. Areas often used by farmers, or areas that are already anthropogenically impacted on, were prioritised where access could not be rerouted. This was done on a case-by-case basis with the avifaunal specialist. The refinement of the risk ratings were done to align with the other avifaunal avoidance zones. WTG 23 is located well outside of the avifaunal exclusion zone. No WTG infrastructure (including the blade), will enter this exclusion zone. Specialist Response: Noted. All WTGs were removed from Yellow-breasted Pipit habitat with the exception of turbine 23 that still appears to be fringing on a high-risk area as identified for the Yellow-breasted Pipit. It is recommended that this turbine position be reconsidered following the avifaunal walkthrough, post-EA (should such EA be granted) prior to construction. Also, according to the final WEF layout, a few proposed access roads and underground cabling routes still transect Yellow-breasted Pipit habitat where these follow existing gravel roads occurring on site. In addition, to promote conservation of the remaining, Yellow-breasted Pipit habitat, alien clearing and rehabilitation of natural grasslands will benefit all grassland bird species within the development footprint as well as in the larger area. An extensive conservation stewardship and habitat restoration and management programme is being developed that will form part of the operational management of the WEF. The implementation of extensive and stringent mitigation measures will ensure that avifaunal species potentially attracted to these habitats receive adequate protection.

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
9.				Given the limited data available on Species 23 movements and collision risks, the curtailment strategy for turbines proposed in the "Medium Sensitivity" Zone for the species is not supported. Mitigation strategies that have no data to validate their success cannot be used to replace the requirement for avoidance. All Turbines and all associated infrastructure must avoid Species 23 habitat entirely, i.e. in "Very High", "Medium" and "High" sensitivity zones.	Applicant: We note DARDLEA's comment regarding the limited data on Species 23 movements and collision risks. While this species is indeed poorly understood at a national scale, the project has undertaken substantial, site-specific investigations to address this gap. Our avifaunal specialist conducted targeted habitat mapping, deployed on-site cameras, and utilised acoustic monitoring equipment to identify potential occurrence areas within the site. Sophisticated modelling and vegetation mapping was done to identify suitable habitat and possible "core" areas for the species. This proactive fieldwork goes beyond standard practice for Environmental Impact Assessments and has directly informed both the wind turbine layout and the mitigation measures proposed. While broader movement data for Species 23 may be scarce, the site-specific dataset we have collected is robust and tailored to the conditions of this project area. It provides a sound, defensible basis for identifying higher-sensitivity zones and refining WTG placement to avoid and minimise potential impacts. To disregard these findings on the grounds of national data scarcity would overlook the targeted work undertaken specifically to improve understanding and ensure the mitigation hierarchy is effectively applied. Specialist Response: Note that Species 23 is now referred to as Species 41 according to SANBI and the National DFFE Screening Tool. Then in response to this comment, the mitigation strategy proposed for Species 41 (previously Species 23) is designed to be both precautionary and adaptive, leveraging high-resolution, near real-time

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					data sources to inform turbine curtailment decisions during the species' active season. The use of dynamic habitat modelling based on updated satellite imagery, rainfall patterns, and soil moisture conditions provides a proactive mechanism to anticipate wetland activation and potential habitat use. This approach offers temporal resolution beyond static or pre-season assessments, ensuring that turbines in the medium-risk mitigation zone are curtailed specifically when habitat conditions become suitable for Species 41 (previously Species 23). In addition, the integration of drone-based structural assessments and vegetation productivity monitoring allows for localized ground-truthing and improves predictive accuracy of habitat suitability. Night-time curtailment is automatically triggered during periods of confirmed habitat favourability between October and March, aligning with the species' life history requirements. Further precaution is embedded in the detailed engineering design phase (or proposed pre-operational research phase) prior to construction, which includes tracking movement and flight height of Species 41 (previously Species 23). These data will be used to refine model thresholds and potentially extend or adjust curtailment periods as needed. Should ongoing monitoring indicate a higher-than-expected risk, curtailment protocols can be intensified or spatially expanded. This strategy ensures that mitigation is not static but instead responds to actual habitat conditions and species activity, thereby balancing ecological protection with operational feasibility in a scientifically defensible manner.
10.				The Avifaunal Report confirms the presence of Species 23, but the location is not disclosed.	Specialist Response: Note that Species 23 is now referred to as Species 41 according to SANBI and the National DFFE Screening Tool.

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				The Avifaunal Assessment must confirm how the recommended sensitivity zones for Species 23 align with Birdlife SA's "Guidelines for surveying and mitigating impacts on [Species 231 in avifaunal assessments for development applications", particularly in respect of the following excerpt of the guideline that specifies a 5km buffer to be applied to suitable wetlands: *"Birds function at a wider ecological scale than most upper-catchment wetlands, thus requiring a larger and interconnected species buffer zone to ensure adequate impact mitigation from developments. Literature from studies on waterbirds, particularly rallids, provides several recommendations for designing and implementing buffer zones. As a general guideline for developments with collision risks, like wind turbines, buffer zones of at least 5 km between the development and wetlands suitable for the [Species 23] are recommended, with buffer zones of at least 1 km for delineated wetland inputs (e.g., streams and aquifers), aquatic-habitat corridors (e.g., riverine habitat), and potential movement pathways between wetlands".*	Also, the deliberate disclosure of known locations of Species of Special Concern such as Species 41 (previously Species 23) undermines efforts to protect these species through strategic obfuscation as is legally required by SANBI and the National DFFE, potentially exposing them to risk of exploitation, poaching or illegal trading. Hence, why the location of Species 41 (previously Species 23) as it pertains to this proposed project has not been disclosed in the Avifaunal Specialist Report. To this effect, the avifaunal specialist has sufficiently buffered all potential suitable habitat associated with Species 41 (previously Species 23) within the proposed project's area of influence and the WEF's development footprint. Buffering potential suitable habitat rather than species occurrence within the proposed development footprint has resulted in much larger hectarage of wetland features being buffered and completely avoided by turbine placement. Furthermore, the rigorous mitigation strategy proposed for Species 41 (previously Species 23) includes a systematic approach, where wetland condition monitoring and observation of catchment level rainfall events offer sufficient warning for night-time proactive turbine curtailment. The system's precision will be improved through further research on the movement patterns and flight height of Species 41 (previously Species 23) prior to the WEF becoming operational, to which the developer has already committed to undertake. It is the specialist's opinion that the mitigation strategy proposed for Species 41 (previously Species 23) is considered sufficient.

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11.				The number of turbines that are located in areas recommended for avoidance (at least 16 out of 22), and the location of the roads, construction camps and OHLs in sensitive areas demonstrates that the site is not compatible with the proposed land use. The areas of concern as they relate to the abovementioned comments, are outlined below:	
11.1				WTG 3 - KBA; NPAES; Terrestrial Biodiversity High (Edge of Highveld Grassland).	During the layout refinement process, turbines WTG 3 reviewed in light of their location within untransformed Key Biodiversity Areas (KBAs). As a result, WTG 15 was removed from the final layout, and WTG 3 was shifted outside of the CBA Irreplaceable area. Where complete avoidance of KBAs was not technically or spatially feasible, site-specific mitigation measures were developed with input from biodiversity specialists. These include habitat management, monitoring protocols, and impact minimisation strategies, all incorporated into the EMPr. In recognition of the broader avifaunal sensitivity of the area, additional measures such as turbine curtailment, shut-down on demand, and blade patterning have been proposed to reduce collision risk and disturbance to bird species. Applicant: Applicant: The sensitivity of areas identified by the I&AP, whereby WTs are proposed, are noted to be mapped at a high level, are slightly outdated and lacking accuracy. The appointed specialist has ground-truthed these locations through robust assessments to determine their actual status. SPECIALIST: Refer to separate table. The comments are not giving consideration to the ground truthed findings

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					(for example where it is designated CBA as per MBSP, but in fact it's in the middle of a mielie field). Incorrect deduction regarding number of days on site – refer to clear outline of dates provided under site visit in Terrestrial Biodiversity Assessment Report, which was more than 4 days across two seasonal visits. This was clarified in the draft comments and responses but is still being incorrectly stated in the MPTA comments as being 4 days only. The MPTA correctly states that 4 days is inadequate, which is why 10 days were spent on site. A preliminary overview site visit was conducted on 18 April 2023 (late autumn/early winter) for the purposes of a high-level reconnaissance of the site, followed by a further site visit between 19 & 22 June 2023 (winter) in order to undertake the preliminary screening, site sensitivity mapping and survey. A final comprehensive site visit and survey was undertaken between 09 & 13 December 2024, which constituted the summer seasonal site visit and assessment and also served to inform final layout design. This constitutes a sampling period of 10 days, which was deemed to be adequate for such an assessment. The blanket designation of an entire vegetation unit based on species that might be represented locally within that vegetation unit, would be incorrect. If the species represented were to inhabit the entire vegetation unit, then it is likely that they would not be

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					considered to have an elevated conservation status, as they would be common.
11.2				WTG 4 - Within 5km Martial Eagle Buffer.	Applicant: Located within Heavily or moderately modified land (cropland), well outside the advised avifaunal WTG no-go buffer, including the blade overhang. Specialist Response: Note that the predominant land use in the project area of influence is crop agriculture, together with mining activities and afforestation that are characteristic of large areas of the Mpumalanga Province, which are considered far less compatible with maintenance of landscape level functioning to maintain IBA or KBA values. The WEF, through displacement of other incompatible land uses, greater regulatory oversight and monitoring effort, and predictable offset type mitigation outcomes is arguably a better land use to encourage than the alternatives and current status (i.e. the no-go option). Furthermore, the avifaunal specialist has recommended the reconsideration/micro siting of WTGs 5, 12, 13, 14, 15, 19, 20, 23 and 25. In addition, all approved turbines which are specifically located in High-Risk zones will be fully subjected to both compulsory SDoD and diurnal proactive curtailment throughout the lifespan of the proposed WEF. Also, for all turbines located in the Medium Risk zones, compulsory SDoD will be fully implemented on all authorized turbines across the entire project site throughout the lifespan of the proposed WEF.
11.3				WTG 5 - Edge of High Risk Turbine Exclusion Zone for Sp23 (Highlighted in Revised Avifaunal Assessment to be moved); Within 5km Martial Eagle Buffer; Terrestrial Biodiversity High (Edge of Highveld Grassland).	
11.4				WTG 7 - Terrestrial Biodiversity High (Edge of Highveld Grassland).	
11.5				WTG 10 - Within 5km Martial Eagle Buffer.	
11.6				WTG 11 - Within 5km Martial Eagle Buffer; Terrestrial Biodiversity High (Edge of	
11.7				WTG 12 - Within 5km Martial Eagle Buffer; Avifaunal High Risk Turbine Exclusion Zone (Highlighted in Revised Avifaunal Assessment to be moved); KBA.	
11.8				WTG 13 - Intact Grassland, Within 5km Martial Eagle Buffer; Avifaunal High Risk Turbine Exclusion Zone (Highlighted in Revised Avifaunal Assessment to be moved); Edge of High Risk Turbine Exclusion Zone for Sp23 (Highlighted in Revised Avifaunal Assessment to be moved); Faunal High Sensitivity escarpment (highest category); IBA; NPAES.	

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11.9				WTG 14 - CBA Optimal (no evidence of "invasion"); Within 5km Martial Eagle Buffer;Avifaunal High Risk Turbine Exclusion Zone (Highlighted in Revised Avifaunal Assessment to be moved); Edge of Intact Grassland; Fauna High Sensitivity; NPAES; IBA.	
11.10				WTG 15 - Partially within an untransformed CBA Irreplaceable, Edge of High Risk Turbine Exclusion Zone for Sp23 (Highlighted in Revised Avifaunal Assessment to be moved); Within 5km Martial Eagle Buffer; NPAES; KBA; Terrestrial Biodiversity High (Edge of Highveld Grassland).	
11.11				WTG 17 -KBA; IBA; NPAES.	
11.12				WTG 19- Intact Grassland; IBA; NPAES; Faunal High Sensitivity - escarpment (highest category); Within 5km Martial Eagle Buffer; Avifaunal High Risk Turbine Exclusion Zone (Highlighted in Revised Avifaunal Assessment to be moved); Medium Risk Zone for Sp23.	
11.13				WTG 20 - Intact Grassland; Within 5km Martial Eagle Buffer; Avifaunal High Risk Turbine Exclusion Zone (Highlighted in Revised Avifaunal Assessment to be moved); Medium Risk Zone for Sp23; Faunal High Sensitivity - escarpment (highest category)-	

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				NPAES.	
11.14				WTG 22 - Intact Grassland; Faunal High Sensitivity - escarpment (highest category); NPAES; IBA; within 5km Martial Eagle Buffer.	
11.15				WTG 23 - Intact Grassland; Within 5km Martial Eagle Buffer; Yellow-breasted Pipit habitat (Highlighted in Revised Avifaunal Assessment to be moved); Medium Risk Zone for Sp23; Faunal High Sensitivity - escarpment (highest category); IBA; NPAES.	
11.16				WTG 25 - Intact Grassland; Faunal High Sensitivity - escarpment (highest category); Within 5km Martial Eagle Buffer; Rotor-swept area penetrates High Risk Turbine Exclusion Zone for Southern Bald Ibis (Highlighted in Revised Avifaunal Assessment to be moved); Medium Risk Zone for Sp23; NPAES; IBA.	
12.				The following infrastructure is located in sensitive areas:	
12.1				The entire Grid in the southern Emvelo site: Intact Grassland; Faunal High Sensitivity - escarpment (highest category); High Avifauna Sensitivity (Due to, inter alia, the large amount of wetlands/drainage lines and natural grasslands).	Specialist Response: Noted. It is understood that the installation of collector network infrastructure (mainly underground cabling) and access roads within these mentioned areas will follow existing road infrastructure, and it is recommended that the required mitigation measures set forth in the Avifaunal Specialist Report for inclusion in the EMPR
12.2				Portions of the OHL and access roads in southern Emvelo site: Intact Grasslands,	

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				which is confirmed High Sensitivity for Fauna, but note that intact grassland also crucial for avifauna).	be strictly implemented to prevent or limit potential disturbance to grassland avifaunal species.
12.3				Collector network and Roads in Southern portion of Emvelo are in Yellow-breasted Pipit habitat (noting that upgrading seldom used jeep tracks will still have substantive impacts for the species).	
12.4				The construction camp is located adjacent to WTG15, which is in the Avifaunal Medium Risk Zone for Sp23 (which was recommended for removal by the Avifaunal Specialist).	
13.				Turbines locations in terms of Bat Sensitivity could not be confirmed. The Figures in the Bat Specialist Report dated February 2025 were once again not provided. We have not been able to determine whether any turbines in the current layout -following the re-positioning of turbines since the bat assessment was undertaken - are located in No-Go areas for Bats.	Applicant: All WTGs avoid Bat no-go areas.
14.				The Terrestrial Assessment (inclusive of Plant Species) did not apply the Site Ecological Importance (SEI) methodology, which is a requirement of the Species Environmental Assessment Guideline. The Species Protocols specifically stipulate that assessments “must be undertaken in accordance with the Species Environmental Assessment Guideline” (South African National Biodiversity Institute, 2020.	SPECIALIST: This project is a Wind Energy Facility, which includes access roads and small localised footprint. It is not an agricultural or mining project that would result in vast areas being transformed (i.e. thousands of hectares). The overall impact is thus low.

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				Species Environmental Assessment Guideline. Guidelines for the implementation of the Terrestrial Fauna and Terrestrial Flora Species Protocols for environmental impact assessments in South Africa. South African National Biodiversity Institute, Pretoria). Non-compliance with the Species Environmental Assessment Guideline has resulted in the following deficiencies:	
14.1				Insufficient time was allocated to surveying in the appropriate season (only 4 days for both Sheepmoor and Emvelo WEF sites, as well as the Grid sites).	
14.2				The classification of the Montane Grassland on site as “moderate sensitivity” in the absence of applying all relevant criteria, including inter alia, conservation importance, functional integrity, receptor resilience, as well as species of conservation concern, spatial priorities, intact grassland patches, and CBAs.	
14.3				The montane ridge (where WTGs 13, 19, 20, 22, 23 and 25, along with grid infrastructure are proposed), which also coincides with intact grassland and the highest sensitivity for Fauna (according to the Faunal Assessment), being classified as “moderate sensitivity”. (Noting further that according to the Fauna Assessment, “the high sensitive escarpment area is likely of general importance for a range of faunal groups, representative of a large	

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				contiguous and ecologically intact area of mostly good-quality montane grassland". If the correct and required criteria are applied, the classification of this area is more likely to be classified as "High" or "Very High Sensitivity".	
15.				As a result of the deficiencies in the Terrestrial Assessment outlined above, we have low confidence in the associated impact analysis, and dispute the Specialist's "low" significance ratings.	
16.				The Impact Analyses in respect of Avifauna and Fauna are also disputed.	
16.1				The Avifaunal Assessment recommended that 9 turbines in high risk zones be relocated, but this has not been implemented in the layout presented as the preferred alternative. This is misleading; the impact analysis must be based on the layout presented, which would translate to High Significance ratings for all impacts assessed with respect to Avifauna.	Applicant: The following WTGs were noted as having their blade swept area located within the avifaunal no-go area. The DEIAr layout shared as a part of the PP period held in July/Aug of 2025 reflect the following: WTG 4 – Located outside the advised avifaunal WTG no-go buffer. WTG 5 - Located outside the advised avifaunal WTG no-go buffer. WTG 7 - Located outside the advised avifaunal WTG no-go buffer. WTG 10 - Located outside the advised avifaunal WTG no-go buffer. WTG 11 - Located outside the advised avifaunal WTG no-go buffer. WTG 12 - Located outside the advised avifaunal WTG no-go buffer. WTG 13 - Located outside the advised avifaunal WTG no-go buffer. WTG 14 - Located outside the advised avifaunal WTG no-go buffer.
16.2				The Fauna Assessment recommendations included moving turbines out of High Sensitivity Areas for Fauna. The Impact Analysis was therefore not undertaken on the layout that was presented and is accordingly disputed. The significance ratings for impacts assessed with respect to fauna should remain High.	

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					WTG 15 - Located outside the advised avifaunal WTG no-go buffer. WTG 17 - Located within Heavily or moderately modified land (Black Wattle forest), surrounded by croplands. WTG 19 - Located outside the advised avifaunal WTG no-go buffer. WTG 20 - Located outside the advised avifaunal WTG no-go buffer. WTG 22- Located outside the advised avifaunal WTG no-go buffer. WTG 23 - Located outside the advised avifaunal WTG no-go buffer. WTG 25- Located outside the advised avifaunal WTG no-go buffer. The layout was updated to remove WTGs from the layout, in line with the faunal specialist recommendations. WTG's located within the High Faunal sensitivity are the highest yielding WTGs, and therefor cannot be removed entirely. Instead they were situated with pre-disturbed and overgrazed areas, which were micro-sighted by the terrestrial specialist. According to a WhatsApp and email survey conducted by the applicant on 16 May 2025 among project landowners and occupiers, 100% of the area identified as having high sensitivity on the escarpment is currently being grazed by livestock. This extensive grazing has resulted in significant overgrazing of the grassland, adversely affecting the Oribi's ability to utilize the area as a viable food source. These findings are supported by the conclusions of the terrestrial specialists.

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					The population of the Oribi on site was not defined due to their small numbers. Operational mitigation and the implementation of the Oribi Management Plan will reduce the current impacts on the Oribi (Local hunting, poaching, taxi dog betting).
17.				While an Oribi Management Plan has been undertaken and included in this revised draft EIA (not in the initial draft EIA), it cannot be motivation to mitigate the potential impact on the species. The Oribi Management Plan clearly states that an "Oribi baseline assessment will be required to understand the current status of the subpopulation, including distribution and population estimates". The report further states that the "WEF layout needs to minimise number of turbines and infrastructure (including laydown)".	Applicant: The Oribi Management Plan was requested to be submitted with the Final Submission. The compilation of this plan has required numerous site visits and material research by the appointed specialist, this has required some time and the Oribi Management Plan will be submitted with the Final Submission. While the Oribi Management Plan is primarily a management and monitoring tool, it actively reduces impacts by ensuring that disturbance is minimised, habitat integrity is maintained, and any emerging risks are identified and addressed promptly. In this way, it provides a practical and enforceable mechanism to limit the potential effects of construction and operational impacts on Oribi. The number of turbines have been minimised throughout the process, from 45 initially assessed in scoping to 22 now. Laydown areas, construction areas, O&M and Tower laydown areas have been reduced in the Final Layout.
18.	Biodiversity Offset Strategy:				
18.1				According to the Biodiversity Offset Guideline, *"The desired outcome of biodiversity offsets are to ensure that - the cumulative impact of an authorised activity, or activities,*	Thank you for the comment, the BOR relies on specialist studies allready completed for the project, specifically the infield assesssment and fine scale mapping from a biodiversity intactness perspective. The BOR will be updated to incorporate these data more accurately

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				and land and resource use change does not: result in the loss of irreplaceable biodiversity or jeopardise the ability to meet biodiversity targets, lead to any ecosystem with a threat status of Vulnerable or Least Concern becoming Endangered; or any Endangered ecosystem becoming Critically Endangered; or cause an irreversible decline in the conservation status of species and the presence of special habitats; or cause a significant loss in ecosystem services". A biodiversity offset cannot therefore cater for the loss of Irreplaceable CBAs or intact grasslands. As detailed in the comments above, intact grasslands are crucial for supporting threatened fauna and avifauna.	SPECIALIST: The layout has sought to avoid the most sensitive areas and prioritise lower sensitivity areas. In order for the project to be feasible some footprints may extend into higher sensitivity areas, but these can be specifically managed. The layout provided includes only road and turbine positions, not final design. The final design will include the actual footprint and it can be undertaken in such a manner that loss can be minimised (for example, where a turbine position (i.e. the point on the map) falls on the edge of or slightly within an elevated sensitivity area, the actual hard stand area can be aligned so that as much as possibly falls outside of the 'sensitive' area. Again, this project is a Wind Energy Facility, which includes access roads and small localised footprint. It is not an agricultural or mining project that would result in vast areas being transformed (i.e. thousands of hectares). The assumptions being made in the comments are assuming that there is going to be transformation of vast areas of grassland (such as would occur in a mining or agricultural context).
18.2				The Biodiversity Offset Guideline specifically states that "biodiversity offsets are not appropriate when an activity, or activities, will have residual impacts on biodiversity of very high significance, including when residual negative impacts will result in loss of irreplaceable biodiversity".	Thank you for the comment, the BOR is based on specialist infield assessments which evaluated the presence of biodiversity of very high significance and irreplaceable biodiversity
18.3				In addition to Irreplaceable CBAs, the Biodiversity Offset Guideline also categorises the	The BOR will aim to include the specialist evaluation of areas of major potential concern

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				following as “irreplaceable biodiversity”: Biodiversity of major potential concern, where residual impacts in this category could lead to - loss of vulnerable or potentially irreplaceable biodiversity in areas of recognised importance, such as - areas evaluated as having High Ecological Site Importance. We maintain that the correct and required implementation of the Species Environmental Assessment Guideline would have resulted in the Montane Grassland being classified as having High Ecological Site Importance.	
18.4				The Intact Grassland Patches on the site must therefore be avoided, and cannot be offset. The requirement to consider biodiversity offsets is applicable only once it has been demonstrated that all measures of avoidance have been exhausted. The loss of irreplaceable biodiversity cannot be offset, and, as outlined above, “irreplaceable biodiversity” includes, key ecological corridors recognized as important for evolutionary processes and climate change adaptation where no options to safeguard these processes exist.	The BOR updated will aim to provide more detail wrt the presence and condiction of IGP
18.5				Furthermore, the Biodiversity Offset Report does not meet the following minimum requirements: i. A portfolio of candidate biodiversity offset sites, including the likelihood of each site’s availability and feasibility.	An updated BOR will include a portfolia of candicate offset sites as well as the required biodiversity outcomes of each

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				ii. The required biodiversity outcomes on each of the candidate biodiversity offset sites.	
19.	Cumulative Impact Assessment:				
19.1				In our comments dated 10 April 2025 on your original draft EIA, despite bringing another 5 approved and in-process WEFs (within a 35 km radius) to your attention (i.e. Zephyr, Ujekamanzi Ntabande and Daggafoort and Emvelo), your revised cumulative impact assessment once again fails to mention or assess these. Subsequently, there are now an additional 3 WEFs within 35 km that are now in-process, i.e. Leghoya WEF 1, 2 & 3, and another one (1) within a 55 km radius (i.e. Anemoi WEF).	Noted. The EIA Report and associated specialist assessments incorporate cumulative impact assessments in line with national guidance, with the standard 30 km radius treated as a minimum rather than a fixed threshold. It is important to clarify that there is no legislated or scientifically fixed threshold for a cumulative impact radius. Instead, the radius should be ecologically justified and context specific. In this case, a 35 km radius was applied for both the avifaunal and bat specialist cumulative assessments, in recognition of the movement ecology of priority species and the density of surrounding wind energy developments. For avifauna, the 35 km cumulative radius included all authorised, in-process, and proposed wind energy facilities reasonably expected to interact with the project's area of influence, such as Camden I & II, Zephyr, Emvelo, Ujekamanzi I, Daggafoort, and Ntabande. The assessment considered spatial overlap, species-specific sensitivity, habitat conservation concern. For bats, two cumulative radii were applied to accommodate differences in ecological behavior: • 35 km for resident and non-migratory batspecies, reflecting expected foraging ranges • 150 km for migratory species, specifically the Natal long-fingered bat (Miniopterus natalensis), to account for their broader movement and migration routes.

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					These radii were selected based on best available ecological understanding and aimed to ensure that the species and habitats most vulnerable to cumulative impacts were identified and assessed. The findings and recommended mitigation measures are fully integrated into the EIA Report and EMPr, with adaptive management and monitoring protocols in place to manage residual and cumulative risks. SPECIALIST: Again, this project is a Wind Energy Facility, which includes access roads and small localised footprint. It is not an agricultural or mining project that would result in vast areas being transformed (i.e. thousands of hectares). The assumptions being made in the comments are assuming that there is going to be transformation of vast areas of grassland (such as would occur in a mining or agricultural context). The comment is again quoting the total project area rather than the actual WEF footprint of the projects included in the calculation. Only a small proportion of the grassland will be transformed (i.e. the actual road, WEF and other infrastructure footprint. The grassland that is retained will still function. Applicant: The assessment of cumulative impacts is limited, and it's accuracy questioned, in this particular sense. There exists no Wind Energy facilities within 50kms which have an approved EA, EMPr and Layout. There are two within 60kms. In order to determine the Cumulative Impact, one would need to be able to consider the impacts of a development. This is determined by the locality of the infrastructure (shown in the approved layout) and the degree to which they can be reduced / mitigated (shown in the approved EMPr). It is therefore impossible for one to

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					consider the impacts of other facilities without the EMPr and Layout approved. Including WEFs still under development and without Environmental Authorisation in the cumulative impact assessment is inappropriate. Their approval, footprint, and operational characteristics are uncertain, making any predicted impacts speculative and inconsistent with EIA Regulations, which require assessments to be based on existing or reasonably foreseeable developments. Referring to “planned Renewable energy applications” in cumulative impact assessments is problematic because “planned” is ambiguous and does not confirm approval, location, or operational details. Including such speculative projects risks overstating impacts and undermines the credibility and compliance of the assessment under the EIA Regulations. On the basis that there have been no new WEFs approved with EA, since the submission of the Draft EIA for PP, there is no need to amend the cumulative impact assessment.
19.2				Furthermore, although section 4.3.3 states that "the scope of this assessment will include all operational, approved or current and planned renewable energy applications”, in addition to the approved or in-process WEFs identified in 17.1. above (not included in this assessment), there are actually an additional two (2) WEFs within 35 km and a further two (2) proposed WEFs (i.e. Pre-Application) within a 55 km radius, that have not been identified. The total number of turbines within 35 km is more	The importance of a robust and comprehensive cumulative impact assessment (CIA) is fully acknowledged, The cumulative impact assessment undertaken for the proposed WEF did identify and assess cumulative impacts from other known WEFs within a 35 km radius, in line with ecologically justified parameters and best practice guidance. These include Sheepmoor, Camden I and II, Zephyr, Ntabande, and Daggafoort WEFs. The 35 km radius used in the assessment reflects a deliberate extension beyond

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				than double that indicated in both the Draft EIA and Revised Draft EIA reports, i.e. 435 (and not 192) and within a 55 km radius there are more than 663 turbines (approved, in-process and proposed). As a minimum, the cumulative impact of approved and in-process applications must be assessed.	the minimum 30 km guidance issued by DFFE, and was selected in consultation with the specialist teams to ensure adequate representation of overlapping zones of influence, particularly for species with known ranging behaviors such as large raptors, cranes, and bats. In terms of project status, the cumulative assessment included all approved and in-process WEFs for which sufficient public domain information was available at the time of reporting. Projects at the pre-application stage were not formally included in the quantitative cumulative turbine count, as many of these are still under development and do not yet have finalised layouts, turbine numbers, or impact information. However, their potential contribution to future cumulative impacts is acknowledged as a limitation and flagged as a key uncertainty in the CIA. The difference in turbine numbers (442 vs. 192) likely stems from inclusion of pre-application and conceptual phase developments in external tallies, which were not yet publicly confirmed or finalised at the time of the EIA compilation. It is standard practice to focus CIA on projects that are sufficiently advanced to provide spatially explicit and reasonably foreseeable data, in line with the NEMA definition of cumulative impacts.
19.3				The potential cumulative impact on avifauna, as indicated in our comments dated 10 April 2025, is now therefore likely to be even more substantial, due to the increased number of proposed turbines in the surrounding landscape. Of particular concern is the potential cumulative impact	Noted. The specialist is curious as to how these fatality figures, as a result of potential bird collisions with turbine infrastructure, were calculated. Also, are these fatality figures based on estimations before or after mitigation? Considering that it is referred to as being a ‘precautionary’ prediction based on bird collision monitoring data recorded at

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				on Martial Eagles and Cape Vultures. The Birdlife South Africa Occasional Report Series 3: Summary of Bird Monitoring Reports from Operational Wind Energy Facilities in South Africa (February 2025), indicates that at current fatality rates due to collisions with wind turbines, “fatalities of Martial Eagles may already be exceeding the Potential Biological Removal (PBR) rate”. Furthermore, “if current fatality rates at operational wind farms continue, at least 37 Cape Vultures could be lost to turbine collisions annually, representing a significant portion of the PBR. This figure is most probably an underestimate” (see limitations in the report) "and does not account for the anticipated acceleration of wind energy development. Unless other human-induced threats, such as powerline electrocutions and collisions, and poisoning, are urgently addressed, the population may not be able to withstand the added impact of turbine collisions.”	existing operational wind farms in South Africa (none of which are located in Mpumalanga), one questions the level of mitigation that is being implemented or the lack thereof at most of these existing facilities. Following from the information provided in this comment, it is noted that these fatality rates are also based on an operational period of 30 years. Furthermore, one should keep in mind that although a large number of wind farm projects are being proposed / approved, not all projects will be realised as several factors could influence / hinder the development process beyond the EIA process and issuing of EA, should such EA be granted. Specialist Response: This observation is considered a statement rather than a comment, and although duly noted does not warrant further response.
19.4				Further to our comments dated 10 April 2025 and considering the additional WEFs in the surrounding landscape, we are now even more concerned about the cumulative impacts of these facilities on Oribi habitat, as expressed in the faunal assessment which states that “any remaining Oribi sub-populations and any contiguous areas of intact grassland are considered as high conservation importance” and that “cumulative impacts may become more significant if added to existing or future impacts from other activities, such	The concern is noted, while it is acknowledged that cumulative pressures on Oribi are a regional concern, the project-level mitigation hierarchy (avoidance, minimisation, monitoring, and adaptive management) has been applied to reduce direct impacts, and the findings have been transparently presented for consideration by the Competent Authority. Importantly, the project now includes an Oribi Management Plan (OMP), which provides detailed measures for avoidance, minimisation, monitoring, and adaptive management of Oribi populations and habitat. The OMP is designed to address both direct

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				as other renewable energy projects in the area".	impacts and the potential additive effects of other nearby renewable energy developments. Furthermore, the Applicant is committed to engaging with the relevant authorities (e.g., MTPA, DFFE) to support coordinated landscape-level monitoring and conservation initiatives. Collectively, these measures provide a robust framework for mitigating cumulative impacts on Oribi while facilitating responsible renewable energy development.
19.5				DFFE also requires that "the cumulative impact assessment for all identified and assessed impacts must indicate the following: (a) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land". The Revised EIA Report does again not accurately quantify the size of the identified impacts, i.e. hectares of cumulatively transformed land. The overall footprint size of this, and all other similar proposed and approved renewable energy facilities within a 35 km radius is now 178 017.24 ha (Approved: 31 440.17 ha, In Progress: 89 247.96 ha, Pre-Application: 57 329.11 ha). Again, as a minimum, the cumulative impact of approved and in-process applications must be assessed.	The EIA process has recognised this requirement and has included project-specific transformation footprint estimates for the Sheepmoor Wind Energy Facility (WEF) based on the full build-out scenario. Furthermore, as part of the cumulative impact assessment (CIA), the avifaunal, bat, and biodiversity specialists considered the spatial extent and likely overlap of ecological disturbance footprints for approved and in-process wind energy developments within a 35 km radius. However, it is acknowledged that the EIA Report did not explicitly aggregate and present a total hectare figure representing the cumulative transformed land area across all facilities in a manner consistent with DFFE's suggested formatting (i.e., in hectares per project stage). This has since been addressed: the cumulative transformation footprint has been recalculated and tabulated, based on the best available data for: • Approved projects (33,060.73 ha), • In-progress projects (47,567.96 ha), • Pre-application projects (108,554.19 ha), Totalling an estimated 167,138.69 ha within the 35 km cumulative assessment radius. It is important to note that the cumulative footprint figure reflects project application areas or lease areas, not the actual physical disturbance footprint,

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					which remains significantly lower (typically <5% of the project area). Nevertheless, this aggregated transformation area has now been incorporated into the final Cumulative Impact Assessment and EIA Report, with an explanation of methodology and limitations, to ensure alignment with DFFE's requirements and support transparent decision making.
19.6				As there has been no amendment in the revised EIA Report to the number of facilities identified surrounding this proposed facility, or a comprehensive comparative cumulative assessment undertaken, our previous comments on this matter dated 10 April 2025 remain unchanged, i.e. the cumulative impact assessment undertaken as part of this EIA does not adequately assess the cumulative impacts of this proposed facility, in relation to current and future similar renewable development facilities in the surrounding area.	The Draft EIA Reports include the cumulative impact assessment that quantifies all renewable energy developments within 35 km (approved, in-progress, and pre-application projects) and considers their combined potential footprint. While project-by-project comparability is limited by data availability, the approach applied is conservative, transparent, and consistent with best practice. The cumulative context has been incorporated into the avifaunal, bat, and terrestrial biodiversity specialist assessments, providing a robust basis for informed decision-making by the Competent Authority.
20.	Environmental Management Programme				
				Our concerns related to the EMPr raised previously, still remain. The EMPr is unclear and vague, ambiguous, and does not provide adequate mitigation measures, timeframes, roles, responsibilities and reporting to adequately mitigate the potential impacts of this facility.	The comments regarding the EMPr are acknowledged. The Environmental Management Programme (EMPr) has been developed in accordance with the requirements of the NEMA EIA Regulations, 2014 (as amended), and the associated guidelines for renewable energy facilities. The EMPr provides mitigation measures aligned with the impact assessments undertaken in the EIA, and identifies responsible parties, reporting requirements, and general timeframes for implementation.

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					Aplicant: We note DARDLEA's concerns regarding the EMPr. While we believe the current EMPr contains clear mitigation measures, timeframes, roles, responsibilities, and reporting requirements, we will further refine and expand these elements for the FEIAr submission to ensure there is no ambiguity. The EMPr will also clarify when additional research is required. We have already engaged with all affected landowners to ensure they understand their roles in the EMPr and what to expect during construction and operation. All applicable landowners have signed lease agreements, which specifically allow for monitoring activities and ensure that such monitoring will not be compromised or restricted, thereby supporting effective impact management.
				Given that we do not agree with the impact analyses undertaken in the EIA, the measures included in the EMPr as mitigation are, similarly, disputed.	We note that DARDLEA disputes aspects of the impact analyses in the EIA; however, The EMPr has been developed based on the findings of the EIA and associated specialist studies, reflecting best available scientific data and standard mitigation practices. While we acknowledge that stakeholders may have differing views on the impact analyses, the mitigation measures in the EMPr are designed to reduce potential environmental impacts to acceptable levels and are consistent with regulatory requirements under the NEMA EIA Regulations, 2014 (as amended).
				The EMPr does not include a specific, measurable and timebound framework for decision-making regarding the duration of monitoring, and the specific circumstances for extension or curtailment.	The EMPr includes defined monitoring frequencies, reporting intervals, and responsible parties for all environmental aspects during construction, operation, and decommissioning. Adaptive management provisions within the EMPr allow for the extension or curtailment of monitoring based on observed environmental outcomes or specialist

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					recommendations. These mechanisms provide a structured and timebound framework for decision-making regarding the duration and scope of monitoring.
				The EMPr must be clear on when additional research is required.	The EMPr clearly outlines the circumstances under which additional research or specialist input is required. These include, inter alia, pre-construction walkdowns to verify sensitive ecological features, post-construction monitoring where impact thresholds are exceeded (e.g., bat or bird fatalities), seasonal biodiversity surveys where initial data indicates potential presence of Species of Conservation Concern, and noise monitoring at sensitive receptors during the operational phase.
				Landowners must understand all access requirements and impacts associated with monitoring throughout the lifespan of a project.	The EMPr outlines protocols for communication with landowners, including prior notification of monitoring activities, explanations of potential impacts, and procedures for granting access to sites. These measures are designed to ensure that landowners are fully informed about monitoring requirements and potential interactions with the project over its lifespan. The applicant confirms that all the affected landowners are engaged and committed to working collaboratively to ensure these measures are effectively carried out, supporting long-term biodiversity outcomes
				Lease agreements must ensure that the effectiveness of monitoring is not compromised, and that restrictions do not compromise monitoring requirements in any way	Lease agreements will be structured to ensure that monitoring requirements, as outlined in the EMPr, are not restricted or compromised in any way. This includes access for specialists and the implementation of all monitoring protocols throughout the project lifecycle. Applicant: All necessary landowner agreements are in place to ensure monitoring is fully implemented, and

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					operational restrictions are structured so as not to compromise the effectiveness of ecological or compliance monitoring.
21.	Public Participation:				
21.1				In paragraph 9.3.2 (page 280) of the EIA Report, it is stated that “A comprehensive record of all comments received to date along with detailed responses from the Environmental Assessment Practitioner (EAP), specialists, and the project applicant is presented in the Comments and Responses Report (Volume II). For transparency and ease of reference, the original comments and corresponding responses are also appended to this volume”. Then in the Paragraph 6 of the Public Participation Report (Volume III), it states that “During the DEIAR PPP comments were received from I&AP’s. Follow-up e-mails were sent to all registered I&APs, stakeholders and authorities, and comments were received. Responses to comments received during the PP period are provided in Section 7, Table 7.1 below, with EAP / specialist / applicant responses, andthe original comment and responses has been appended to the PP report which will be submitted with the FSR for DFFE decision”.	The comment is noted. We acknowledge that certain individual submissions received on 4, 9, and 10 April 2025 were not appended in the Public Participation Report or fully reflected in the Comments and Responses Report (CRR) of the Draft EIA Report. This was an oversight in compilation and formatting and was not intended to disregard any I&AP input.
21.2				However, in the copies of Emails included in the Public Participation Report, comments were submitted to you on 4, 9 and 10 April 2025 by: Megan Kim Govender; Adelma	All comments received during the public participation period, including those submitted by Megan Kim Govender, Adelma Vorster (Restov Boerdery), Celine Oats (Richard Summers Inc.), and Elize Robberts, have now been incorporated into the final Comments

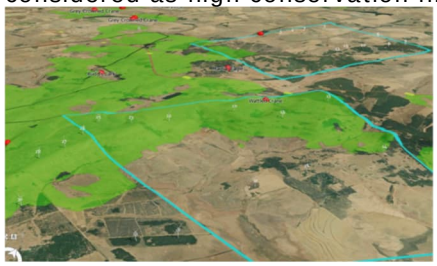
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				Vorster (Retsrov Boerdery); Celine Oats (Richard Summers Inc.); and Elize Robberts. These comments have not been incorporated in your Comments and Response Report, nor have copies of the comments been appended to the Public Participation Report.	and Responses Report(see updated Table 8-5~~Table 23-5~~). Copies of the original correspondence have been appended to the final PPP documentation to ensure transparency and compliance with NEMA EIA Regulations, 2014 (as amended), particularly Regulation 23(1)(a), which requires that all comments received during the public participation process are addressed and included in the final EIAr. The final CRR clearly links each I&AP comment to the corresponding response from the EAP, specialists, and the Applicant, ensuring that all input is captured, acknowledged, and addressed prior to submission to the Competent Authority for decision-making.
22.				Based on what has been outlined above, at least more than half (i.e. 16) of the 22 turbines proposed are located in unsuitable areas. Furthermore, the application of no-go buffers in accordance with BirdLife SA's Guidelines for surveying and mitigating impacts on [Species 23] referred to herein would likely increase the number of turbines that are in unsuitable areas. In light of this, and in conjunction with the location of associated roads, OHLs and cabling in CBAs, intact grasslands, and avifauna and fauna high sensitivity areas, DARDLEA cannot support the application in its current format.	Noted. Applicant response: The Emvelo Wind Energy Facility has undergone extensive refinement, reducing turbines from 45 at Scoping to 22 in the Final EIA, with careful application of the mitigation hierarchy to avoid sensitive habitats and biodiversity features. Turbines were removed or shifted out of intact grasslands as far as possible, high faunal areas, and avifaunal buffers, with all remaining sites micro-sited in degraded or overgrazed land. The project area has been reduced from 25,000 ha initially screened to 6,700 ha, with a disturbance footprint of only 48 ha, demonstrating a significant reduction in impact. Specialist-led studies, including avifaunal tracking, terrestrial surveys, and habitat modelling, have informed site-specific buffers, curtailment measures, and the Oribi Management Plan to ensure residual impacts are responsibly managed.

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					Importantly, the project aligns with South Africa's Just Energy Transition, supporting the Integrated Resource Plan (IRP) by replacing coal-intensive land uses with clean wind power, thereby contributing to climate change mitigation, emissions reduction, and energy security. The development also provides social upliftment opportunities through landowner partnerships, local job creation, and sustainable land use that is less damaging than mining, coal power, or unsustainable farming. Overall, the project demonstrates a balanced, scientifically robust, and socially responsible approach to renewable energy development in Mpumalanga. Specialist Response: This concluding remark is considered a statement rather than a comment, and although duly noted does not warrant further response.

TABLE 7-~~3~~3 COMMENTS FROM MTPA

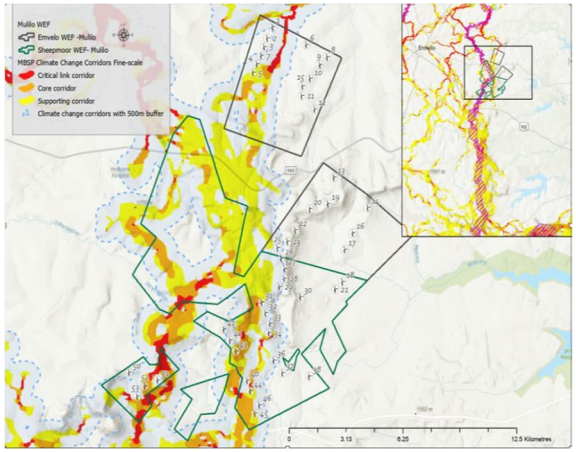
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1.	F.N. Krige & Dr. M Lötter MTPA	14 August 2025 Per Email	Revised Draft EIAr	The Mpumalanga Tourism and Parks Agency (MTPA) has reviewed the application for the proposed Emvelo Wind Energy Facility (WEF) and associated infrastructure (Reference: 14/12/16/3/3/2/2611), dated 14 July 2025. The MTPA notes the changes made, such as a revised layout with a reduced number of turbines (now up to 22) and a lower maximum output capacity of up to 240 MW. While these revisions were informed by additional studies identifying	The Applicant notes MTPA's concerns but stresses that the current layout reflects a rigorous application of the mitigation hierarchy. . The Emvelo WEF originally proposed 45 WTGs during the Scoping phase. This number has been halved to 22. The project area has been reduced from 25,000 ha initially screened to 6,700 ha, with a disturbance footprint of only 48 ha. With the layout compilation informed directly by the specialist team, including targeted measures for

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				sensitive areas requiring avoidance, the modifications often merely shifted turbines into partially transformed areas, with blades and footprints still encroaching on sensitive habitats. These changes are not substantial enough to address our concerns, and the MTPA does not support the current proposed layout. Key areas of concern include potential impacts on critical habitats such as intact grassland patches, Critical Biodiversity Areas, Important Bird Areas (IBA), climate change corridors, and National Protected Area Expansion Strategy (NPAES) zones; risks to avifauna, including numerous species of conservation concern; perceived shortcomings in specialist assessments and statistical methods; insufficiently tested mitigation measures, especially with respect to buffer zones; and the cumulative impacts within a region already facing significant development pressure.	Southern Bald Ibis, Species 23, and Martial Eagle. Sensitive habitats were avoided where feasible, with strict operational mitigation and a biodiversity offset aligned to Mpumalanga Biodiversity Sector Plan (MBSP) targets. This refined configuration balances environmental protection with the urgent need for renewable energy capacity in line with the national Just Energy Transition, IRP 2019 and NDP 2030. We therefore submit that the revised layout represents a defensible and acceptable compromise, ensuring both sustainability and contribution to South Africa's energy security.
2.	Impacts on Sensitive Habitats				
2.1				Intact Grassland Patches Intact grassland patches allow species to thrive and to support species that may need to move in response to climate change, enabling the normal functioning of natural ecological processes such as fire regimes or pollination. These patches are typically larger than 100 ha, with little or no gaps and minimal edge effects, and occur in close proximity to other intact grassland patches. They function as "source areas" in metapopulation dynamics where birth rates exceed death rates. No significant impacts should be allowed that would change a source area into a sink area (where death rates exceed birth rates).	Intact Grassland Patches The MBSP was considered during Screening and Scoping by the applicant and specialists. It however does not provide strategic objectives for Intact Grasslands, or development guidelines within the Intact Grasslands. This prevents prospective developers from being informed of limitations of development within these areas. The only available guidance is provided by the area being designated as "Other Natural Areas" with the following guideline provided - These areas have the greatest flexibility in terms of management objectives and permissible land-uses.

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				Mpumalanga has only 1,039 intact grassland patches, covering 15% of the province. These areas have been prioritised for their connectivity importance and must be avoided by wind energy facilities. The intact patches on Emvelo are critical for maintaining connectivity with other grasslands. Despite MTPA raising concerns, specialist reports were largely silent on their importance. Using over 80,000 bird observations, the MTPA confirmed that intact grasslands have a 22% higher likelihood of hosting birds of conservation concern, 49% more birds of conservation concern, and 98% more individual bird observations than non-intact grasslands. These patches make up 23% of the Emvelo WEF footprint, and six turbines (13, 19, 20, 22, 23, and 25) are located within them. These turbines should be removed. The MTPA feels strongly that the establishment of wind farms in intact grassland patches should not be allowed as it may turn a "source" area into a "sink" area. Even Pages 3 and 4 of the Faunal assessment within the DEIA recognises that “Faunal integrity relies on inter-connected grassland habitats across landscapes.” and “…any contiguous areas of intact grassland are considered as high conservation importance.” 	It should also be noted that the proposed development will disturb approximately 0.0003% of the total Provincial area mapped as Intact Grasslands. While six turbines remain within intact grassland patches, the footprint of these is minimal, and any residual impacts after avoidance and minimisation will be addressed through a like-for-like biodiversity offset, consistent with the National Biodiversity Offset Guideline. The offset will ensure no net loss and preferably a net gain of grassland ecosystem function and species persistence at an appropriate scale. Infact the offset proposed will set aside more intact grasslands and CBAs for protection, than the areas will be lost, in line with the guidelines recommended offset ratios. Climate Change Corridor The Applicant recognises the Climate Change Corridor identified in the MBSP, but notes that this layer functions as a strategic, landscape-level planning tool, not an absolute no-go constraint for development. The project specialists have specifically assessed flight behaviour, displacement, and collision risk for large birds along this north–south flyway, and the mitigation suite, including curtailment triggers, Shut-down of Turbines, Oribi management and offset commitments, ensures that the ecological function of the corridor is maintained in line with the MBSP’s intent. The project also delivers essential renewable energy capacity directly aligned with South Africa’s IRP 2019, NDP 2030, and Just Energy Transition commitments, where

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				Figure 1: 3D map showing the location of the current turbines. Intact grassland patches are shown in green. Nest sites of threatened birds in red. In the current layout, there are still many turbines in the intact grassland patches.	the need for low-carbon energy is a national priority. By combining scientifically informed turbine positioning, adaptive management, and offsets, the project will in fact strengthen long-term ecological resilience under climate change while advancing energy security, thereby achieving the MBSP corridor's objectives through a robust, operationally grounded approach. Furthermore, the proposed renewable energy project will ultimately assist with combatting climate change effects. NPAES The Applicant notes the overlap with NPAES 2018 spatial priorities but stresses that the NPAES is a long-term strategic planning tool intended to guide systematic protected area expansion, not to sterilise land from all development. Our specialists have carefully considered the ecological sensitivities of these focal areas, applying the mitigation hierarchy, curtailment protocols, and now a biodiversity offset that will deliver like-for-like conservation gains consistent with NPAES objectives. SPECIALIST: The terrestrial biodiversity assessment served to refine the mapping, which is the norm, where bioregional plans are often not up to date and/or reflect inconsistencies that require ground-truthing. This was presented in the terrestrial biodiversity assessment reporting accordingly, which is being ignored by the respective authorities. This was noted in the draft EIA comments but is still being overlooked as it does not align with the agenda that serves to promote the Mpumalanga Bioregional Plan rather than acknowledge that there are shortcomings.

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					The proposed project is not seeking to develop the entire intact grassland patch, only a very small footprint. The resultant loss is thus not deemed to be excessive as the area that will remain undeveloped (i.e. intact grassland) far exceeds the actual hard stand footprint of the project. Were it a mining or agricultural project that would result in the clearance of thousands of hectares of grassland the impact would be more significant. The terrestrial biodiversity impact or risks to ecological processes associated with an access road and turbine footprint would not be deemed excessive within an already modified surrounding landscape (i.e. significant agricultural and mining related land transformation).
				Other Sensitive Spatial Areas: Climate Change Corridors The MBSP's climate change corridor network was designed to enable species and ecosystems to adapt to a changing environment. The corridor network considered a single-best (least-cost) corridor connecting up the climate change refugia with the climate change corridors from adjacent provinces. Additional fine-scale corridors were then identified using Circuitscape, finding alternative pathways and identifying pinch points in the corridors and thereby building resilience into the corridor network. As can be seen from Figure 2, climate change corridor runs predominantly north-south through the project area, linking the climate change focal areas (as well as coincidentally the Grassland IBA with the Chrissies Pans IBA). Given that large	The MBSP's climate change corridor network is indeed a critical ecological feature, but the assertion that the proposed wind farm will irreparably compromise it oversimplifies both the design of the corridor and the mitigation strategies in place. The proposed wind farm includes extensive mitigation strategies that directly address avifaunal risks: • Automated Shut Down on Demand (SDoD) systems—both radar and observer-led—will be implemented on turbines in high and medium risk zones. These systems are responsive to real-time environmental and bird flight conditions, significantly reducing collision risk. • Dynamic habitat modelling using satellite imagery and on-site sensors will guide turbine

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				birds do not fly in narrow, predictable lines, a flight corridor would need to be functionally broader than the MTPA provided fine-scale corridor. A broader macro-scaled corridor would be required for avifauna to ensure safe passage along the corridors. Maintaining this linkage is essential for long-term ecological resilience under climate change. The following turbines are within 500m of the climate change corridors and should be removed: 1, 4, 5, 7, and 25, as they would compromise this corridor. The risk from the proposed wind farm on the corridor network is that the wind farm is unfortunately located along an important north-south macro regional flyway/corridor (also supported by vulture tracking data, Figure 9) which will result in increased collisions and electrocution, and habitat displacement. It stands to disrupt movement along the corridor and result in increased mortalities. 	curtailment during sensitive seasons, especially for nocturnal and migratory species. • Blade patterning and carcass monitoring protocols are mandated to reduce raptor collisions and assess ongoing risk.

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				Figure 2: MBSP Climate Change Corridor network that links up climate change priorities with refugia and national climate change corridors. A 500m buffer has been added to the fine-scale corridors due to the need to accommodate mobile avifauna along a macro-scale corridor.	
				National Protected Area Expansion Strategy (NPAES 2018) Over 70% of the proposed WEF falls within NPAES spatial priority areas, with 25% of turbines directly on focal areas. These sites are nationally significant for conservation expansion. Currently, seven turbines (13, 14, 19, 20, 22, 23, and 25) are located in NPAES zones and should be removed.	While parts of the proposed WEF overlap with NPAES spatial priority areas, this does not automatically preclude development. The Environmental Impact Assessment confirms that the majority of turbines are located in low or moderate sensitivity areas, with only three turbines placed near high sensitivity zones—these are situated on degraded or marginal habitat with limited conservation value. The project includes a 1:3 offset ratio for alien vegetation clearing and will be managed under an Environmental Management Programme (EMPr), offering a net conservation benefit across the broader site. The proposed layout avoids key ecological risk zones and is unlikely to result in unacceptable biodiversity loss.
2.2	Avifaunal Risks and Buffer Zones				
				The site's recognised avian biodiversity, including numerous sensitive and threatened species, necessitates a highly precautionary approach to impact assessment and mitigation. Many of the proposed mitigation measures are novel, untested, and costly. We don't believe the developer has adequately considered the costs of implementing all the recommended mitigation (and curtailment) measures on the success of this project, nor the chances of their efficient implementation (as they rely on models, people, expertise, budgets, and commitment).	The Applicant and its shareholders have the resources, expertise, and responsibility to fully implement all recommended mitigation measures. We welcome the challenge of operating a wind energy facility under stringent mitigation, with rigorous monitoring ensuring compliance and accountability. Novel or advanced measures will be applied adaptively and transparently. This project will set a benchmark for responsible renewable energy development in South Africa.

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					Important Bird Areas (IBAs) and IUCN Key Biodiversity Araes (KBAs) The Applicant acknowledges the site's overlap with IBAs and KBAs but notes these are strategic conservation priorities, not regulatory no-go areas. The project avifaunal specialists have applied the mitigation hierarchy, including additional assessments, curtailment, powerline mitigation, and offsets aligned to MBSP targets. These measures ensure the objectives of IBA/KBA recognition are achieved in practice. Residual risks will be managed through rigorous monitoring and adaptive management. The project will proceed responsibly while safeguarding key species and habitats. White-winged Flufftail The Applicant notes that the White-winged Flufftail is no longer listed as Critically Endangered, and has been downlisted to Endangered by BirdLife South Africa. Nonetheless, detailed extensive habitat modelling for the species was conducted, followed by in field surveys for the species. The turbine layout has been updated to further avoid core habitats, and blade lengths have been reduced to minimize collision risk. Avoidance is complemented by operational mitigation, targeted monitoring, and adaptive management, ensuring impacts remain low. Combined, these measures substantially reduce potential fatalities and protect species persistence. The project applies a comprehensive mitigation hierarchy beyond avoidance alone. The Applicant notes that the recently published WWFT guidelines by BirdLife SA were not available during the EIA and Scoping phases and

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					are informational only, not legally binding. Indeed the guidelines themself have a disclaimer stating "The content is provided for informational purposes only and does not constitute legal or financial advice. Users should exercise their own judgment and, when appropriate, consult with qualified professionals before implementing any recommendations. Neither the authors nor their affiliated organisations shall be liable for any direct, indirect, incidental, consequential, special, or exemplary damages resulting from the use or misuse of the information contained in this document. The information provided is based on knowledge available at the time of writing and may not reflect current best practices or regulatory requirements. This disclaimer may be updated periodically without notice. By using this document, you agree to hold harmless and indemnify the authors and their affiliated organisations from any claims arising from your use or reliance on the information contained herein." ." Extensive site-specific surveys, habitat modelling, and targeted mitigation, including turbine curtailment and avoidance buffers, have been applied to protect the species. The guidelines' large blanket buffers were not formally consulted with the wind energy industry, making retrospective application impractical. Applying such broad 5 km and/or 3 km buffers across the site is impractical, as it would effectively sterilise large areas of land and prevent essential renewable energy development. The guidelines are based on opinion rather than site-specific data, whereas our targeted surveys and modelling provide precise, actionable

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					mitigation tailored to actual species use (or potential use) of the site. African Grass Owl The Applicant conducted focused habitat assessments and species-specific modelling for African Grass Owl, which directly informed turbine micro-siting. This targeted approach ensures that known owl localities are avoided while maintaining the feasibility of the wind farm. Residual risks will be managed through operational mitigation and monitoring. REDZ datasets The Applicant acknowledges receipt of the draft REDZ datasets but notes that these are still under refinement and not yet regulatory tools. Current site-specific avifaunal surveys and modelling provide the most accurate, actionable data for impact assessment and mitigation. The project's layout and mitigation measures have been designed using this robust, ground-truthed evidence, ensuring responsible management of all sensitive species, including the White-winged Flufftail. Martial Eagle Buffers The Applicant confirms that Martial Eagle tracking data was shared with the MTPA to support broader flyway research initiatives, and not specifically for review within the EIA. The data was provided in good faith to inform regional conservation work. It is important to note that the buffers are not determined by the tracking data alone, conclusions remain based on the site-specific surveys and the project specialist's modelling conducted for the project.

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					The Applicant acknowledges the precautionary intent of the BirdLife 5 km and EWT 6 km buffers around Martial Eagle nests. However, site-specific empirical data from GPS-tagged resident eagles provides a far more accurate basis for mitigation, showing that these birds canrange 40–60 km from their nests, well beyond static buffer distances. Fixed-radius buffers therefore leave high-use areas unprotected, whereas our data-driven, landscape-scale mitigation strategy applies measures where the eagles actually fly. This approach is predictive, adaptive, and facility-wide, ensuring effective protection of Martial Eagles while maintaining project feasibility. We strongly recommend proceeding with this targeted, evidence-based strategy as the best conservation outcome for the species. The Applicant notes concern about reducing the buffer to 2.5 km, but this is based on a site-specific approach. Current impacts on Martial Eagles are already measurable, including one confirmed shooting and numerous fires within the nest area during the EIA phase, highlighting the need for proactive mitigation and management. Our strategy combines site-specific tracking data, SDOD implementation, automated curtailment, and blade patterning, all tailored to this species. These measures ensure effective protection of both adults and breeding pairs. We are confident that this evidence-based, adaptive approach will successfully minimize collision risk across the facility. AfriAvian's Flight Risk Model and mitigation strategy combines GPS tracking, Met Mast data

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					and extensive detailed on site observations to accurately identify areas where Martial Eagles are most at risk and when to curtail automatically. This site-specific, evidence-based approach, together with our adaptive mitigation measures, provides the most effective strategy for protecting the species while enabling responsible wind farm operation. Breeding Cycle Considerations The GPS tracking data for the resident Martial Eagle female has now been collected for 16 months since April 2024, providing extensive coverage of their movements. Prior to this, focused nest monitoring confirmed consistent annual breeding at this location, ensuring that both breeding and non-breeding behaviours are well represented in the dataset. This comprehensive monitoring supports a reliable understanding of range use for effective mitigation planning. While no male Martial Eagle was GPS-tagged at this specific nest, the tagged male in the nearby area provides valuable insight into broader movement patterns. Additionally, on-site focal nest monitoring included observations of male activity, ensuring that male flight behaviour and range use were considered in the design of mitigation measures. Mitigation Concerns Curtailment may reduce output, but this mitigation strategy is required to reduce the impacts to an acceptable level. These costs are part of responsible wind farm operation and do not outweigh the urgent need for renewable electricity.

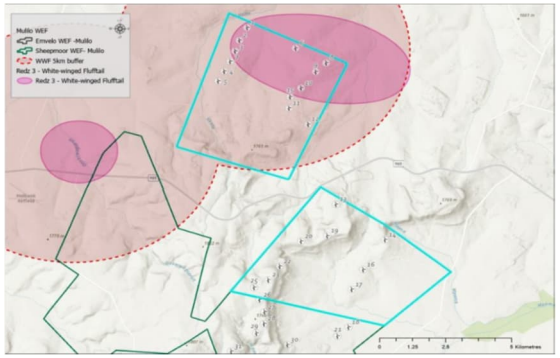
No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					While the Leghoya example is not relevant to the proposed project nor approved, the Applicant emphasises that all modelling at the proposed project site is grounded in extensive site-specific data, from habitat identification to flight path prediction. Specialist surveys, GPS tracking, and focal monitoring ensure that model outputs are validated and directly applicable for effective mitigation of sensitive species. The Applicant notes that while we did not formulate the models ourselves, these were developed by highly qualified and experienced avifaunal specialists using extensive, site-specific habitat data. Specialists undertook detailed, on-the-ground habitat assessments during key seasons, carefully mapping and verifying conditions across the site. This thorough, field-validated dataset directly informed turbine layout and mitigation measures, ensuring accurate, informed decisions to minimise impacts on sensitive species. Cape Vulture Flyways We acknowledge the MTPA's concerns regarding Cape Vulture flight paths over the proposed WEF, as illustrated in Figure 9 of your comment. However, we note that through extensive monitoring on site, very low activity of this species was recorded. The mitigation measures proposed, including observer-led shutdown on demand and camera-based monitoring systems, are highly suitable for this species. These systems allow for real-time detection of vultures approaching the rotor-swept zone, enabling immediate turbine shutdowns to prevent collisions. This approach has been successfully

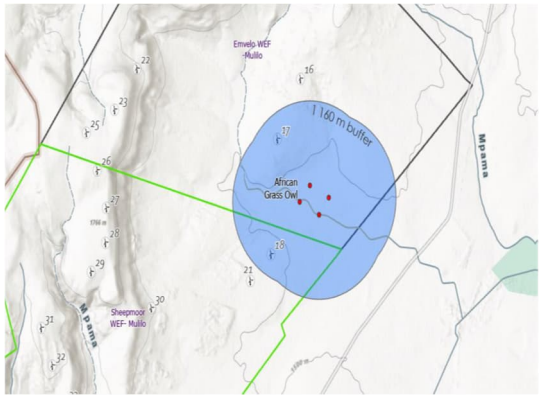
No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					applied at other operational wind farms with similar species, ensuring both the safety of the birds and the continuity of wind farm operations. Given their size and flight behavior, Cape Vultures are particularly responsive to visual detection, making our proposed mitigation highly effective. The combination of pre-construction monitoring, ongoing observer vigilance, and automated detection ensures that the risk to these birds remains low despite their occasional use of the corridor. We are confident that they adequately reduce potential collision risks.
				Important Bird Areas (IBAs) and IUCN Key Biodiversity Araes (KBAs) The proposed WEF falls in an area rich in bird species, particularly birds of conservation concern. Thirty-two priority bird species for wind energy development have been recorded within the WEF and broader area. An additional seventy-six species have been recorded which are powerline sensitive. Of particular concern are the occurrence of African Grass Owl (VU), African Marsh-Harrier (EN), Black Harrier (EN), Blue Crane (VU), Blue Korhaan (NT), Cape Vulture (EN), Denham's Bustard (VU), Grey Crowned Crane (EN), Lanner Falcon (VU), Martial Eagle (EN), Secretarybird (EN), Southern Bald Ibis (VU), White-bellied Bustard (VU), and Yellow-breasted Pipit (VU). These are all threatened bird species at risk of extinction, over various timeframes. This rich avifaunal biodiversity is recognised regionally and globally through its	Specialist Response: Noted. From a terrestrial biodiversity perspective, intact grassland vegetation present within the project site and with a CBA 1 (Irreplaceable) classification was modelled and has been avoided by the proposed infrastructure placement. Great effort was employed to ensure the placement of the majority of proposed turbines in areas of lower biodiversity value. However, the proposed development site's avian biodiversity is recognised with up to 32 priority bird species recorded in the larger project area. Noteworthy is the confirmed presence of 2 of the 3 KBA trigger species (Southern Bald Ibis, Blue Crane and Rudd's Lark). Blue Crane presence has been accommodated by exclusion of suitable habitat from the development footprint and with stringent mitigation to be implemented for all authorised turbines. For Southern Bald Ibis, please refer to our response provided below in

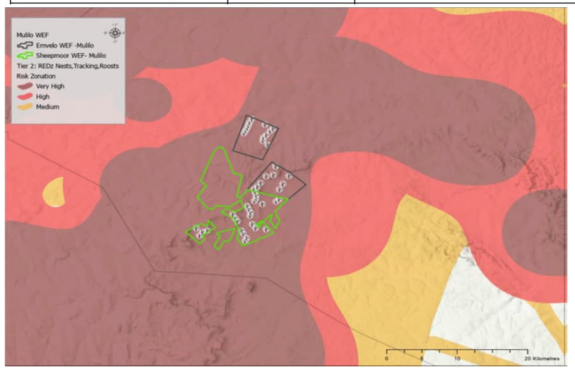
No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				inclusion within IBAs and KBAs. IBAs make up 49% and KBAs 65% of the Emvelo WEF. At the heart of the MTPA's concerns, resulting in our objection, is the rich avifaunal diversity that is at risk of continual loss of mature individuals through collisions and electrocutions. The avifaunal specialist report acknowledges that collision can be reduced from a high to a medium impact following post-mitigation. However, with 14 threatened bird species occurring on site, reducing the impact to a medium level is still significant (if at all possible), as any loss of large individuals may impact the conservation status of these species, particularly in light of cumulative impacts from the 302 planned or approved, and 82 approved wind turbines within 35 km of Emvelo WEF. Additionally, the avifaunal specialist report assessed the cumulative impact of Emvelo WEF to be moderate to high. BirdLife monitoring report of 2025 states that on average, for every turbine, there are 4.25 bird fatalities per year, and that 10% of these were species of conservation concern. With every turbine added, the risk of collisions increases.	the Sheepmoor WEF comments. Note that the Rudd's Lark was not recorded on site. However, the current state of anthropogenic disturbance on the site is concerning and has an existing significant effect on the rich avifaunal diversity of species known to occur in the area. The extent of grazing pressure on the grasslands and continued trampling of wetlands by overstocking of livestock have a significant negative impact on the biodiversity value and continued sustainability of these avian habitats to support healthy populations. It is believed that the development of the proposed WEFs in the area will provide an opportunity for the potential improvement of the habitat conditions through improved grazing regimes, the implementation of onsite conservation measures and the facilitation of potential stewardship agreements in order to manage and reduce anthropogenic impacts. Furthermore, the compulsory implementation of an extensive suite of mitigation measures as recommended by the specialist for all approved turbines are believed to sufficiently reduce the risk to avifauna through potential collision and/or electrocutions posed by the WEF infrastructure. The reference made to the number of approved turbines in the province and surrounding area as well as fatality rates contained in the Birdlife South Africa monitoring report of 2025 is acknowledged; however, one should keep in mind that although a large number of wind farm projects are being proposed / approved, not all projects will be realised as several factors could influence / hinder the development process beyond the EIA phase and decision-making process. Also, several existing wind farms are

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					located in IBAs and KBAs throughout South Africa, and therefore as a result, IBAs and KBAs as a unit cannot be used to exclude turbines.
				White-winged Flufftail (Critically Endangered) • Collision risk modelling results for White-winged Flufftail yielded a mean annual fatality rate of 1.54 birds/year with the original wind turbine layout, which was reduced to 0.45 birds/year with implemented avoidance of core (highly suitable) habitats. For a Critically Endangered species, with only a handful of known localities in South • Africa, we cannot afford to lose 1 bird every 2 years for the next 25 years. This would certainly push this species closer to extinction. This risk is too high. • The February reports explicitly states a 250 m buffer around White-winged Flufftail habitat, defined through detailed habitat modelling. The July reports mention that White-winged Flufftail habitat is "appropriately buffered" and that "movement corridors were determined and buffered," but the report does not explicitly state a numerical value for this buffer. • The developer commits to implementing dynamic, real-time nocturnal curtailment i.e., from dawn to dusk for the duration of the summer season, for all wind turbines located within the modelled medium risk zone and traversing White-winged Flufftail habitat connectivity corridors. The following turbines are affected: 26, 27, 28, 29, 31, 44 and 45. • Of greater concern is the fact that White-winged Flufftail has been recorded on site although there is scant mention of it.	Specialist Response: Note that Species 23 is now referred to as Species 41 according to SANBI and the National DFFE Screening Tool. Also, we believe that there are 67 known localities of Species 41 (previously Species 23) and the deliberate disclosure of known locations of a Species of Special Concern such as Species 41 (previously Species 23) undermines efforts to protect these species through strategic obfuscation as is legally required by SANBI and the National DFFE, potentially exposing them to risk of exploitation, poaching or illegal trading. Hence, why the location of Species 41 (previously Species 23) as its occurrence pertains to this proposed project has not been disclosed in the Avifaunal Specialist Report. It is important to note that the species has been reclassified from Critically Endangered to Endangered in the 2025 BLSA Red Data Book. The continued use of the outdated conservation status by the MTPA remains unexplained. The avifaunal specialist has sufficiently buffered all potential suitable wetland habitat associated with Species 41 (previously Species 23) within the proposed project's area of influence and the WEF's development footprint. Buffering potential suitable habitat rather than species occurrence within the proposed development footprint has resulted in much larger hectarage of wetland features being preserved and that were completely avoided by turbine placement. Furthermore, the rigorous mitigation strategy proposed for Species 41 (previously Species 23)

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				There is reference to being recorded in the Avifaunal assessment on Page ii, 19, and 21. Its occurrence on site is significant and a fatal flaw. • BirdLife (Lloyd et al. 2025) distinguishes between *habitat buffer* zones and *species buffer* zones for White-winged Flufftail. Habitat buffer zones maintain ecosystem functions and processes that the species rely on, while species buffer zones protect and maintain the biological needs of a particular species. • BirdLife published a guideline (Lloyd et al. 2025) for developments with collision risks, like wind turbines, with buffer zones of at least 5 km between the development and wetlands suitable for the White-winged Flufftail, with buffer zones of at least 1 km for delineated wetland inputs (habitat buffers). Importantly, the buffers proposed in the avifaunal report equate to the habitat buffers while the species buffer was not implemented. This is a fatal flaw. • The occurrence of White-winged Flufftail on Emvelo is also confirmed within the Draft REDZ layer on nests, tracking data, roosts and sightings. These points were buffered for the REDZ project, but one can easily find the wetlands within this buffer. This point won't be provided here, to protect the locality, but I buffered this point, and an adjacent one, by 5 km and the result excludes a significant amount of the Emvelo WEF. See Figure 3 below.	includes a systematic approach, where wetland condition monitoring and observation of catchment level rainfall events offer sufficient warning for night-time proactive turbine curtailment. The system's precision will be improved through further research on the movement patterns and flight height of Species 41 (previously Species 23) prior to the WEF becoming operational, to which the developer has already committed to undertake. It is the specialist's expert opinion that the mitigation strategy proposed for Species 41 (previously Species 23) is considered sufficient. Of greater concern is the fact that MTPA is citing information from the draft Strategic Environmental Assessment (SEA) for Phase 3 for Wind and Solar Photovoltaic Energy (i.e., REDZ Phase 3) that currently remains under peer review and was shared in confidence with the commenting authority for comment. Referencing data and findings from the unpublished draft REDZ Phase 3 SEA is considered a serious breach of ethical conduct and professional trust that was instilled by the CSIR on the commenting authorities to keep the information confidential until released in the public domain. Specialist Response: Note that based on the sensitivity mapping undertaken both turbine 17 (Emvelo WEF) and turbine 18 (Sheepmoor) completely avoid the Very High Risk All Infrastructure Exclusion Zone, the High-Risk Turbine Exclusion Zone and the Medium Risk Mitigation Zone on each of the project sites.

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				 Figure 3: Confirmed White-winged Flufftail within Emvelo WEF, with REDZ 3 locality from Avifaunal risk layer and with point locality buffered by 5 km as a no go to development zone (Lloyd et al. 2025). African Grass Owl African Grass Owl (Tyto capensis), a regionally Vulnerable species, has been recorded on Emvelo WEF in the east. These endemic and range-restricted owls have a very small home range of 423 ha (Pretorius 2019). To avoid any impacts to these sites, Pretorius pers. comm. recommends this home range be converted to a radius of a circle of 423 ha in size. This equates to a 1160 m buffer. By applying these to the known observations on Emvelo, it affects the placement of turbines 17 (Emvelo) and 18 (Sheepmoor). These localities are buffered and mapped in Figure 4.	To further reduce potential risk of collision to this species by turbines 17 and 18, it could be recommended that these turbines be subjected to pro-active nocturnal curtailment during the summer months (October–March) as well as radar based SDOD during nighttime should African Grass-Owl mortalities occur. Specialist Response: MTPA citing information from the draft Strategic Environmental Assessment (SEA) for Phase 3 for Wind and Solar Photovoltaic Energy (i.e., REDZ Phase 3) that currently remains under peer review and was shared in confidence by the CSIR on behalf of the DFFE with MTPA for comment constitutes a serious breach of ethical conduct and professional trust. As data information from the REDZ Phase 3 SEA has not been published yet and is currently being revised based on the updated red data statuses, the specialist is not in a position to respond to this comment.

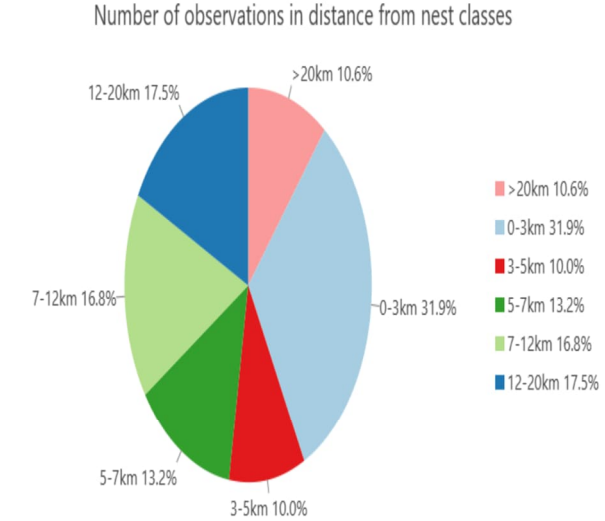
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				 Figure 4: African Grass Own (Vulnerable) localities with the recommended 1160 m buffer to cover their strict home range of 423 ha.	
				Avifaunal assessment for draft Strategic Environmental Assessment for Phase 3 For Wind and Solar Photovoltaic Energy The MTPA received the REDZ datasets from the CSIR in May for comment. These datasets may still be refined, but they represent the best available avifaunal data that will eventually inform the DFFE screening tool. Although still a draft product, the dataset is based off actual data and the MTPA believe it to be a significant improvement in the data currently available to evaluate renewable energy applications. Querying this dataset, besides the Critically Endangered White-winged Flufftail being present within the Emvelo footprint, the following important avifaunal datasets cover Emvelo (Table 1). The spatial extent these features is mapped in Figure 5.	

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				Table 1: List of REDZ species and their risk and conservation status occurring over Emvelo and Sheepmoor WEFs. **Species** / **Risk** / **RDL Status** African Grass Owl / High / Vulnerable Cape Vulture / Medium / Endangered (Regionally) Grey Crowned Crane / High / Endangered Rudds Lark / High / Endangered Secretarybird / Very High / Endangered (globally) Southern Bald Ibis / Very High / Vulnerable White-winged Flufftail / Very High / Critically Endangered Wattled Crane / High / Critically Endangered Yellow breasted Pipit / Very High / Vulnerable  Figure 5: Spatial extent of the Tier 2 draft SEA REDZ 3 avian sensitivity layer covering Emovelo and Sheepmoor WEFs.	
				Buffers: Martial Eagle The MTPA has significant concerns regarding the use and modelling of Martial Eagle collar data. The MTPA obtained a copy of the flight data containing 13,111 observation points, compared to the 13,680 observations used by AfriAvian. We used GIS to confirm key findings in the avifaunal	Specialist Response: Noted. The flight risk model and sensitivity zonation for Martial Eagle were developed using a combination of tracking data, focused field observations, and high-resolution environmental predictor variables. While the model incorporates GPS data from one adult (13 months, 6380 transmitted locations) and one

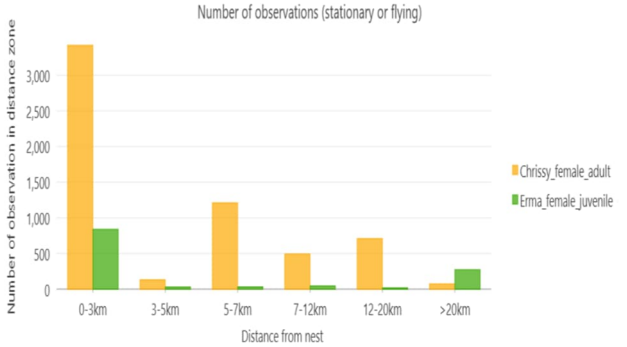
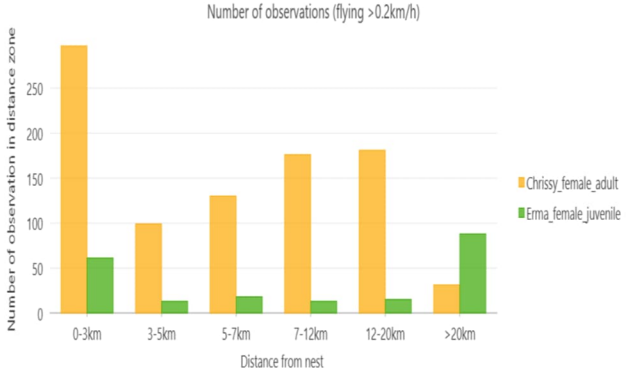
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				assessment, focusing only on data from juvenile and adult tracking collars around the Emvelo and Sheepmoor sites, excluding the Free State male. EWT previously advised using a 5-6 km buffer around nest sites. More recently, BirdLife (2025) recommended a 6 km buffer around nesting sites. This recommendation aligns with preliminary outputs from the National Martial Eagle Risk Assessment (MERA) tool led by the University of Cape Town, which supports applying a circular buffer of approximately 5 km to include core ranges heavily utilised by resident breeding Martial Eagles, rather than applying bespoke buffers based on tracking and observational flight path data. Given 40 individual collared Martial Eagle tracking datasets, researchers could not build a reliable model to guide wind farm development, as Martial Eagles appear particularly difficult to model for flight patterns. Against this backdrop, it is concerning that AfriAvian claimed they could accurately model flight risk for Martial Eagles and were confident enough to reduce the nationally recommended buffer by more than 50% (to 2.5 km for the High Risk zone). Such confidence in model output would be required to make this bold decision, as any failure may result in the loss of both parents and the entire breeding pair.	juvenile individual (5 months, ~1450 transmitted locations) at the project site, it also includes tracking data (12 months, ~5850 transmitted locations) from a second adult male Martial Eagle monitored at a comparable highland grassland site. This second dataset extended to approximately 12 months and exhibited a remarkably similar spatial use pattern. Together, these datasets provided a robust basis for assessing spatial flight activity in relation to nest proximity and landscape features. In addition to the tracking data, over 37 hours of direct Martial Eagle flight observations were recorded near the nest site during 60 hours of targeted pre-construction surveys. This effort produced a substantial dataset of localized flight behaviour, which was used to train a flight risk model (FRM) using an artificial neural network (ANN). The ANN was developed using a suite of predictor variables representing topography (e.g., slope, ruggedness, TWI), hydrology, and remotely sensed vegetation productivity indices. This enabled a data-driven approach to modelling spatial risk beyond traditional buffer methods. Regarding the delineation of high and medium sensitivity zones: the original high-risk zone (~80 km²) closely mirrors the area of a 5 km circular buffer recommended by BirdLife South Africa and EWT. However, based on the tracking and observation data showing that ~75% of recorded activity occurred within 3 km of the nest, a more precautionary Very High-Risk zone (~31 km²) was delineated, within which no wind turbines will be permitted. The Medium Risk zone (~148 km²) now incorporates a more stringent mitigation regime than conventional practice, including both
				AfriAvian's Approach: AfriAvian combined all GPS tracking data with fine-resolution field monitoring data (37+ hours of observations) to develop a Flight Risk Model. The output was processed to identify High and Medium risk zones. The High risk zone encompassed approximately 79 km², comparable to the area covered by a 5 km circular buffer (78.5 km²) recommended by	

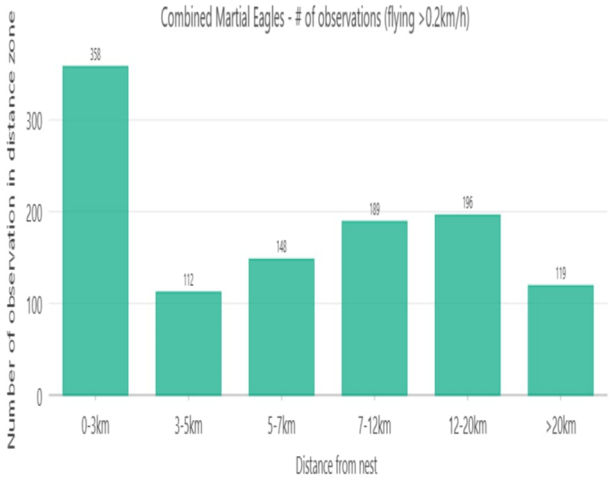
No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				BirdLife and EWT. However, AfriAvian then extracted from the High risk zone a "Very High risk zone" as their no-go area, relying on Martial Eagle tracking and observational data showing approximately 75% of recorded flight activity within 3 km of the nest. This was not only a subjective decision lacking scientific rigour, but as demonstrated below, the approach is fatally flawed.	automated Shutdown-on-Demand (SDOD) and dynamic diurnal curtailment during periods of expected eagle activity. Importantly, the risk classification framework was not adjusted to reduce turbine constraints, but rather to reflect biologically informed risk thresholds derived from empirical data. The risk model thresholds themselves remained unchanged; what changed was the delineation of more conservative spatial zones to better reflect the observed space use and mitigate risk more effectively. While we acknowledge the limitations inherent in working with a small sample size — which is a known challenge for this species — the modelling approach integrates multiple lines of evidence and has prioritized precaution in delineating turbine exclusion zones and mitigation areas. The intent is to implement a risk-responsive mitigation hierarchy that reduces potential collisions. Due to the limitations of the GPS data — specifically, inconsistent one-hour ping intervals — we chose to analyse bird movement using proportion of time spent within distance bands rather than flight paths or number of GPS points – see Figure 1 below. This method more accurately indicates areas where birds are at increased risk, as the duration spent within a zone serves as a more reliable metric considering the data resolution of one-hourly GPS fixes. The chart represents delta time across zones, not distance travelled or observation count, and we believe this method is the most appropriate and transparent given the data quality.
				Statistical Flaws in the Model: The flight risk model created using machine learning combined coarse-scaled GPS data across a wide area with fine-scaled, dense flight path data from a very limited area (majority within 2 km of nest) (see Figure 18 in the avifaunal assessment). Incorporating detailed, fine-scaled observational flight paths from such a limited area introduces spatial bias, where model output is disproportionately influenced by the more detailed sampling from the fine-resolution area, leading to overrepresentation of that smaller region. This approach is statistically flawed when differences in spatial area, resolution, sampling intensity, and density are not properly accounted for. This violates spatial statistical assumptions, resulting in inconsistent variance estimates, inaccurate predictions, and biased interpretations that do not accurately reflect broader spatial patterns.	
				MTPA Analysis and Findings: The MTPA used the same GPS tracking data to verify whether Martial Eagles spent 75% of their recorded flight activity within 3 km of the nest but could not replicate this statistic. We calculated the distance between each GPS observation (n=7266) and the nest, we then categorised each observation into	

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				the same distance classes that AfrAvian used in Figure 22 of their report. We used only flight data from the adult female and juvenile in this area, discarding Free State data (nest location unknown). Importantly, we separated data into two types: (1) the complete dataset covering flying and stationary periods, and (2) a subset including only flying periods (>0.2 km/h). The second dataset was considerably smaller. Although collar tracking was programmed not to record locations between 19:00 and 4:00, 20% of observations were still recorded at before sunrise or after sunset. For flight risk modelling, only observations when birds are flying and at collision risk should be included, not when roosting, nesting, or perched. We calculated the distance within which 75% of all observations occurred for the full dataset (including evening and nesting periods), finding a distance threshold of 5.6 km. For the flying-only dataset, this distance increased to 13.5 km (see Figures 6 and 7). For AfriAvian to get to a value of 75% for all observations within 3km of the nest, they must have (1) used all the flight data, including the datasets that were only recorded at the nest (introducing spatial bias and a statistical flaw), (2) they must have used all the observational data, including when the bird was stationary and sitting on a nest, and (3) a different statistical approach to analysing the data. Regardless, our analysis provides a markedly different outcome, aligned with the 5-6 km buffer recommended by EWT and BirdLife, and invalidates the 2.5 km buffer proposed by Mulilo for the High Risk zone. This High Risk zone should be removed as there is	Figure 1: Proportion of time spent by the tracked Martial Eagles (ME) within varied distance bands from the nest site (April 2024 to May 2025). We remain open to integrating additional tracking data from future studies to refine the risk model and will update proactive curtailment protocols accordingly as part of an adaptive management strategy. The national Martial Eagle Risk Assessment (MERA) tool, that has been in development for the past five years using tracking data from over 40 birds, presumably aims to produce a generalized risk framework/model suitable for application across diverse biomes and/or ecoregions. However, the objective of the modelling effort employed by AfriAvian in this instance differs in that our intent is to create a localized site-specific flight risk model that reflects the specific behavioural ecology and landscape use of a resident breeding pair within a defined project area. This includes integrating GPS tracking, direct observational flight data, and spatial environmental predictors to capture actual space use patterns in situ. Using site-specific data allows for the following: • Spatial delineation of risk areas based on observed behaviour rather than conservative generalization. • Habitat-contextualized modelling, accounting for topographic and vegetative (e.g. distribution of perch sites) features that affect flight behaviour at this particular site. • Empirical validation of proposed mitigation zones (e.g., shaped buffers, curtailment areas) using real exposure data

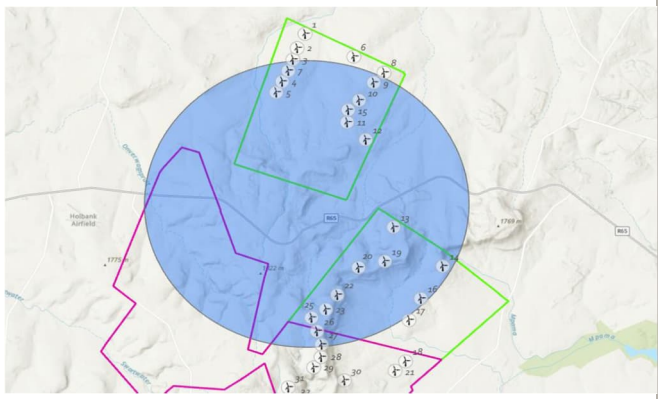
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<tr><td></td><td></td><td></td><td></td><td>no statistical confidence in its delineation, potentially putting birds at collision risk.
 

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<tr><th>Distance from nest class</th><th>Flying only localities</th><th>Flying / Stationary localities</th></tr>
<tr><td>0-3km</td><td>31.9%</td><td>58.6%</td></tr>
<tr><td>3-5km</td><td>41.9%</td><td>60.8%</td></tr>
<tr><td>5-7km</td><td>55.1%</td><td>77.9%</td></tr>
<tr><td>7-12km</td><td>71.9%</td><td>85.3%</td></tr>
<tr><td>12-20km</td><td>89.4%</td><td>95.3%</td></tr>
<tr><td>>20km</td><td>100.0%</td><td>100.0%</td></tr>
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Figure 6: Pie chart showing the number of Martial Eagle observations/points within distance classes from Martial Eagle nest. The table on the right presents the cumulative value of the distance classes, for the entire combined dataset,</td><td>rather than assumed or pooled exposure distributions.
This approach provides a more comprehensive and context sensitive model and includes the use of shaped buffers, derived from actual movement patterns, which represents a refined evolution of the circular buffer concept.</td></tr>
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No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				or with only the localities where the Martial Eagle were flying (>0.2 km/h). Results show that for the entire dataset of 7 266 points, 75% of the observations were within 5.6 km of the nest, while for the flying Martial Eagles, 75% of the records were within 13.5 km of the nest.   	

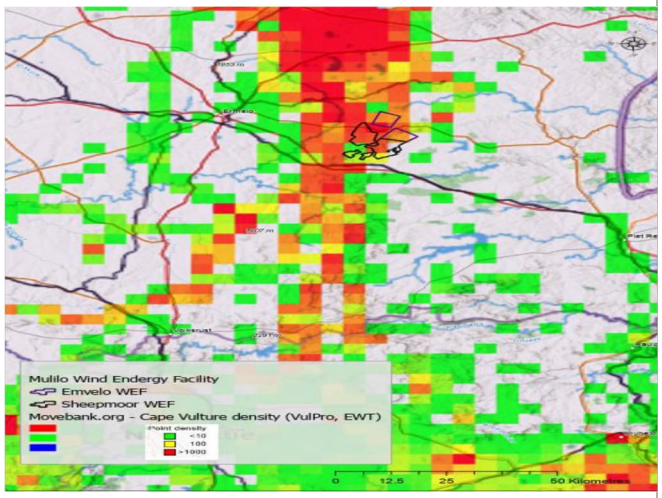
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				 Figure 7: Bar-chart showing the number of observations from the collar tracking data in distance classes as used in Figure 22 of avifaunal report. Top-most chart presents all the observations (n=7266) for the adult and juvenile Martial Eagles. The middle chart presents only the observations where the Martial Eagles were flying (n=1122) in distance classes from nest. Bottom chart presents the combined datasets for both juvenile and adult birds in distance classes from nest. Bar chart bars are labelled with actual number of records in each class.	
				Breeding Cycle Considerations: Martial Eagles display significant differences between breeding and non-breeding periods. They typically breed every second year; therefore, a minimum of two years of data is essential when considering range use to capture both intensive breeding seasons and "sabbatical" periods when Martial Eagles	

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				often utilise larger ranges away from nesting sites. The GPS records for both birds covered 1 year and 1 month (10 April 2024 to 9 May 2025), meaning AfriAvian's analysed data did not cover a full two-year cycle. Adult female Martial Eagles utilise home ranges differently than males, who spend considerable time hunting and provisioning for incubating partners and developing nestlings. During core breeding periods, females exhibit much higher nest site fidelity while males forage extensively over larger ranges. Females typically do not fly as far as males during core breeding seasons; therefore, the exclusion and lack of buffers considering male Martial Eagle range use is concerning. The conclusions did not factor in male flight activity, range use, and flight paths over the Mulilo project area.	
				Mitigation Concerns: Proposed mitigation measures include curtailment for Martial Eagle flights. However, the avifaunal report found that Martial Eagles are most active at moderate wind speeds of 5.5-10 m/s. Curtailment would significantly impact turbine power generation capacity, and we believe these costs were not considered in assessing the viability of proposed mitigation measures. With the 5.5 km circular buffer being the current recommended buffer around Martial Eagle nests, the application of a 5.5 km buffer will result in the removal of 16 turbines, namely: 4, 5, 7, 9, 10, 11, 12, 13, 14, 15, 16, 19, 20, 22, 23, and 25. See Figure 8 below.	

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				 Figure 8: Application of a 5.5 km buffer around the Martial Eagle nest site and the impacted wind turbines.	
				Avifaunal Assessment: 2 -year of vantage point monitoring required and overreliance of models Given the site's avifaunal sensitivity, two years of comprehensive avifaunal monitoring would be required. While we understand an additional year was added to monitor the Martial Eagle, this did not include visiting all vantage points as required by BirdLife guidelines. Figure 19 in the Avifaunal assessment shows the limited extent of this additional monitoring, which was confined to the Martial Eagle nest site. Such sensitive and vulnerable avifauna requires more comprehensive monitoring to properly understand and assess potential impacts. Modelling is used throughout the project sites, from the identification of suitable habitat to avoid, through to predicting where Southern Bald Ibis is likely to fly once leaving a roost, to mitigating	Specialist Response: The Guidelines require a minimum of four surveys over a period of a year (12 months) covering four seasons. Pre-construction monitoring data collected at both the Emvelo and Sheepmoor WEF sites include a dataset covering a period of approximately 18 months (February 2022 to August 2023) with additional surveys done adding approximately five more months to the dataset (from October 2023 to February 2024). These additional surveys were done to cover the expanded WEF and EGI development footprints as well as additional targeted Martial Eagle monitoring during which time all other bird species were also recorded across the entire project site. In addition, from December 2024 to February 2025 additional targeted wetland surveys were conducted with special focus on Species 41 (previously Species 23) and again all other bird species were also

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				impacts. AfriAvian's flamingo model for Leghoya WEF was found to miss 50% of the important pans supporting flamingos (based on actual sightings). We highlight above the spatial bias that was introduced into the Martial Eagle Flight Risk Model, and the inability to replicate and confirm that 75% of the recorded flight activity is within 75% of the nest. George P. Box famously once said "*All models are wrong, but some are useful*". We need to be careful on our reliance on models. There is an increasing tendency to over rely on models, perhaps because they sound to sophisticated, to mitigate and minimise all possible impacts to acceptable levels. This is wrong. Unless models can be validated with data that was withheld, or gathered afterwards, we need to approach models with caution. Models may be acceptable when they refine boundaries of established circular buffers, but they become problematic when they result in 50% reductions in buffer boundaries without validation or peer review. Our detailed analysis of the Martial Eagle model revealed several critical flaws, as discussed above. As a result of these repeated issues with model accuracy and validation, the MTPA has become increasingly distrustful of models as primary decision-making tools for sensitive environmental assessments. Robust field monitoring and established precautionary guidelines must take precedence over unvalidated modelling outputs.	recorded across the entire project site during this time. Furthermore, our specialist assessment and review of the proposed project specifications and the receiving environment, together with the risk models we have developed using sound spatial data and >24-months of field-based monitoring data, and the recommendations for the strict implementation of the tailored mitigation measures we have proposed, will in our expert judgement afford adequate protection for the priority avifaunal species recorded on site. Note that MTPA presented their own data analysis outputs using partial datasets and alternative metrics of activity and then sought to discredit the specialist when results diverged — without acknowledging potential methodological differences or limitations. Presenting different datasets, alternative analysis workflows and metrics without acknowledging these methodological differences creates a misleading impression of inconsistency. In addition, the inclusion of commentary on other recent projects assessed by the specialist is inappropriate, irrelevant and distracts from the current proposal's merits.
				Cape Vulture flyways Cape Vultures are globally vulnerable and regionally endangered. The specialist assessment did observe Cape Vultures over the project area	Specialist Response: Noted. The potential risk to Cape Vultures from the proposed wind energy facility was given due consideration, especially given the species' global and regional Vulnerable

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				for 48 minutes over 756 hours, and within the rotor swept zone. This amounts to 1 vulture visit every 2 weeks. According to the vantage point priority bird monitoring statistics, Cape Vultures were the 7th most observed priority species (out of 23) over the 1 year of observation. In the recent Birdlife summary report from monitoring operational wind energy facilities (2025), it provides a case study of a wind farm that recorded a very low numbers of Cape Vultures during pre-construction monitoring (recorded in less than 1% of total vantage point surveys), yet later in the year, once operational, the wind farm had shutdowns involving 384 Cape Vultures. This highlights the need for impact assessments to incorporate all sources of information, and to be careful of initial low observations during pre-construction monitoring. The MTPA queried the Cape Vulture flight paths on Movebank.org early in April 2025 – See Figure 9 (Kruger NP Raptors E-obs (n=18); Vulpro (Rehab & Captive bred) (n=123); & EWT SigFox Vultures (n=18)) to create the below map showing Cape Vulture flight paths based on density of observations in Movebank.org. This data in Figure 9 clearly shows a north-south flightpath that connects the northern Mpumalanga Escarpment with KwaZulu Natal in the south. And with the specialist reported observation that the vultures fly within the rotor swept zone, we are very concerned about the risk that the wind farm may pose to vultures as they fly through this corridor. This corridor impacts all the proposed wind turbines.	conservation status and known collision vulnerability with wind energy infrastructure. The site-based pre-construction monitoring recorded low vulture activity (48 minutes over 756 hours). These results align with the Cape Vulture utilization distribution model published by Cervantes et al. (2023), which classified the area of interest (AOI) as a mosaic of low and medium sensitivity for this species. Nonetheless, we recognize the importance of incorporating additional datasets beyond pre-construction surveys. The recent query of Movebank data by MTPA showing a north–south flight path near the AOI adds a broader regional perspective. However, it is important to note that the density of GPS tracking points (as per Figure 4) does not necessarily imply intensive use of airspace at rotor-swept height or regular passage directly over the proposed turbine positions. Our own focal surveys did record vulture presence, including at risk heights, but these were marginal and irregular events—not indicative of regular corridor-like use at the local scale. This distinction highlights a key issue: the Movebank-derived corridor represents a regional pattern recorded over what appears to span more than a decade, whereas our assessment focuses on localized collision risk informed by observed behaviour at rotor height. Nonetheless, we acknowledge the precautionary value in layering mitigation across spatial scales. As such, in addition to the site being classified as low/medium sensitivity in Cervantes et al. (2023), we have adopted a stringent, site-wide mitigation strategy. The following compulsory mitigation measures have been incorporated into the EMPr:

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				 Figure 9: Tracking data from Cape Vultures flying over the Emvelo and Mulilo WEFs. Data sourced from Movebank.org in April 2025. Data source VulPro, EWT. Symbology represents density of recorded points. Red = high density. *Vantage Point Monitoring* Based on the latest and current turbine layout, 5 out of the 22 turbines are not covered by the 2 km vantage point buffers, amounting to 23% of turbines not been covered.	• All turbines, whether in low, medium, or high sensitivity zones, will be subject to Shutdown-on-Demand (SDoD) protocols, with automated radar and camera-based detection systems capable of operating in low-visibility conditions (e.g., mist, dusk). • SDoD systems will be operational from the Commercial Operation Date (COD) and monitored continuously throughout the lifespan of the facility. • A comprehensive Biodiversity Management Plan (BMP) will be developed prior to COD, specifying turbine-specific curtailment protocols, including diurnal and nocturnal shut-down triggers based on vulture activity and weather conditions. • Post-construction monitoring results will be reviewed quarterly to evaluate the effectiveness of mitigation, and the SDoD programme will be adaptively refined based on evidence of elevated flight activity or near-miss events. In conclusion, while the observed risk at site level remains low, we have adopted a precautionary and adaptive approach that implements best-practice curtailment/shut-down technology to prevent collisions. This implemented mitigation measure ensures that if Cape Vulture activity within rotor swept height increases over time, appropriate mitigation measures will be triggered without delay for this conspicuous species.
2.3	Specialist Assessments - other				
				While extensive specialist work has been undertaken, MTPA notes areas where further	Noted.

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				information or methodological alignment could strengthen the overall environmental assessment. General Enhanced integration between the aquatic, faunal, bat, terrestrial and avifaunal assessments is recommended to better understand potential synergistic or cumulative biological impacts.	
				Faunal Specialist Assessment Placement of infrastructure in high/very high sensitivity areas warrants careful justification given specialist recommendations to avoid these areas. While we acknowledge the inclusion of a detailed oribi management plan, no detailed oribi survey of this area has occurred, nor is a map of oribi habitat or oribi observations included. Its inclusion at this late stage is only in response to issues raised in the Draft EIA report. Although it is possible that an oribi management plan could improve the local status of the oribi within the footprint area, it can also be said that the failure to adequate survey for oribi since this was raised in the scoping report stage (meeting), means that the proposed development may have a significant negative impact on the oribi. How do we know that turbines, roads, or infrastructure will not be placed in core habitat for oribi? The MTPA has reached out to EWT and they do not know what impact wind turbines will have on this highly sensitive mammal. The developer should not be surveying for oribi after the development is approved, it should have happened during the EIA phase.	Faunal Specialist Assessment The Oribi Management Plan was requested to be submitted with the FEIAr during the draft scoping public participation on 18/04/2024, not during the EIA phase. While time constraints in the EIA phase limited detailed surveys, the plan aims to mitigate impacts during construction and operations. This area is a busy farming and hunting zone, and while oribi are not completely desensitized to human activity, they are increasingly vulnerable. Current threats within this area include extensive overgrazing, fencing, local poaching, and illegal 'taxi hunts' (organized events where dogs are released onto farms to chase oribi, often for gambling purposes). One such event occurred recently within the project area but was halted by local farmers, unfortunately an Oribi was killed. These hunts are a significant threat to oribi populations . The Oribi Management Plan is designed to address these issues and reduce impacts on the species.
				Terrestrial Biodiversity Assessment:	SPECIALIST: The terrestrial biodiversity assessment served to refine the mapping, which

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				The MTPA has significant reservations regarding the Terrestrial Assessment. Key concerns include: • The terrestrial biodiversity theme is still not aligned with SANBI's Species Environmental Assessment Guideline (2022) that the consultant is required to comply with in terms of Notice 1150 of Government Gazette 43855 of 2020. • The author only allowed for 4 days to survey both the Sheepmoor and Emvelo WEF sites during the summer months, when most summer rainfall plants would be flowering and identifiable. Four days is certainly not enough to cover an area this size (12,543 ha for both WEFs). This report is the same report as submitted with previous DEIA. • No plant species of conservation concern, or endemics, were recorded on site. This is not surprising given the lack of time to survey this large area. ERM also opted to appoint a botanist not familiar with the flora of this area. There are several endemics restricted to this area that would be unfamiliar to someone not from the area. It just makes it harder to confirm identification, particularly with limited time and coverage in the field. The MTPA is confident that several species of conservation concern would occur on site; they were just not detected. • The failure to apply the SANBI Guidelines resulted in inadequate time being allowed to properly assess the terrestrial biodiversity (botany) and the determining of site ecological importance (SEI). The consultant did not follow the SEI methodology, as required in terms of the SANBI guidelines and the MTPA does not believe that the approach	is the norm, where bioregional plans are often not up to date and/or reflect inconsistencies that require ground-truthing. This was presented in the terrestrial biodiversity assessment reporting accordingly, which is being ignored by the respective authorities. This was noted in the draft EIA comments but is still being overlooked as it does not align with the agenda that serves to promote the Mpumalanga Bioregional Plan rather than acknowledge that there are shortcomings. The proposed project is not seeking to develop the entire intact grassland patch, only a very small footprint. The resultant loss is thus not deemed to be excessive as the area that will remain undeveloped (i.e. intact grassland) far exceeds the actual hard stand footprint of the project. Were it a mining or agricultural project that would result in the clearance of thousands of hectares of grassland the impact would be more significant. The terrestrial biodiversity impact or risks to ecological processes associated with an access road and turbine footprint would not be deemed excessive within an already modified surrounding landscape (i.e. significant agricultural and mining related land transformation).

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				followed to identify sensitive areas would be able to adequately assess the environmental sensitivity for this area. There were a number of additional variables that could have been applied (site-specific species, CBAs and ESAs, climate change corridors, intact grasslands, rocky ridges, etc.), patch size, together with criteria and approach of that are required in the SANBI Species Environmental Assessment Guidelines. • The approach followed resulted in some CBA Irreplaceable areas, that overlapped with intact grasslands and provincial climate change corridors, being designated medium sensitivity (as a maximum value because it did not ultimately fall within the Eastern Highveld Grassland). This is fundamentally wrong as there was no consideration for any species of conservation concern (like roosting areas) or other spatial priorities like CBAs to meet biodiversity targets. Applying the SANBI criteria could allow the montane grassland to be categorised as *high*, or even *very high* if species and additional data were considered. • In terms of the terrestrial biodiversity assessment, the result is that the montane grassland (not degraded) is of *medium* sensitivity, but the degraded Highveld grassland has *high* sensitivity, and non-degraded a *very-high sensitivity.* This does not make sense. We have significantly more threatened plant species recorded in the Wakkerstroom Montane Grassland than for the Eastern Highveld Grassland and consider far more sensitive. • Ultimately, the MTPA does not agree with the vegetation sensitivity analysis that then fed	

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				into other planning processes, such as the offsets, as it did not apply SANBI's Species Environmental Assessment Guideline (2022).	
2.4	Biodiversity Offset Report (BOR)				
				Firstly, the MTPA never requested a biodiversity offset report. When meeting with Mulilo many months ago, Mulilo mentioned they would offset their impacts, and even committed to developing an Oribi Biodiversity Management Plan. In reviewing the first DEAI, the MTPA merely commented that there were no BOR or Oribi management plans. The MTPA appreciates the effort that has gone into compiling the draft Biodiversity Offset report, however the offset assessment and report only partly covers the residual biodiversity loss to sensitive areas, such as CBAs and Intact Grassland Areas, and not to the avifauna of conservation concern. The offset report should in fact explicitly assess whether any residual impacts affect irreplaceable biodiversity that cannot be offset, which will be a fatal flaw. In addition, the MTPA feel that the anticipated negative impacts to long-lived threatened bird species cannot be adequately quantified nor offset. The proposed BOR sets specific hectare targets for offsetting the direct loss of natural terrestrial habitats, particularly for areas supporting Species of Conservation Concern (SCC). These targets are based on biodiversity offset ratios, with a total of 507.15 hectares designated for offset, broken	We acknowledge the MTPA's detailed comments and appreciate the guidance provided. As the applicant, we are committed to addressing all concerns regarding offset site security, measurable biodiversity outcomes, and alignment with national offset guidelines in the final submission. We have proactively begun discussions with our landowners to explore feasible offsite and onsite options, ensuring long-term protection and management. This presents a unique opportunity to secure critical habitat for Species of Conservation Concern, such as the oribi, and to enhance ecological integrity in an area currently under significant anthropogenic pressure. An update of the BOR will aim to provide clarity and re-evaluate the use of rehabilitation as a gain for offsetting. The proposed measure for birds will be updated aftert detaileld consultation with the Avifauna specialists.

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				down by vegetation type and Mpumalanga Biodiversity Sector Plan (MBSP) category. The core of the terrestrial offset involves restoration efforts on disturbed and transformed areas within the study area. These areas include cultivated lands, disturbed Montane Grassland, disturbed Highveld Grassland, and alien invasive plantations. The aim of the BOR is to create additional habitat for Species of Conservation Concern (SCC), such as the Oribi, by restoring degraded grasslands. The proposed offset strategy is partly aligned with the national offset strategy, however the formal legal security of the offset sites is incomplete. The BOR is certainly not clear how the site security will be guaranteed over the long term. Mulilo have lease agreements, and mention that servitudes or protected areas declaration may be pursued, but that does not meet the requirement of the offset guideline to do so and secure them. Mulilo proposes several internal onsite areas as offsets. These may not meet the requirements for a protected environment in a wind farm where avifaunal collisions occur. The MTPA will only consider offsets away from areas with turbines as possible protected environments. Hence there is no guarantee that the selected offset areas can ever be secured. Offsite offsets should have been identified and assessed in the report. Furthermore, the candidate portfolio of offset sites is not provided in any detail. This shortfall is important as it is required for the competent authorities to assess any risks that cannot be offset. In addition, Mulilo commits to monitoring and adaptive management but alignment with the	

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				national offset guidelines do require specific biodiversity outcomes, monitoring indicators, success thresholds, and reporting plans. The long-term financing mechanism and governance of the offsets are not discussed in any detail. It is important to secure long-term management funding (via a trust, endowment, etc.) and the governance arrangements, such as who will manage the sites, who will audit performance, etc. The BOR also relies on rehabilitating disturbed areas; however, offsets should ideally be in relatively good condition (except for wetlands, which can be disturbed). Once grassland has been ploughed or planted up with trees, the biodiversity does not recover in our lifetime and restoration of these areas do not meet the biodiversity offset requirements. The BOR includes offsite actions for priority bird species and avifauna buffer concepts, however, these must be converted into measurable outcomes (e.g., collision mortality reduction targets, powerline design/marking standards, and monitoring). Alignment with the national offset strategy requires species-sensitive responses be explicitly built into offset design when species with specific habitat needs are affected.	
2.5				<u>Visual Impact</u> Page 134 in the DEIA states that the visual analysis of the Emvelo project was found to be fatally flawed.	

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2.6				<u>Cumulative Impacts</u> The concentration of renewable energy projects in Mpumalanga (890 turbines approved, in process, or planned), particularly along this sensitive escarpment, necessitates careful consideration of cumulative impacts. Each additional project contributes incrementally to regional habitat fragmentation and potential impacts on species populations, especially avifauna. The avifaunal assessment states that the proposed Emvelo WEF, alongside three other renewable energy projects within a 35 km radius, would contribute to a total of 133 turbines in similar habitat. Emvelo's turbines represent approximately 18% of the total planned turbines, indicating a moderate to high cumulative impact. For Emvelo, the cumulative impacts on birds are rated as High pre-mitigation and Medium post-mitigation. Bearing in mind the very optimistic mitigation proposals, dependant on a multitude of models and processes, places the implementation at risk. The MTPA queried its database on renewable energy projects and actual turbine locations to provide the following important statistics (based on approved, under-consideration, and planned wind farms). Please note that these numbers include the current proposed Emvelo project's turbines within the numbers that are presented. • *10 km radius*: 57 turbines (none approved) • *20 km radius*: 107 turbines (2 approved) • *35 km radius*: 302 turbines (82 approved) The actual number of turbines approved or in process of being approved is double that what the avifaunal specialist used in their calculations. Yes, the Emvelo addition would make up a smaller percentage but it adds to the threshold beyond	EAP: The EAP notes that additional wind energy facility approvals may have come to light during the course of this EIA process. However, the cumulative impact assessment for the Emvelo WEF was undertaken in accordance with the Environmental Impact Assessment Regulations, 2014 (as amended). The assessment considered the past, current, and reasonably foreseeable future impacts of similar developments within a 35 km radius at the time of project commencement. The Final EIA Report reflects these findings and includes mitigation measures to address cumulative risks, particularly to avifauna and bats. The EAP acknowledges the need for ongoing regional coordination and adaptive management as the renewable energy landscape evolves. APPLICANT: We note the comments regarding cumulative impacts and reaffirm that, to date, no Wind Energy Facilities within 50 km have an approved EA, EMPr, and layout, with only two within 60 km. Accurate assessment of cumulative impacts requires certainty on approved infrastructure and mitigation measures, which is not available for developments still under application. Including speculative or "planned" projects in the assessment risks overstating impacts and is inconsistent with EIA Regulations, which require consideration of existing or reasonably foreseeable developments. Based on the current status, we maintain that the cumulative impact assessment remains appropriate and does not require amendment. Specialist Response: Note that for the Emvelo WEF a total of 18 of 22 turbines were covered by

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				which avifauna populations(and bats) may start crashing. With every turbine added, the risk of collisions increases. As these turbines have not been built, the renewable energy industry and government, do not fully comprehend the massive impact that the wind farms will have on the avifauna and bats and the need to preserve sensitive areas to ensure their long terms persistence.	vantage point monitoring translating to a total coverage of 88% of the proposed project site which according to the BLSA Guidelines is considered sufficient.
2.7				Acknowledgement of recent change in landcover and impact on spatial mapping products The delineation of the CBAs and intact grassland patches was based off a landcover map from 2010 and 2019 (but just for CBAs). Any subsequent loss or transformation is not a fault in the MBSP or intact grassland patches, but as a result of a legal or illegal change in land use. In the MBSP Handbook, the guidelines recommend that a site assessment is required to confirm the current land use. Any loss may require additional areas to meet targets (to be addressed in MBSP v2), while acknowledging that the CBA status may no longer apply to these areas if they have been ploughed or developed (where recovery is not possible within our lifetimes). Therefore, in terms of the Emvelo WEF, any change in land use from natural to cultivation or plantation would result in this particular area no longer being identified as a CBA or intact grassland patch. The impact of this has been considered when commenting on turbine placement and those that need to be removed.	The delineation of CBAs and intact grassland patches using 2010 and 2019 landcover maps is acknowledged. However, the MBSP Handbook itself recommends site-level verification to confirm current land use. The WEF assessment incorporated recent site visits and aerial imagery to validate habitat condition and land use, ensuring that turbine placement avoids areas where ecological recovery is no longer feasible. Where transformation has occurred—whether legal or illegal—the affected areas no longer qualify as CBAs or intact grassland, and this has been factored into turbine siting decisions.
3.				<u>Summary of Turbine Locations Requiring Reconsideration</u>	EAP: Noted. From an avifaunal perspective, following careful consideration of the comments

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				Should DFFE proceed towards authorisation, we strongly recommend the exclusion of the turbines identified in below. • WT 1: KBA, Climate change corridor, within 5km of White-winged Flufftail, • WT 2: KBA, Within 5km of White-winged Flufftail, • WT 3: KBA, Within 5km of White-winged Flufftail, • WT 4: KBA, Climate change corridor, within 5km of White-winged Flufftail, within 5.5 km of Martial Eagle nest. • WT 5: KBA, within 5km of White-winged Flufftail, within 5.5 km of Martial Eagle nest • WT 6: KBA, within 5km of White-winged Flufftail, • WT 7: KBA, CBA, climate change corridor, within 5km of White-winged Flufftail, within 5.5 km of Martial Eagle nest • WT 8: KBA, within 5km of White-winged Flufftail, • WT 9: KBA, within 5km of White-winged Flufftail, within 5.5 km of Martial Eagle nest • WT 10: KBA, within 5km of White-winged Flufftail, within 5.5 km of Martial Eagle nest • WT 11: KBA, within 5km of White-winged Flufftail, within 5.5 km of Martial Eagle nest • WT 12: KBA, within 5km of White-winged Flufftail, within 5.5 km of Martial Eagle nest • WT 13: IBA, Intact grasslands, NPAES, within 5.5 km of Martial Eagle nest • WT 14: IBA, NPAES, within 5.5 km of Martial Eagle nest • WT 15: KBA, within 5km of White-winged Flufftail, within 5.5 km of Martial Eagle nest	received, the Developer has revised the proposed WEF layout with the following adjustments as it relates to these turbine locations: WTG 3 – The turbine is located outside of the Avifaunal Turbine Exclusion Zone. WTG 13 – The turbine is located on the edge of the Avifaunal Turbine Exclusion Zone. WTG 14, 15, 17 and 19 – The turbines are located outside of the Avifaunal Turbine Exclusion Zone. WTG 20 – The turbine has been moved and is now located outside of the Avifaunal Turbine Exclusion Zone. WTG 22 – The turbine has been moved and is now located outside of the Avifaunal Turbine Exclusion Zone. WTG 23 – The turbine has been moved and is now located on the edge of the Avifaunal Turbine Exclusion Zone. WTG 25 – The turbine has been moved and is now located outside of the Avifaunal Turbine Exclusion Zone. Note that for WTG 4, 5, 7, 10, 11, 12 and 15 which are specifically located in High-Risk zones, both compulsory SDoD and diurnal proactive curtailment will be fully implemented on all authorized WTGs throughout the lifespan of the proposed WEF. In addition, for all turbines located in the Medium Risk zones, compulsory SDoD will be fully implemented on all authorized WTGs across the entire project site throughout the lifespan of the proposed WEF.

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				• WT 16: KBA, IBA, Within 5.5 km of Martial Eagle nest • WT 17: KBA, IBA, Within African Grass Owl buffer • WT 19: IBA, Intact grasslands, NPAES, within 5.5 km of Martial Eagle nest • WT 20: IBA, Intact grasslands, NPAES, within 5.5 km of Martial Eagle nest • WT 22: IBA, Intact grasslands, NPAES, within 5.5 km of Martial Eagle nest • WT 23: IBA, Intact grasslands, NPAES, within 5.5 km of Martial Eagle nest • WT 25: IBA, Intact grasslands; climate change corridor, NPAES, within 5.5 km of Martial Eagle nest.	APPLICANT: 5km White-winged Flufftail - WT 2 ,3 ,4 ,5, 6, 8, 9, 10, 11, 12 and 15- We are implementing the buffer zones as recommended by our specialist, based on their expert assessment of habitat suitability, species sensitivity, and site-specific conditions. This approach balances precaution with practical management, ensuring that potential impacts to White-winged Flufftail habitat are mitigated without unnecessarily restricting the project footprint. The specialist-driven buffers provide a targeted, evidence-informed safeguard aligned with the species' conservation requirements. At this stage, the full avoidance approach recommended in the guidelines cannot be implemented without sterilising large portions of the site and compromising the feasibility of the project. Climate change corridor WT 1, 4, 7 and 25 - It should be noted that all the listed WTs are located to the east of Climate Change Corridor, with only 1 or 2 WTs actually within the Climate Change Corridor. All other WTs listed

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					are located within the Climate Change corridor buffer and not within Supporting, Core and Critical Corridors. Further, The climate change corridors on site cannot be fully avoided without sterilising large portions of the project area, making the development unfeasible. Our specialist-driven layout and mitigation measures, including buffers and offset strategies, are designed to minimise impacts while maintaining ecological functionality. This approach ensures that the corridors' connectivity and conservation value are respected within a practical, evidence-informed framework. Furthermore, the proposed renewable energy project will ultimately assist with combatting climate change effects KBA WT1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 15, 16, 17- The Key Biodiversity Areas (KBAs) on site cannot be entirely avoided without rendering large sections of the project area unworkable. While the KBA layer highlights areas of high conservation importance, it does not necessarily require complete avoidance in every instance. Our specialist-informed layout,

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					combined with buffers and offset strategies, is designed to minimise impacts while supporting the conservation objectives of these KBAs, ensuring their ecological importance is managed within a practical, evidence-based framework. IBA WT 13,14, 16, 17, 19, 20, 22, 23 and 25 - The Important Bird Areas (IBAs) on site cannot be entirely avoided without rendering large part of the country unworkable. While the IBA layer identifies critical avifaunal areas, it does not necessarily mandate complete avoidance in all cases. Our specialist-informed layout, together with buffers and offset strategies, is designed to minimise impacts while supporting the conservation objectives of these IBAs, ensuring their ecological importance is managed within a practical, evidence-based framework. NPAES WT 14, 19, 20, 22, 23 and 25 - The NPAES priority expansion areas are recognised for their conservation importance, but the designation itself does not require full

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					avoidance. Our specialist-informed layout, combined with buffers and offset strategies, is designed to minimise impacts while ensuring the ecological objectives of these areas are respected within a practical, evidence-based framework. Intact Grasslands WT 19, 20, 22, 23 and 25 - The site includes intact grassland areas, but the Mpumalanga Biodiversity Sector Plan (MBSP) does not explicitly require full avoidance or prescribe specific management measures. We have avoided these areas as much as possible, and the remaining turbines within the mapped grasslands are those required to make the project feasible, representing the highest-yielding locations. All necessary mitigation measures have been applied, and we are now implementing the biodiversity offset to further manage and enhance the ecological function of these grasslands. The WTGs within mapped intact grasslands are located in already degraded portions of these areas, as advised by the

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					specialist, ensuring minimal additional disturbance to their ecological function. WT 7 – Not located within a CBA, CBA area mapped according to old imagery. WT is clearly on the boundary of a Crop Field which is heavily impact on by agricultural activities:  Martial eagle 5.5km 4, 5, 7, 9, 10, 11, 12, 13, 16, 19, 20, 22, 23, 25 - We acknowledge the BirdLife 5 km and EWT 6 km circular buffers

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					as precautionary tools, but our site-specific data provides a more accurate basis for mitigation. Following the discovery of the Martial Eagle nest, we GPS-tagged the three eagles to understand their movements, which extend 40–60 km from the nest—far beyond the standard buffers. This shows that fixed-radius buffers are overly simplistic and do not protect the eagle across its actual range. Our specialist-recommended, data-driven mitigation strategy is dynamic, predictive, and adaptive, applying measures across the landscape where the eagles actually fly. We therefore support our targeted buffer approach as the most effective way to minimise risk to the Martial Eagle while allowing the project to proceed. SPECIALIST: Refer to separate table. The comments are not giving consideration to the ground truthed findings (for example where it is designated CBA as per MBSP, but in fact it's in the middle of a mielie field).
4.				Closing	

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				In conclusion, the MTPA maintains a strong objection to the proposed Emvelo WEF in its current form. The site overlaps with highly sensitive and irreplaceable biodiversity features—including intact grassland patches, climate change corridors, Critical Biodiversity Areas, KBAs, IBAs, and NPAES priority expansion areas—supporting numerous threatened and endemic species. The avifaunal assemblage present, particularly threatened species such as the White-winged Flufftail, Martial Eagle, Black Harrier, Denham's Bustard, Cape Vulture, and African Grass Owl, places this site among the most sensitive in the province for wind energy development.	We acknowledge the MTPA's detailed concerns and recognise the sensitivity of the site and its biodiversity. As the applicant, we are committed to ensuring a science-based, precautionary approach, and have already undertaken extensive specialist studies, including avifaunal and Oribi assessments, to inform mitigation measures. While some surveys are ongoing or refined during the EIA phase, the proposed mitigation and offset strategies are designed to reduce residual impacts and enhance habitat management. We are actively engaging with landowners to secure and manage offsets, and adaptive management and monitoring will be implemented to respond to evolving ecological conditions. Furthermore, the project aligns with South Africa's energy transition objectives under the National Development Plan (NDP) and Integrated Resource Plan (IRP), contributing to a just energy transition (JET) by providing renewable energy, supporting national climate goals, and enhancing energy security. We remain confident that, with these measures, the project can proceed in a manner that responsibly safeguards the region's biodiversity. Specialist Response: Refer to section 2.2 – Important Bird Areas (IBAs) and IUCN Key Biodiversity Areas (KBAs) above under comments received from MTPA for a detailed response from the avifaunal specialist. Note that several existing wind farms are located in IBAs and KBAs throughout South Africa and as such cannot be used to exclude turbines. Note that Species 23 is now referred to as Species 41 according to SANBI and the National

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					DFFE Screening Tool. Refer to section 2.2 above under comments received from MTPA for a detailed response from the avifaunal specialist. The avifaunal specialist has recommended a comprehensive suite of mitigation measures for all approved turbines. Extensive and stringent mitigation for Martial Eagles in the form of pro-active diurnal curtailment and automated Shutdown-on-Demand (SDOD) will be implemented during periods of expected eagle activity for all approved turbines located in the High-risk zones.
				Our review identifies substantial flaws in the baseline data, methodological approaches, and statistical analyses used in the supporting specialist studies, particularly in the avifaunal assessment. Several models relied upon for impact prediction and mitigation zone delineation are unvalidated, contain spatial biases, or deviate from nationally recognised guidelines. Critical surveys, such as comprehensive Oribi assessments and adequate botanical surveys aligned with SANBI protocols, were not completed. As a result, sensitivity mapping, buffer zones, and mitigation recommendations cannot be considered robust or defensible.	The specialist studies for the WEF followed a systematic, multi-seasonal methodology aligned with national protocols. Avifaunal assessments incorporated four seasons of pre-construction monitoring, SABAP2 datasets, vantage point counts, and species-specific surveys, supplemented by regional data from nearby WEFs. Botanical and faunal surveys were conducted with seasonal relevance and supported by SANBI vegetation maps and biodiversity databases. While limitations are acknowledged, the precautionary principle was applied throughout, and mitigation measures were designed to address any residual uncertainties. The sensitivity mapping and buffer zones are therefore considered robust and defensible within the context of current best practice.
				The proposed mitigation measures—many novel, untested, and potentially unfeasible—are unlikely to adequately reduce the high to very high pre-mitigation risks to acceptable levels. Given the cumulative turbine density in the broader landscape, the unquantifiable long-term impacts	The mitigation strategy for the Emvelo WEF is grounded in multi-seasonal, species-specific data and incorporates internationally recognised best practices. Measures such as Automated Shut Down on Demand (SDoD), dynamic habitat modelling, and turbine exclusion zones are not

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				on species with slow reproductive rates, and the loss of ecological connectivity, residual effects are expected to be severe and potentially irreversible.	only feasible but have been successfully implemented in similar contexts. These interventions are tailored to reduce collision risk, habitat displacement, and cumulative impacts, particularly for species with slow reproductive rates. While residual impacts cannot be entirely eliminated, they are expected to be moderate and manageable with ongoing monitoring and adaptive management as outlined in the Biodiversity Management Plan.
				In light of these factors, the MTPA concludes that the current turbine layout and offset strategy are fatally flawed from both a biodiversity conservation and environmental authorisation perspective. We recommend that authorisation be withheld and that any future proposal for this site be preceded by at least two full years of comprehensive, guideline-aligned monitoring; complete botanical and faunal surveys; and a layout that entirely avoids intact grasslands, key corridors, and critical habitats for species of conservation concern. Only a precautionary, science-based approach can ensure the long-term persistence of the biodiversity assets of this region.	The turbine layout and offset strategy for the Emvelo WEF have been carefully designed to avoid high sensitivity areas and incorporate robust mitigation measures. Only three turbines are located near high sensitivity zones, and these are sited on degraded or marginal habitat with limited conservation value. The offset strategy includes a 1:3 clearing ratio of alien vegetation, which will significantly enhance the ecological integrity of the site. The Environmental Management Programme (EMPr) ensures long-term conservation management across the broader landscape, offering a net biodiversity gain. The precautionary principle has been applied throughout, and the proposed mitigation measures—such as dynamic curtailment and habitat modelling—are science-based and aligned with best practice.
				Please do not hesitate to contact this office if there are any enquiries.	Noted.

TABLE 7-44 COMMENTS FROM BIRDSLIFE SOUTH AFRICA

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
1.	Samantha Ralston Birdslife SA	14 August 2025 Per Email	Revised Draft EIAr	From: Sam Ralston <energy@birdlife.org.za> Sent: Thursday, August 14, 2025 3:19 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Dear Lucien Thank you for the opportunity to review the additional information. While we have not have the capacity to review the revised application in-depth, it is apparent that that many of our previously raised concerns and recommendations have not been addressed. Our previous comments dated 10 April 2025, and our objection to the proposed developments, therefore remain applicable. We would also like to draw your attention the recently published guidelines for Special Species 23, available at the following link. We are concerned that the application is not aligned with these guidelines, which have been endorsed by the DFFE. Please consider those guidelines as additional comment on the applications. Yours sincerely Sam	Dear Sam, I hope this email finds you well. Thank you for your email and response. We acknowledge receipt of your comment and concern; we hereby confirm that they will be addressed and incorporated into the Comments and Responses Report for the proposed development. A formal response to your comments will be provided within that report, which will form part of the Final EIA submission to the DFFE. Kind Regards.

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				The applicant note's Birdlife SA's email (from Sam Ralston-Paton) to the EAP on 14 August 2025, stating that BLSA would like to "draw your attention the recently published guidelines for Special Species 23, available at the following link". It's not clear exactly when these guidelines were officially released by BLSA, and both the applicant and the avifaunal specialist have only recently become aware of them, long after the completion of the Impact Assessments and Specialist reports for this project. The retrospective application of guidelines can be challenging and can add significant delays to the developers project. These guidelines recommend large blanket buffers, which seems to be counterproductive to the development of much needed renewable energy in Mpumalanga. Furthermore, it must be stated that these are merely guidelines, and the guideline document itself has the following disclaimer (owe emphasis added) "*The content is provided for informational purposes only and does not constitute legal or financial advice. Users should exercise their own judgment and, when appropriate, consult with qualified professionals before implementing any recommendations. Neither the authors nor their affiliated organisations shall be liable for any direct, indirect, incidental, consequential, special, or exemplary damages resulting from the use or misuse of the information contained in this document. The information provided is based on knowledge available at the time of writing and may not reflect current best practices or regulatory requirements. This disclaimer may be updated periodically without notice. By using this document, you agree to hold harmless and indemnify the authors and their affiliated organisations from any claims arising from your use or reliance on the information contained herein*." The applicant is not bound to follow this guidance, and in the absence of the guidelines during the Scoping and EIA phase of the project timeline, the applicant has consulted accordingly with qualified professionals, to conduct studies on this species and provide appropriate avoidance areas and recommendations. The avifaunal specialist has conducted extensive and detailed habitat modelling, as well as in situ camera and acoustic surveys for the species, and has recommended site specific, no-go areas and buffers, based on a detailed examination of the site. Furthermore, species specific mitigation has been recommended for WWFT, in that turbines will need to have curtailment at key breeding times when flight activity of this species might be possible. We believe this mitigation, combined with the avoidance of specific areas discussed above, is an effective preventive and

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				cautionary approach, that will allow development and conservation of this important species to co-exist. It is also unfortunate, that these guidelines (and the extensive no-development buffers recommended by them), don't appear to have been consulted upon with the renewable or wind energy industry in a formal Public Participation process. This is unusual, as BLSA has previously extensively consulted SAWEA and developers on other species and wind energy specific guidelines. The applicant is unaware of any such consultation with industry during the preparation of these guidelines. This is concerning, especially at a time when the Just Energy Transition is so important for the country, and that BLSA is well aware of the focus on the Development of possible Wind Energy in Mpumalanga by developers, for various reasons including the JET, suitable resource as well as current and future grid capacity. It should also be noted that Species 23 has recently been downlisted to Endangered, and is no longer Critically Endangered.	

TABLE 7-5 COMMENTS RECEIVED FROM BIRDLIFE SA SPECIALIST RESPONSES

No.	Comment	Responses
	Receiving Environment	
	The proposed developments overlaps with critical habitats, including Intact Grassland Patches, Critical Biodiversity Areas (CBAs), Climate Change Corridors, National Protected Area Expansion Strategy (NPAES) areas, and Key Biodiversity Areas (KBAs), wetlands and the escarpment (the latter is used by birds for altitudinal and north-	Specialist Response: Noted. The sensitivity of the site and area in general is noted and recognised in terms of the number of sensitive avifaunal species. The degradation of the landscape as a result of current unsustainable farming practises of overgrazing the grasslands and wetlands, as well as the alien tree

	south migrations). The area supports numerous species of conservation concern, including bird that are at risk of direct fatalities (e.g., collisions and electrocutions), habitat loss, and disturbance. We are therefore concerned that this site is not suitable for wind turbine and associated infrastructure.	infestation should be highlighted. The developer commits to implementing numerous mitigation measures and to embark on extensive land management issues to minimise anthropogenic impacts.
	Avifaunal Impact Assessment – Data Collection	
	The duration and scope of data collection for the avifaunal assessments appear inadequate given the sensitivity of the habitats and the spices they support. BirdLife South Africa and the Endangered Wildlife Trust (EWT)'s Best Practice Guidelines and our Cape Vulture guidelines recommend increased survey effort in areas of high avifaunal sensitivity. The sites have been confirmed as such by the avifaunal specialist.	Specialist Response: Noted. The Guidelines require a minimum of four surveys over a period of a year (12 months) covering four seasons. Pre-construction monitoring data collected at both the Emvelo and Sheepmoor WEF sites include a dataset covering a period of approximately 18 months (February 2022 to August 2023) with additional surveys done adding approximately five more months to the dataset (from October 2023 to February 2024). These additional surveys were done to cover the expanded WEF and EGI development footprints as well as additional targeted Martial Eagle monitoring during which time all other bird species were also recorded across the entire project site. In addition, from December 2024 to February 2025 additional targeted wetland surveys were conducted with special focus on Species 23 and again all other bird species were also recorded across the entire project site during this time. Furthermore, the risk to vultures were confirmed to be low; therefore, the claim made in terms of the Cape Vulture Guidelines regarding increased survey effort is considered unsubstantiated. We are therefore of the opinion that the onsite monitoring dataset is

		sufficiently robust and considered adequate given the avifaunal sensitivity on site. Note that Species 23 is now referred to as Species 41 according to SANBI and the National DFFE Screening Tool.
	While the location of vantage points is provided, there is no indication of view-sheds, and it is unclear what proportion of turbines were covered by vantage point surveys.	Specialist Response: Noted. For the Emvelo WEF, only 4 out of 24 proposed WTG locations fell outside the 2 km radii of the vantage point surveys, whereas for the Sheepmoor WEF, also only 4 out of 29 proposed WTG locations were located outside the 2 km radii of the vantage point surveys. Therefore, the total site area surveyed during pre-construction bird monitoring covered about 105 km^2 out of the approximately 143 km^2, translating to about 73% reporting coverage of the entire Amsterdam WEFs project site. Some factors influenced the reporting coverage through vantage point surveys such as i) the development footprint for each WEF kept changing during the pre-construction monitoring period, and ii) additional land was added to the project area mid-way through the pre-construction monitoring period. As a result, additional effort was made to include additional surveys in the area in general beyond the first year of pre-construction monitoring as well as the recording of additional flight data of all incidental observations supports the slightly below average reporting coverage via vantage point surveys.
	Cumulative Impacts	

	Limiting cumulative assessment to a 35 km radius is inappropriate for wide-ranging species - i.e. most birds. A more ecologically relevant approach is needed	Specialist Response: Noted. The specialist was required to assess all cumulative impacts within a 30 km radius of the proposed Amsterdam WEF cluster as provided by the EAP. From a specialist perspective, a radius of at least 50 km would have been considered a more ecologically relevant approach, hence why the Avifaunal Impact Assessment considered all cumulative impacts within a slightly increased radius of up to 35 km based on available information provided to the specialist at the time of assessment.
	Species 23 (Critically Endangered)	
	We are concerned about potential degradation of wetlands associated with the developments, including habitat for Critically Endangered Species 23. We are particularly concerned where MV cabling is proposed to traverse a wetland (marked as a no-go area). It is unclear whether the cable will be buried or above ground; neither option is supported due to collision risk (above ground) and habitat degradation (below ground).	Specialist Response: Noted. This MV cable has been removed from the revised WEF layout completely and no longer traverses Species 23 habitat. Also, project related infrastructure avoids all wetlands as well as the identified Species 23 habitat. Wetland functioning is set to improve through proper grazing regimes and onsite remediation. Note that Species 23 is now referred to as Species 41 according to SANBI and the National DFFE Screening Tool.
	We acknowledge the thought and analysis that went into developing the proposed mitigation strategy for Species 23 but are concerned that the proposed avoidance and mitigation measures are not sufficiently precautionary.	Specialist Response: Noted. The mitigation strategy proposed for Species 23 is designed to be both precautionary and adaptive, leveraging high-resolution, near real-time data sources to inform turbine curtailment decisions during the species' active season. The use of dynamic habitat modelling based on updated satellite imagery, rainfall patterns, and soil moisture conditions provides a proactive mechanism to

		anticipate wetland activation and potential habitat use. This approach offers temporal resolution beyond static or pre-season assessments, ensuring that turbines in the medium-risk mitigation zone are curtailed specifically when habitat conditions become suitable for Species 23. In addition, the integration of drone-based structural assessments and vegetation productivity monitoring allows for localized ground-truthing and improves predictive accuracy of habitat suitability. Night-time curtailment is automatically triggered during periods of confirmed habitat favourability between October and March, aligning with the species' life history requirements. Further precaution is embedded in the detailed engineering design phase (or proposed pre-operational research phase) prior to construction, which includes tracking movement and flight height of Species 23. These data will be used to refine model thresholds and potentially extend or adjust curtailment periods as needed. Should ongoing monitoring indicate a higher-than-expected risk, curtailment protocols can be intensified or spatially expanded. This strategy ensures that mitigation is not static but instead responds to actual habitat conditions and species activity, thereby balancing ecological protection with operational feasibility in a scientifically defensible manner. Note that Species 23 is now referred to as Species 41 according to SANBI and the National DFFE Screening Tool.

	In light of the to the limited data on the species of its movement patterns and collision risk, we do not support the location of turbines in any of the medium sensitivity areas identified for the species in the avifaunal assessment.	Specialist Response: Noted. The rigorous mitigation strategy includes a systematic approach, where wetland condition monitoring and observation of catchment level rainfall events offer sufficient warning for night-time proactive turbine curtailment. The system's precision will be improved through further research on the movement patterns and flight height of Species 23 prior to the WEFs becoming operational, to which the developer has already committed to undertake. Furthermore, WTG7 has been removed from the Species 23 Very High Sensitivity No-Go area based on the revised WEF layout. It is the specialist's opinion that the mitigation strategy proposed for Species 23 is sufficient. Note that Species 23 is now referred to as Species 41 according to SANBI and the National DFFE Screening Tool.
	Additional comments on the proposed curtailment strategy are detailed below.	
	Martial Eagle (Endangered)	
	The avifaunal assessment uses various data sources to predict how Martial Eagles use the area, but the basis for the final buffer recommendations is unclear. For example, a 2.5 km no-development buffer is recommended, despite the report's own vantage point surveys suggesting 3 km may be more appropriate.	Specialist Response: Noted. Additional Vantage Point monitoring was conducted near the identified Martial Eagle nest to gain a better understanding of flight behaviour. Five additional targeted surveys were conducted, in addition to the seven surveys completed as part of the pre-construction monitoring recorded during February 2022 to August 2023. The five additional targeted surveys were conducted during the following time envelopes: • 17–22 October 2023 • 15–23 November 2023 • 30 November–05 December 2023

		• 17–22 January 2024 • 14–20 February 2024 A total of 60 hours of Vantage Point watches were completed to record flight patterns of Martial Eagles as well as other priority species. Observations were primarily concentrated in the vicinity of the Martial Eagle nest, but where feasible, the eagles were followed to collect as much flight data in the landscape around the nest as possible. The flight risk model developed is based on the extensive flight data (60+ hours) collected on-site. The model output has been refined using tracking data, which indicated that the majority of tracked flight activity (up to about 75% of recorded Martial Eagle flight time) was concentrated within an approximately 3 km buffer zone surrounding the nest.
	Tracking data from a single adult and one juvenile was used to model habitat use and define high and medium sensitivity zones (turbine collision). However, as far as we can ascertain, the model was based on less than a year's worth of data and does not account for interannual variation, seasonal use, alternative nest sites, or sex-based behavioural differences. Furthermore, the criteria used to define high, medium, and low/no sensitivity areas are not transparent. It is also unclear whether other relevant data (e.g., territory size and tracking data from other studies) were considered and how this influenced the recommendation.	Specialist Response: Noted. The flight risk model and sensitivity zonation for Martial Eagle were developed using a combination of tracking data, focused field observations, and high-resolution environmental predictor variables. While the model incorporates GPS data from one adult (13 months, 6380 transmitted locations) and one juvenile individual (5 months, ~1450 transmitted locations) at the project site, it also includes tracking data (12 months, ~5850 transmitted locations) from a second adult male Martial Eagle monitored at a comparable highland grassland site. This second dataset extended to approximately 12 months and

	While we support refining circular buffers with more robust, site-specific data, we are concerned that the proposed buffer is significantly smaller than the 5–6 km buffer recommended by BirdLife South Africa and EWT. Although available studies in this regard are limited, this buffer is based on the best available data on territory size.	exhibited a remarkably similar spatial use pattern, which is included in the figures reporting on space use. Together, these datasets provided a robust basis for assessing spatial flight activity in relation to nest proximity and landscape features. In addition to the tracking data, over 37 hours of direct Martial Eagle flight observations were recorded near the nest site during 60 hours of targeted pre-construction surveys. This effort produced a substantial dataset of localized flight behaviour, which was used to train a flight risk model (FRM) using an artificial neural network (ANN). The ANN was developed using a suite of predictor variables representing topography and focal site characteristics (distance from nest, perch sites, etc.). This enabled a data-driven approach to modelling spatial risk beyond traditional buffer methods. Regarding the delineation of high and medium sensitivity zones: the original high-risk zone (~80 km²) closely mirrors the area of a 5 km circular buffer recommended by BirdLife South Africa and EWT. However, based on the tracking and observation data showing that ~75% of recorded activity occurred within 3 km of the nest, a more precautionary Very High Risk zone (~31 km²) was delineated, within which no wind turbines will be permitted. The Medium Risk zone (~148 km²) now incorporates a more stringent mitigation regime than conventional practice, including both automated Shutdown-on-Demand (SDoD) and dynamic diurnal curtailment during periods of expected eagle activity.

		Importantly, the risk classification framework was not adjusted to reduce turbine constraints, but rather to reflect biologically informed risk thresholds derived from empirical data. The risk model thresholds themselves remained unchanged; what changed was the delineation of more conservative spatial zones to better reflect the observed space use and mitigate risk more effectively. While we acknowledge the limitations inherent in working with a small sample size — which is a known challenge for this species — the modelling approach integrates multiple lines of evidence and has prioritized precaution in delineating turbine exclusion zones and mitigation areas. The intent is to implement a risk-responsive mitigation hierarchy that reduces potential collisions. Refer to Section 5.8.7.1 of the updated Avifaunal Specialist Report for additional information on Martial Eagle tracking data considered in this study.
	Southern Bald Ibis (Vulnerable)	
	A shaped turbine exclusion zone was delineated in the avifaunal reports, based on modelled flight activity for Southern Bald Ibis. Again, we request clarity on how the thresholds for the sensitivity zones (i.e. between high, medium, and low/no sensitivity) were defined.	Specialist Response: Noted. The delineation of the turbine exclusion (sensitivity) zones for Southern Bald Ibis (SBI) was based on a continuous flight risk surface derived from flight data and spatial modelling of flight behaviour around known roost and colony sites. To define the risk categories (High and Medium), we applied an empirical thresholding approach informed by observed flight density patterns.

		Specifically, the High Risk zone was delineated to encompass the core 70% of modelled flight activity, with a target of including at least 70% of all recorded SBI flight points surrounding known roosts and colonies. The final High-Risk Zone achieved coverage of approximately 75% of all observed flights, slightly exceeding the target to ensure conservative spatial buffering around high-use areas. The Medium Risk zone was extended outward to capture a broader range of movements, aiming to encompass over 80% of recorded SBI flights. The final modelled zone covered approximately 79% of all flight data, offering a precautionary yet data-driven buffer beyond the core area. This tiered thresholding strategy attempted to reflect biologically meaningful space use given available recorded data. These zones were not arbitrarily defined, but rather derived directly from spatial correspondence between observed flight patterns and modelled risk predictions.
	Cape Vulture (Endangered)	
	We are concerned that the impact assessments underestimates the risk of Cape Vulture fatalities. Our recent review of operational monitoring reports (BirdLife South Africa 2025) shows that vulture collisions occurred even at sites where the species was rarely or never recorded during monitoring surveys. We are therefore of the opinion that the recorded observation of one vulture a week is sufficient to warrant the implementation of shutdown-on-demand (SDoD) for all proposed turbines.	Specialist Response: Noted. The implementation of SDoD can be an effective mitigation measure to prevent the risk of Cape Vulture fatalities. SDoD will be fully implemented on all authorized WTGs throughout the lifespan of the proposed WEF. The Avifaunal Specialist Report has been updated to include the following compulsory mitigation measures as recommended for inclusion in the EMPr: 1. All wind turbine generators (WTGs) – located in both ‘high risk zones’ and 'medium risk

		zones' - must be subjected to SDoD, which must include Automated SDoD (camera and radar) to accommodate misty conditions and night flying species, as well as proactive curtailment based on environmental and weather conditions. 2. SDoD and radar technology must be in operation at the onset of commercial operation date (COD). 3. SDoD success must be monitored throughout the lifetime of the facility, where monitoring data during operation will continuously inform the SDoD needs for each turbine. 4. The requirement of a comprehensive diurnal and nocturnal Shut Down on Demand (SDoD) programme must be included in the EMPr, post–EA (should such EA be granted) during the detailed design phase prior to construction. Specific details of the SDoD programme will be included in a comprehensive Biodiversity Management Plan (BMP) which will be developed and implemented prior to the commercial operational date of the facility.
	Yellow-breasted Pipit (Vulnerable)	
	Turbines and roads have been proposed within Yellow-breasted Pipit habitat, contrary to the avifaunal specialist's recommendations. We do not support this.	Specialist Response: Noted. All WTGs were removed from Yellow-breasted Pipit habitat with the exception of WTG 23 that still appears to be fringing on a high-risk area as identified for the Yellow-breasted Pipit. It is recommended that this turbine position be reconsidered following the avifaunal walkthrough, post-EA (should such EA be granted) prior to construction. Also,

		according to the revised WEF layout, a few proposed access roads still transect Yellow-breasted Pipit habitat where these roads follow existing gravel roads occurring on site.
	We also suggest that there should be greater commitment to avoid and conserve the remaining habitat of this species.	Specialist Response: Noted. All wind turbines (WTGs) were removed from the Yellow-breasted Pipit habitat, except for WTG 23, which still appears to encroach upon a high-risk area identified for the species. It is recommended that this turbine position be reconsidered following the avifaunal walkthrough, post-EA (should such EA be granted) prior to construction. To promote conservation of the remaining, Yellow-breasted Pipit habitat, alien clearing and rehabilitation of natural grasslands will benefit all grassland bird species within the development footprint as well as in the larger area. An extensive conservation stewardship and habitat restoration and management programme is being developed that will form part of the operational management of the WEF. The implementation of extensive and stringent mitigation measures will ensure that avifaunal species potentially attracted to these habitats receive adequate protection.
	Other Species at Risk	
	The ecological importance of intact grassland patches for birds (e.g. Endangered Secretarybird) is not sufficiently acknowledged in the assessment.	Specialist Response: Noted. The current conservation status of Secretarybirds is locally Vulnerable. The grassland habitat in the area is of importance for numerous of the priority species and species of conservation concern that occur in the area. The site ecological importance in terms of grassland has been rated as medium. Grassland areas of importance have been

		avoided from both an avifaunal as well as a terrestrial biodiversity perspective.
	At least 32 priority bird species were recorded in the project area of influence, and more within the powerline corridor. However, sensitivity maps were only produced for a few of these species. It appears that the assumption is that the overlap in mitigation/avoidance zones for the handful of key species will cover the others. However, this is not made explicit and may give the false impression that only the mapped species are at risk.	Specialist Response: Noted. The sensitivity of the site is duly recognised. Several species share specific sensitive habitat types e.g. grasslands and wetlands and will collectively benefit from avoidance areas delineated for specific species. Although sensitivity maps were only generated for specific species it must be noted that all species of conservation concern and priority species will be SDoD trigger species. Low detection probability species and nocturnal or smaller species will be offered protection through selective proactive curtailment and other innovative mitigation strategies.
	Similarly, collision risk modelling was only conducted for a few species, likely due to limited data (see above regarding concerns about data limitations).	Specialist Response: Noted. Our Collision Risk Modelling (CRM) approach follows the Bayesian framework developed by New et al. (2015), which explicitly incorporates uncertainty by using prior distributions informed by the best available biological and empirical data, and updates these with site-specific pre-construction survey data. This model structure is transparent and repeatable and has been successfully implemented in both international and local contexts. Initially, CRM outputs were generated for five high-priority species: Martial Eagle, Southern Bald Ibis, Cape Vulture, Yellow-breasted Pipit, and Species 23. However, we have expanded the CRM analysis to include all wind priority bird species. Where robust species-specific data were available (e.g., bird exposure rates, collision probabilities),

		these were used directly to inform the prior distributions of the model. For species with limited or no local/regional empirical data, ecologically relevant surrogate species were used. Surrogates were selected based on comparable morphology, flight behavior, habitat use, and foraging strategy, in line with best practice guidelines. This ensures that all priority species are accounted for in the CRM, even in data-poor scenarios, while maintaining biological realism and precaution. The core principle of our CRM is to assess predicted fatalities based on three key parameters: (1) bird exposure (flight minutes within turbine space), (2) collision probability (chance of being struck while within the rotor-swept zone), and (3) the hazardous footprint (spatial-temporal turbine risk volume). The Bayesian structure allows for continuous improvement of predictions as additional monitoring data become available, enabling updates to fatality estimates and mitigation strategies within an adaptive management framework. Note that Species 23 is now referred to as Species 41 according to SANBI and the National DFFE Screening Tool.
	Mitigation Against Bird Strikes – Shutdown on Demand (SDoD)	
	SDoD is recommended for medium sensitivity areas, yet the (applicants') "preferred" alternative includes turbines within high sensitivity zones. If such turbines are approved (which we do not	Specialist Response: Noted. Diurnal and nocturnal SDoD will be fully implemented on all authorized WTGs throughout the lifespan of the proposed WEF. The Avifaunal Specialist Report

	support), SDoD should be extended to those areas as well.	has been updated to include the following compulsory mitigation measures as recommended for inclusion in the EMPr: 6. All wind turbine generators (WTGs) – located in both 'high risk zones' and 'medium risk zones' - must be subjected to SDoD, which must include Automated SDoD (camera and radar) to accommodate misty conditions and night flying species, as well as proactive curtailment based on environmental and weather conditions. 7. SDoD and radar technology must be in operation at the onset of commercial operation date (COD). 8. SDoD success must be monitored throughout the lifetime of the facility, where monitoring data during operation will continuously inform the SDoD needs for each turbine. The Shut Down on Demand (SDoD) programme must be developed and included in the EMPr, post–EA (should such EA be granted) during the detailed design phase prior to construction. Specific details of the SDoD programme will be included in a comprehensive Biodiversity Management Plan (BMP) which will be developed and implemented prior to the commercial operational date of the facility. In addition, note that the SDoD implementation will entail systems capable of curtailing turbines during daylight hours based on species level identification. Also, all turbines will be subjected to several tiers of mitigation that include seasonal night time proactive curtailment for Species 23 (from dusk to dawn), daylight

		proactive curtailment at high-risk periods for specific turbines in relation to known high risk periods for Martial Eagle flight activity, and night time radar SDoD for nocturnal species such as flamingos. Blade patterning will also be fully implemented on all WTGs. Note that Species 23 is now referred to as Species 41 according to SANBI and the National DFFE Screening Tool.
	Several species recorded on site were not mapped for sensitivity but are likely to be at risk of collisions (e.g. Secretarybird and Cape Vulture). SDoD should therefore be applied to all turbines.	Specialist Response: Noted. SDoD will be fully implemented on all authorized WTGs throughout the lifespan of the proposed WEF. The Avifaunal Specialist Report has been updated to include the following compulsory mitigation measures as recommended for inclusion in the EMPr: 1. All wind turbine generators (WTGs) – located in both 'high risk zones' and 'medium risk zones' - must be subjected to SDoD, which must include Automated SDoD (camera and radar) to accommodate misty conditions and night flying species, as well as proactive curtailment based on environmental and weather conditions. 2. SDoD and radar technology must be in operation at the onset of commercial operation date (COD). 3. SDoD success must be monitored throughout the lifetime of the facility, where monitoring data during operation will continuously inform the SDoD needs for each turbine. 4. The Shut Down on Demand (SDoD) programme must be developed and included in the EMPr, post-EA (should such EA be granted) during the detailed design phase

		prior to construction. Specific details of the SDoD programme will be included in a comprehensive Biodiversity Management Plan (BMP) which will be developed and implemented prior to the commercial operational date of the facility. Note that blade patterning will be applied to all authorised WTGs and diurnal proactive curtailment for Martial Eagles will also be fully implemented within high risk zones.
	The EIA and EMPrs suggest either observer-led or automated (radar or camera) SDoD should be implemented - implying that just one of these approaches will be adequate. However, a combination of approaches, tailored to the behaviour of all priority species at risk may be required. For example, radar would benefit large night-flying species (e.g., flamingos, owls) and those that fly in misty conditions, while camera-assisted SDOD is more suited for large soaring birds (e.g., eagles) that move during the day. Observer-led SDOD on would benefit species that spend time on the ground (e.g., Secretarybird and Southern Bald Ibis), that, when they do fly, may not be detected by technology in time to shut turbines down.	Specialist Response: Noted. Compulsory diurnal and nocturnal SDoD, both observer-led and/or automated (radar and/or camera) will be fully implemented on all authorised WTGs throughout the lifespan of the proposed WEF.
	In light of the above, we suggest that more detail is needed with regards to required approach to SDOD, including the spatial and temporal coverage, trigger species, and operational protocols for implementation.	Specialist Response: Noted. Automated SDoD will be implemented on all turbines at both WEF facilities. The SDoD implementation will entail systems capable of curtailing turbines during daylight hours based on species level identification. Also, all turbines will be subjected to several tiers of mitigation that include seasonal night time proactive curtailment for

		Species 23, daylight proactive curtailment for Martial Eagles at high-risk periods for specific turbines, and night time radar SDoD for nocturnal species such as flamingos. Note that Species 23 is now referred to as Species 41 according to SANBI and the National DFFE Screening Tool.
	Mitigation – Curtailment	
	With regards to reducing collision risk for Species 23 (which is too small to benefit from SDoD), the proposal to curtail operations at night based on habitat suitability monitoring does not offer adequate protection.	Specialist Response: Noted. Rallids (and Species 23) are predominantly confined to wetland habitats with dense cover during daylight hours, reinforcing our confidence that the 350m wetland buffer will provide effective protection for these birds. When flushed, their daytime flights are brief—covering only a few meters—and remain low to the ground, never exceeding a few meters in height. During nighttime, when longer distance flight activity becomes a possibility, a comprehensive proactive turbine curtailment strategy will be implemented for the entire duration of the summer season. Every turbine within the mitigation zone will be shut down during the night while the birds are present, significantly reducing (if not entirely eliminating) the likelihood of collisions and ensuring their safety. We believe that curtailing the turbines at night, as per the rigorous mitigation strategy proposed, will provide Species 23 with adequate protection against collision risk. Furthermore, it is commonly known that rallids and other waterbirds such as Species 23 that are known to migrate (local, seasonal, or palearctic) do so primarily at night to conserve energy, avoid

		predators and to use the stars for navigation. Given our knowledge and understanding of Species 23's ecology, it is strongly believed that this species would exhibit similar behaviour and hence the proposed mitigation strategy would provide adequate protection. Note that Species 23 is now referred to as Species 41 according to SANBI and the National DFFE Screening Tool.
	Movements likely occur between wetlands as conditions change—often faster than the proposed 7–14-day monitoring interval, and while it is commonly assumed that the species only moves at night, there is no data to verify this assumption yet.	Specialist Response: Note that the satellite imagery is updated weekly, therefore the frequency of checking these datasets cannot be increased; however, the proposed mitigation strategy prescribes the onsite implementing of hydrometric equipment that would measure the ambient conditions (such as soil moisture, temperature, etc.) on an hourly basis. Therefore, changes in the local weather parameters will be detected much more frequently than at a 7-14 day interval. Wetland monitoring at the onset of spring / summer will be conducted more frequently, and regional rainfall patterns will also be monitored in order to determine when conditions become or are likely to become suitable for the species. At such time, the facilities will be required to curtail all turbines located within the identified medium risk Species 23 habitat connectivity corridors at night i.e., from dawn to dusk. The following turbines at each facility are affected: Emvelo WEF: WTGs 5, 13, 15, 19, 20, 23, 25 Sheepmoor WEF: WTGs 26, 27, 28, 29, 44, 45

		Refer to Table 11 in section 6.3.2 as well as Appendix 7 (EMPr inputs) of the updated Avifaunal Specialist Reports. Note that Species 23 is now referred to as Species 41 according to SANBI and the National DFFE Screening Tool.
	We are further concerned that much simpler operational phase mitigation measures have failed at wind farms elsewhere in South Africa. The complexities and expertise required for this "smart" curtailment presents a risk of poor implementation and an inability of officials to ensure and, if necessary, enforce compliance.	Specialist Response: Noted. The Developer themselves will construct and operate the proposed two WEFs and is therefore committed to implementing the specialist's recommended mitigation measures and management actions as underpinned by the conditions of the Environmental Authorisation (EA) (should such EA be granted), and as such the proposed mitigation strategy is therefore enforceable.
	Given our limited understanding of this species' movement patterns and risk of collisions we do not support turbines in any medium sensitivity areas identified for this species. Alternatively, we suggest that a risk averse, precautionary approach would be full seasonal curtailment of turbines in medium risk areas during summer.	Specialist Response: Noted. All turbines avoid very high and high sensitivity areas identified for Species 23. For WTGs 5, 13, 15, 19, 20, 23, 25, 26, 27, 28, 29, 44 and 45 that are located within medium sensitivity areas i.e., habitat connectivity corridors identified for Species 23 will be subjected to a rigorous nocturnal proactive curtailment strategy during summer (i.e., from dusk to dawn) to reduce and mitigate any potential risk those turbine positions could possibly pose on Species 23. Note that Species 23 is now referred to as Species 41 according to SANBI and the National DFFE Screening Tool.
	Mitigation – Other Measures	

	The EIA and EMPr mention adaptive management strategies should be implemented if fatality thresholds are exceeded. However, no such thresholds are defined.	Specialist Response: Noted. The avifaunal specialist report has been updated to include Potential Biological Removal (PBR) and Collision Risk Model (CRM) results calculated for all priority species recorded on site. CRM values that take the effectiveness of avoidance and mitigation measures into account have been used to calculate the PBR as a percentage value for each priority species. This value is then considered to serve as the annual fatality threshold value per species as it relates to turbine collisions per site. If these annual fatality thresholds are potentially exceeded during operations the prescribed mitigation strategy will be improved and refined. Refer to Section 5.8.8 of the updated Avifaunal Specialist Report.
	In the absence of robust figures, we recommend a zero-fatality target for threatened and demographically sensitive species. Exceeding this should trigger further mitigation if available data suggests that	
	We are exceptionally concerned that there are currently no proven, additional mitigation options beyond curtailment, or stopping turbines entirely. This would have significant cost implications for the operator. This open-ended recommendation introduces a significant degree of risk and uncertainly for the applicant, as well as biodiversity. There should be clear parameters defined and budget set aside accordingly.	Specialist Response: Noted. If the calculated annual fatality thresholds for these WEFs are potentially exceeded during operations, the prescribed mitigation strategy will be improved and refined. For example, the automated SDoD species level identification algorithm might need to be improved or retrained for the specific species or more camera systems with better viewsheds might be required.
	Operational Phase Monitoring	
	Given the site's sensitivity and risk to birds species of conservation concern, monitoring requitements should be more detailed and species-specific. For example: a. Carcass surveys should be tailored to detect fatalities for Species 23 and other small	Specialist Response: Noted. The Avifaunal Specialist Report has been updated to include more species-specific detail regarding both monitoring to assess impacts and the implementation of stringent Post Construction Fatality Monitoring at the facility.

	species (e.g., Yellow-breasted Pipit) in addition to large birds, b. Surveys should be designed to detect displacement, disturbance, and habitat alteration for priority species. c. Carcass surveys must continue for the facility's lifespan to evaluate SDoD and curtailment effectiveness.	
	Operational Phase EMPr	
	Fatality thresholds must be clearly defined to avoid ambiguity.	Specialist Response: Noted. The Avifaunal Specialist Report has been updated to include Potential Biological Removal (PBR) and Collision Risk Model (CRM) results calculated for all priority species recorded on site. CRM values that take the effectiveness of avoidance and mitigation measures into account have been used to calculate the PBR as a percentage value for each priority species. This value is then considered to serve as the annual fatality threshold value per species as it relates to turbine collisions per site. If these annual fatality thresholds are potentially exceeded during operations the prescribed mitigation strategy will be improved and refined. Refer to Section 5.8.8 of the updated Avifaunal Specialist Report.
	We suggest that the operational EMPr, specifically the mitigation actions included in the avifaunal management plan should be reviewed at least every five years. Stakeholders should be provided an opportunity to provide input into any changes.	Specialist Response: Noted. Appendix 7 and 8 of the Avifaunal Specialist Report has been updated accordingly to include this recommendation as a condition in the EMPr.

	Operational phase EMPr compliance, including avifaunal management plan, should be audited annually.	Specialist Response: Noted. Appendix 7 and 8 of the Avifaunal Specialist Report has been updated accordingly to include this recommendation as a condition in the EMPr.
	All avifaunal monitoring and audit reports should be made publicly available and shared with BirdLife South Africa.	Specialist Response: Noted. Appendix 7 and 8 of the Avifaunal Specialist Report has been updated accordingly to include this recommendation as a condition in the EMPr.
	Conditions of authorisation	
	We are concerned that the proposed conditions of authorization relating to impacts on birds are weak, particularly with regard to monitoring and mitigating operational phase impacts. While the EMPrs play an important role, many requirements can be lost in the detail of these vast documents. Critical recommendations should be highlighted in the EA and detailed in the EMPr.	Specialist Response: Noted. Section 8.3 of the Avifaunal Specialist Reports have been updated to include specific conditions relating to the implementation of recommended and required mitigation measures and management actions as it relates to potential Avifaunal impacts.

TABLE 7-6 COMMENTS AND RESPONSE TABLE FOR IAPS ON REVISED DRAFT EIA PHASE (14 JULY 2025- 15 AUGUST 2025)

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				General Comments	
	Mervyn Lotter MTPA	15 July 2025 (Email)	Revised Draft EIA phase	From: Mervyn Lotter <Mervyn.Lotter@mtpa.co.za> Sent: Tuesday, July 15, 2025 6:54 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Celia de Waal <celia@mtpa.co.za>; Khumbelo Malele <Khumbelo.Malele@mtpa.co.za>	Hi Mervyn, I hope this email finds you well. Thank you for reaching out; kindly receive the KML files as requested.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Dear Stephanie Please could you provide me with a KML file of the latest placement of the turbines and associated infrastructure? Thank you. Regards Mervyn	Please reach out should you need any further information or clarification. Kind Regards Attachments kmz • Amsterdam Layout • Emvelo DEIAr kmz • Sheepmoor DEIAr kmz
	Josua Meyer	16 July 2025	Revised Draft EIA phase	From: Josua Meyer <meyerjosua55@gmail.com> Sent: Wednesday, July 16, 2025 11:58 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Richard Summers <richard@summersinc.co.za> Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province EXTERNAL MESSAGE Goodday me. Gopaul It appears that the specialist report for Sheepmoor WEF was duplicated under Emvelo WEF. Could not find specialist reports for Emvelo WEF. Please check and rectify if needed. Thanks Josua Meyer	Dear Mr Josua Meyer, Kindly see updates to the website, easy access to website using below link: https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/ Regards,

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
	Robyn Luyt DARDLEA	16 July 2025	Revised Draft EIA phase	From: Robyn Luyt <rluyt@mpg.gov.za> Sent: Wednesday, July 16, 2025 11:15 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com> Cc: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; mervyn@mtpa.co.za Subject: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Importance: High EXTERNAL MESSAGE Good day Stephanie and Lucien, 1. Please provide links to the full Public Participation Reports for both Emvelo and Sheepmoor. Only the cover pages for the public participation reports are available. 2. You have stated that the public comment period is from 15 July to 14 Aug. However it seems you have not accounted for the public holiday on 9 Aug, which would mean that the 30 day comment period ends on 15 Aug. However the 30 comment period should only commence when we have access to the full reports (ie. we await the public consultation reports). 3. It is our understanding - based on the meeting that was held in Nelspruit - that the layouts have changed. Please urgently provide the shapefiles, which we require to undertake our review. Shapefiles to include turbines and all infrastructure. Kind Regards Robyn	Hi Robyn Thanks for your message. 1.The full Public Participation Reports for Emvelo and Sheepmoor are available on the website now — kindly do check again. Let us know if you still can't access them. https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/ 2. We've extended the comment period by one day, so it now ends on 15 August 2025. A notice will be sent out shortly. 3. Please see the attached updated layout and shapefiles, including all turbines and infrastructure. Let us know if you need anything else. Regards Attachments kmz • Amsterdam Layout • Emvelo DEIAr kmz • Sheepmoor DEIAr kmz
	Celia de Waal MTPA	16 July 2025	Revised Draft EIA phase	From: Celia de Waal <celia@mtpa.co.za> Sent: Wednesday, July 16, 2025 2:46 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Frans Krige <frans@mtpa.co.za>	Good morning, Cecilia, Thank you for your request.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Good afternoon Kindly send us, the MTPA a hard copy of the Draft EIA for the Mulilo Amsterdam Wind Energy Facility Cluster, for our scientists to comment on, to the following physical address in Lydenburg: To: Celia de Waal (EIA Data Capturer) MTPA Office Building (Lydeburg) End of Morganstreet 1120 Lydenburg My cell number is: 082 841 7163 Kind regards Celia de Waal	Kindly confirm whether we may submit a USB drive containing the full set of Draft Environmental Impact Assessment (EIA) Reports for the Sheepmoor and Emvelo Wind Energy Facilities, in lieu of printed hard copies. The USB will include all relevant documentation to assist your scientists in their review and commentary. If possible, we would appreciate it if you could get back to us today, so that we can arrange for delivery as soon as possible. Kind Regards
			Revised Draft EIA phase	From: Celia de Waal <celia@mtpa.co.za> Sent: Thursday, July 17, 2025 9:48 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Good morning A USB drive is 100 %. Kind regards Celia	Thank you so much for your understanding and swift response to the matter. We will arrange the delivery ASAP and let you know when it is on the way to you. Kind Regards

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
	Robyn Luyt DARDLEA	16 July 2025	Revised Draft EIA phase	From: Robyn Luyt <rluyt@mpg.gov.za> Sent: Wednesday, July 16, 2025 3:37 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com> Cc: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; mervyn@mtpa.co.za Subject: Re: RE: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Hi Lucien, The reports I was able to access for each WEF are titled "Public Participation Volume III". Does this imply that there are there are 2 more volumes for each WEF? Regards Robyn	Hi Robyn, The configuration for each WEF's documents is as follows: • 02 Volume I: Draft EIA Report • 03 Volume II: Specialist EIA Reports • 04 Volume III: Public Participation Reports Kind Regards
	Serah Muobeleni DALRRD	16 July 2025	Revised Draft EIA phase	From: Serah Muobeleni <SerahMu@nda.gov.za> Sent: Wednesday, July 16, 2025 4:40 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za> Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Good day The Department has noted the letter regarding the draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province. Therefore, the department of Agriculture would request a formal application in terms of the Subdivision of Agricultural Land Act, 70 of 1970 in order to provide formal comments.	Hi Serah, I hope this message finds you well. We acknowledge receipt of your correspondence regarding the draft Environmental Impact Assessment (EIA) Report for the Sheepmoor and Emvelo Wind Energy Facilities in Mpumalanga Province. We would like to kindly request clarity on the specific application you are referring to in your response. It is our understanding that as part of the EIA process, we submitted the relevant reports to your department for review and comment in your capacity as a commenting authority and Interested and Affected Party (I&AP).

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				Your assistance will highly be appreciated in this regard. Regards Serah	To ensure we comply with all procedural requirements, we would appreciate your guidance on the nature and purpose of the formal application required under the Subdivision of Agricultural Land Act, 70 of 1970 at this stage of the process. Your assistance and clarification in this regard will be highly appreciated. Kind Regards
	Josua Meyer	16 July 2025	Revised Draft EIA phase	From: Josua Meyer <meyerjosua55@gmail.com> Sent: Wednesday, July 16, 2025 4:42 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Goodday Sir The avifaunal specialist removed in both reports, Sheepmoor WEF and Emvelo WEF, the High Sensitivity - Turbine Exclusion Zone in Figures 33 for the aquatic buffer zones from an avifaunal perspective. It must be a mistake and request reinstatement of it. If it was deliberate we request the detailed reasoning and motivation for such a drastic decision. Thanks	Good day Mr Josua Meyer, Kindly see below response regarding your query on the Mulilo Amsterdam, Sheepmoor and Emvelo Avifaunal Specialist Reports. In both the proposed Emvelo and Sheepmoor WEF avifaunal reports, Figure 33 refers to No-Go Zones around Yellow-breasted Pipit Habitat. However, we assume that you are referring to Figure 31, which addresses aquatic buffers. Initially, as a precautionary approach, the avifaunal buffers related to aquatic features included a uniform 200m buffer area around all wetland and drainage line features. In the final avifaunal report, however, the following sensitive areas were considered:

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				Josua Meyer	- All wetland areas and drainage lines as identified by the aquatic specialist. - Minor drainage lines that only facilitate runoff were not assigned an additional avifaunal buffer beyond what was already proposed by the aquatic specialist. The rationale for this adjustment is as follows: •Minor drainage line areas that only facilitate runoff would not hold permanent water and, therefore, would not provide suitable habitat for water and wetland-associated species. •Extensive wetland habitat models for wetland-associated species (including spp 23) were developed for the project areas, focusing on providing comprehensive avoidance mitigation around the most expansive and sensitive wetland habitats. •Waterbird and wetland-associated species are expected to use these extensive wetland areas in higher densities, and the avoidance mitigation would thus offer a high degree of protection. •Although it is acknowledged that waterbirds may also move outside these areas, it is essential to note that extensive additional mitigation measures will be in place at the facilities, such as Auto SDoD and Radar SDoD. •Waterbird species of conservation concern will be added as SDoD trigger species as part of the Biodiversity Management Plan (BMP) to be developed and implemented prior to operation.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					•The BMP will also allow for the modification and enhancement of mitigation measures if any thresholds are exceeded Kind Regards,
	Robyn Luyt	17 July 2025	Revised Draft EIA phase	From: Robyn Luyt <rluyt@mpg.gov.za> Sent: Thursday, July 17, 2025 10:17 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com> Cc: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; mervyn@mtpa.co.za Subject: Re: RE: RE: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Dear Lucien, I can confirm that all documents are now on the website. However, given that I&APs only had access to the full reports on 16 July and not 15 July (ie. Specialist Reports for Both WEFs, and the specialist reports for the Emvelo WEF were only accessible on 16 July 202), would this not mean that the regulated 30 days commences on 17 July and ends on 18 August (since 17 Aug is a Sunday)? Kind Regards Robyn	Dear Robyn, We intend to submit the FEIAr on the 25th of August 2025 and we are commitment to thoroughly addressing all comments received during the Public Participation Process. We acknowledge that this process requires both time and resources, and as such, we are limited in our ability to extend the timeline beyond 15 August 2025. That said, we fully recognise the challenges faced in accessing the Draft EIA documents. If you are unable to submit your comments by the 15th, we're willing to accept them by the 18th of August to ensure you have had a full and fair opportunity to review and engage with the Draft EIA documents. Additionally, should the Mpumalanga Tourism and Parks Agency (MTPA) or MDARDLEA still wish to engage further on our applications, we would be happy to arrange a physical meeting at a mutually convenient time. Please feel free to let us know if such an engagement would be of interest. Regards,

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
	Sindy Mbuyane DARDLEA	17 July 2025	Revised Draft EIA phase	From: Sindy Mbuyane <mbuyanesb@mpg.gov.za> Sent: Thursday, July 17, 2025 10:28 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Robyn Luyt <RLuyt@mpg.gov.za> Cc: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Gavin Cowden <GCowden@mpg.gov.za>; mervyn@mtpa.co.za Subject: Re: RE: RE: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Dear All, Please also note that our office has not yet received the hard copies. In the future, kindly ensure that reports are dispatched to all relevant offices at the same time so that the regulated timelines can commence and conclude on the same dates. Kind Regards, Sindi	Good morning, Sindy, I hope this email finds you well. Kindly note that the copies are on the way and will be delivered today. Kind Regards
			Revised Draft EIA phase	From: Robyn Luyt <rluyt@mpg.gov.za> Sent: Thursday, July 17, 2025 10:35 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za> Cc: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Gavin Cowden <GCowden@mpg.gov.za>; mervyn@mtpa.co.za Subject: Re: RE: RE: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Correction to my email below:	Noted

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				Public Participation reports for both WEFs and the specialist reports for Emvelo WEF were only available on 16 July 2025.	
	Serah Muobeleni	17 July 2025	Revised Draft EIA phase	From: Serah Muobeleni <SerahMu@nda.gov.za> Sent: Thursday, July 17, 2025 5:05 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>; Jan V <jan.agric@gmail.com> Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Good Day May you kindly send the motivation or report regarding the proposed activity, title deed, locality plan. Regards Serah	Good morning, Serah, I hope this email finds you well. Thank you so much for your feedback. Kindly receive the attached link to access all the reports related to the project. https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/ Please do not hesitate to reach out should you need any further information or clarity. Kind Regards
	Josua Meyer	18 July 2025	Revised Draft EIA phase	From: Josua Meyer <meyerjosua55@gmail.com> Sent: Friday, July 18, 2025 4:51 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Johans Van Wyk <Piwy@mulilo.com>; Lloyd@mulilo.com Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Goodday mr Lucien Barbeau, Referring to your email dated 7/04/2025 it will be appreciated if you can arrange such a meeting urgently before the 9/08/2025 with the applicant, Mulilo, on site.	Dear Mr. Meyer, Good day, and thank you for your recent correspondence regarding the Draft EIA Reports. We acknowledge your request for a meeting to discuss the concerns raised. In consultation with the applicant, Mulilo, we are proposing a provisional date of Wednesday, 7 August 2025, with the meeting to be held at a venue in Ermelo. Kindly confirm whether this date is suitable for you

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				Concerns as previously raised with Mulilo in an email dated 19/02/2025 will be on the agenda. That request for a meeting was refused by Mulilo. Another urgent item which also must be discussed is the tagging of the two martial eagles. According to the MTPA report in my possession, the martial eagles were tagged by Mulilo without a permit. Copy of the report can be provided at the meeting. That leaves the tagging of the martial eagles illegally, if not criminal. Therefore the data being used in the specialist report is illegally obtained and all sections, models and references where data has been used must be removed from the report. Looking forward to your urgent response. Regards Josua Meyer (I&AP)	and whether you will be attending alone or accompanied by others. As a registered I&AP, your comments form an important part of the formal public participation process and will be incorporated into the Final EIA Reports. We also acknowledge the concerns raised regarding the tagging of the Martial Eagles. Relevant documentation, including permits, will be made available where appropriate to support transparency and clarity during the engagement. We look forward to your response. Kind Regards,
	Josua Meyer	18 July 2025	Revised Draft EIA phase	From: Josua Meyer <meyerjosua55@gmail.com> Sent: Tuesday, July 22, 2025 10:30 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Hi Lucien There might be a mistake in your day or date ..... 7 August 2025 is a Thursday. Nevertheless the 6 or 7 th August 2025 is fine with us.	Dear Mr Meyer, Following discussions with the applicant, unfortunately it will not be possible to schedule a meeting prior to 1 August due to limited availability. However, we would be pleased to meet with you on Monday the 4th of August 2025 at 13:00, as per your request, at your farm. Kindly confirm whether this date and time are suitable, and please advise who will be attending the meeting from your side.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				Will appreciate it if we can meet on my farm. We intend to be three (3) I&AP Regards	I will continue to provide you with the requested documentation ahead of the meeting. Kind regards,
	Josua Meyer	18 July 2025	Revised Draft EIA phase	From: Josua Meyer <meyerjosua55@gmail.com> Sent: Friday, July 18, 2025 11:18 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Dear Sir Can you urgently provide us with the coordinates of the current positions of all the WTG for Emvelo and Sheepmoor. WEFs. Thanks Josua Meyer	Good Day Josua, Please see attached as requested. Kind Regards, Attachment Excel WTG coordinates Amterdam
	Josua Meyer	25 July 2025	Revised Draft EIA phase	From: Josua Meyer <meyerjosua55@gmail.com> Sent: Friday, July 25, 2025 5:11 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province EXTERNAL MESSAGE Goodday Lucien Proposed date for the meeting seems to be too close to submission of comments which is already 9/08/25.	Good day Mr Josua Meyer, Kindly see below response regarding your query on the Mulilo Amsterdam, Sheepmoor and Emvelo Avifaunal Specialist Reports. In both the proposed Emvelo and Sheepmoor WEF avifaunal reports, Figure 33 refers to No-Go Zones around Yellow-breasted Pipit Habitat. However, we assume that you are referring to Figure 31, which addresses aquatic buffers.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				Can you arrange the meeting for us before 1/07/2025. Can you in the meantime forward the detail previously requested - All the documentation with Department concerning the 3 months extension granted even after time lapps to submit final report - Mulilo's permits to fit telemetry device on the two martial eagles - AfriAvian motivation for altering Figure 33 in both avifaunal reports Above info are urgently required and no reason to wait for the meeting Regards Josua	Initially, as a precautionary approach, the avifaunal buffers related to aquatic features included a uniform 200m buffer area around all wetland and drainage line features. In the final avifaunal report, however, the following sensitive areas were considered: - All wetland areas and drainage lines as identified by the aquatic specialist. - Minor drainage lines that only facilitate runoff were not assigned an additional avifaunal buffer beyond what was already proposed by the aquatic specialist. The rationale for this adjustment is as follows: • Minor drainage line areas that only facilitate runoff would not hold permanent water and, therefore, would not provide suitable habitat for water and wetland-associated species. • Extensive wetland habitat models for wetland-associated species (including spp 23) were developed for the project areas, focusing on providing comprehensive avoidance mitigation around the most expansive and sensitive wetland habitats. • Waterbird and wetland-associated species are expected to use these extensive wetland areas in higher densities, and the avoidance mitigation would thus offer a high degree of protection. • Although it is acknowledged that waterbirds may also move outside these areas, it is essential to note that extensive additional mitigation measures will be in

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					place at the facilities, such as Auto SDoD and Radar SDoD. • Waterbird species of conservation concern will be added as SDoD trigger species as part of the Biodiversity Management Plan (BMP) to be developed and implemented prior to operation. • The BMP will also allow for the modification and enhancement of mitigation measures if any thresholds are exceeded Kind Regards,
	Celia de Waal	25 July 2025	Revised Draft EIA phase	From: Celia de Waal <celia@mtpa.co.za> Sent: Friday, July 25, 2025 12:30 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Frans Krige <frans@mtpa.co.za> Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Dear Ms. Malema The USB was received on 22 July 2025. Our EIA/LUA registration numbers are: - Emvelo Wind Energy Facility - Our ref: LUA 25/3966 (4) - Sheepmoor Wind Energy Facility – Our ref: LUA 25/3967(4) Kind regards Celia	Thank you so much for your feedback and confirmation. Please do not hesitate to contact us should you need any further information or clarity. Kind Regards

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	Josua Meyer	25 July 2025	Revised Draft EIA phase	From: Josua Meyer <meyerjosua55@gmail.com> Sent: Friday, July 25, 2025 5:11 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province EXTERNAL MESSAGE Goodday Lucien Proposed date for the meeting seems to be too close to submission of comments which is already 9/08/25. Can you arrange the meeting for us before 1/07/2025. Can you in the meantime forward the detail previously requested - All the documentation with Department concerning the 3 months extension granted even after time lapps to submit final report - Mulilo's permits to fit telemetry device on the two martial eagles - AfriAvian motivation for altering Figure 33 in both avifaunal reports Above info are urgently required and no reason to wait for the meeting Regards Josua	Dear Mr Meyer, Following discussions with the applicant, unfortunately it will not be possible to schedule a meeting prior to 1 August due to limited availability. However, we would be pleased to meet with you on Monday the 4th of August 2025 at 13:00, as per your request, at your farm. Kindly confirm whether this date and time are suitable, and please advise who will be attending the meeting from your side. I will continue to provide you with the requested documentation ahead of the meeting. Kind regards,
	Serah Muobeleni (	29 July 2025	Revised Draft	From: Serah Muobeleni <SerahMu@nda.gov.za> Sent: Tuesday, July 29, 2025 3:10 PM	Good morning, Serah,

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	DALRRD Environment)		EIA phase	To: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za> Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Good day I hope all is well. Can you kindly provide the department with a hard copy application as the link provided contain documents that are more than 800 pages and such will be impossible to print. I hope the above is in order. Regards Serah	Thank you for your request. Kindly confirm whether we may submit a USB drive containing the full set of Draft Environmental Impact Assessment (EIA) Reports for the Sheepmoor and Emvelo Wind Energy Facilities, in lieu of printed hard copies. The USB will include all relevant documentation to assist your scientists in their review and commentary. If possible, we would appreciate it if you could get back to us today, so that we can arrange for delivery as soon as possible. Kindly include address and contact (Cell no.) that should be used for delivery notification. Kind Regards
	Nhlamulo Machume(DALRRD Environment)	31 July 2025	Revised Draft EIA phase	From: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za> Sent: Thursday, July 31, 2025 10:55 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Serah Muobeleni <SerahMu@nda.gov.za> Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Good day The application should not exceed our printing limit of 100 pages even if it's submitted in form of a USB, if its more than 100 pages, you are required to hand deliver hard copies, accompanied by proof of payment of a R1000 (see banking details on the attached) address below on my signature.	Dear Nhlamulo, Thank you for your correspondence regarding the below-mentioned Amsterdam WEFs. Kindly be advised that the applicant has confirmed that a SALA application will not be submitted, as the intention is to register leases over the entire project properties, rather than leasing portions of land for individual wind turbine generators. As such, the requirements of the Subdivision of Agricultural Land Act, 70 of 1970 (SALA) are not triggered in this instance.

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				Regards	Nonetheless, the applicant welcomes any comments that the Department may wish to provide on the Draft Environmental Impact Assessment Report (https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/) as part of the environmental authorisation process. Please do not hesitate to contact us should you require any further information or clarification.
	Lucien Barbeau (ERM)	31 July 2025	Revised Draft EIA phase	Dear Mr Meyer, I hope this message finds you well. I'm writing to kindly follow up on our proposed meeting scheduled for Monday, 4 August at 13:00 at your farm. We would appreciate it if you could please confirm whether you are still available to meet on that date. Should you require any additional information or documentation ahead of the meeting, beyond what you have already requested, please don't hesitate to let me know, I'd be happy to assist. Looking forward to your confirmation. Kind regards,	
	Josua Meyer	31 July 2025	Revised Draft EIA phase	From: Josua Meyer <meyerjosua55@gmail.com> Sent: Thursday, July 31, 2025 6:13 PM To: Lucien Barbeau <Lucien.Barbeau@erm.com> Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province	Good Morning Mr Meyer, Thank you for your response. If you feel Monday is too short availability, please do not feel rushed. We would be happy to accommodate you later in the week. We will

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				Gooday Will confirm tomorrow before 12h00 Thanks	await your feedback and move accordingly from there. Kind Regards,
	Johans Van Wyk (Mulilo)	01 August 2025	Revised Draft EIA phase	From: Johans Van Wyk <piwy@mulilo.com> Sent: Friday, August 1, 2025 11:51 AM To: Lucien Barbeau <Lucien.Barbeau@erm.com> Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <Lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <Andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com> Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Guys, I just received a voice note from Mr Meyer at 11h47. Monday 12h00 is on in Ermelo! Meeting is Monday at 12h00	
	Josua Meyer	01 August 2025	Revised Draft EIA phase	From: Josua Meyer <meyerjosua55@gmail.com> Sent: Friday, August 1, 2025 1:29 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Good day Monday is fine with me I did inform Johans also Will 12h00 be convenient for you? How may people? Regards	Dear Mr Meyer, Thank you for confirming the meeting for 12h00 tomorrow, 4 August, at your farm. That time works perfectly, and we look forward to meeting with you. If you would kindly share the physical address or GPS coordinates for the entrance to your farm, it would be greatly appreciated to ensure we arrive without any difficulty. There will be five people attending the meeting, including myself.

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					Should there be anything further you would like us to prepare or bring along for the meeting, please don't hesitate to let us know, we'll be happy to assist in any way we can. Kind regards,
	Evelyn Shogole	05 August 2025	Revised Draft EIA phase	From: Evelyn Shogole <ShogoleE@caa.co.za> Sent: Tuesday, August 5, 2025 10:32 AM To: Mpho Malema <mpho.malema@erm.com> Cc: Pamela Madondo <MadondoP@caa.co.za>; Mary Motete <motetem@caa.co.za> Subject: RE: Reminder: Draft EIA Reports Available for Comment – Sheepmoor and Emvelo Wind Energy Facilities Dear Mpho, I hope you are well. Following our telephone conversation, the below comments will not affect or impact the current final impact report. Please note the below comments should be considered before project construction phase upon receipt of an Environmental Authorisation. Due to the nature of this project, a formal obstacle assessment will be required to determine whether the proposal could impact flight safety. Kindly lodge an application as published on the SACAA website: www.caa.co.za/industryinformation/obstacles/ .The list and contact details of the approved obstacles assessment services providers can be obtained from the CAA website: www.caa.co.za . Regards,	Noted

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			Revised Draft EIA phase	From: Khululwa Matshoba <StuurmKV@ntcsa.co.za> Sent: Wednesday, August 6, 2025 8:53 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Kindly share the kmz files, Please find attached Eskom/NTCSA requirements for work in or near Eskom/NTCSA servitudes and infrastructure. Thank you. Warm regards Khululwa	Dear Khululwa, Kindly see attached kmz files of the proposed development. Thank you,
	Khululwa Matshoba	06 August 2025	Revised Draft EIA phase	From: Khululwa Matshoba <StuurmKV@ntcsa.co.za> Sent: Wednesday, August 6, 2025 10:56 AM To: ERM Arcus Amsterdam <erm.arcusamsterdam@erm.com>; Mpho Malema <mpho.malema@erm.com> Cc: David Tunnicliff <TunnicDA@ntcsa.co.za> Subject: Fw: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province EXTERNAL MESSAGE Good day Lucien Kindly note that your proposed project is affecting existing CAMDEN EDWALENI 1 line. Kindly correct and revert back . Thank you Warm regards	Good day Khululwa, I hope this email finds you well. Thank you for your comment and for identifying the interaction between the proposed Amsterdam Wind Energy Facility and the existing Camden–Edwaleni 1 transmission line. We confirm that we will follow the required Eskom processes to apply for and, where appropriate, request relaxations of relevant clearance and servitude standards. We remain committed to engaging with Eskom's technical team following the approval of the Environmental Authorisation to ensure that any infrastructure interfaces are addressed in line with your requirements.

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				Khululwa	The site selection process for the project has considered a large assessment area and evaluated various technical and environmental constraints, which provides flexibility for potential adjustments if required. We have also considered alternative configurations during the planning phase, which will assist in working collaboratively to achieve a mutually acceptable solution. We look forward to continued engagement with Eskom to address this matter in a coordinated manner.
	Josua Meyer	06 August 2025	Revised Draft EIA phase	From: Josua Meyer <meyerjosua55@gmail.com> Sent: Wednesday, August 6, 2025 1:47 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Hi Lucien, The purpose of the meeting was to address concerns of the I&AP's regarding the proposed Sheepmoor and Emvelo WEF's. The applicant gives the impression that they are not interested in taking any action regarding the I&AP's concerns and attend it only to avoid negative reflection. Therefore the meeting created unfortunately more questions than answers. Your EAP's input was also disappointing.	Dear Mr Meyer, Thank you for your email and for taking the time to share your reflections following our meeting on Monday. We acknowledge receipt of your comments and the additional questions you have raised. We appreciate your continued engagement in the process and will respond to your queries as soon as possible. Should you have any further inputs in the meantime, please feel free to share them with us. Kind Regards

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				We urgently need clarification and answers on the following 1 - The EAP is expected to participate and actively engage with the impacted community. Why has my request for a meeting since February 2025 repeatedly declined and pushed in at the 11th hour? 2 - Do you as EAP feel that the process has been credible and transparent as well as accountable in circumstances where you reach out and respond to a request for a meeting at the 11th hour? How is that considered to be meaningful and in the spirit of the constitution? 3 - Why are biodiversity related issues only being property investigated at the 11th hour although the Provincial Department requested it in the scoping phase? 4 - Why are requested documentation regarding the additional 3 months extension granted by DFFE to the applicant still outstanding? 5 - Are you as EAP confident that the data and modelling that has been undertaken to address bird related impacts and specifically the martial eagle is accurate and credible? If so, please explain why. 6 - Are you as EAP confident and can you confirm in writing that the data that is being obtained in relation to the martial eagle was correctly obtained and in accordance with all minimal standards and legal criteria? 7 - Are you as EAP comfortable that if the tagging of the martial eagle were done without a valid permit, that the tagged data can still be used in the specialist report? If so, please explain why.	

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				8 - Are you as EAP in acceptance that the permits to tag the martial eagles, also the one at Verkykerskop, were not presented at the meeting? If so, please explain why. 9 - Are you as EAP confident that all the recommendations in the specialist reports and specifically the Social report are satisfactorily addressed? If not, please explain why. 10 - It became clear in the meeting that none of the affected landowners are prepared to allow the proposed powerline over their properties. Are AEP comfortable to support an application without a secured powerline route? 11 - The avifaunal specialist signed a NDA (non disclosure agreement) with the applicant and it was also revealed in the meeting by the applicant that they collectively determined the shaped exclusion zones for the southern bald ibis. Are you as EAP comfortable that it is not in contradiction with the declaration the avifaunal specialist signed as independant specialist? If so, please explain why. Due to the time constraint answers required before the 11/08/2025. Regards	
			Revised Draft EIA phase	1 - The EAP is expected to participate and actively engage with the impacted community. Why has my request for a meeting since February 2025 repeatedly declined and pushed in at the 11th hour? MULILO: The applicant regrets that the ad hoc meeting request sent by you to the applicant in February this year was not attended to immediately. Unfortunately, the request for a private meeting with the applicant was not seen at the time by the applicant's representatives, and the applicant sincerely apologises for any frustration this may have caused you. The applicant and EAP remain committed to engaging with I&APs, and the in-person meeting requested by yourself, and attended by me as the appointed EAP for this project, and by the applicant's representatives, on the 4th of August 2025 was welcomed and seen to constitute substantive progress in	

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				responding to your queries. Your queries, and these responses, will obviously form part of the Comments and Responses Report included together with the next draft of the EIA Report. ERM: As the EAP, we are committed to engaging meaningfully with Interested and Affected Parties (I&APs) in accordance with the requirements of the Environmental Impact Assessment (EIA) Regulations under NEMA. We have undertaken all necessary steps and where possible, gone beyond these requirements to engage with the community. This has included an additional focus group meeting with you at a mutually suitable time within the regulated timelines to address your concerns. All I&AP comments have been acknowledged, and this engagement process remains ongoing. 2 - Do you as EAP feel that the process has been credible and transparent as well as accountable in circumstances where you reach out and respond to a request for a meeting at the 11th hour? How is that considered to be meaningful and in the spirit of the constitution? ERM take the principles of credibility, transparency, and accountability in the EIA process very seriously. In this case, we regret that your initial request for a private meeting with the applicant, sent to the applicant in February, was not seen at the time by the applicant. Had it been, ERM would have engaged with you much earlier. Please include the EAP in such requests in order to ensure this is not missed in the future. The recent outreach was made in good faith. Once ERM became aware of your request for a meeting, ERM responded promptly in an effort to engage meaningfully and ensure your views are heard. While ERM acknowledges that earlier engagement would have been preferable, we remain fully open to meeting and engaging in a meaningful and constructive way as the EIA process continues. ERM sees this as part of our commitment to upholding the intent and spirit of public participation, as set out in the Constitution and in NEMA and the 2014 NEMA EIA Regulations. We believe that the EIA process we are facilitating has been credible, transparent, and accountable, in line with the requirements of NEMA. While the timing of certain engagements is sometimes influenced by the availability of multiple parties, we made every effort to accommodate your request for a meeting within the regulated timeframe. The process remains open, transparent, and documented for review by the competent authority. 3 - Why are biodiversity related issues only being property investigated at the 11th hour although the Provincial Department requested it in the scoping phase? During the scoping phase, it was noted that a biodiversity offset may be required based on final layouts proposed. However, this indication was based on preliminary findings and initial specialist inputs, which were still being	

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				refined at the time. As is typical in EIA processes, more detailed and site-specific assessments only become available during the impact assessment phase, once the full suite of specialist studies is completed and verified. It is on the basis of these completed studies that a more accurate determination of residual impacts, and thus the need for and scale of a biodiversity offset, can be made. We understand the importance of early clarity, but it's also essential that such recommendations are based on robust, defensible data. That said, ERM has aimed to finalise and address these issues as efficiently and transparently as possible once the necessary information became available. Biodiversity-related issues have been considered from the outset of the EIA process, beginning in the scoping phase. The assessment has been iterative, with the project layout being amended several times to address environmental sensitivities and viability concerns, including biodiversity matters. These changes are documented in the Comments and Responses Report (CRR) and specialist assessments. 4 - Why are requested documentation regarding the additional 3 months extension granted by DFFE to the applicant still outstanding? Please see the attached correspondence as requested. 5 - Are you as EAP confident that the data and modelling that has been undertaken to address bird related impacts and specifically the martial eagle is accurate and credible? If so, please explain why. The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible.	

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				The appointed avifaunal specialist is an expert in the field of wind energy facility impacts on birds. Based on their expertise and experience, we have no reason to doubt the accuracy, credibility, and applicability of the data and modelling undertaken for this assessment. 6 - Are you as EAP confident and can you confirm in writing that the data that is being obtained in relation to the martial eagle was correctly obtained and in accordance with all minimal standards and legal criteria? As illuded to in our response to Point 5 above. The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. This permitting process is separate from the EIA, and as the EAP we do not have direct oversight over it. 7 - Are you as EAP comfortable that if the tagging of the martial eagle were done without a valid permit, that the tagged data can still be used in the specialist report? If so, please explain why. The legality of the data collection process is the responsibility of the avifaunal specialist and the applicant. It is our understanding that a permit for such activities is legally required, and that the data included in the specialist report was provided on the basis that the necessary permit was obtained. The data collected from the tagged Martial Eagle is invaluable. It provides critical insight into the bird's movements and habitat use, which directly strengthens the EIA findings; informs a more effective mitigation strategy; and ultimately, enhances the likely further and better protection of the species. As explained in Point 5 above – the EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The applicant was informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the	

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				tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible. 8 - Are you as EAP in acceptance that the permits to tag the martial eagles, also the one at Verkykerskop, were not presented at the meeting? If so, please explain why. The proposed Verkykerskop Wind Farm cluster is not a part of the proposed Emvelo and Sheepmoor wind farms and are consequently not relevant or applicable to the current process. The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible. As a general practice, fieldwork permits obtained by specialists are not typically presented during stakeholder engagement or I&AP meetings. 9 - Are you as EAP confident that all the recommendations in the specialist reports and specifically the Social report are satisfactorily addressed? If not, please explain why. In the specialist reports, including the Social Impact Assessment, have been carefully considered and addressed to the extent possible within the on-going EIA process, and that will continue to be the case. Where certain recommendations require further action, these have been clearly outlined for implementation during the construction and operational phases, and will be monitored through the Environmental Management Programme (EMPr). We have reviewed the social specialist's findings and recommendations and accept them as valid and credible, given the specialist's expertise in the field. Recommendations and mitigation measures that could reasonably be	

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				incorporated into the Environmental Management Programme (EMPr) have been included. If there are specific recommendations you believe have not been adequately addressed, please let us know so that we can review them. 10 - It became clear in the meeting that none of the affected landowners are prepared to allow the proposed powerline over their properties. Are AEP comfortable to support an application without a secured powerline route? Thank you for raising this important point. While the EIA process does not require landowner consent for linear infrastructure at this stage, the applicant is committed to engaging in good faith negotiations with affected landowners to secure the necessary servitudes following the achievement of the EA. The landowner in question (Mr Moodie) did not formally raise any objections. He advised that the routing could be relooked at in due course. In recognition of the risks involved, and in the context of the NEMA EIA Regulations' requirement to consider reasonable and feasible alternatives, alternative powerline routes have also been assessed as part of the EIA to reduce potential impacts and improve the likelihood of an acceptable alignment being secured. The other landowners did not formally raise any objections yet and formal discussions still need to take place with these landowners to the extent that the OHL needs to traverse their respective properties. The routing referred to in your comment is an alternative powerline route considered, and is not the preferred route. Our role as the EAP is to independently assess the potential impacts of alternatives, identify mitigation measures to reduce impacts to acceptable levels, and provide an informed opinion on the acceptability of the project. The final decision on whether the project may proceed rests with the DFFE. 11 - The avifaunal specialist signed a NDA (non disclosure agreement) with the applicant and it was also revealed in the meeting by the applicant that they collectively determined the shaped exclusion zones for the southern bald ibis. Are you as EAP comfortable that it is not in contradiction with the declaration the avifaunal specialist signed as independant specialist? If so, please explain why. The avifaunal exclusion zones are proposed by the appointed avifaunal specialist alone, informed by additional avifaunal studies commissioned by the applicant. The applicant has no role to play in determining the shape or size of proposed buffers. Please also see my response to your fifth question, above. It is common practice for parties to sign NDAs in order to protect confidential information, such as for instance intellectual property, specific project sites and does do not detract from or limits a specialist to act independently and impartially.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				We operate on the assumption that all appointed specialists, including the avifaunal specialist, conduct their work in an ethical, independent manner, in compliance with the EIA Regulations. Both we as the EAP and all specialists have signed declarations of independence, as required under NEMA, confirming that our assessments are conducted impartially.	
	Riaan Meintjes	07 August 2025	Revised Draft EIA phase	From: Riaan Meintjes <riaan@themis.co.za> Sent: Thursday, August 7, 2025 1:48 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Importance: High Dear Sir/Madam We have briefly perused the draft EIA report and have been unable to find any reference to the comment submitted by us on the instructions of our client, a copy of which is attached to this email. Kindly refer us to the relevant pages of the draft report which deal with our client's comments? We further note from the draft report that a formal application has been lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted. Kindly furnish us with a copy of this application and all communications to and from ATNS relating thereto. We look forward to hearing from you as a matter of urgency. Regards Riaan Meintjes Director Dear Sirs	Dear Mr Riaan Meintjes, Thank you for providing comment, we will return with responses shortly. May I please request the name and CAA Registration number for the aerodrome in question. Your prompt attention to this request would be greatly appreciated. Regards

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				SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER 1 We address this correspondence to you on the instructions of our clients, the Trustees for the time being of the Peter Celliers Trust (“the Trust”). 2 The Trust is the owner of Portions 8, 19 and 28 of the Roodewal Farm (Farm number 270), Registration Division IT, Mpumalanga. It is an interested and affected party with regard to the proposed development of the Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province. 3 The Trust conducts an aerodrome and a helipad from Portion 28 of its farm. The aerodrome has been used for aircraft of the Learjet and KingAir categories and has, at all times material hereto, remained in regular use. The landing strip of the aerodrome is used in both directions. 4 The operation and safety requirements of aerodromes and helipads are governed by the provisions of the Civil Aviation Act, 13 of 2009, the Civil Aviation Regulations, 2011 (as amended) (“the Regulations”) and Annex 14 to the Convention on International Civil Aviation, 7th Edition, July 2016. 5 The safety requirements for aerodromes and heliports are contained in Part 139 of the Regulations and Regulation 139.01.30 deals with obstacle limitation and marking outside aerodromes and heliports. Regulation 139.01.30(1) imposes an obligation on the holder of an aerodrome licence to monitor the	

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				surroundings of the aerodrome to assess permanent or temporary obstacle limitation and penetration surfaces, to establish if any obstacle has an impact on the safety of aircraft operations at such aerodrome. Sub-regulation (7) goes on to provide that the holder of an aerodrome licence shall not allow to be erected, without the prior approval of the Director, an object higher than 45 meters above the mean level of a landing area or within 8 kilometres measured from the nearest point on a boundary of an aerodrome. Regulation 139.01.30 further incorporates the provisions of Document SACATS 139. 6 Document SA-CATS 139.01.30 elaborates upon the requirements for obstacle limitations and markings outside aerodromes or heliports. Paragraph 1.14 deals extensively with the requirements pertaining to wind turbine generators (wind farms) and paragraph 1.14(2), dealing with wind farm placement, states as follows: “Due to the potential of wind turbine generators to interfere on (sic) radio navigation equipment, no Windfarm should be built closer than 35 km from an aerodrome. In addition, much care should be taken to consider visual flight rules routes, proximity of known recreational flight activity such as hang-gliders, en route navigational facilities etc.” (our underlining) 7 In addition to the aerodrome, there is a registered nature conservancy named Nu-Scotland on the Trust’s farm. The conservancy regularly hosts guests and bi-annually hosts cricket groups of between 80 to 100 people. The visual impact assessments of the proposed wind farms will need to take the use of the Trust’s farm as a nature conservancy into account. The conservancy is home to a wide range of antelope, zebra and birds, including Secretary Birds, which have been classified as endangered, largely due to habitat degradation. Appropriate	

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				mitigation measures will need to be put in place to address the threats that the wind farms will pose to the fauna on the Trust's farm and surrounds. 8 The Trust is accordingly opposed to the erection of any wind turbines closer than 35 kilometres from the boundary of the Trust's aerodrome. Yours faithfully RIAAN MEINTJES HAYES INCORPORATED	
	Braam Moodie	10 August 2025	Revised Draft EIA phase	From: Braam Moodie <b.moodie@vodamail.co.za> Sent: Sunday, August 10, 2025 11:27 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Stephen Burton <stephen.burton@erm.com>; Stephanie Gopaul <stephanie.gopaul@erm.com>; Braam Moodie <b.moodie@vodamail.co.za>; thomas Moodie <thomasmoodie99@gmail.com>; Ilona Deveugele <ilona@commettre.co.za> Subject: COMMENTS ON THE MAY 2025 DRAFT EIA REPORT FOR SHEEPMOOR AND MULILO WIND ENERGY FACILITIES , AND OBJECTION OF TRANSMISSION LINE (ALTERNATIVE LOOP) WINDHOEK 291 POR 3,5 & 10 Goodday 1. I am the owner of the farm Windhoek 291 Por 3 & 5 and leaser of por 4 & 10 which are adjacent to the proposed development of the Sheepmoor Windfarm' 2. No communication or notification from Mulilo concerning the development the windfarm next to my property.Neighbours informed me of it and helped me to register as I&AP in March 2025.	Dear Mr. Moodie, Thank you for your comments regarding the proposed Sheepmoor and Emvelo WEFs, and for your patience while we prepared responses to your comments. Please find attached a document containing our responses to each of your comments. We would like to assure you that your comments and the corresponding responses will be incorporated into the Final Comments and Responses Report, which forms part of the EIA Process. Should you have any further questions or require clarification on any of the points, please feel free to reach out. Attachment: B Moodie responses 19.08.2025.pdf

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				Mulilo acting on there own and ignore all protocols and spells danger for the future. 3. May 2025 draft report suggested power lines will be constructed over my Windhoek property . There was no prior communication nor negotiations from any party concerning the permission for the power lines.Totaly unacceptable. 4. No power lines will be allowed to run over my properties for various reasons. 4.1 Route as shown in report are crossing crop lands and will interfere with activities of farm machinery. 4.2 It will limit future expansions on the farm. 4.3 Increase movement of people for inspection line will increase criminal activities and risk of veld fires and therefore not acceptable. 4.4 Indications that power lines have negative influence on the reproduction of cattle.Unplanned and poorly communicated maintenance visits especially if involving helicopters and machinery can spook cattle,leading to stampedes Injuries , or even loss of livestock not to mention damage to infrastructure like fencing. 4.5 Aesthetic and Environmental Value will be lost. 4.6 Danger due to collusion of the bird population on the farm. 5. There is secretary birds present on my farm which are foddering on the grassland where 4 turbines are planned on Windhoek Por 8. These secretary birds will be in great danger to be killed by collusion with the turbines. 6. The same danger exists for the ibises which are in great numbers present on the farm. Some are roosting on the farm Waaihoek to the east and other on the farm Windhoek to the north - west. Both roosting routes will be polluted with turbines and the shredding of birds will be unavoidable, even with proposed mitigation gimmies. 7. I apposed the location of the 4 turbines close to the eastern border because. 7.1 Killing of the southern bald ibis which due that route to there roosting site.	1. Acknowledged. Your ownership and leasehold details have been noted and recorded for the project. 2. Notification of the project was undertaken in accordance with the requirements of the Environmental Impact Assessment (EIA) Regulations, including the placement of site notices, newspaper adverts, direct notification to identified landowners, and availability of project information for registration as an Interested and Affected Party (I&AP). We acknowledge that you became aware of the project through neighbours, and we will ensure that you continue to receive all project-related updates going forward. 3. The draft EIA report included an alternative grid connection layout and this is not the preferred route. Your opposition to any overhead lines crossing your land has been noted. The applicant is committed to engaging with yourself following a decision on the EA, in order to ensure that the layout aligns with your operations, as discussed with yourself during the in person meeting held on 04 August 2025. 4. The potential impacts on farming operations, farm expansion, security,

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				7.2 Located in the secretary bird foddering area. 7.3 Combined effect will change the local microclimate of surrounding area. Report by specialist of influence on microclimate are requested. 7.4 It is visual not acceptable. 7.5 The noise pollution will increase during the dominate eastern winds. 7.6 The lights during the night as required by aviation are not acceptable. 8. Also opposed the turbines on the Farm Windhoek Por 8 8.1 Killing the southern bald ibis on their route to their breeding nest in the winter. 8.2 Turbine 51 & 52 to close to my boundary in case of collapsing when the steep slope considered 8.3 Turbine 51,52 & 53 will be to close to the farmhouse on Windhoek Por 4 and will cause unaccepted noise pollution which are likely to be more due to the topography. 8.4 There are people staying in the same farmhouse which are on chronical medication for heart and epilepsy . The shadow flickering of turbines 51,52 and 53 will trigger the epilepsy. 9. It will kill the bee population in the area which are essential for pollination of the fauna. Report of effect on the bee population by specialist are requested. 10. Further the proposed Sheepmoor windfarm are going to negatively damage the character and scenic views of the escarpment and will change the sense of place. 11. Therefore ,we apposed the proposed Sheepmoor windfarm in the strongest terms. Kind Regards Braam Moodie 0824683729	livestock health, aesthetic value, and avifauna have been recorded and assessed as part of the EIA report. We note your comments and will likely utilise other routes that do not pass over your property. We expect that the final layout of the powerline will not be approved in the EA process, and a layout update and future approval of the final route will still be needed. 5. Avifaunal specialist studies have identified several sensitive bird species within the project area. Turbine placements have all been mitigated, and the avifaunal specialist is confident that the data and modelling undertaken to date to address avifaunal impacts is both accurate and credible. Secretarybirds are large conspicuous birds, that spend large periods of time on the ground. When they do fly, we are confident that the proposed mitigation of Shut Down on Demand will prevent significant mortalities of this species. 6. Avifaunal assessments conducted for the project included focal studies specifically aimed at understanding the movement and habitat use of Southern Bald Ibis (SBI) within the landscape. These studies informed the delineation of formal no-go areas, which were

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					established to avoid critical roosting and foraging zones. 7. The flight paths and spatial use patterns of SBI were modelled using extensive site-specific data, collected over multiple seasons. This modelling allowed for a more accurate representation of how the species interacts with the terrain and infrastructure. 8. As a result, turbine placements have been strategically adjusted to avoid overlap with identified SBI activity zones. In addition to spatial avoidance, mitigation 9. measures such as Shut Down on Demand (SDOD) will be implemented to further reduce collision risk during active flight periods. 10. Your concerns regarding turbine placement near the eastern border and on Portion 8 have been recorded, including potential impacts on avifauna, microclimate, noise, visual character, lighting, and shadow flicker. The microclimate aspect is outside the standard EIA scope, however, specialist studies have addressed noise, visual,

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					and shadow flicker impacts, with recommendations and mitigations that the applicant will adhere to. The applicant will investigate all feasible solutions to reduce light pollution, in line with CAA minimum requirements, which may include an automated lights/radar system that only activates selected minimal turbine lights if aircraft are in the area. 11. Please see above response regarding the impacts associated with turbine placements. 12. At present, this aspect is not covered within the EIA specialist studies, however, your request for further investigation has been noted and will be shared with the project team. It is important to highlight that a terrestrial ecological assessment was conducted as part of the EIA process. This assessment evaluated the broader ecological impacts of the proposed development, including habitat integrity and species presence. According to the screening tool and field surveys, no species of conservation concern—including pollinators such as bees—were flagged within the project area. While bees were not identified as a focal concern in the current assessment, the ecological study does

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					speak to habitat quality, vegetation types, and ecosystem functioning, which indirectly supports pollinator health. 13. Visual impact assessments have been conducted by a qualified specialist. While any large infrastructure will have some visual impact, the design and placement of turbines aims to reduce the visual impact where possible. 14. Your overall opposition to the proposed Sheepmoor Wind Farm is noted and will be included in the Final Comments and Responses Report submitted to the competent authority for decision-making.
	Josua Meyer	12 August 2025	Revised Draft EIA phase	From: Josua Meyer <meyerjosua55@gmail.com> Sent: Tuesday, August 12, 2025 11:32 AM To: Lucien Barbeau <Lucien.Barbeau@erm.com> Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com> Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Goodday Lucien	Good day Mr Meyer, Please find below our responses to your comments. We are in the process of finalising the meeting minutes, which will be shared with you before the end of this week. Thank you Attachments - RE: REQUEST TO EXTEND THE PRESCRIBED TIMEFRAME TO SUBMIT THE FINAL EIAr FOR THE SHEEPMOOR & EMVELO WIND ENERGY FACILITIES (DFFE REF): 14/12/16/3/3/2/2611 &

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				Time is running out. Where are the minutes of the meeting as well as a copy of the recorded transcript? Thanks	14/12/16/3/3/2/2613- Email attachment – DFFE extension approval letter - REQUEST TO EXTEND THE PRESCRIBED TIMEFRAME TO SUBMIT THE FINAL EIAr FOR THE SHEEPMOOR- Email attachment with DFFE Comms/motivation for extension - 14-12-16-3-3-2-2611 & 14-12-16-3-3-2-2613 Email attachment. DFFE refusal letter Dear Mr. Meyer, Thank you once again for your participation in the recent stakeholder engagement meeting regarding the proposed Sheepmoor and Emvelo WEFs. We also appreciate your patience as we compiled and reviewed the meeting documentation. Please find attached a copy of the meeting minutes and the full transcript of the session. These documents reflect the discussions held, including your contributions and concerns. Certain sections of the transcript were relistened to and translated from Afrikaans to English to ensure clarity and accuracy. Should you have any feedback or wish to propose amendments, please feel free to reach out. These minutes will form part of the official record. Kind Regards, Attachments: -Formal J Meyer Meeting Minutes 04 AUG.pdf

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					-Meeting Transcript with Lucien Barbeau_04 AUG.pdf
	Riaan Meitjies	14 August 2025	Revised Draft EIA phase	From: Riaan Meintjes <riaan@themis.co.za> Sent: Thursday, August 14, 2025 12:58 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Mpho Malema <mpho.malema@erm.com> Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Dear Lucien Please see the attached. We look forward to receiving the information requested in our email of 7 August 2025 without further delay. Regards Riaan Meintjes Director	Good day Mr Riaan Meitjies, I hope this email finds you well. Thank you for your feedback and swift response to the matter. Your response is almost ready it was pending the information we just requested. Kind Regards
	Josua Meyer	14 August 2025	Revised Draft EIAr	From: Josua Meyer <meyerjosua55@gmail.com> Sent: Thursday, August 14, 2025 10:44 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com> Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province	Good day Mr Meyer, Thank you for your email and your responses. We acknowledge receipt of your comments and confirm that they will be incorporated into the Comments and Responses Report for the proposed development. A formal response to your comments will be provided within that report, which will form part of the Final EIA submission to the DFFE. Kind Regards,

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				Dear Lucien Just want to get the records straight without getting into an informal debate 1 - 4 : Correspondence - Request info from ERM, Mr Lucien Barbeau, on 17/12/2024 at 11h04. Still no response ? - First request for meeting to applicant, mr Johans van Wyk, on 19/2/2025 at 12h35. Applicant, mr Johans van Wyk, reject request on 19/02/2025 at 15h35 First formal request for meeting through ERM on 16/4/2025 at 03h24. No response ? Request again for meeting through ERM, Mr Lucien Barbeau, on 18/07/2025 at 16h51. Meeting took place on 4/08/2025. Almost 8 months later!? - Requested on 16/06/2025 for official documentation concerning the 3 month extension. Repeat request during meeting of 4/08/2025 Received info only on 12/08/2025 Almost 2 month later?! - Request tagged data of two martial eagles from ERM on 11/03/2025 at 10h59 Repeat request for tagged data from ERM on 29/03/2025 at 11h44 Received refusal of data in email from applicant, mr Johans van Wyk, on 14/4/2025 at 20h40. ERM was also CC. Remind ERM, Mr Barbeau, on 15/04/2025 at 22h11 that formal answer on request for tagged data is still outstanding.	

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				Still no response from ERM !! Is that what you and ERM means by CREDIBLE, TRANSPARENT and ACCOUNTABLE? 5 - 8 : Tagged data Mulilo and EWT is in a partnership, confirmed in email from mr Johans van Wyk, in tagging the birds and therefore co-accountable for each other's conduct The issue is not who did wrong but is the tagging done with a valid permit.? If not, then it is illegal and that also implies for the data obtained by the unlawful act. What ERM says by implication is that they are comfortable in driving a stolen vehicle as long as it is to their advantage? Very dangerous and controversial approach.. We still insist that everything connected to the tagged data must be removed from the avifaunal report because it is illegally obtained regardless who did it. The avifaunal specialist used the Verkykerkop tagged data in his report and on that ground we requested the permit to tagg that eagle (Bred) 9 - 11 : Specialist report and NDA Mr Moodie strongly opposed the powerline crossing his farms and that also without consulting him.That was the main reason why Mr Moodie attended the meeting. Maybe you did not pick it up because Mr Moodie spoke Afrikaans. Will address the rest in my comments. Regards	

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				Josua Meyer	
	Retsrov Boerdery (NWJ Vorster Trust)	15 August 2025	Revised Draft EIAr	From: Retsrov Boerdery <vorsterboerdery@lantic.net> Sent: Friday, August 15, 2025 1:28 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: Comments on the draft EIA report for Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province - NWJ Vorster Trust The NWJ Vorster Trust is thankfully not part of the proposed WEF anymore. We will still be affected by the wind farm if it becomes a reality. Therefore we want to raise our strongest concern against it. 1. All the turbines, on the edge of the escarpment, will permanently scar the scenery and is unacceptable. 2. We are very concerned about proposed turbines 40, 44, 45 and 46 because of the noise and most probably shadow flickering. 3. The same applies for turbines 51, 52 and 53. 4. Turbines 40, 41,42,43,44,45,46, 51 and 52 will cause visual pollution which is unacceptable. 5. Proposed turbines 40,043 and 44 are too close to the breeding site of the secretary bird. A safe no-go zone of at least 2,5km should be implemented around the nest. The two secretary birds stay in the area south east of this location and provision should be made to secure its foddering habit. 6. A Marial Eagle pair were spotted several times in the past at Farm Klipfontein. It is of great concern because the always fly off in a north east direction where most of the turbines will be located. 7. The southern bald ibis are also present in great numbers on the farm Klipfontein especially when cultivating land or harvesting. Provision should be made for a safe flying zone to their roosting site on neighbouring farm Windhoek where four turbines will be located.	1. Visual impacts have been assessed by a qualified visual specialist. While the introduction of turbines will alter the landscape, the placement and design have been guided by specialist input to reduce visual intrusion where possible by avoiding the placement of WTGs in areas advised by the specialist. The concern regarding the scenic value of the escarpment has been recorded and will form part of the decision-making record. The proposed WEF has a life time of between 20 and 25 years. The facility will therefore not exist permanently. 2. Noise and shadow flicker impacts have been assessed through specialist studies. Turbine placement and mitigation measures will be implemented to ensure compliance with acceptable thresholds. Should post-construction monitoring identify exceedances, further mitigation will be required. 3. Answered above 4. As noted, visual impacts have been assessed by the visual specialist, with turbine locations refined to reduce exposure from key viewpoints. Your objection to the

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				Regards, Pikkie Vorster – Director at Retsrov Boerdery	visual impact of these turbines has been recorded. 5. The avifaunal specialist has surveyed known Secretary bird nesting and foraging areas in the study area. Turbine placement has considered these areas, and appropriate buffer zones are being implemented. Your request for a 2.5 km no-go zone will be shared with the avifaunal specialist for consideration in the final mitigation recommendations. 6. Martial eagle observations have been incorporated into the avifaunal assessment. Turbine layout refinements have been made to reduce potential collision risk, and mitigation measures, including operational curtailment where necessary, are being considered. Mitigation measures, specific to Martial Eagle have been incorporated into the Final EMPr. These management measures are informed by robust data and scientific research. Additionally, the applicant has welcomed the blanket implementation of blade patterning and Shut-down on Demand. 7. Southern Bald Ibis roosting and foraging behavior has been a key focus of the avifaunal specialist study. The avoidance areas (for

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					Southern Bald Ibis) was informed by the focal point monitoring of the bird species over a dedicated period of time, to understand where the species forages and how they interact with the receiving environment. Turbine placement has been adjusted to avoid high-use flight paths. Mitigation measures, such as Shut-down on demand and blade patterning, are under consideration.
	Richards Summers INC	15 August 2025	Revised Draft EIAr	From: Richard Summers <Richard@summersinc.co.za> Sent: Friday, August 15, 2025 8:11 PM To: Stephanie Gopaul <Stephanie.Gopaul@erm.com> Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; BNcube@dffe.gov.za; Reception – Richard Summers Inc. <Reception@summersinc.co.za>; Clarice Arendse <clarice@summersinc.co.za>; Celine Oates <celine@summersinc.co.za>; Mary-Jane Morris <mjm@megateam.co.za>; Josua Meyer <meyerjosua55@gmail.com> Subject: RE: FINAL ENVIRONMENTAL IMPACT ASSESSMENT REPORTS FOR THE PROPOSED SHEEPMOOR AND EMVELO WIND ENERGY FACILITIES, MPUMALANGA PROVINCE (DFFE REF: 14/12/16/3/3/2/2611 & 14/12/16/3/3/2/2613) Importance: High Dear Stephanie Please see attached comments in respect of the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province (DFFE ref: 14/12/16/3/3/2/2611 & 14/12/16/3/3/2/2613).	Dear Mr. Richard Summers, Thank you for your email and your responses. We acknowledge receipt of your comments and confirm that they will be incorporated into the Comments and Responses Report for the proposed development. A formal response to your comments will be provided within that report, which will form part of the Final EIA submission to the DFFE. Kind Regards.

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				Kindly acknowledge receipt. Kind regards Richard Summers	
				<u>Attachment: Combined DEIR Comment 15.08.25.</u> This document contains comments on the Environmental Impact Reports (“DEIRs”) and associated Annexures for the proposed Emvelo and Sheepmoor Wind Energy Facilities (“WEFs”) which were made available to interested and affected parties (“I&APs”) during July 2025. 1.2. These comments are submitted on behalf of Mr. Josua Meyer a registered I&AP and owner of Portions 3, 4, 12 and 14 of the Farm Waaihoek No. 286, as well as Portions 4, 5 and 6 of the Farm Onverwacht No. 287, and Portion 7 of the Farm Windhoek No. 291. 1.3.Comments on the first version of the Draft EIA Report (March 2025) were provided within the commenting period timeframe of 30 days (i.e. by 10 April 2025) and covered both the proposed Emvelo and the Sheepmoor WEFs in a single report. ERM have released a second draft of the EIA Report dated July 2025 and the commenting period closes on 15 August 2025. The comments herein are supplementary to those made on the initial Draft EIA Reports of March 2025 and are not to be taken as substituting those earlier comments. 1.4 It must be noted that the comments, recorded herein, are based on a review of select items using examples primarily from the Sheepmoor Draft EIA Report and associated documents, but apply equally to the proposed Emvelo WEF. This is because the same approach has been adopted by ERM for both projects.	Noted.

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				PUBLIC PARTICIPATION PROCESS (PPP) *User unfriendly documentation places an undue burden placed on I&Aps* 2.1. As noted in our comments of April 2025, an undue burden is placed on I&APs in the context of being forced to comment simultaneously on the EIA documents related to these two proposed WEFs. This situation has not changed in relation to the current commenting period. Yet again, an undue an unreasonable burden is placed on I&APs to comment on two Draft EIA Reports for two separate applications for the projects located adjacent to each other and proposed by the same Applicant. The commenting periods run concurrently which effectively reduces the opportunity for meaningful public participation.	The EAP acknowledges the concern. The Applicant submitted two separate applications as required under the EIA Regulations, 2014 (as amended), given that each Wind Energy Facility (WEF) has a distinct development footprint and associated grid connection. Regulation 3(1) requires a separate application per listed activity unless formally consolidated by the Competent Authority. To facilitate participation, combined notices, joint information meetings, and a consolidated Comments and Responses Report (CRR) were prepared, ensuring that stakeholders could raise project-specific or cumulative issues in a single forum.
				2.2 In fact, as is noted elsewhere in these comments, the sites of the proposed WEFs have changed, such that they overlap to some extent. This points to the fact that separating these applications is a ruse and that it is unjustified and unreasonable to treat these as two separate applications. It serves no logical impact management purpose and simply places an undue and undesirable burden on the purpose and simply places an undue and undesirable burden on the EIA system – I&APs, the commenting authorities and the Competent Authority.	While certain alternative layouts resulted in portions of the proposed footprints being in proximity or overlapping buffer areas, the projects remain separate applications with independent Environmental Authorisation requirements. Regulation 21(1) of the EIA Regulations requires submission of an EIA per application accepted. The EAP acknowledges the concern regarding the accessibility and structure of the Public Participation Process (PPP) reports. In accordance with Regulation 18(1) of the NEMA EIA Regulations, 2014 (as amended), which requires that information be made available in a manner that is accessible and understandable to Interested and Affected Parties (I&APs), the Final EIAr includes a simplified summary of the PPP process and a

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					consolidated Comments and Response Report (CRR) to improve clarity and traceability. Furthermore, the EAP has ensured compliance with Regulation 23(1)(a) by subjecting the Draft EIAr to a 30-day public participation process and incorporating all comments received. We accept the recommendation to enhance user-friendliness and commit to applying clearer formatting, document navigation tools, and change-tracking methods in future submissions to support meaningful public participation and procedural fairness.
				2.3. Also noted in our comments of April 2025, the PPP reports for the respective proposed WEFs are difficult to follow. This situation persists with the current reports– no discernible effort by the EAP has been made to make these documents more user-friendly in this 'second version' of the Draft EIA Report.	2.2 While certain alternative layouts resulted in portions of the proposed footprints being in proximity or overlapping buffer areas, the projects remain separate applications with independent Environmental Authorisation requirements. Regulation 21(1) of the EIA Regulations
				2.4. There is extensive duplication of the same correspondence, which makes it an arduous exercise to track the sequence of different activities undertaken and also the issues raised by I&APs (Appendix 6 of the PPP report). Some correspondence is repeated more than 10 times. It also makes it exceedingly difficult to find the original comments made by an I&AP. This adds to the unfair burden on I&APs and reduces the opportunity for meaningful public participation.	The duplication was unintentional and arose from automated collation of correspondence across the two project databases. This has been corrected in the Final EIAr.
				2.5. In certain instances, one cannot read the original comments in their entirety (i.e. read the full letter or email from submitted by an I&AP) as the original communication is not provided. Thus, in these cases comments are only available in a disjointed point-by-point fashion in a tabular format (i.e. Section 7 – Comments	The EAP acknowledges the concern. For transparency, the Final EIAr includes the full, unabridged original submissions from I&APs and authorities in (PPP Appendices). The CRR retains point-by-point responses for clarity

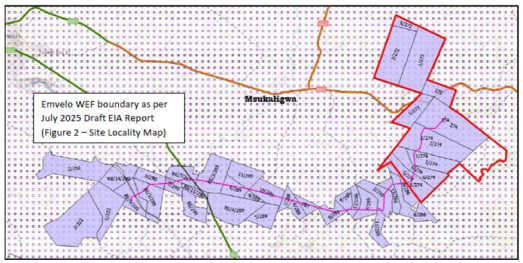
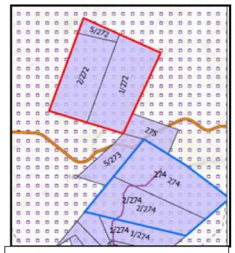
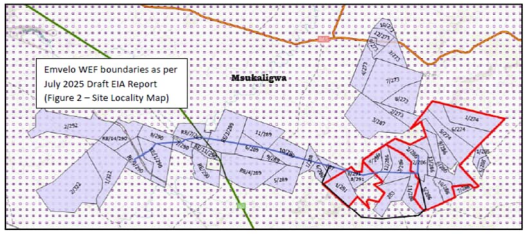
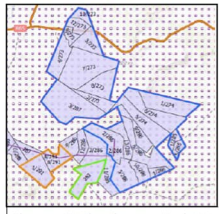
Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				and Responses Report in Volume III - PPP Report), hereafter referred to as the CRR. This adds to the unfair burden on I&APs and reduces the opportunity for meaningful public participation.	but cross-references the complete original submissions. Additionally All the comments were recorded verbatim in the CRR tables (see Table 8-1~~Table 23-1~~ and Table 8-3~~Table 23-3~~). Both the DARDLEA and MTPA submissions (10 April 2025) are now included in full and can be cross referenced to check any omission against recorded in the tables referenced.
				2.6. The burden placed on I&APs is exacerbated by the fact that the EAP has not clearly indicated or described what has changed, such as which specialist reports have been revised or which sections of the Draft EIA Reports have been updated. In addition, the documents themselves do not show where changes have been made through use of underlining or a different colour text. This means I&APs are faced with having to compare the two draft reports (version 1 with version 2) to ascertain what changes have been made. Clearly this is wholly unreasonable and constitutes unfair process.	We acknowledge the concerns raised regarding the identification of changes between the initial and revised versions of the DEIA Report. The EAP has followed the prescribed procedures in accordance with the relevant environmental regulations and guidelines. While we understand that tracking changes can be challenging, it is important to note that the EIA process does not require the use of underlining, colour coding, or other visual markers to denote revisions within the report. Instead, the approach adopted encourages all I&APs to engage with the full content of the revised Draft EIA Report, thereby ensuring a comprehensive understanding of the project and its potential impacts. Highlighting changes through formatting may inadvertently lead to selective reading or subconscious bias, which could detract from the holistic review intended by the public participation process. Where substantive updates have been made—such as revisions to specialist studies

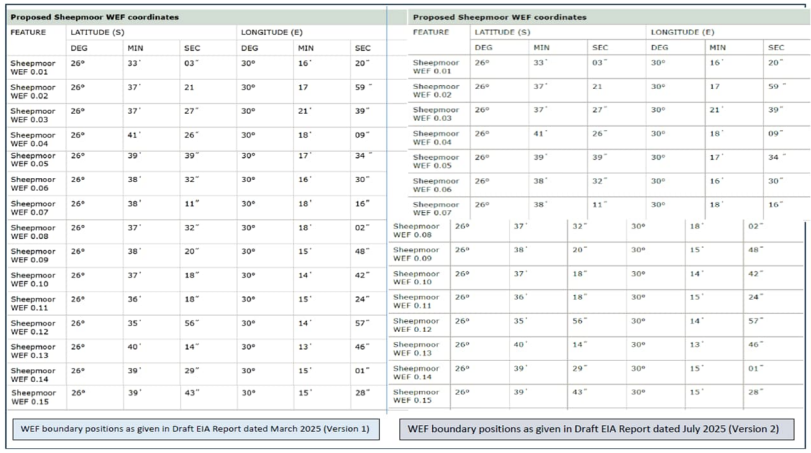
Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					or amendments to impact assessments—these have been incorporated into the revised report and are reflected in the updated documentation available for public review. In addition, a summary of changes or clarification of updates can be provided upon request to assist I&APs in navigating the revised content – this does not appear to have been requested at in the review period.
				2.8. DFFE stated that: "Copies of the original comments received from I&APs and organs of state, which have jurisdiction in respect of the proposed activity, must be submitted with the Final EIAr." If these comments are required for the Final EIR Report, then it follows that must also be available in the Draft EIA Reports. Examples of missing original comments are:	
				2.8.1. Most notably, the original comments on the first version of the Draft EIA Report (dated March 2025) from DARDLEA and MTPA are not provided in the CRR, which forms part of the suite of documents that make up the July 2025 Draft EIA Report. These comments were submitted on 10 April 2025 (as per the CRR), but the original submissions are not included in the PPP Reports. This is the case for both Emvelo and Sheepmoor. This has been fact-checked through searching for DARDLEA, 10 April 2025, April 2025 as well as scrolling through Appendix 6 of the CRR. The EAP is requested to explain this material omission.	The EAP acknowledges this administrative error to not include the copies of the original comments from DARDLEA and MTPA. However all the comments were recorded in the CRR tables (see table Table 8-1~~Table 23-1~~ and Table 8-3~~Table 23-3~~) Both the DARDLEA and MTPA submissions (10 April 2025) are now included in full and can be cross referenced to check any omission against recorded in the tables referenced.
				2.8.2. The comments submitted by Richard Summers Inc. and MEGA on the March 2025 Draft EIA Reports are ignored and not included. Email communication dated 10 April 2025 from Richard Summers Inc to ERM confirming that comments had been submitted is included in Appendix 6 of the CRR (see pages 371 and 372 Emvelo CRR and pages 377-379 Sheepmoor CRR). Several searches of both CRRs have been conducted, using various search terms as well as scrolling slowly through the respective documents. The comments are nowhere to be found. The EAP is requested to explain this material omission.	The EAP acknowledges the concern raised regarding the comments submitted by Richard Summers Inc. and MEGA on the March 2025 Draft EIA Reports. Following a detailed review of the Comments and Responses Reports (CRRs) for both the Emvelo and Sheepmoor WEFs, it has been confirmed that while email correspondence confirming receipt of these comments was included in Appendix 6, the substantive

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					comments themselves were inadvertently not captured in the CRR tables. This omission is regrettable and unintentional. To address this, all comments submitted by Richard Summers Inc. and MEGA on 10 April 2025 have now been fully incorporated into the final EIAr and reflected in the updated CRR (Section 7, Volume III). Each comment has been cross-referenced with the relevant sections of the Draft EIA Reports, and detailed responses have been provided, including any adjustments to impact assessments, mitigation measures, or monitoring requirements where applicable. This ensures compliance with the requirements of Regulation 23(1)(a) of the NEMA EIA Regulations, 2014 (as amended), which mandates that all comments from I&APs be adequately addressed and included in the final EIAr, and supports transparent decision-making by the competent authority.
				2.9.The DFFE also required the following: “All issues raised and comments received during the circulation of the SR and draft EIAr from registered Interested and Affected Parties (I&APs) and organs of state, as listed in your I&APs Database, and others which have jurisdiction in respect of the proposed activity must be adequately addressed and included in the final EIAr” (see Sheepmoor PPP Report, Section 7 - CRR, page 46). This also has not been achieved:	The EAP acknowledges that not all comments were captured in the July 2025 Draft CRRs. The Final EIAr now includes all submissions received, including those referenced below, and provides responses accordingly to ensure alignment with the DFFE’s requirements.
				2.9.1. The aforementioned comments from Richard Summers Inc are not recorded in the CRR tables in either of the CRR reports (See Section 7). This means they have been completely ignored.	The EAP acknowledges the oversight. Mr. Meyer’s follow-up submission of 15 April 2025. It is important to note that the

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					comment was submitted after the PPP closing date, however the comment has now been included in of the Final EIAr, and responses are provided in the updated CRR (see Table 8-5~~Table 23-5~~).
				2.9.2. The comments of 15 April 2025 from Mr Joshua Meyer are not included in the CRR tables in either of the CRR reports (See Section 7). Since this communication involved follow-up on previous comments to which Mr Meyer had not received an adequate response, these comments ought to have been included. The relevant correspondence can be found on page 369 of Appendix 6 Emvelo CRR and page 375 of Appendix 6 Sheepmoor CRR. Two landowners, of which at least one is a neighbour, requested inclusion as an I&AP. These requests were submitted on 9 April 2025 (Mr Braam Moodie) and 4 April 2025 (Restov Boerdery). Neither of these I&APs were afforded a fair opportunity to comment on the Draft EIA Report – they were simply provided with a link to the EIA documentation. There is no evidence of any effort by the EAP to afford them a meaningful opportunity to comment or to assist them in familiarising themselves with the proposed projects and associated EIA process.	The EAP confirms both individuals/entities have been formally added to the I&AP database. They were provided links to documentation during the Draft EIAr stage; This is consistent with Regulations 41–44 of the EIA Regulations, which govern public participation requirements. Additionally the individuals have been afforded the opportunity to comment during the revised DEIAr and have submitted their comments which have been added to this CRR (Mr Braam Mooodie submitted his comments on 10th August 2025 and Mr. Retsrov Boerdery (NWJ Vorster Trust) submitted his comments on the 15th August 2025) see emails and responses above.
				2.10. Whilst one of the uses of the CRR by I&APs is the ability to cross-reference a response from the EAP to the relevant section in the Draft EIA Report to see whether the I&AP's input was actually addressed (i.e. a change is discernible in the report) – this is of no use if an I&AP's comments are not recorded in the CRR first place. This is relevant because not all comments are recorded in the CRR. It therefore follows that these comments have not been considered at all.	The Final EIAr now includes all missing submissions, fully captured and responded to in the CRR, with cross-referencing to relevant EIAr sections. This addresses the requirement of Regulation 23(1)(a) to reflect all comments received.
				INFORMATION PROVISION AND PRESENTATION *Confusing, unclear and poor-quality information*	

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				3.1. The site boundaries shown in the second version of the Draft EIR Report (dated July 2025) differs for both sites relative to the Draft EIA Report issued in March 2025. This is confusing and casts doubt on the accuracy of the information in the reports:	
				3.1.1. Portions 1, 6 and 5 of Farm 274, Farm Schiedamre are shown in the list of affected farm properties for both Sheepmoor (See Table 0.2) and Emvelo (See Table 0-2).	This is correct, as Portions 1, 6 and 5 of Farm 274 (Schiedam) accommodate proposed infrastructure for both the Emvelo and Sheepmoor WEFs, this includes access roads. This overlap was assessed in both EIA processes and reflected accordingly in the respective property tables.
				3.1.2. Further to the above, this is the case in both versions of the Draft EIA Reports, that is the March 2025 (Version 1) and July 2025 (Version 2), but the maps and diagrams in the March 2025 Draft EIA Report show a site boundary that does not include the aforementioned properties. This means that tabulated information (Table 0-2) in which affected farm properties are recorded for the proposed Emvelo WEF and the site boundary shown in diagrams and maps are different.	The July 2025 Draft EIA Report includes updated site boundaries which show that both the Emvelo and Sheepmoor WEFs share Portions 1, 5 and 6 of Farm 274 (Schiedam), aligning the spatial data with the tabulated property information.
				3.1.3. In addition, the site boundary for the proposed Sheepmoor WEF differs in the July 2025 Draft EIA Report, relative to that shown in the earlier version of March 2025. No explanation for the change is given. To add to the confusion, this change is not reflected in all of the maps / diagrams in the July 2025 Draft EIA Report. All of the figures in Section 6: Description of the Baseline Environment in the July 2025 Draft EIA Report show the old site boundary (i.e. as per the March 2025 Draft EIA Report).	The updated site boundary in the July 2025 Draft EIA Report reflects the shared use of Portions 1, 5 and 6 of Farm 274 (Schiedam) by both the Emvelo and Sheepmoor WEFs, due to the shared access road. All figures have been updated in the Final EIA Report to reflect the updated site boundary.
				3.1.4. The positions of WTGs on the overlapping farm portions (Portions 1, 6 and 5 of Farm 274,Farm Schiedamre) is unclear. Neither a written description nor a combined diagram showing WTG positions associated with the respective projects on these	Updated figures showing the placement of WTGs for both the Emvelo and Sheepmoor WEFs on the overlapping farm portions are included in the appendices of the Final EIA Report.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				parcels of land is provided and the project information is materially deficient.	Applicant: The layout proposed in the Final Submission clearly shows the distinction between the two layouts.
				3.2. The evidence for the situation described above is shown in the following diagrams and tables. Boundary coordinates are listed in the tables, which show that no changes have been made to this list of boundary coordinates (the example is taken from the Sheepmoor Draft EIA Reports) provided in the March 2025 versus the July 2025 reports.   Emvelo WEF boundary as per March 2025 Draft EIA Report (Figure 2 – Site Locality Map)   Sheepmoor WEF boundary as per March 2025 Draft EIA Report (Figure 2 – Site Locality Map	Please refer to the updated table of boundary coordinates and revised figures included in the appendices of the Final EIA Report, which reflect the correct and current site boundaries.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					

Proposed Sheepmoor WEF coordinates

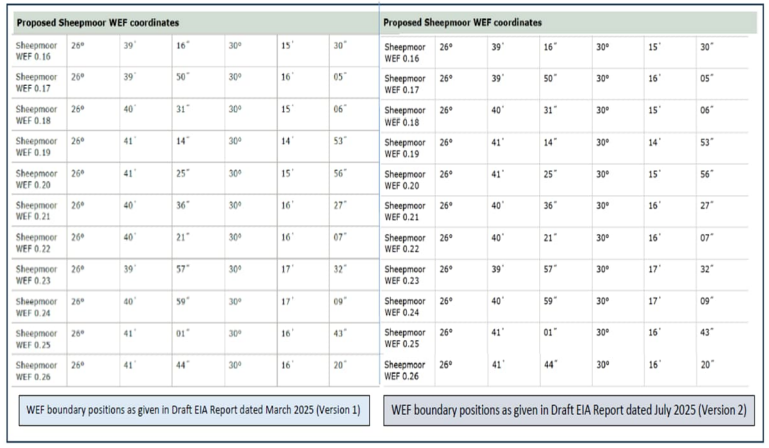
FEATURE	LATITUDE (S)			LONGITUDE (E)		
	DEG	MIN	SEC	DEG	MIN	SEC
Sheepmoor WEF 0.01	26°	33'	03"	30°	16'	20"
Sheepmoor WEF 0.02	26°	37'	21	30°	17	59 "
Sheepmoor WEF 0.03	26°	37'	27"	30°	21'	39"
Sheepmoor WEF 0.04	26°	41'	26"	30°	18'	09"
Sheepmoor WEF 0.05	26°	39'	39"	30°	17'	34 "
Sheepmoor WEF 0.06	26°	38'	32"	30°	16'	30"
Sheepmoor WEF 0.07	26°	38'	11"	30°	18'	16"
Sheepmoor WEF 0.08	26°	37'	32"	30°	18'	02"
Sheepmoor WEF 0.09	26°	38'	20"	30°	15'	48"
Sheepmoor WEF 0.10	26°	37'	18"	30°	14'	42"
Sheepmoor WEF 0.11	26°	36'	18"	30°	15'	24"
Sheepmoor WEF 0.12	26°	35'	56"	30°	14'	57"
Sheepmoor WEF 0.13	26°	40'	14"	30°	13'	46"
Sheepmoor WEF 0.14	26°	39'	29"	30°	15'	01"
Sheepmoor WEF 0.15	26°	39'	43"	30°	15'	28"

WEF boundary positions as given in Draft EIA Report dated March 2025 (Version 1)

Proposed Sheepmoor WEF coordinates

FEATURE	LATITUDE (S)			LONGITUDE (E)		
	DEG	MIN	SEC	DEG	MIN	SEC
Sheepmoor WEF 0.01	26°	33'	03"	30°	16'	20"
Sheepmoor WEF 0.02	26°	37'	21	30°	17	59 "
Sheepmoor WEF 0.03	26°	37'	27"	30°	21'	39"
Sheepmoor WEF 0.04	26°	41'	26"	30°	18'	09"
Sheepmoor WEF 0.05	26°	39'	39"	30°	17'	34 "
Sheepmoor WEF 0.06	26°	38'	32"	30°	16'	30"
Sheepmoor WEF 0.07	26°	38'	11"	30°	18'	16"
Sheepmoor WEF 0.08	26°	37'	32"	30°	18'	02"
Sheepmoor WEF 0.09	26°	38'	20"	30°	15'	48"
Sheepmoor WEF 0.10	26°	37'	18"	30°	14'	42"
Sheepmoor WEF 0.11	26°	36'	18"	30°	15'	24"
Sheepmoor WEF 0.12	26°	35'	56"	30°	14'	57"
Sheepmoor WEF 0.13	26°	40'	14"	30°	13'	46"
Sheepmoor WEF 0.14	26°	39'	29"	30°	15'	01"
Sheepmoor WEF 0.15	26°	39'	43"	30°	15'	28"

WEF boundary positions as given in Draft EIA Report dated July 2025 (Version 2)



Proposed Sheepmoor WEF coordinates

Sheepmoor WEF 0.16	26°	39'	16"	30°	15'	30"
Sheepmoor WEF 0.17	26°	39'	50"	30°	16'	05"
Sheepmoor WEF 0.18	26°	40'	31"	30°	15'	06"
Sheepmoor WEF 0.19	26°	41'	14"	30°	14'	53"
Sheepmoor WEF 0.20	26°	41'	25"	30°	15'	56"
Sheepmoor WEF 0.21	26°	40'	36"	30°	16'	27"
Sheepmoor WEF 0.22	26°	40'	21"	30°	16'	07"
Sheepmoor WEF 0.23	26°	39'	57"	30°	17'	32"
Sheepmoor WEF 0.24	26°	40'	59"	30°	17'	09"
Sheepmoor WEF 0.25	26°	41'	01"	30°	16'	43"
Sheepmoor WEF 0.26	26°	41'	44"	30°	16'	20"

WEF boundary positions as given in Draft EIA Report dated March 2025 (Version 1)

Proposed Sheepmoor WEF coordinates

Sheepmoor WEF 0.16	26°	39'	16"	30°	15'	30"
Sheepmoor WEF 0.17	26°	39'	50"	30°	16'	05"
Sheepmoor WEF 0.18	26°	40'	31"	30°	15'	06"
Sheepmoor WEF 0.19	26°	41'	14"	30°	14'	53"
Sheepmoor WEF 0.20	26°	41'	25"	30°	15'	56"
Sheepmoor WEF 0.21	26°	40'	36"	30°	16'	27"
Sheepmoor WEF 0.22	26°	40'	21"	30°	16'	07"
Sheepmoor WEF 0.23	26°	39'	57"	30°	17'	32"
Sheepmoor WEF 0.24	26°	40'	59"	30°	17'	09"
Sheepmoor WEF 0.25	26°	41'	01"	30°	16'	43"
Sheepmoor WEF 0.26	26°	41'	44"	30°	16'	20"

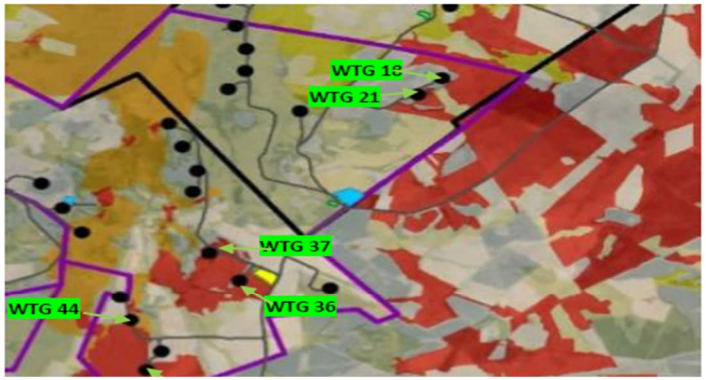
WEF boundary positions as given in Draft EIA Report dated July 2025 (Version 2)

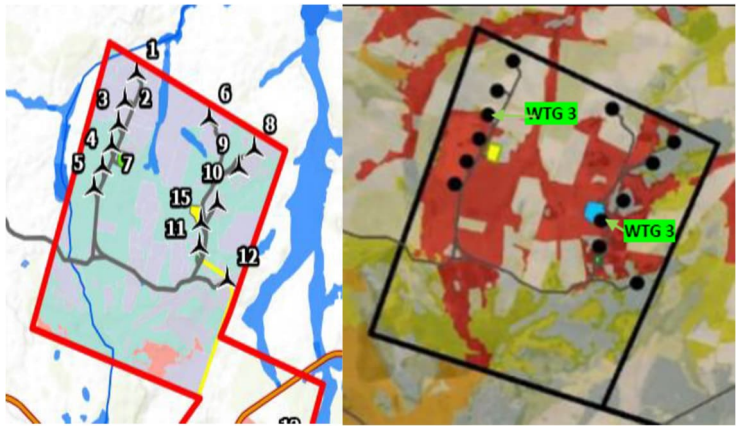
Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				3.3. The result of the situation as described in the foregoing points is that it is wholly unclear to I&APs as to what properties are affected by the proposed WEFs, what the extent of the respective proposed WEF sites actually is, how the two sites overlap in terms of infrastructure, WTGs and environmental constraints or sensitivities. Information which is materially deficient and reporting that is in such a state of disarray is not acceptable at the stage of a Draft EIA Report, which needs to be submitted as a Final EIA Report to the Competent Authority on 25 August 2025. It will not be possible to rectify these material omissions in that timeframe and any Final EIA Report submitted to the Competent Authority on this basis will be materially deficient.	The final EIAr includes a consolidated and fully updated layout for both WEFs, clearly showing the boundaries of each project site, WTGs, and associated infrastructure. Any relocations or changes made to WTGs since the March 2025 Draft EIAr have been fully documented in the final report, with explanations for the rationale behind these changes, including environmental sensitivities, avoidance of CBAs, and other constraints. This ensures compliance with the precautionary principle and the mitigation hierarchy.
				3.4. Based on responses from the EAP in the CRR, it appears the some of the WTGs may have been relocated / moved. These site layout changes are not detailed and the rationale for any such changes is not given in the project description. In fact, the Draft EIA Report is silent on the manner in which the layout has changed and the rationale behind these changes and which were made in response to environmental constraints or sensitivities. Such details and related information are central to determining if a concerted and authentic effort has been made to avoid adverse impacts, in accordance with the precautionary principle and the mitigation hierarchy.	
				3.5. Coordinates of the WTGs are not provided, and therefore reliance has to be placed on the figures (diagrams), to ascertain where the turbines and other infrastructure is located relative to environmental sensitivities. This makes it confusing for I&APs to appreciate if the impact assessment is informed by credible data. This is exacerbated by the fact that the figures provided by ERM in the March 2025 Draft EIA Report did not have labels on the WTGs because the WTGs are not numbered. This makes it exceedingly difficult for I&APs and the Competent Authority to correlate these figures with those in the July 2025 Draft EIA	The final EIAr includes precise coordinates for all WTGs, consistently numbered across all figures. Figures have been updated to reflect WTGs relative to environmental sensitivities, ensuring that I&APs and the Competent Authority can verify positions and understand the spatial basis for impact assessments.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				Report. The lack of WTG coordinate information undermines the ability of I&APs and the Competent Authority to establish whether the position of WTGs has changed in response to concerns about environmental sensitivities.	
				3.6. Given the foregoing concerns regarding the adequacy and accuracy of information relied on by the EAP and provided in the reports, no reliance can be placed on any statements about WTGs having been relocated / moved in response to noise, biodiversity sensitivities, cultural / heritage resource sensitivities and the like because spatial data shown on maps is confusing, boundaries have changed, the two sites overlap and diagrams and maps in reports have not been updated accordingly.	The Emvelo WEF assessment includes updated site sensitivity verifications and specialist walkdowns that informed turbine micro-siting decisions. Turbines have been strategically relocated to avoid high-risk zones, including Martial Eagle nests, Southern Bald Ibis colonies, and wetland corridors, with clear mapping of exclusion zones and mitigation buffers. While overlapping site boundaries and evolving layouts are acknowledged, the final Environmental Impact Assessment (EIA) integrates the most current spatial data and specialist inputs. The Environmental Assessment Practitioner (EAP) has committed to further refinement during the detailed design phase, ensuring alignment with biodiversity, noise, and heritage sensitivities.
				<u>Assurances given in the CRR have no substance</u> 3.7. In the CRR the EAP has offered assurances to concerned parties that WTGs have been moved / relocated away from sensitive areas. Unfortunately, there are instances where this contention is not borne out by the facts and data contained in the reports. Therefore it must be concluded that these assertions by the EAP must be treated with extreme caution by the Competent Authority.	The assertion that assurances provided in the CRR “have no substance” is unsubstantiated. In terms of Regulation 23(1)(a) of the NEMA EIA Regulations, 2014 (as amended), the EAP is required to provide an EIAr inclusive of all specialist reports and responses to comments received. All assurances are based on professional judgment and verified specialist input, consistent with NEMA’s precautionary principle, and the mitigation hierarchy. Regulation 23(1)(a) requires that

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					I&AP comments be considered and responded to; this has been done in the CRR. The Final EIAr includes verifiable data and maps confirming turbine positioning in relation to sensitive areas. Assertions otherwise are not factually substantiated.
				3.8. A specific example is the concern raised by DARDLEA about the location of WTGs in CBA: Irreplaceable areas, with specific mention of Turbine 45. In response the EAP has stated that this turbine has been "relocated approximately 330 metres southward to ensure complete avoidance of the CBA: Irreplaceable area". Since the Figure 6 – Important Ecological Areas in the Draft EIA Report shows CBAs as a single entity (i.e. does not differentiate according to the CBA: Irreplaceable and CBA: Optimal categories as per the Mpumalanga Biodiversity Sector Plan (MBSP), it is difficult to verify this claim. The information is materially deficient and the Competent Authority, and I&APs are unable to determine – from the reports made available - if the claims made by the EAP are valid. There is too much uncertainty.	With respect to Turbine 45 in the CBA: Irreplaceable area, the turbine has been relocated to the maximum extent technically feasible, approximately 330 metres southwards, in accordance with the mitigation hierarchy and the precautionary principle (NEMA, Section 2). While CBA: Irreplaceable extends further south, full avoidance of the feature is constrained by topography, site layout requirements, and technical feasibility. Where complete relocation is not possible, robust mitigation measures have been implemented to minimize impacts on the CBA and associated biodiversity. The Final EIAr transparently documents these decisions and mitigation measures, ensuring that the Competent Authority and I&APs can clearly understand the rationale, the limitations encountered, and the measures in place to manage residual impacts. This approach is fully consistent with NEMA EIA Regulations (2014, as amended), the Biodiversity Guidelines, and DFFE requirements for avoidance, minimization, and mitigation of impacts on sensitive areas.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				3.9. Accordingly, we considered the diagram on Biodiversity Offset Report prepared by WSP. This shows the CBA: Irreplaceable in accordance with the MBSP. It can be seen that in the case of the proposed Sheepmoor WEF, a number of WTGs fall within or right on the edge of CBA: Irreplaceable. WTG 45 remains located in CBA: Irreplaceable, despite the EAP's contention that it has been moved to completely avoid CBA: Irreplaceable.	The updated BOR includes a quantified offset strategy aligned with the National Biodiversity Offset Guideline (2023) and the Mpumalanga Biodiversity Sector Plan (MBSP), and proposes conservation measures to secure ecologically equivalent habitat elsewhere. This update ensures that the concern is addressed transparently and that the mitigation hierarchy is applied rigorously.
				3.10. The contradiction in the documentation is deeply concerning because it misrepresents the correct factual position on the ground. Furthermore, even if it was moved southwards as stated by the EAP, this would not resolve the situation, since CBA: Irreplaceable is present to the south of this turbine.	Turbine 45 and other WTGs have been relocated to minimize impacts on CBA: Irreplaceable areas to the extent technically feasible. Where full avoidance is impossible due to site constraints, robust mitigation measures have been implemented, including habitat offsets, monitoring programs, and operational restrictions during sensitive periods. These measures ensure compliance with the NEMA Section 2 principles and the mitigation hierarchy. The Final EIAr provides transparent documentation of all decisions, demonstrating that no misrepresentation has occurred and that impacts are effectively managed.
				3.11. What is notable in the case of Sheepmoor is that there are other WTGs sited within CBA: Irreplaceable or on the edge thereof, besides WTG 45: Irreplaceable, namely WTGs 44, 36, 37, 21 and 18. A similar situation exists for Emvelo as can be seen from the WSP Biodiversity Offset Report – Figure 3-1.	While some turbines are located near or on the edge of CBA: Irreplaceable zones, the Environmental Impact Assessment confirm that these placements are either within degraded patches or marginal areas with limited conservation value. The Emvelo layout has been refined to avoid core sensitive areas, with turbines like WTG 23 and WTG 25 flagged for micro-siting outside

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				 WTGs located in CBA: Irreplaceable – Sheepmoor (extract from Figure 3-1 of the WSP Biodiversity Offset Report). According to the key associated with this diagram, red shading shows CBA: Irreplaceable.	exclusion zones during the detailed design phase. These adjustments, combined with offset strategies and robust mitigation measures, ensure that residual impacts are minimal and manageable.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					
				3.12. The EAP states “the turbine and infrastructure layout has been revised in accordance with specialist recommendations, with a strong emphasis on avoidance of ecologically sensitive areas. All no-go areas identified by biodiversity specialists have been fully excluded from the final layout.” (e.g. Sheepmoor CRR, page 24).	The statement in the CRR regarding “full exclusion of all no-go areas” reflects the intent and design principles applied during layout planning, guided by specialist input and the mitigation hierarchy (NEMA, Section 2, Principles of Environmental Management). It must be noted that “full exclusion” applies to areas that are technically feasible to avoid. Where physical, technical, or operational constraints limit complete avoidance, mitigation measures—including offsets, monitoring, and adaptive management—have been implemented and are clearly documented in the Final EIAr and EMPr.
				3.13.Concern was raised about WTG 15 being located in a Key Biodiversity Area (KBA) that is untransformed (page 15 Emvelo CRR). In reply the EAP states that WTG 15 was removed from the final layout. This is not the case! Examination of the extract from Figure 6 – Important Ecological Areas (from the figures volume attached to the July 2025 Draft EIA Report) shows that both WTG3 and WTG 15 remain located in a CBA (green shading), albeit in a different position relative to the March 2025 Draft EIA Report. A construction camp is located next to the WTG and is also shown situated in a CBA. What is the explanation for this? Therefore, the relocation of WTG 15 does not seem to have offered any advantage from an avoidance of an adverse impact on biodiversity perspective. The lower image is extracted from the Biodiversity Offsets Report and it can be seen that both WTG 3	

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				and WTG 15 are situated within CBA: Irreplaceable. Again, it appears that this is mere tick-box exercise by the EAP with no real intent to report accurately.	
				3.14. The status of the layouts that have been assessed by the EAP is unclear. Terminology is used loosely as shown in the examples below, taken from the July 2025 Draft EIA Report for the proposed Emvelo WEF. The same text is evident in the Draft EIA Report for the proposed Sheepmoor WEF, albeit that the page numbers are different. Examples include:	
				3.14.1. Page 9 of the Emvelo July 2025 Draft EIA Report under the topic Terrestrial Biodiversity, it is stated that "It is recommended that a final site walkdown be undertaken in order to inform the final layout design and inform micro-siting of footprints."	The term "final layout" is used to describe the preferred turbine and infrastructure arrangement available at a given stage in the iterative project design process. It does not imply that all micro-siting adjustments have been completed. Environmental assessments are based on the layout available at the time of report preparation, with the understanding that minor refinements may occur following site verification. The recommendation for a final site walkdown is a standard procedural step to verify on-the-ground conditions and inform micro-siting of turbine footprints and associated infrastructure. This ensures that placement considers local environmental sensitivities and construction constraints. The reference to the final layout design as "not finalised" reflects the iterative nature of wind farm design. While a preferred layout exists, its precise footprint may be refined during micro-siting. The reported area of up to 180 ha accounts for potential minor adjustments.
				3.14.2.Yet the project description also references final layout design as not being finalised (page 2): "The proposed turbine footprints and associated facility infrastructure will cover an area of up to 185 ha after rehabilitation, depending on final layout design."	
				3.14.3.Then on page 13 on the topic of fauna, the following statement is made: "Final layouts of turbine placement, access roads, OHPLs, and other associated developments were provided by ERM on 30 January 2025. The final layout plans indicate that several wind turbines and access roads fall within areas of high faunal sensitivity" . 3.14.4.Page 28: "Prior to the submission of the final layout plan to the DFFE for approval….."	

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					The January 2025 layout provided by ERM represents the working “final layout” for assessment purposes. Environmental sensitivities, including high faunal sensitivity areas, were identified based on this layout. Adjustments to turbines and infrastructure (where required) are documented in the reports. References to submission of the “final layout plan” indicate the layout that will be formally submitted to the competent authority after all micro-siting and specialist verification has been completed. This is consistent with standard EIA procedure. Conclusion: The EAP confirms that references to “final layout” throughout the reports are consistent with standard project design practices. The environmental assessments and mitigation measures are robust and based on the layout available at the time of assessment. Walkdowns and micro-siting are standard steps to ensure that the final submitted layout is fully informed by on-site conditions and specialist input.
				3.15.It is unclear as to what the final layout constitutes because as already noted, in the CRR the EAP makes reference to WTGs being moved in the “final layout”. The reports are plagued with inaccuracies and contradictory statements. The credibility of the assessment process is doubtful as so many uncertainties prevail. IN this regard, the following questions arise:	The EAP acknowledges the concerns regarding apparent discrepancies in references to the “final layout” across the reports. The following clarifications are provided:

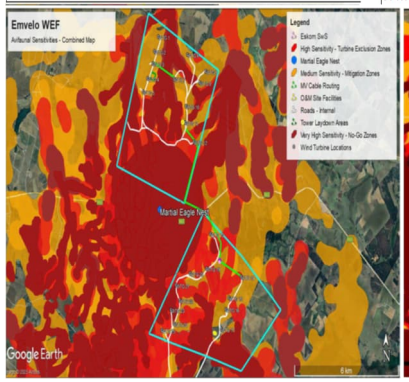
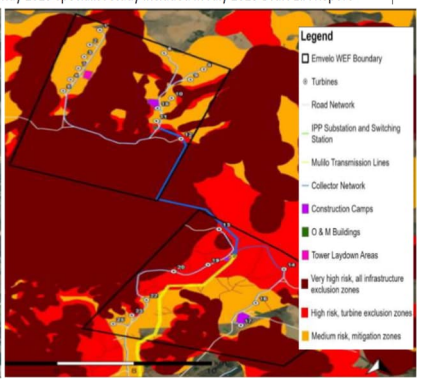
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				3.15.1.If as noted by the terrestrial biodiversity specialist (for example), final layout plans were provided by ERM in January 2025, then is this the layout that was assessed for the purposes of the March 2025 Draft EIA Report? This is not clear at all from the reports made available to I&APs.	The layout assessed in the March 2025 Draft EIA Report was based on the January 2025 layout provided by ERM, which represented the preferred arrangement of turbines and infrastructure at that time. While this layout served as the reference for the environmental assessments, it is acknowledged that the final layout remains subject to micro-siting refinements following on-site verification and specialist input. Therefore, the March 2025 Draft EIA accurately assessed the environmental sensitivities of the layout available at that stage, with any subsequent adjustments clearly documented in the July 2025 Draft EIA Report.
				3.15.2.If concerns were raised by I&APs, specifically commenting authorities, about the layout plan presented in the March 2025 Draft EIA Report, and the EAP's response is that this has been resolved in the final layout, then which final layout is this? This is not clear at all from the reports made available to I&APs.	Any responses to I&AP or commenting authority concerns referencing the "final layout" relate to the preferred layout available at that stage, including proposed micro-siting adjustments. The term "final layout" in this context does not indicate that all micro-siting has been completed but reflects the layout under current assessment and review.
				3.15.3.More importantly, why is there a disparity between the EAP's claim that WTGs and infrastructure has been moved / relocated (and thus, according to the EAP, the concerns about environmental sensitivities have been addressed). This is NOT the case. The figures presented in the July 2025 Draft EIA Report, which show definitively that this is not the case, with one or two exceptions (WTG 7 was moved due to the sensitivity of bird species 23).	Adjustments to WTGs and infrastructure have been made where environmental sensitivity necessitated changes (e.g., WTG 7). Where no relocation occurred, this was due to the placement being acceptable within the design and mitigation constraints. Figures in the July 2025 Draft EIA accurately reflect these cases.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				3.15.4.Why is there reference to the need to do a walkover to develop a final layout and inform micro-siting of turbines and infrastructure, whereas the CRR creates the impression that micro siting has already been done?	The recommendation for a walkover to inform micro-siting is standard procedure and does not contradict the iterative adjustments made to the layout. Micro-siting continues to be applied to ensure optimal environmental and technical outcomes.
				3.16.As evident from the foregoing discussion, as well as that in relation to avifaunal sensitivity, any assertion by the EAP that layouts have been changed, WTGs and infrastructure moved to avoid or reduce adverse impacts, are questionable. Such assertions must be interrogated by the Competent Authority and treated with caution. In fact, these claims cannot be relied upon and the manner in which information in this regard has been presented serves to compromise the entire EIA process. Moreover, it undermines the validity of significance ratings (over and above the weaknesses in the rating methodology highlighted in Section 4 of this document) pre-and post-mitigation.	The EAP confirms that all layout adjustments and micro-siting recommendations are based on sound professional judgment and specialist input. Assertions regarding relocated infrastructure are accurate where changes occurred. The iterative design process and ongoing micro-siting are standard practice and do not compromise the validity of the EIA or the significance ratings. All adjustments and their rationale are documented and will be submitted to the Competent Authority for review prior to construction.
				<u>4. INADEQUATE IDENTIFICATION AND ASSESSMENT OF IMPACTS</u> 4.1.As noted in our previous comments (dated April 2025), the significance ratings of impacts reported by the EAP cannot be relied upon. It is inconceivable that in an environment that has so many highly sensitive environmental attributes, that not one single negative impact post-mitigation is rated more than being of 'moderate' significance. In general significance has been understated and this situation persists.	The EAP acknowledges that the environmental sensitivity of the site is high. However, significance ratings reported in the Draft EIA were based on professional judgment informed by standard impact assessment methodology, considering both the likelihood and consequence of potential impacts, as well as proposed mitigation measures. The classification of post-mitigation impacts as "moderate" reflects mitigation measures that are practicable and enforceable, rather than an underestimation of sensitivity. All assumptions and rationale are documented within the EIA reports.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				4.2.An example is the way the criterion “extent” is applied. To illustrate this point, avifauna is given as an example using the operational impact “Mortality due to Collisions with Turbines”. The first problem is that all birds are considered as a single entity – there is no differentiation between Species of Conservation Concern versus other species. Where a species is listed globally as CE or E, then the extent of any impact that could cause mortality is a major concern at an international level and cannot be rated as medium in terms of extent. It is immediately apparent just from this single example of the criterion of “extent”, that the result will be understatement of impact significance.	The impact assessment methodology used in the Sheepmoor WEF EIA applies a structured and transparent scoring system for significance, based on five criteria: Extent, Duration, Reversibility, Magnitude, and Probability. The “extent” parameter is defined across a scale from site-level to international, with scores assigned accordingly. While the assessment does not explicitly separate SCC from other species in the extent scoring, it does incorporate SCC considerations in the magnitude and probability parameters, which directly influence the final significance score. For example: • Collision mortality for birds is assessed as having a national extent, medium-term duration, and reversible impact, with a high magnitude and probable occurrence, resulting in a high significance rating without mitigation and moderate with mitigation. • The cumulative impact of grid infrastructure on priority species is also rated as high pre-mitigation, acknowledging the broader ecological implications. • Furthermore, the EIA includes species-specific mitigation measures such as blade patterning, carcass monitoring, and fatality thresholds based on Potential Biological Removals (PBR), which are tailored to SCCs like the Martial Eagle and Southern Bald Ibis.

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					In summary, while the extent criterion may appear generalised, the overall impact significance framework accounts for SCCs through other weighted parameters and targeted mitigation strategies.
				4.3.Impacts on policies and plans have not been assessed. For example, NPAES (National Protected Area Expansion Strategy) areas occur on the sites of both proposed WEFs. This is not shown on the sensitivity maps / diagrams. In addition, the impact on this strategy has not been assessed. Similarly, the potential impact of the proposed projects on conservation targets and objectives such as those expressed in the or on MBSP have not been assessed. There is also no indication that these types of policies, plans and programmes influenced impact significance rating.	The EAP acknowledges that NPAES areas and other conservation planning instruments (including MBSP targets) are important considerations. Sensitivity mapping and impact assessments incorporated highly sensitive habitats and species occurrences, which are the practical proxies for policy and planning objectives on-site. Explicit references to policy documents do not alter the specialist-derived sensitivity of the areas assessed, and all proposed mitigation is consistent with national and provincial conservation objectives.
				4.4.The figures overleaf (extracted from Figure 39 of the Avifaunal Specialist Study) do show that WTG 7 was moved (in response to the sensitivity of Species 23). Relocation of WTG 15 as described in point 19 would seem to be disadvantageous in the context of Martial Eagle sensitivity. It is located closer to the Martial Eagle buffer (May 2025 Avifaunal Specialist Study) and also closer to the “Very high risk – all infrastructure exclusion zone”. It is not known to what extent the relocation of WTG 15 was considered in the May 2025 Avian Specialist Study as no reference could be found to a specific discussion in this regard. Note that changed turbine positions are shown in yellow circles in the diagrams overleaf.	Applicant: WTGs 12, 13, 14, 19 and 20 are located outside of the Martial Eagle buffer, including their blade overhang.
				4.5.There are several WTGs that are still located within the Martial Eagle Turbine Exclusion Zone. These are WTGs 12, 13, 14, 19 and	

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				20 are located. This was raised in the comments on the Draft EIA Report dated March 2025 (page 20 Emvelo CRR). In response the EAP states the following: “Noted. WTGs 12, 20 and 21 have been moved outside of the Avifaunal Turbine Exclusion Zone (Martial Eagle nest buffer), and WTG 13 has been micro sited to be located further away with the rotor swept area also not intersecting with this zone. This is simply not the case, which means this response by the EAP is factually incorrect. In fact, the specialist notes in his revised report (May 2025 – page 106) that these turbines need to be moved. Accordingly, the EAP has misrepresented the situation with regard to an extremely sensitive species.	
				4.6.Further to the above, fatality rate decreases described in the Avifaunal Specialist Study (Section 5.8.8) are open to question. It is unclear how the fatality rate for the Martial Eagle,for example, can be predicted to reduce as much as described in of the specialist study, especially as the reduction of >50% is attributed to project layout changes. In the absence of specific details of what was changed so as to result in this predicted fall in fatality rates, together with clear diagrams showing ‘before’ and ‘after’ layouts, this conclusion cannot carry a high degree of certainty. This is particularly as the recommended buffer zone for Martial Eagles has not been adhered to (5-6 km not 2.5 km radius). Moreover, the layout itself does not appear to have altered so significantly relative to Martial Eagle sensitive areas so as to point to a substantial reduction in the threat of fatality. The following diagrams from the Avifaunal Specialist Studies provided with the Draft EIA Reports of March and July 2025 show that it is exceedingly difficult to discern layout changes that may have been in response to avifaunal sensitivities.	

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				Combined Avian Sensitivity – Proposed Emvelo WEF (extract from Fig. 3.9 of February 2025 specialist study included in March 2025 Draft EIA  Combined Avian Sensitivity – Proposed Emvelo WEF (extract from Fig. 3.9 of May 2025 specialist study included in July 2025 Draft EIA Report 	
				<u>5. INADEQUATE APPLICATION OF THE MITIGATION HIERARCHY</u> <u>Avoiding avoidance – the pinnacle of the mitigation hierarchy</u> 5.1.One just has to consider the impact tables where one of the questions is: "Can impact be avoided, managed, or mitigated?" realise that the impact assessment methodology is based on a misconception of the mitigation hierarchy. The specialist response to the question "Can impact be avoided, managed, or mitigated?" is either "yes" or "no". There is no requirement to specify which mitigation strategy is being applied. Avoidance is different to management / mitigation, but the EAP makes no account for this. It is important to know whether the impact can be avoided as opposed to whether it can be mitigated. This ought to be explicitly explained by the EAP, but the EAP has failed to provide a rational explanation.	Acknowledged. The Draft EIA Report applied the mitigation hierarchy consistent with NEMA's Section 2(4)(a)(i) principles, which require that "disturbance of ecosystems and loss of biological diversity are avoided, or, where they cannot be altogether avoided, are minimised and remedied." Avoidance was the first and primary step, reflected in the iterative layout refinements that relocated turbines, access roads, and infrastructure away from highly sensitive areas (e.g., CBAs, wetlands, Martial Eagle exclusion zones). Where avoidance was not feasible due to technical or land-use constraints, mitigation and management measures were proposed. While the comment suggests a "yes/no" format oversimplifies the hierarchy, the accompanying narrative within the specialist reports explains where avoidance is feasible

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					(e.g., exclusion of wetland and riparian areas from development) and where management or mitigation is more appropriate. The approach therefore does not misconceive the hierarchy, but applies it pragmatically in line with legislative requirements.
				5.2.Avoidance is preferred and should always be considered before any other options in terms of the sequence of tiered steps mandated by the impact mitigation hierarchy. Definitively proving that avoidance has been implemented in accordance with the mitigation hierarch is something the EAP has categorically failed to establish.	Agreed in principle. Avoidance is always considered as the first step. This is demonstrated by the exclusion of turbines from formally protected areas, NFEPA wetlands, and mapped critical biodiversity areas (CBAs) during the layout refinement process. Avoidance opportunities are limited by the spatial requirements of the project, land availability, and technical constraints. Where avoidance is not feasible, the next tiers of the hierarchy minimisation, mitigation, and rehabilitation are applied. This is consistent with both South African regulations practice and IFC Performance Standard 6, which recognises that absolute avoidance is not always possible, but must be prioritised.
				5.3.The EAP's trend and preferred methodology – as shown in the Draft EIA Report - is to avoid 'avoidance' as the primary means for preventing adverse impacts in terms of the hierarchy. The EAP's approach flies in the face of IEM and the mitigation hierarchy because avoidance is assumed but not reflected in the project documentation. When working in such a sensitive environment, such as the sites of the proposed projects, it goes without question that AVOIDANCE should be top priority and a critical threshold to adhere to BEFORE proceeding to the following stages of the mitigation hierarchy. The role of the EAP is to ensure development is undertaken in a manner that ensures the interests	The concern regarding the perceived underutilization of avoidance as the primary mitigation measure is noted and appreciated. The Draft Environmental Impact Assessment (EIA) Report does, in fact, apply the mitigation hierarchy in accordance with the principles of Integrated Environmental Management (IEM) and Section 2(4)(a)(i) of the National Environmental Management Act (NEMA), which prioritizes avoidance of

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				of the biophysical environment and affected communities. This is an enormous responsibility and cannot be fulfilled if concerns raised by I&APs and conservation authorities are downplayed and effectively ignored. The impact assessment and public participation processes are materially inadequate.	adverse impacts on ecosystems and biodiversity. Avoidance was not only considered but also implemented during the iterative design process. This is evidenced by the relocation of turbines, access roads, and associated infrastructure away from Critical Biodiversity Areas (CBAs), wetlands, riparian zones, and Martial Eagle exclusion zones where it was feasible. These refinements were informed by specialist input and stakeholder engagement, and they reflect a deliberate effort to prevent impacts before considering minimization or mitigation.
				5.4. Instead of avoiding areas of high sensitivity the EAP recommends pre-commencement flora relocation and faunal relocation (see for example page 384 Draft EIA Report). This is unacceptable and illustrative of a fundamentally defective approach to impact assessment and management. Areas of high sensitivity ought to be avoided outright in terms of the mitigation hierarchy. This has NOT been done.	These areas have been assessed by the relevant specialists as either previously transformed or degraded to a degree that allows for development with appropriate mitigation. Predefined buffers have been applied to protect remaining intact habitats, and the updated Biodiversity Offset Report (BOR) provides a quantified offset strategy to address residual impacts. I&APs are encouraged to review the revised DEIRs and BOR, which now reflect these refinements and mitigation commitments in full
				5.5. There is no clarity of which species will be affected or whether they are good candidates for relocation (i.e. is the success of this proposed mitigation measure proven). The proposal to relocate species has associated impacts and these have NOT been assessed. In a scenario where relocation is unavoidable (i.e. all other options in terms of the mitigation	Relocation of species is not proposed as a primary mitigation measure but may be considered only where all other options in the mitigation hierarchy have been exhausted. In such cases, relocation would be subject to site-specific ecological

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				hierarchy have been applied and exhausted) – this constitutes a project impact and is not solely a proposed mitigation measure.	assessments to determine feasibility and appropriateness.
				5.6.It is stated “Several burrowing faunal species are present and will allow for relocation of less mobile species, although most faunal species in proximity are likely to vacate the area once earth moving equipment commences clearing and construction, however some species may require manual relocation.” Firstly, the way this proposal is framed is muddled / does not make sense. It reads like some sort of circular argument. Secondly, the impacts of relocation have not been assessed. Thirdly, once earth-moving equipment moves in, the project has commenced – which does not tie up with the proposed pre-commencement relocation of the sensitive species.	Relocation will occur before the commencement of any earthworks, and this has been clarified in the Environmental Management Programme (EMPr). Furthermore, as previously acknowledged, any relocation constitutes a project impact and will be subject to appropriate assessment, specialist input, and monitoring. The EMPr has been updated to reflect this sequencing and to ensure that relocation, where necessary, is undertaken in a controlled and ecologically responsible manner
				5.7.Inadequate thought has been given to relocation of plant and animal species, which results in the following unsubstantiated, bland and rather meaningless statement by the EAP: “They are relocated into a suitable habitat and protected from further damage and all disturbances to aid their re-establishment.”	The relocation of plant and animal species, where considered necessary, will be guided by the findings of the Biodiversity Offset Report and the Oribi Management Plan, both of which provide a structured framework for managing impacts on sensitive species and habitats. These documents outline the conditions under which relocation may be appropriate, the criteria for identifying suitable receptor sites, and the monitoring requirements to ensure ecological viability. The Environmental Management Programme (EMPr) has been updated to reflect these measures and to ensure that any relocation is implemented in a scientifically defensible and ecologically responsible manner.
				5.8. There are too many unanswered questions to place any reliance on this relocation proposal:	

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				5.8.1. Have suitable alternative habitat locations been identified for relocation purposes? How far away are these and is the location accessible for this purpose? These questions are unanswered. 5.8.2. What is the impact of the faunal species that might be relocated? What about their wellbeing? These questions are unanswered. 5.8.3. How will they be caught so as to avoid trauma? Are they territorial species and if so, how will they be introduced into a new territory? How will faunal species in the new territory react? These questions are unanswered. 5.8.4. Has a faunal relocation expert been consulted? Where is the specialist input on relocation? These questions are unanswered. 5.9. The key priority and statutory obligation for an EAP is to determine whether a proposed project can respond to the environmental constraints present at the proposed location. This is the most important assessment and guidance that an EAP can provide. Instead, in this case, focus is placed on mitigation such as relocation of sensitive flora and fauna. It appears that little or no thought is given to the recipients or receiving environment of this relocation, as if one is dealing with environmental impact management is akin to dealing with inanimate objects. 5.10. There is also a disproportionate reliance placed by the EAP on reconsideration of WTG positions following a post-authorisation walkthrough. The question that has not been answered by the EAP is this: Why can such a walkthrough not be conducted during the EIA process when the specialists have been on site? Emphasis is placed on how much field work has been done, so why did this	At this stage, specific relocation sites have not been confirmed, as the need for relocation will be determined through pre-construction surveys and site-specific sensitivity verification. Where relocation is deemed necessary, suitable receptor sites will be identified in consultation with faunal specialists, ensuring ecological compatibility, accessibility, and minimal stress to the species involved. The wellbeing of relocated fauna, including their territorial behaviour and potential interactions with resident species, will be considered in the relocation protocol, which will be developed by a qualified faunal relocation expert. This protocol will include humane capture methods, species-specific handling procedures, and post-relocation monitoring. The layout has undergone multiple iterations informed by specialist input, with avoidance of sensitive features prioritised in line with the mitigation hierarchy. While mitigation measures such as relocation are discussed, they are not relied upon as primary solutions but are included as contingency measures where avoidance is not feasible. The Biodiversity Offset Report and Oribi Management Plan provide further guidance on managing residual impacts in such cases. The offset strategy has been revised to focus on measurable, area-based outcomes that contribute to the long-term protection and management of biodiversity priority areas. The BOR now includes a commitment to

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				not include detailed examination of proposed WTG locations? For example (page 87 of the Emvelo CRR) concern is raised about the location of turbines and roads within Yellow-breasted Pipit habitat, contrary to the avifaunal specialist's recommendations. The EAP's response is "All WTGs were removed from Yellow-breasted Pipit habitat with the exception of WTG 23 that still appears to be fringing on a high-risk area as identified for the Yellow-breasted Pipit. It is recommended that this turbine position be reconsidered following the avifaunal walkthrough, post-EA (should such EA be granted) prior to construction." It seems that WTG 31 (Sheepmoor) is also located on the edge of this bird's habitat. 5.11. There is reference to turbines having been micro-sited out of certain areas. See for example the Emvelo CRR (page 20) in relation to Martial Eagle. This raises the obvious question as to why micro-siting was not completed for all bird species and other environmental sensitivities. The maps are such that it is extremely difficult to discern whether the positions of turbines have changed, and this is due to lack of information on coordinates as mentioned elsewhere in this report. An explanation as to how the siting of WTGs was done is required. Was this done in field? When and how was micro-siting done? Were the edges between sensitive habitats and WTG positions verified in the field? 5.12.It is strange that if there is such precision about blade sweep and how far it extends and that it does not impinge into sensitive areas (see page 19 and 20 of Emvelo CRR) that more detailed diagrams / maps are not provided at a scale that clearly shows the difference between the before and after changes that have been made to the layout. Another example (page 36 of the Sheepmoor CRR) of this type of feedback is: "The Sheepmoor WEF has undergone significant layout refinement to avoid high-sensitivity areas, particularly Critical Biodiversity Areas (CBAs) and known flight paths of key species." Again, is one looks at the figures, it is extremely difficult to see any material difference in the layout.	securing offset areas through formal mechanisms such as conservation servitudes or stewardship agreements, with clear implementation responsibilities, cost provisions, and timeframes. The offset will not be located within the development footprint or its immediate sphere of influence, in accordance with the national guideline. The offset strategy has been revised to ensure that it reflects the application of the full mitigation hierarchy, with avoidance prioritised wherever technically and spatially feasible. The use of offsets is not presented as a substitute for avoidance but as a final step to address residual impacts that could not be eliminated through layout refinement or on-site mitigation. The revised BOR also addresses the need to understand the ecological drivers behind CBA designation. Specialist input has been used to identify the specific biodiversity features and processes underpinning the CBA status of impacted areas, and the offset design has been tailored accordingly. This includes a focus on securing and managing ecologically equivalent or higher-value grassland systems outside the development footprint, with an emphasis on connectivity, condition, and long-term protection. 6.1.3 Applicant response:The Biodiversity Offset Report recognises the need for a clear, auditable offset framework, with final size

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				5.13. Given the foregoing points, no reliance can be placed of assurances that the layout has been substantially changed and that micro-siting has been conducted. If this were the case, then the information presentation would be clearer, especially spatial information. Precise coordinates would be given of WTG positions before and after relocation, for example. <u>Misunderstanding of legal obligations – alien invasive legislation</u> 5.14. Clearing of alien invaded areas is offered as a trade-off, at a ratio of 1:3 for direct loss of natural grassland habitat (as a trade-off or offset), in conjunction with other mitigation proposed by the terrestrial biodiversity specialist. This proposal is repeated many times in the Draft EIA Report for both proposed WEFs (e.g. page 32 Emvelo Draft EIA Report of July 2025). This proposal cannot be accepted as a trade-off or an offset. The reason is that this proposal is attached to the site of the proposed development, and the influence / impacts are not confined solely to the development footprint. 5.15. Furthermore, alien vegetation control is a legal requirement under the Alien and Invasive Species Regulations (GNR 1020 of 25 September 2020). As such, the meeting of a legal obligation cannot be used as a trade-off. Even if the WEF owner is not the same party as the landowner, this applies, because the WEF is being operated on that land. Thus, under the duty of care obligations under NEMA, the WEF operator is required to fulfil alien vegetation control obligations. 5.16. It may be argued that the WEF operator has no obligation to control alien invasive vegetation, especially that present prior to development. This is a weak argument because one of the impacts associated with disturbance caused by the proposed development is the possible spread of alien invasive vegetation.	and location to be confirmed with authorities. Service access for the OHPL will be minimised through use of existing tracks where possible, and micro-siting during pre-construction will ensure sensitive habitats are avoided. Losses in corridors and wetland catchments are acknowledged as negative residual impacts, addressed through offsets that secure larger, viable conservation areas.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				<u>Misuse of biodiversity offsets</u> 5.17. The proposed offset does not meet the required outcomes of the National Biodiversity Offset Guideline of 2023, which are that the offset outcomes must be practically measurable on the ground. Importantly an offset must ensure that: 5.17.1. biodiversity is secured in the long term through the protection and appropriate management of ecosystems and species; 5.17.2. efforts to protect biodiversity in the long term contribute to the expansion of South Africa's protected area network, and are focused in areas identified as biodiversity priorities, with particular emphasis on the consolidation of protected areas and biodiversity priority areas and securing effective ecological links between priority areas; and 5.17.3. it contributes to the long-term security of biodiversity priority areas and maintains or improves their ecological condition, thereby resulting in tangible and measurable positive outcomes for biodiversity conservation 'on the ground'. 5.18. Internationally, research, capacity building, training and other activities are not recognised as 'offsets' but can be used to support, expedite, improve or bolster the outcomes required of an offset. 5.19. The offset report proposes various measures to deal with residual impacts on birds. Area-based offsets are not feasible; several offsite actions have been proposed in an effort to achieve no net loss of these species. How no nett loss of bird species through these measures is to be achieved is wholly unclear. Furthermore, since WEFs pose a threat of bird deaths the loss of a single bird within the category of a species categorised as Critically Endangered or Endangered is one too many and pushes the species ever closer to a tipping point. 5.20. 13.7 ha of the 31 ha total residual impacts are in CBA 1 which is, by definition, IRREPLACEABLE and constitute a FATAL	

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				FLAW as noted in the national offset guideline. i.e. 44% of the proposed footprint. Also, it is in a NPAES focus area (Fig 3.1 of the WSP Biodiversity Offset Report). 5.21. No assurance that land can be secured for conservation, and no assurance of long-term protection of a possible offset area is provided. There is passing mention of 'may' look at conservation servitudes, but that is all." To suggest that Mulilo can motivate to the lessor that the offset plan is part of "maintenance and repairs" is wholly unacceptable and nonsensical. 5.22. Furthermore, suggesting that target areas be identified in the context the existing site due to having lease agreements in place is counter to the intention of offsets. This land is within the proposed project's sphere of influence – so it is in fact not an offset as applied internationally and as understood in the aforementioned national guideline. 5.23. There is no clarity on responsibility for managing the offset area(s) (i.e. who would implement the offset and do the work) and covering costs of the offset, and duration of liability. Talking about clearing of alien species 'in a (questionable) ratio of 1:3' as a 'trade-off or offset' is nonsense. Any offset site would need to be cleared of alien species as an integral part of its management. 5.24. Of the proposed offset measures for birds (Section 10.2 in Biodiversity Offset report) – only the bird flight diverters may be acceptable BUT evidence that this would translate into on-the-ground outcomes is required (i.e. improvement in bird populations commensurate with expected residual impacts/ reduction in numbers due to electrocution/ collision with turbines/ powerlines). These outcomes must be directly linked to the affected species. Furthermore, no basis is given for specifying 5000 bird diverters every 10 years.	

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				5.25. Support of research programmes are not recognised as an offset. 5.26. All of the items listed are in fact what a responsible corporate citizen ought to be doing and therefore do not constitute a praiseworthy offset (see point 53 below), particularly in circumstances where the mitigation hierarchy has not been applied. The first or top priority in the mitigation hierarchy is to avoid the adverse impact in the first place. This is precisely the mitigation approach that has been avoided in the EIA process for these proposed WEFs. Avoidance would mean removing any WEFs that is within away from bird sensitive areas on the basis of the precautionary principle – meaning do more than the minimum. For example, if there is a general guideline buffer applicable to nest areas, then application of the precautionary principle would mean adding to this buffer, because of the uncertainties about bird movements, for example. 5.27. The use of an offset demonstrates that there are residual adverse impacts, which means that the project has significant adverse impacts associated with it. It is not proactive compliance as espoused by the EAP. “This BOR is not a reactive add-on; it reflects a proactive compliance, demonstrating that the project has embraced its environmental responsibilities. Significant resources, technical input, and time were invested to ensure the offset plan would stand up to scrutiny and deliver real conservation value. It is a key part of what gives this project its integrity, and the applicant is proud to include it as a cornerstone of the DEIR submission. It should provide the competent authorities with a clear assurance that residual impacts have not only been recognised, but systematically addressed, avoided where possible, and responsibly offset where unavoidable.” Besides the fact that the foregoing paragraph is verbiage, it is also factually incorrect. This type of language is wholly inappropriate – the language is not objective and compromises the independence of the EIA process.	

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				Additional comments and concerns regarding the Offset Report prepared by WSP include: Re: Section 3.1.2 PRIORITY AREAS FOR PROTECTED AREA EXPANSION How has this section influenced the need for and design of any offset? This information would have and should have been evident during project planning and should have triggered upfront offset development at the earliest stages of the design process. What was this not investigated by the EAP before the 11th hour of the EIA process? <u>Re: 3.2.1 ECOLOGICAL IMPORTANCE OF VEGETATION COMMUNITIES IN THE LSA</u> 5.28.2. The applicable Guideline suggest that impacts on CBAs should be AVOIDED AT ALL COSTS, unless the CBA can be shown to be inaccurately mapped or otherwise wrongly determined. The actual drivers of why the area is designated a CBA are important in terms of understanding the impact, requisite offset (if possible) and offset design to accommodate the feature driving CBA. <u>Re: Figure 3-7 - Sheepmoor Vegetation Sensitivity</u> 5.28.3. It is curious (and inexplicable) to note that the areas in green are mapped as only moderate sensitive - although from an avifaunal perspective many areas are rated High or VERY HIGH. Offsets must synthesize the full array of features to derive a trigger but this has not been undertaken by the EAP. <u>Re: Section 5 AQUATIC BIODIVERSITY OVERVIEW</u> 5.28.4. It is not clear whether there are any significant impacts on wetland systems (for instance from stream crossings by access roads or buried power lines) and whether these may trigger wetland offsets? This is unresolved and unanswered. The gaps in information and inadequacy of the assessment and it is not possible for the Competent Authority to render an informed decision on such impacts. <u>Re: Section 6.1.2 FLORA</u>	

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				5.28.5. EAP to confirm whether this is the first time a footprint figure has been made available during the EIA process. If so, why is this information made available at the 11th hour only? 5.28.6.There is no table of impact areas by feature, with a clear indication of what ratio should be applied. In order to determine a final offset quantum that can be audited for compliance monitoring the relevant information is not tabled. How much invaded area needs to be cleared? This is not clear from the reports. How is it to be rehabilitated to secondary grassland? This is not clear from the reports. Does this qualify as an acceptable offset for loss of intact grassland? If so, why? Again, this is not clear from the reports. 5.28.7. There is no map to determine whether it is feasible compensate for loss of secondary grassland in corridors between intact patches that are ESA designated – but the EAP states:"*this impact to negligible levels with only a very small proportion of the footprint occurring in or near higher sensitivity areas. Very High Sensitivity or No- Go habitat has largely been avoided and reduced to an acceptable level."* 5.28.8. The above contradicts what the Avifauna report says or the fact that there are impacted CBAs and ecological corridors and processes. only valid for narrow vegetation lens. What is the total footprint of these areas impacted? Who is able to determine whether the impacts significance is acceptable without the material underlying data which has not been made available? <u>Re: Section 6.1.3 FAUNA</u> 5.28.9. Agreed. This requires a clear and compensatory offset. i hope it still is to be clarified how much and where? could the OHPL be constructed without a service road? It seems unlikely	

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				5.28.10. In this finely dissected landscape, with no-go areas immediately adjacent to low sensitivity, micro-siting would seem vital to have been completed before arriving at an impact statement and an estimation of footprint and offset liability. This is a key and material flaw in the entire EIA process. This weakness in impact assessment methodology flies in the face of IEM and the mitigation hierarchy. 5.28.11. The report relies on an indefinable and this un-auditable requirement and is fatally flawed. Re: Plant Species page 410 5.28.12.Any loss of intact or degraded grassland habitat in corridors or wetland catchments cannot be rated as a positive impact! Re: Table 9-2 – Terrestrial habitat offset targets 5.28.13. How does this relate to the 180 ha indicated in the report above? This is an unacceptable impact. fully 40% of the impact is in CBA1 ? <u>Re: Section 10 CANDIDATE OFFSET SITES</u> 5.28.14. There is no candidate list, or any credible analysis of the contribution of each? do sufficient sites exist? are the landowners amenable to having their activities curtalied? 5.28.15. There is no evidence these lease conditions include restriction of farming activities and proactive biodiversity management. When were they signed, and has proof been submitted to the authorities? 5.28.16. Much of the assessment is entirely theoretical. Actual offset sites need to be identified and the specifics of their rehabilitation are determined to assess functional gains before a decision can be made. More specifics would have helped the decision maker here regarding the biodiversity impacts	

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				5.28.17. Rehab of grasslands is difficult and expensive, and often incomplete/inconclusive. restoration is likely impossible - especially to achieve prior diversity levels and structure, and keep invasive and alien species out. <u>Re: Section 10.1 SIGNED LEASE AGREEMENTS</u> 5.28.18. The mooted lease agreements are likely to be contested by the landowners. A dedicated offset lease agreement and servitude - with accompanying management plan setting out the requisite outcomes - should have been concluded with the sites but this has not been done. . All of these proposed offset areas will be adjacent to the WEF/ WTG and this is questionable in terms of offset efficacy. 5.28.19. There is little indication of competing interests which might undermine potential offset efficacy e.g. Mining & Prospecting Rights, and the limits that these rights might impose on the applicants' ability to attain offset outcomes <u>Re: Section 11 10.2 OFFSITE ACTIONS FOR PRIORITY BIRD SPECIES</u> 5.28.20.None of the actions listed qualify as offsets, or are so insufficiently described as to be so vague and meaningless that it is impossible to link the action directly to an impact (which methodology is expressly prohibited by the Offset Guideline). The reason being that the impact is not quantifiable and is unauditable based on the available information. <u>Re: Section 11 RECOMMENDED CONDITIONS FOR ENVIRONMENTAL AUTHORISATION</u> 5.28.21. The quantum needs to be specified here, but it isn't quantified. The final status and/or protection and management regime need to be confirmed but this information has not been made available 5.28.22. There is insufficient information to demonstrate that the landowner has consented to the proposed arrangement. It is also	

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				not clear how certain this outcome is and whether this is covered in the lease conditions. Re: Section: AFFECTED TERRESTRIAL HABITATS 5.28.23.This assessment is meaningless unless attached to a specific infrastructure element, which it is not. In the circumstances, the DFFE is unable to determine accurately what the offset liability is should they choose to only approve a portion of the project. The reliance on micro-siting 5.29. Whilst post-approval micrositing is applied internationally in the wind energy sector, this is within very specific limitations. According to Scottish Natural Heritage1, for example, the siting of wind turbines in small incremental distances and is used at two main stages of wind farm development: 5.29.1. Firstly, during the design stage to ensure that turbine layout is satisfactory from key viewpoints and achieves the design objectives. 5.29.2. Secondly, during the construction phase of a project, where previously unexpected conditions are encountered on site. 5.30. Provision for micrositing is normally covered by a specification in the EIA Report which can then be included in the conditions in the approval. This serves to set a limit within which micrositing is permitted and normally limits this to 50-100m from the specified (approved) turbine location. This information ought to be known to ERM South Africa, since exactly this approach is applied by the company in the UK (for example Crosbie Wind Farm.2	

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				5.31. From the foregoing information it can be seen that micrositing is not to be applied in a nonspecific manner. It is recognised that some flexibility is required in final design stages and also to allow for unforeseen circumstances during construction. It is standard and accepted practice internationally to specify a distance limitation within which micrositing is permitted. This must of course be included in the project description and included in the impact assessment. This way, I&APs and the Competent Authority are provided with a full picture of the potential development footprint (including the micrositing zone) and the associated footprint. More importantly, it means the Competent Authority has full information and can include a specific zone for each WTG within which micrositing is permissible. Hence, this is clear and known to the Competent Authority upfront from the provision of this information in the EIA Report, instead of being faced with an unknown quantity in terms of	
	Josua Meyer	16 August 2025 as Per email	Revised DEIAr	From: Josua Meyer <meyerjosua55@gmail.com> Sent: Saturday, August 16, 2025 10:33 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province EXTERNAL MESSAGE Goodday Lucien To avoid any confusion, I just want to inform ERM that I have submitted 3 reports with comments on the relevant draft EIA reports for the Mulilo Sheepmoor and Emveli WEFs. Each report	Dear Mr. Meyer I hope this email finds you well. I hereby confirm that your comments have been received and will be incorporated in the final CRR as indicated below. Kind Regards.

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				with comments cover both the Sheepmoor and Emvelo proposed WEFs and are listed below for clarity - Comments date 10/04/2025 compiled by Richard Summers attorney on the March 2025 draft EIA report (Submitted on 10/04/2025) - Comments date 15/08/2025 compiled by Richard Summers attorney on the July 2025 draft EIA report (Submitted on 15/08/2025) - Comments date 14/08/2025 compiled by Josua Meyer on the July 2025 draft EIA report (Submitted on 15/08/2025) All three reports with comments were provided within the applicable commenting period timeframe of 30 days. Richard Summers Attorney was appointed by myself and he submitted the comments on behalf of Josua Meyer as a registered I&AP. All comments submitted are supplementary to each other and are NOT to be taken as substituting the other one. Please contact me if anything remains unclear.	

TABLE 7-7 COMMENTS AND RESPONSE TABLE FOR IAP R SUMMERS ON DRAFT EIA PHASE

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				General Comments	
	Celine Oates (Richard Summers inc)	10 April 2025	Initial Draft EIAr	From: Celine Oates <celine@summersinc.co.za> Sent: Thursday, April 10, 2025 10:32 PM To: ERM Arcus Amsterdam <erm.arcusamsterdam@erm.com>; Stephanie Gopaul <stephanie.gopaul@erm.com> Cc: Richard Summers <Richard@summersinc.co.za>; Reception – Richard Summers Inc. <Reception@summersinc.co.za>; Clarice Arendse <clarice@summersinc.co.za>; Matodzi Albert Silidi <Matodzi@summersinc.co.za>; Lauren le Grange <lauren@summersinc.co.za> Subject: RE: COMMENTS ON THE ENVIRONMENTAL IMPACT ASSESSMENT PROCESS FOR THE PROPOSED EMVELO WIND ENERGY FACILITY AND SHEEPMOOR WIND ENERGY FACILITY [DFFE REFERENCE Dear Sir/Madam We refer to the above matter. We act on behalf of Mr. Josua Meyer, a registered interested and affected party. Kindly find attached hereto the Combined Comments in response to the proposed Emvelo and Sheepmoor Wind Energy Facilities. Kindly find Annexures A-F in support of our comments in the following WeTransfer link: https://we.tl/t-Z2fOZ4MEbM . Kindly acknowledge receipt of our comments and associated annexures.	

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				Should you have any difficulty accessing the documentation, kindly let us know so that we may provide you with same. Kind regards, Celine Oates RICHARD SUMMERS INC. Attachment: Annexure F4.pdf • Combined Comment on the Sheepmoor and Emvelo WEF DEIRs_10.04.25.pdf Contents of the letter INTRODUCTION 1.1. This document contains combined comments on the Draft Environmental Impact Reports (“DEIRs”) and associated Annexures for the proposed Emvelo and Sheepmoor Wind Energy Facilities (“WEFs”) which were made available to interested and affected parties (“I&APs”) on 10 March 2025. These combined comments are authored by both Richard Summers Incorporated and Morris Environmental & Groundwater Alliances (“MEGA”) on behalf of Mr. Josua Meyer a registered I&AP and owner of Portions 3, 4, 12 and 14 of the Farm Waaihoek No. 286, as well as Portions 4, 5 and 6 of the Farm Onverwacht No. 287, and Portion 7 of the Farm Windhoek No. 291. 1.2. The proposed WEFs are located in Mpumalanga near Ermelo and is part of the proposed Amsterdam WEF cluster comprising the Emvelo and Sheepmoor WEFs. Throughout these comments, any reference to the environmental assessment practitioner (“EAP”) is also to be read as meaning ERM Southern Africa (Pty) Ltd.	
				GENERAL COMMENTS / CONCERNS	

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				2.1. Neither the Emvelo nor the Sheepmoor WEFs are located within Renewable Energy Developments Zones ("REDZ"), and the respective overhead powerlines are not located within identifiedtransmission corridors. The DEIRs fail to motivate in terms of the Guideline on Need and Desirability as to why the projects depart from the REDZ and transmission corridors. This is a material flaw in the need and desirability analysis of the projects. What is the motivation for the proposed project sites and what is the justification for failing to locate the two WEF projects within a REDZ?	It is acknowledged that the proposed Emvelo and Sheepmoor Wind Energy Facilities (WEFs) are not located within gazetted Renewable Energy Development Zones (REDZ) or Strategic Transmission Corridors. As outlined in Government Notice 114 of 2018 under NEMA, REDZ and corridors were established to streamline environmental authorisation for renewable energy in areas of strategic importance. However, these zones are not exclusive, and projects outside REDZ remain permissible, provided they follow the full EIA process In line with the DEA's 2017 Guideline on Need and Desirability, the site selection for the proposed WEFs is motivated by: • Adequate wind resource potential; • Availability of land through agreements with landowners; • Proximity to existing Eskom substations and grid infrastructure; and • Environmental, technical, and social feasibility as assessed through the EIA process. The Draft EIRs confirm that the projects have followed the full environmental authorisation process in terms of section 24 of NEMA, which applies to all listed activities regardless of location.

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				2.2. External review specialist Charl De Villiers undertook a review of the DEIRs, attached hereto, and identified the following flaws from the perspective of the principles of sound environmental management:	
				2.2.1 The exclusion of no-go areas is deduced by 'reading between the lines' and would not be apparent to a lay reader who is not trained in integrated environmental management. No -go areas for terrestrial and aquatic ecosystems, threatened vegetation, Critical Biodiversity Areas ("CBAs") / Ecological Support Areas ("ESAs"), fauna and avifauna must be recorded in a prominently-placed, single table with a brief explanation of the overall sensitivity of each no-go area and why development could be accommodated in these areas or not. This table must be informed by the thresholds of significance and adequately synthesised and presented in the DEIRs. The approach in the DEIRs fall short of what is intended by sound integrated environmental management, especially considering that the DEIRs and supporting reports amount to an excess of 5000 pages between two applications.	The Draft EIRs identify and exclude "no-go" areas for turbines and infrastructure based on findings from specialist studies. These constraints are reflected in the project layout and sensitivity maps. While not consolidated in a single table, the constraints are spatially represented and incorporated into the iterative design process. This approach is consistent with Appendix 3 of the 2014 EIA Regulations, which requires the identification of environmental attributes and constraints but does not prescribe a specific format for their presentation. The suggestion to include a consolidated summary table in the Final EIR is noted and will be considered to enhance accessibility for non-technical stakeholders.
				2.2.2 The DEIRs fail to indicate how the proposed development responds to the principles of environmental management held in section 2 of the National Environmental Management Act ("NEMA"), or how these principles have been applied to impact evaluation and the determination of potentially significant impacts. These principles entrench human needs as the primary concern for environmental management, promote the maintenance of ecosystem resilience, and prescribe care, caution, inclusivity and accountability in environmental governance and decision-making. The principles are binding on the actions of all organs of state thereby providing a basis for review of administrative action that does not adhere to these principles in a judicial setting.	The Draft EIRs and specialist studies have applied the principles of section 2 of NEMA, including: • Promoting social and economic benefits aligned with energy security and human needs; • Avoiding and minimising impacts on Critical Biodiversity Areas (CBAs), Ecological Support Areas (ESAs), wetlands, and sensitive habitats; • Applying the precautionary principle (section 2(4)(a)(vii)) through conservative assumptions and

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					mitigation such as Shut Down on Demand for avifauna; and • Ensuring inclusivity through public participation in accordance with Regulation 41 of the EIA Regulations and section 2(4)(f) of NEMA These principles are embedded throughout the impact evaluation and mitigation hierarchy, even if not explicitly repeated in every section of the DEIR.
				2.2.3 The DEIRs do not reflect nor demonstrate how the EIAs have set out to identify the best practicable environmental option for the WEFs, in that the options chosen provide the most benefit whilst causing the least damage to the environment, at a cost acceptable to society, in the long terms as well as the short term. This has substantive relevance for the determination of impact significance.	The DEIRs considered a range of project alternatives, including layout configurations, turbine technologies, and the “no-go” option. The selected layout represents the Best Practicable Environmental Option (BPEO) as defined in section 1 of NEMA—that is, the option that provides the most benefit or causes the least environmental harm at an acceptable cost, both in the short and long term. The EIA demonstrates that, with mitigation and monitoring, the project offers net benefits in terms of renewable energy generation, emissions reduction, and socioeconomic upliftment, while limiting environmental impacts.
				2.2.4 The DEIRs do not refer to the public trust doctrine, the precautionary principle or the injunction that development (and by implication integrated environmental management and environmental impact assessment) must be anchored in the foundation of the principle of sustainable development which derives its authority from the Constitution of the Republic of South	While the DEIRs may not explicitly reference the public trust doctrine or the constitutional language of sustainable development, the assessments are guided by the principles of section 24 of the Constitution and section 23 of NEMA, which underpin Integrated Environmental Management (IEM).

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				Africa, 1996, with particular reference to the Bill of Rights in Chapter 2 thereof.	The EIA process integrates environmental protection, social wellbeing, and economic development to ensure sustainability. The competent authority, acting as custodian of environmental resources, will make a final decision based on the information presented and in accordance with these constitutional and statutory obligations.
				2.2.5 The DEIRs do not explicitly respond to the requirement that the management of the WEFs will be pursued in compliance with the general objectives of integrated environmental management in section 23 of NEMA.	It is acknowledged that the Draft Environmental Impact Reports (DEIRs) may not explicitly reference Section 23 of NEMA; however, the principles and objectives of Integrated Environmental Management (IEM) as outlined in this section are embedded throughout the EIA process. Section 23 of NEMA promotes the application of appropriate environmental management tools to ensure that activities are assessed and managed in an integrated, coordinated, and holistic manner. The DEIRs demonstrate compliance with these objectives by: • Incorporating specialist studies across multiple disciplines (e.g., biodiversity, heritage, hydrology) to ensure a comprehensive understanding of environmental interrelationships; • Applying the mitigation hierarchy to avoid, minimise, and manage impacts; • Facilitating public participation in accordance with Chapter 6 of the EIA Regulations, thereby ensuring inclusive decision-making;

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					• Considering cumulative impacts, alternatives, and sustainability indicators in line with the requirements of Appendix 3 of the EIA Regulations. While the DEIRs may not cite Section 23 verbatim, the EIA process has been conducted in a manner that aligns with its intent namely, to promote sustainable development through integrated planning, assessment, and management of environmental impacts. The competent authority will ultimately evaluate the project against these objectives when making its decision.
				2.3 With respect to the methodology used in determining the significance of potential environmental impacts, Charl de Villiers identifies the use of international EIA regulatory reporting standards such as the European Union ("EU") EIA Directive, 2014/52/EU ("EIA Guideline") for both impact assessments. De Villiers identifies the following issues in this regard:	
				2.3.1. No mention is made of the EU guidance document on the preparation on environmental impact reports ("EIRs") which stipulates that the assessment of significance should be based on clear and unambiguous criteria: Significance criteria take both the characteristics of an impact and the values associated with the environmental issues affected into account; and significance is always context-specific and tailored criteria should therefore be developed for each project and its settings.	The reference to the European Union ("EU") EIA Directive (2014/52/EU) and related guidance is acknowledged. While international best practice is always considered as a reference point, it is important to note that the South African EIA process is governed by the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), read with the EIA Regulations, 2014 (as amended). These prescribe the minimum content requirements for Scoping and Environmental Impact Assessment Reports (Appendix 3 of the EIA

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					Regulations), including the need to assess impacts in terms of nature, extent, duration, probability, intensity, and significance, both before and after mitigation. It is further acknowledged that the EU EIA Directive promotes a broad, value-based approach to determining environmental significance, encouraging consideration of factors such as human health, biodiversity, cultural heritage, and landscape. Although South Africa's EIA system does not prescribe the use of EU criteria, it does require that significance be assessed in context, as outlined in the EIA Regulations under NEMA. In this regard, the approach taken in the current EIA reflects contextual sensitivity: significance ratings were informed not only by the biophysical characteristics of the environment but also by nationally endorsed socio-economic, ecological, and conservation value systems. These include Critically Endangered ecosystems, Species of Conservation Concern, and priority areas identified in the National Protected Area Expansion Strategy (NPAES). Such frameworks represent recognised national values and sensitivity criteria, aligning with the requirement that significance be context-specific and consistent with sustainable development principles.
				2.3.2 The Terms of Reference ("TOR") for the specialists list environmental assessment criteria limited to technical, scientific judgements of predicted impacts (such as extent, duration, magnitude etc). The TORs do not provide any guidance on how the specialists are to evaluate the significance of potential impacts with	The Terms of Reference (ToR) issued to specialists therefore aligned with these legal requirements. Specialists were requested to apply criteria consistent with Appendix 6 of the EIA Regulations, which sets out the

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				respect to important or otherwise valued aspects of the receiving environment, or the acceptability of such impacts in terms of scientific and societal values.	requirements for specialist reports, including a description of methodology used, assessment of potential impacts, and recommendations for mitigation.
				2.4 The DEIRs fail to explain the critical distinction between 'impact assessment' and 'impact evaluation':	We acknowledge the distinction between impact assessment, which is a technical and science-based process, and impact evaluation, which involves a value-based and normative dimension. Within the South African EIA framework, this distinction is addressed through an integrated process: specialists provide technical assessments, while the Environmental Assessment Practitioner (EAP), guided by NEMA and the 2014 EIA Regulations, consolidates these findings together with applicable legal requirements, policy objectives (including the mitigation hierarchy in section 2 of NEMA), and stakeholder inputs. In this way, the evaluation of overall significance is not solely a technical exercise but is informed by scientific evidence, the precautionary principle (NEMA section 2(4)(a)(vii)), and the principles of inclusivity and fairness in decision-making (NEMA section 2(4)(f)). Public participation ensures that societal values are meaningfully embedded into the process, while the competent authority retains the responsibility for the final evaluation of environmental acceptability. This approach ensures that both the assessment and evaluation of impacts are scientifically robust, socially responsive, and legally complian
				2.4.1 Whereas impact assessment is a largely technical process usually involving specialists to investigate, assess and report on the anticipated effects of the proposed projects in scientific, empirical terms, impact evaluation introduces a normative dimension to environmental assessment through the mechanism of impact significance.	
				2.4.2 Evaluation entails making informed, value-based judgements about the societal acceptability of the potential environmental consequences of activities which must be normatively inclusive (in that the evaluation must recognise the validity of more than solely technocratic or scientific value systems.	

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				2.5 Due to the flawed assignment of significance values or ratings can compromise the predictive and precautionary, risk-averse value of the DEIRs and associated environmental impact assessments:	
				2.5.1. The mitigation hierarchy and duty of care cannot be applied proactively, effectively or equitably due to the inadequate understanding of the importance the receiving environment or its vulnerability;	We note the concern raised regarding the assignment of significance ratings and their implications for the precautionary principle. The assessment of impacts in the Draft Environmental Impact Reports (EIRs) was undertaken in accordance with the 2014 EIA Regulations (as amended), relevant best-practice guidelines, and the principles set out in section 2 of the National Environmental Management Act (NEMA), including the duty of care (section 28) and the mitigation hierarchy (section 2(4)(a)(i)–(viii)). Significance ratings were derived from specialist technical inputs, using transparent criteria such as intensity, duration, extent, probability, and reversibility, consistent with accepted EIA practice in South Africa. While the concern is acknowledged, the mitigation hierarchy and duty of care have been proactively applied throughout the assessment process. The receiving environment was characterised using a combination of baseline fieldwork, specialist studies, and authoritative datasets (e.g., provincial conservation plans). The site walkdown and final micro-siting are intended to further refine this understanding, ensuring that avoidance, minimisation, and mitigation measures are appropriately tailored and implemented at the project level.

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				2.5.2 I&APs are denied crucial information about the potential adverse environmental consequences of the WEFs, thus compromising their right to relevant information and effective participation in environmental management; and	The EIA process has been designed to ensure that Interested and Affected Parties (I&APs) are provided with sufficient, accessible, and timely information to enable meaningful participation. This is in line with section 2(4)(f) of NEMA and Regulation 41 of the 2014 EIA Regulations. All identified potential impacts, including residual risks after mitigation, were disclosed in the Draft EIAr. The process remained iterative, with further opportunities for I&APs to comment on updated or additional information prior to a decision by the competent authority.
				2.5.3 The WEFs could result in serious environmental harm due to the EIAs inadequately evaluating and identifying potentially severe threats to human wellbeing or sensitive, vulnerable, highly dynamic or stressed ecosystems.	The precautionary principle, as articulated in section 2(4)(a)(vii) of NEMA, underpins the EIA process and requires that significant harm to the environment or human wellbeing be avoided or minimised, particularly where there is uncertainty. This principle was applied in the assessment of risks to sensitive and dynamic ecosystems, including through biodiversity, avifaunal, bats and fauna studies. cumulative impacts were also considered. These findings, along with proposed mitigation measures, will inform the competent authority's decision on the project's acceptability.
				PUBLIC PARTICIPATION PROCESS ("PPP")	
				<u>3.1 Undue burden placed on I&Aps</u> 3.1.1 An undue burden has been placed on I&APs to comment on two DEIRs for two separate applications, by the same Applicant and located adjacent to each other. The commenting periods for	The Public Participation Process (PPP) for both applications has been undertaken in full compliance with the Environmental Impact Assessment Regulations, 2014, published under section 24 of the National

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				the two WEF projects run concurrently meaning that I&APs are expected to comment on two separate applications each with their own DEIR and specialist reports (amounting to approx. 5000 pages of material) within a 30-day commenting period. This is unreasonable, unethical and unfairly prejudicial towards I&APs.	Environmental Management Act (NEMA). Specifically, Regulation 3(8) and Regulation 23(1)(a) prescribe a minimum 30-day commenting period for Draft Environmental Impact Reports Both DEIRs were made available for this statutory period, and notifications were issued to registered Interested and Affected Parties (I&APs) and relevant authorities in accordance with Regulation 41, which outlines the methods and requirements for public notification. The volume of material is acknowledged to be substantial, reflecting the complexity of assessing large-scale renewable energy projects involving multiple specialist disciplines. While the Regulations set a minimum requirement, any extension to the commenting period must balance the need for inclusive participation with the imperative of regulatory certainty. In this case, the applicant is subject to the timeframes prescribed under Regulation 45, which governs the procedural deadlines for the EIA process and requires strict adherence unless an extension is formally granted by the competent authority.
				3.1.2 The Public Participation Reports are difficult to follow. There is extensive duplication of the same correspondence for example, which makes it an arduous and time-consuming exercise for I&APs to track the sequence of different activities undertaken by the EAP and also the issues raised by stakeholders (Appendix 6 of the Public Participation Reports). Information is presented in a haphazard and disorderly fashion in this Appendix. It is unjustifiable for the EAP not to have sorted the PPP information to make it easy for the reader to follow the content of the document. For example, the correspondence could be grouped according to the stages of the PPP such as notification and I&AP registration, Scoping Phase comments or the correspondence in Appendix 6 could be sorted according to categories of I&APs (e.g. commenting authorities, NGOs, landowners etc.). The manner in which the information is presented by the EAP unfairly prejudicial towards I&APs given the unreasonably short 30-day comment period.	
				3.1.3 As indicated, due to the EAP's refusal to grant an extension to the comment period, I&APs have a 30-day commenting period to deal with documentation that amounts to over 5 000 pages. The average person is unlikely to have time to read a book of several	It is acknowledged that the volume of documentation associated with the Emvelo and Sheepmoor Wind Energy Facility applications is substantial, reflecting the

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				hundred pages for interest or pleasure, let alone highly technical EIA documents totalling over 5 000 pages. Whilst the commenting period of 30 days complies with the requirements of the 2014 NEMA EIA Regulations (GNR 326 of 7 April 2017)1, the way this has been applied in the case of these two applications (Emvelo and Sheepmoor) is unreasonable and is more likely than not, to compromise the efficacy and quality of the PPP. The 30-day comment period contemplated in the NEMA EIA Regulations represents the bare minimum period of public comment. It does not mean that the bare minimum period is reasonable. In this case, the period of public comment is unreasonably short.	complexity of assessing large-scale renewable energy projects involving multiple specialist disciplines. The 30-day commenting period provided complies with the statutory minimum prescribed by the 2014 EIA Regulations (GNR 326 of 7 April 2017), specifically Regulation 3(8) read with Regulation 23(1)(a). These regulations were promulgated under section 24 of NEMA, which governs the environmental authorisation process. While the Regulations set a minimum standard, the EIA process has complied to the regulations by implementing several measures to facilitate meaningful participation within the available timeframe. These include: • Early engagement during the Scoping Phase; • Circulation of Background Information Documents (BIDs); • Provision of non-technical executive summaries; • Availability of both electronic and hard copies of the DEIRs; These efforts are consistent with the general objectives of Integrated Environmental Management (IEM) . The EIA process has been designed to give effect to these objectives, not only by adhering to the regulatory framework but also by ensuring transparency, accessibility, and responsiveness to stakeholder input. It is further noted that any extension to the commenting period must be balanced against the need for regulatory certainty and

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					adherence to the timeframes prescribed under Regulation 45. These timeframes are binding unless formally extended by the competent authority. In this case, the EAP has applied their mind to the procedural requirements and stakeholder engagement needs, and has implemented measures to support informed participation within the statutory limits.
				3.1.4 In fact, the approach adopted by the EAP, namely to adhere to the minimum commenting period, flies in the face of the objectives of Integrated Environmental Management set out in section 23 of NEMA, specifically section 23(d) “ensure adequate and appropriate opportunity for public participation in decisions that may affect the environment” (emphasis added). The EIA process is expected to be undertaken in a manner that gives effect to the general objectives of Integrated Environmental Management (see section 24(1) of NEMA). This means that the EAP must apply his / her mind to how these objectives ought to be incorporated into the EIA process, and not just blindly follow the 2014 NEMA EIA Regulations, which represent the minimum requirements to be fulfilled.	The concern raised regarding the adequacy of the public participation period is acknowledged. In accordance with the 2014 NEMA EIA Regulations (as amended), the Draft Environmental Impact Reports (DEIRs) for both the Emvelo and Sheepmoor Wind Energy Facilities were made available for public comment for the legally prescribed minimum period of 30 days, as required by Regulation 3(8) read with Regulation 23(1)(a). Notifications were issued to registered Interested and Affected Parties (I&APs) via multiple channells including email, newspaper advertisements, and site notices in compliance with Regulations 41 and 42, ensuring accessibility and procedural fairness. While the Regulations set minimum standards, the EAP is mindful of the broader objectives of Integrated Environmental Management (IEM) as outlined in Section 23 of NEMA, particularly Section 23(d), which requires that public participation be both adequate and appropriate.

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					The principle of adequacy must also be balanced against the need for regulatory certainty and efficiency, as required by Section 2(4)(f) of NEMA, which calls for decisions to be informed, inclusive, and timely. The EAP is required to operate within the framework of the Regulations, including Regulation 45, which prescribes timeframes for the EIA process. Where requests for extensions were reasonably motivated, these were considered, and in some cases, additional engagement opportunities were provided beyond the initial commenting period. In light of the above, the EAP submits that the public participation process was lawful, procedurally fair, and substantively aligned with both the EIA Regulations and the objectives of IEM. The suggestion that adherence to statutory requirements undermines NEMA's intent is respectfully disagreed with, as the process has actively sought to balance inclusivity with regulatory compliance and decision-making efficiency.
				3.1.5 The manner in which the commenting opportunity on the two applications has been handled is likely to compromise the very aims stated in Section 2 of the Public Participation Reports (page 2), in particular "To promote transparency of the project and its potential consequences and ensure I&APs understanding of the proposed development".	The concern regarding duplication and the organisation of PPP records in Appendix 6 is acknowledged. The inclusion of full correspondence is intended to ensure transparency and auditability, with no omission of communications for each project. This approach aligns with Regulation 45(1)(a) of the EIA Regulations, which requires that all relevant documentation be submitted to the competent authority. To

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					improve accessibility, the Final EIAR will include a synthesised summary table of key issues raised, grouped by I&AP categories (e.g., authorities, NGOs, landowners) and PPP stages. The full correspondence will remain annexed for completeness and compliance.
				3.1.6 It seems that in the notification on the availability of the Draft Scoping Reports, the commenting authorities were advised of a 30-day commenting period, instead of the 40 days provided for in the DFFE Guideline on Public Participation.	It is important to clarify that the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended) under the National Environmental Management Act (NEMA), Act 107 of 1998, prescribe a minimum 30-day commenting period for public participation during the Scoping phase. This is outlined in Regulation 41(2)(c), which states that the public must be given at least 30 days to comment on the draft reports. The Department of Forestry, Fisheries and the Environment (DFFE) Public Participation Guideline (2017) recommends a 40-day commenting period for organs of state and commenting authorities as a best-practice approach. However, it is essential to note that this is a guideline, not a legally binding requirement. The guideline is intended to enhance inclusivity and responsiveness but does not override the statutory minimum period set out in the EIA Regulations. In this instance, the 30-day period provided was compliant with the legal requirements of the EIA Regulations.

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				3.1.7 A table showing the impacts and significance rating is shown in the Executive Summary of the DEIRs for the two proposed WEFs. These show that the identified impacts are the same (there may be a few wording variations) and the significance ratings are exactly the same in almost every instance. There are some heritage issues that are unique to one of the two sites. Some impacts are missing (e.g. bats). Other than that, the only impacts where there is a difference in the significance rating is noise (construction and operation) and mortality impacts involving avifauna. This begs the question as to why two separate applications, which appear to pose the same potential impacts at the same level of significance (according to information in the respective DEIRs) were compiled and submitted concurrently for public comment, thereby placing an undue burden on I&APs.	The submission of two separate applications is consistent with the requirements of the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended) under the National Environmental Management Act (NEMA), Act 107 of 1998. Each WEF constitutes a distinct development proposal with its own geographic footprint, land ownership, technical layout, and site-specific environmental sensitivities. As such: Regulation 16 requires that each application for environmental authorisation must be site-specific and supported by its own impact assessment. The competent authority must assess each application independently, considering the unique attributes and potential cumulative impacts of each site. Even where impacts may appear similar in nature or significance—such as those related to construction activities, visual intrusion, or socio-economic effects—the contextual factors (e.g. topography, proximity to receptors, biodiversity features, and heritage resources) differ between sites and must be assessed separately. The presence of heritage features unique to one site and the variation in noise and avifaunal mortality ratings demonstrate that the sites are not identical in environmental terms. We acknowledge that reviewing multiple documents can be demanding for Interested

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					and Affected Parties (I&APs). To mitigate this: The DEIRs were structured with executive summaries, impact tables, and clear formatting to facilitate comparison and accessibility. Public participation processes were aligned to allow concurrent review, enabling stakeholders to engage with both proposals within the same timeframe. While we strive to reduce administrative burden, the integrity of the EIA process requires that each application be treated independently to ensure robust, site-specific decision-making. The submission of separate applications is procedurally correct and necessary under South African environmental law. The similarities in impact ratings reflect consistent methodology and assessment criteria, not duplication of process. We remain committed to supporting I&APs through clear communication and accessible documentation.
				Inadequate identification of I&APs	
				3.2.1. Inadequacies in the identification of I&APs, especially among commenting or affected authorities is evident providing further evidence of a compromised PPP. Examination of the I&AP database in the Public Participation Reports (Appendix 1, Section 3: National / Provincial / Local Government Departments) shows that 6	The EAP updated the I&AP database to include the appropriate contacts within both DARDLEA and MTPA. These officials actively engaged in the process and have received all

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				officials were identified from the provincial office of the Department of Mineral Resources and 7 individuals were identified within the Provincial Economic Development & Tourism Department. In comparison, only 3 officials are listed from the Department Agriculture, Rural Development, Land and Environmental Affairs – Mpumalanga ("DARDLEA"). Of these, two are described as Director: Communication Services and the third as Director: Gert Sibande District. Two officials from the Mpumalanga Tourism and Parks Agency ("MTPA") are listed, both of whom are involved in permitting.	relevant documentation and submitted their comments throughout the process.
				3.2.2. Concern about lack of involvement by DARDLEA and the MTPA was communicated to the EAP. This arose in early August 2024, when it came to their attention (not via the EAP) that Draft Scoping Reports for the proposed WEFs were available for comment. The officials that raised this matter are involved in EIA and Biodiversity at these respective organisations. It is inconceivable that the EAP did not seek to identify the relevant officials within these commenting authorities, particularly those in the fields of EIA and Biodiversity, given the environmental sensitivity of the location of the proposed projects.	
				3.2.3 It seems these officials were ultimately added to the I&AP database under Category 5: General Stakeholders and I&APs, as their names appear at the end of the I&AP database. They are, however, not recognised as being government / commenting authorities in the I&AP database as they are not placed in this category of that database. Whilst their names are now recorded in the I&AP database, the organisation they represent is not given.	The comment is noted. The I&AP database is a live document that is updated throughout the EIA process as stakeholders join or withdraw from the process. The categorisation and organisational affiliations of all registered I&APs will be reviewed and corrected where necessary in the Final EIA Report to ensure accurate representation.
				3.2.4. Neither the DARDLEA nor the MTPA were consulted until after an email dated 3 August 2024 (see pg. 189 of Public Participation Reports) was sent to the EAP stating the following (emphasis added): "It has come to our attention, and not via any official notification from ERM, that draft Scoping Reports for the	The EAP confirms that notification was sent to identified officials on 19 July 2024 via standard communication channels. While there were initial challenges in ensuring receipt confirmation, these were promptly

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				following wind farms proposed in the Gert Sibande District in Mpumalanga Province are out for public comment….”3 and “Neither DARDLEA nor MTPA have been consulted to date, nor have we received copies of any of the draft Scoping Reports.” The EAP responded that notification had been sent on 19 July 2024, but was again informed that no notification had been received via email on 8 August 2024. The conduct of the EAP is inexcusable.	addressed once brought to attention. Both DARDLEA and MTPA subsequently received all project documentation and have submitted comments, demonstrating their full opportunity to participate in accordance with NEMA 2014 EIA Regulations as amended.
				3.2.5. The above situation arose because the EAP failed to identify the correct officials with whom to communicate, as is evidenced by the 8 August communication from DARDLEA: “There are also no officials in the list of officials in your screenshots that are in the Environmental Affairs Chief Directorate in DARDLEA - as far as I am aware they are in the section that deals with Agriculture, which is an entirely different mandate”.	The EAP notes that reasonable efforts were made to identify relevant officials based on available information and prior correspondence. Once the oversight was highlighted, the I&AP database was updated to include the correct officials. These officials were provided full access to the DEIRs and have submitted comments, fulfilling their right to participate
				3.2.6. A similar situation occurred in relation to the MTPA as is evident from correspondence dated 13 August 2024 (pg. 344 of the Public Participation Reports): “Upon reviewing my email records, I found communications from Andrew Pearson, Annitta Attieh, and Verushka Snyders (all from Mulilo) regarding CBAs for other projects, indicating that Mulilo is aware that I am the appropriate contact for biodiversity planning related matters. I also have several emails to both Frans Krige and myself from ERM staff, such as Kate Hamilton from around 2016 and more recently. ERM should know who the correct staff would be to send the EIA documents to for comment.”	Upon clarification from MTPA regarding the appropriate contacts, the EAP immediately updated the I&AP database and ensured access to all project documentation. The relevant officials from MTPA have since submitted comments which are part of the CRR and also appended, confirming their participation in the process.
				3.2.7 There is no evidence that efforts were made to identify relevant officials from the tourism section of the MTPA. No such representatives are listed in the I&AP database (Public Participation Reports, Appendix 1). In fact, no representatives of the tourism sector appear to have been identified at all. The Social Impact	The SIA primarily focused on stakeholders directly impacted by land-use and biodiversity changes. While no tourism-specific officials were initially identified, all relevant DARDLEA and MTPA stakeholders, including those representing tourism

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				Assessment (“SIA”) also does not mention any tourism stakeholders.	interests where relevant, were provided the opportunity to comment. These officials have submitted input.
				Comments from key I&APs (commenting authorities) not taken into account	
				3.3.1 Having provided the documentation as requested to DARDLEA and MTPA and arranged a virtual meeting (September 2024), the EAP then proceeded (inexplicably) to ignore the comments provided by these two important commenting authorities. This is clearly demonstrated by the following facts:	
				3.3.1.1 There is no reference to the comments provided by the MTPA or DARDLEA in any of the biodiversity specialist reports. Hence, there is no evidence that these comments were provided to any of the biodiversity specialists. Whilst there is reference to MTPA in the Terrestrial Biodiversity Assessment (“TBIA”), this is only in respect of documents / reports published by the Agency dated 2014 (TBIA – Table 14, pg. 115).	The EAP confirms that the comments received from DARDLEA and MTPA were considered during the EIA process and informed the scope of the biodiversity assessments. While the biodiversity specialist reports may not explicitly reference the authorities’ submissions, their concerns—particularly regarding habitat sensitivity, offset requirements, and species-specific management—are addressed through the inclusion of mitigation measures, offset strategies, and management plans such as the Biodiversity Offset Report, Oribi Management Plan, and Alien Invasive Species Management Plan. These measures were developed in alignment with the concerns raised and are incorporated into the EMPr.
				3.3.1.2 There is no reference to the MTPA in the Avifaunal Impact Assessment (“AvIA”), which suggests that despite the fact that MTPA raised numerous concerns about avifaunal impacts, these were not communicated to the avifaunal specialist by the EAP.	The EAP confirms that the concerns raised by the MTPA were communicated to the avifaunal specialist during the EIA process. The specialist provided responses to these concerns, which informed the development of mitigation measures and recommendations.

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				3.3.2.3 Moreover, not one of the biodiversity specialists was involved in the virtual meeting with DARDLEA and MTPA, held in September 2024. This is particularly surprising, given the ease with which these specialists could have participated in a meeting held virtually.	The EAP and the Applicant made a conscious effort to attend the September 2024 meeting in person, and invitations were circulated however, they indicated that they were unable to attend due to prior work commitments.
				3.3.2 The situation with respect to the inadequate identification of I&Aps is a serious omission, as identification of the correct officials, particularly within commenting authorities that have an environmental mandate, is a non-negotiable. This is particularly so given the environmental sensitivities of the locations for the proposed Emvelo WEF and Sheepmoor WEF. The nett result is that had the DARDLEA not found out about the availability of the Draft Scoping Reports 'via the grape vine', it may well have been assumed by the EAP that they had no comment. There is no evidence that the EAP proactively followed up with key commenting authorities to ensure that feedback in areas of key concern (e.g. biodiversity) were obtained. In turn, this poses an undeniable risk to the efficacy of the EIA processes and more importantly to the identification of significant impacts. It also directly undermines the credibility of the entire public participation process.	The Final Scoping Reports for both the Emvelo and Sheepmoor WEFs were submitted to DARDLEA and made accessible during the formal scoping phase. Furthermore, both DARDLEA and MTPA were consistently notified of project developments throughout the EIA process, including the availability of the Draft EIA Reports for public review. The Applicant also extended invitations to DARDLEA for in-person meetings to provide a platform for raising concerns and submitting comments. The EAP acknowledges the importance of early and accurate identification of key commenting authorities and confirms that efforts were made to engage proactively and transparently with the relevant officials throughout the process.
				3.3.3.1 It is notable that in the Comments & Responses documents (pg. 6), the DFFE mentions that comments on the DEIRs must be obtained from the Department's Biodiversity Conservation Directorate and the Protected Areas section. This is a very late stage in the EIA process to involve these Directorate's / sections, especially given the biodiversity sensitivities involved.	The EAP confirms that the comment from the DFFE regarding the involvement of the Biodiversity Conservation Directorate (BCD) and the Protected Areas section was accurately captured when received. The EAP did engage with the BCD during the EIA process following receipt of this instruction. The timing of the referral and the late-stage involvement of these internal directorates

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					falls within the DFFE's internal processes and is therefore for their account.
				3.3.4. There is reference to a pre-application meeting with DFFE but no minutes are provided and thus it is not known if all the relevant Directorates within DFFE were in attendance so as to provide input at an early stage in the EIA processes. The fact that the minutes are not included in the Public Participation Reports or in any other Appendix is inappropriate, as the principle of transparency ought to have been applied.	A pre-application meeting with the DFFE was held in April 2023 as part of the early engagement process. The minutes of this meeting form part of the application documentation submitted to the DFFE and are included as an appendix to the application form. These minutes are submitted directly to the competent authority and are not typically included in the Public Participation Reports
				3.3.5. DFFE Biodiversity Mainstreaming and EIA (Tebego Kgaphala) submitted comments on 13 August 2024 (pg. 84 and 89 of the respective proposed WEF Comments and Response Reports) – these were attached to an email. There is a note by the EAP in response: "Post concerns expressed from DARDLEA / MTPA. The previous draft applications were withdrawn and the entire process restarted to afford all IAPs 30 days." It is wholly unclear what is meant by this statement as it is poorly written. Assuming it means that the comments from DFFE Biodiversity Mainstreaming & EIA were deemed by the EAP to no longer be relevant because the process was "restarted", then this conclusion does not stand up to scrutiny. Tebego Kgaphala notified the EAP via email on 26 August 2024 that the comments "still stand". These comments, are however, not included in Comments & Responses Report (Section 7 of the Public Participation Reports) or in the correspondence (Appendix 6). It is, therefore, not known what issues were raised and whether these have been substantively considered.	The statement referenced was intended to inform I&APs that the EIA process was restarted from the Draft Scoping phase due to complications with DARDLEA and MTPA receiving the Final Scoping Reports. To ensure procedural fairness, the Applicant withdrew the initial application and restarted the process, affording all I&APs a full 30-day commenting period. During this restarted process, DFFE Biodiversity Mainstreaming and EIA submitted comments, which were acknowledged and responded to by the EAP. It is confirmed that these comments were considered in the EIA process. Importantly, DFFE Biodiversity Mainstreaming and EIA did not raise any objection to the proposed development.
				3.4. Inadequate opportunities for I&APs to provide meaningful input	
				3.4.1. In Section 2 (page 2) of the Public Participation Reports, the following is stated: "The PPP is key in that it provides the public	Concern is noted. In terms of Regulation 3(3) of the EIA Regulations, 2014 (as amended),

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				the opportunity to have meaningful input into the decision-making process." These are empty words, since there has been limited opportunity for I&APs to have meaningful input into the EIA process. The "opportunity for meaningful input" is wholly dependent on the manner in which the PPP is formulated and run by the EAP and / or PPP facilitator. The "opportunity for meaningful input" is undermined and negated by the constrained and prejudicial manner in which I&APs are forced to engage with 5000 pages of technical documents in a truncated 30-day comment period.	a 30-day comment period is the prescribed minimum for a Draft EIR. This period was applied in full compliance with legislative requirements. Furthermore, all documents were made available electronically and at public venues, and executive summaries were provided to support accessibility. While the documentation is extensive due to the nature of the project, all I&APs had the right to submit substantive inputs, which have been considered and been responded to.
				3.4.2. On page 3 of the Public Participation Reports, it is stated that: "Focus Group Meetings or One-on-One meetings will be held, if necessary, throughout the EIA process. Furthermore, I&APs will also be able to register throughout the duration of the EIA process. Once registered, I&APs will be informed about the EIA process as it progresses." In this regard:	The Public Participation Reports clearly set out that focus group or one-on-one meetings could be arranged on request and where considered necessary. While no such requests were received from I&APs during the EIA process, the EAP remained available to facilitate these engagements at any stage.
				3.4.2.1. There is no evidence that I&APs were given any information on the opportunity for focus groups or one-on-one meetings.	The public notices, correspondence, and Public Participation Reports all indicated that I&APs could engage with the EAP directly and register for ongoing communication. While specific invitations to focus groups were not circulated, all I&APs were provided with EAP contact details and notified of their right to request further engagement, including one-on-one discussions.
				3.4.2.2. No invitations to / notifications of such meetings or focus group sessions are evident and I&APs were not specifically informed that a meeting or focus group could be requested. (NOTE: There was a single virtual meeting in September 2024 with the DARDLEA and MTPA).	
				3.4.2.3. No focus group meetings or one-on-one meetings took place in the SIA – there are no records in this regard.	While no focus group meetings were held, the assessment included telephonic interviews and direct engagement with affected landowners. These interactions, along with the broader public participation process, informed the social baseline and

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					impact findings. All engagement was conducted in accordance with the EIA Regulations and Public Participation Guidelines.
@				3.4.3. Proof of site notices is provided, but the content thereof is not legible (Appendix 2). Assuming these are the same as the advertisement (Appendix 3), then these are simply a notification of the PPP for the proposed projects. The PPP has followed a 'long-arm' or 'hands off' approach in that it has been solely based on published notifications and written communications (e.g. email correspondence). There is no evidence that consideration was given to whether this was the appropriate level of PPP (as per PPP Guidelines (DFFE and Western Cape). No rationale forapplying what is effectively the bare minimum level of public participation is given in the Public Participation Reports or the DEIRs.	These notices were prepared in accordance with the requirements of the NEMA EIA Regulations, and the PPP was implemented in line with the legally prescribed minimum requirements. While the statutory minimum requirements were met, the EAP acknowledges that best practice guidelines encourage more proactive engagement. The live stakeholder database and direct written communication with registered I&APs supplemented the notices and advertisements, ensuring all stakeholders had an opportunity to engage.
				3.4.4. Whilst it is not a legal requirement, no Background Information Document ("BID") was provided to I&APs. Such documents are useful to I&APs for the purpose of obtaining information about the proposed projects as well as the EIA processes at an early stage. It also provides a valuable platform to enable I&APs voice their concerns to the EAP at an early stage in the EIA process.	You are correct that a BID is not a legal requirement. In this case, the EAP opted to integrate project information into the initial notification emails and site notices, which included: • A description of the proposed project • Contact details for queries and submissions • Instructions for registration and participation in the process While this approach met the statutory requirements of the NEMA EIA Regulations, it is acknowledged that a standalone BID could have further enhanced clarity and accessibility for I&APs. This feedback is

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					valuable and will be used to strengthen future PPP design.
				3.4.5. The lack of a BID is further evidence of a PPP approach that has not catered for meaningful engagement with I&APs, but is based on the absolute minimum required – and in fact, failed to achieve even this (e.g. poor identification of I&APs as already shown in this discussion).	While the circulation of a Background Information Document (BID) is not a statutory requirement under the EIA Regulations, the EAP acknowledges its value. Throughout the EIA process, the EAP made every effort to communicate with I&APs who required additional information, encouraging registration to receive project updates and notifications. Furthermore, a dedicated project website was maintained, providing access to project information, EIA documentation, and contact details for further engagement. These measures were implemented to support transparency and facilitate meaningful participation.
				3.4.6. The inadequate identification of I&APs as described in this comment will have adversely affected the opportunity for meaningful input by I&APs. Accurate and comprehensive identification of I&APs at an early stage in the EIA process is critical for capturing I&AP concerns at the earliest possible stage in the EIA process. These issues can then be taken into account in the scoping process (identification of issues) as well as incorporated into the scope of work of specialist studies. The efficacy of the scoping phase (with attendant consequences for the EIA phase) is compromised by the inadequate identification of I&APs.	The identification and registration of Interested and Affected Parties (I&APs) was undertaken in line with the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), and the Public Participation Guidelines issued under NEMA. The process included: • Development of a consolidated I&AP database, incorporating stakeholders from the Sheepmoor, Emvelo, and Rochdale WEF applications. • Direct notification via email and SMS to identified landowners, occupiers, municipalities, and relevant organs of state.

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					• Public advertisements in regional newspapers (Mpumalanga News and The Highvelder), inviting interested parties to register as I&APs. • Placement of site notices at strategic points within affected towns and along project boundaries. • Provision of online access to project documentation and registration portals. All previously registered I&APs from earlier applications were retained on the database and notified of the revised project scope and layout. The Department of Forestry, Fisheries and the Environment (DFFE), in correspondence dated 17 February 2025, confirmed that the consolidation of stakeholder databases and project components was legally permissible, provided that public consultation obligations were met. Recognising that early identification of I&APs is critical to shaping specialist studies, the EAP took proactive measures to ensure that: • Relevant authorities and stakeholders were engaged during both the Scoping and EIA phases. • Stakeholder comments were incorporated into the Terms of Reference for specialist assessments. Additional biodiversity studies and layout revisions were undertaken in direct response to stakeholder input. The Comments and Responses Report (CRR) records how issues

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					raised by landowners, conservation authorities, and technical specialists were addressed and integrated into the project development process. Hence, the process followed was accurate and itterative to date.
				NEED AND DESIRABILITY	
				<u>4.1. Misconception about the meaning and intention of "Need and Desirability"</u> 4.1.1. According to the 2017 DFFE (formerly DEA) guideline on need and desirability "Need and desirability is based on the principle of sustainability, set out in the Constitution and in NEMA, and provided for in various policies and plans, including the National Development Plan 2030 (NDP). Addressing the need and desirability of a development is a way of ensuring sustainable development – in other words, that a development is ecologically sustainable and socially and economically justifiable."	The DEIRs have addressed both the "need" and "desirability" of the proposed Emvelo and Sheepmoor WEFs in accordance with the DFFE 2017 Guideline. The "need" is addressed through national and provincial policy, socio-economic drivers, energy security, and climate change mitigation priorities, while the "desirability" is informed by detailed site-specific environmental assessments, including biodiversity, ecological sensitivity, and landscape context. The DEIRs integrate findings from all relevant specialist studies, including the Terrestrial Biodiversity Assessment (TBIA), Avifaunal Impact Assessment, Fauna studies etc . These studies identify high-sensitivity areas, threatened ecosystems, Key Biodiversity Areas (KBAs), Species of Conservation Concern, and National Protected Areas Expansion Strategy (NPAES) focus areas. The proposed layout has been informed by these assessments, with micro-siting and adaptive management measures designed to minimize impacts, including potential turbine relocation and shutdown-on-demand for sensitive avifaunal species.
				4.1.2. Another important point to note is that the guideline differentiates between the focus of "need" and that of "desirability". Whereas "need" primarily refers to time (i.e. is this the right time to undertake the development), "desirability" relates to place (i.e. is it the right place for locating the type of land-use / activity being proposed?). When considering need and desirability, cognisance must be taken of the strategic context relevant to the proposed development and its location.	
				4.1.3. A list of questions which are divided into those that are concerned with ecological sustainability and those that relate to justifiable economic and social development are provided in the DFFE Guideline. The guideline is very clear that answering these questions "will ensure that all the relevant considerations have been taken into account." Need and desirability considerations	

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				must be addressed during each stage of the EIA process (screening, "scoping", and assessment). The questions must be used to identify the key issues to be addressed as well as to identify alternatives that will better respond to the need to avoid the negative impact or better mitigate the negative impact, or that will better enhance the positive impact.	Contrary to the suggestion that sensitive areas are not considered, the DEIRs incorporate comprehensive sensitivity mapping and mitigation measures consistent with the precautionary principle and the objectives of NEMA. While some turbines may intersect edges of high-sensitivity areas, adaptive management strategies are proposed to ensure residual impacts are minimized and ecological integrity is maintained. References to "directly enhancing the conservation landscape" reflect these mitigation and habitat management measures. The assessment of desirability explicitly considers ecological integrity, conservation targets, land-use compatibility, and potential impacts on biodiversity connectivity and climate change resilience. The projects have been located to balance renewable energy development with environmental constraints, ensuring that the proposed sites are suitable from both a development and sustainability perspective. The DEIRs further acknowledge that renewable energy benefits are not unique to these sites but demonstrate that the location is compatible with the integrated environmental and socio-economic objectives. In summary, the Need and Desirability assessment demonstrates that the proposed projects are justified in terms of timing, location, and ecological sustainability, with all identified environmental sensitivities addressed through mitigation measures, informed micro-siting, and adaptive
				4.1.4. Need and desirability is addressed in Section 5 of the DEIRs and the questions from the DFFE Guideline are covered in Table 5-1. The responses do not meet the requirements of the guideline. In most cases, the responses do not clearly explain how the projects respond (or not) or align (or not) to the context provided by applicable sustainability plans, policies, strategic objectives.	
				4.1.5. Also, the answers flip-flop from statements about what information was consulted and compiled in the EIAs, to giving long, wordy explanations that do not provide a substantive answer. For example, with respect to CBAs (pg. 116 Emvelo; pg. 127 Sheepmoor) a vague answer is given in relation to the grid infrastructure and the question of the impact of the WTGs on CBAs is not mentioned. The effect is that none of the questions relating to ecological sustainability are actually answered to any meaningful extent, and/or answers are incomplete and/or answers contradict what is stated in specialist reports. Consequently, answers serve to prejudice the environment and benefit the projects. For example:	

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					management in accordance with NEMA principles and the objectives of integrated environmental management.
				4.1.5.1. Question: How were the following ecological integrity considerations taken into account? Threatened ecosystems? The answer provided is (Table 5-1, pg. 115 Emvelo; pg. 127 Sheepmoor): "The proposed development area includes no threatened ecosystems as verified through the IUCN Red List of Ecosystems conservation tool." This is an exceedingly strange answer given that the Threatened Ecosystems are mentioned in both the Aquatic Impact Assessment ("AqIA") and the TBIA. Furthermore, the comments from DARDLEA and MTPA raise several concerns about the projects' location and CBAs. Moreover, the presence of a Key Biodiversity Area ("KBA") is not noted in the response. The "IUCN Red List of Ecosystems conservation tool" is not mentioned in a single specialist study that is concerned with ecological / biodiversity issues and no reference to a tool of this name could be found via a Google search. Clearly, the response provided in the Table 5-1 has no scientific basis or standing. It is also factually incorrect and self-serving, since there are numerous Red Data species mentioned in the aforementioned specialist reports. Please explain the reasoning for this inexplicable misrepresentation.	The presence of Critical Biodiversity Areas (CBAs), Key Biodiversity Areas (KBAs), and Red Data species has been assessed in detail by qualified specialists. These sensitivities informed the layout refinement and mitigation measures, including biodiversity offsets. The final EIA documentation will clarify terminology and ensure consistency with specialist findings.
				4.1.5.2 Question: How were the following ecological integrity considerations taken into account? Threatened ecosystems? Sensitive, vulnerable, highly dynamic or stressed ecosystems, such as coastal shores, estuaries, wetlands, and similar systems require specific attention in management and planning procedures, especially where they are subject to significant human resource usage and development pressure? The answer given is: "An ecological sensitivity map of the site was produced by integrating information collected on-site with available ecological and biodiversity information. Sensitive features such as wetlands, drainage lines, water bodies, steep slopes and rocky outcrops were	The DEIR states that high-sensitivity areas were avoided, it is correct that a limited number of WTGs are located on the edge of or within areas mapped as high sensitivity. This was disclosed in the terrestrial biodiversity assessment, which also explains that these turbines are sited in degraded or marginal areas where the majority of the footprint can be accommodated in transformed habitat.

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				mapped and appropriately buffered. The proposed layout avoids all high-sensitive areas." This answer is simply not true and is not supported by the facts or the information presented in the DEIRs. For example, examination of the sensitivity map in the DEIRs (Fig. 7.2 on pg. 614) shows WTG positions in, intersecting or on the edge of areas of high environmental sensitivity. Furthermore, these maps do not accurately capture all the relevant sensitivities, as will be shown elsewhere in these comments.	The layout was informed by a sensitivity mapping process that integrated field data and specialist input. Where avoidance was not feasible, mitigation and offset measures were proposed, including a 1:3 alien vegetation clearing ratio and a pre-construction walkdown to refine micro-siting.
				4.1.5.3 Question: How were the following ecological integrity considerations taken into account? Conservation targets? The answer given is: "The PAOI5 does not intersect with any NPAESs. There are no specific features of very high biodiversity value within the affected polygons and highly sensitive areas have been avoided for development. In addition, the site does not appear to fall on any significant gradients or corridors that are likely to be of high importance for biodiversity processes such as migration and faunal movement". There are multiple problems with this answer which misrepresents the significance of the WEF sites. Besides the fact that it is factually incorrect, it also ignores the role of CBAs in achieving conservation targets, as well as targets as applicable to Species of Conservation Concern, to name two examples. Factual incorrectness is clearly demonstrated by the following (from pg. 216 (Emvelo) and pg. 206 (Sheepmoor) of the DEIRs): "Parts of the PAOI fall within a National Protected Areas Expansion Strategy (NPAES) Focus area (Moist Escarpment Grasslands), targeted for protected area expansion for improved ecosystem representation, ecological sustainability and resilience to climate change. Chrissiesmeer Protected Environment and Jericho Dam Nature Reserve overlap the north and east of the PAOI respectively."	The terrestrial biodiversity assessment served to refine the mapping, which is the norm, where bioregional plans are often not up to date and/or reflect inconsistencies that require ground-truthing. This was presented in the terrestrial biodiversity assessment reporting accordingly, which is being ignored by the respective authorities. This was noted in the draft EIA comments but is still being overlooked.
				In addition to the above point and to further demonstrate the inaccurate claim that "all highly sensitive areas have been avoided", reference to the AvIA shows that this is not the case, since the avifaunal specialist has identified a number of WTGs that need to be removed or moved / micro-sited, yet the description of	As part of the early project design phase, strategic environmental screening and specialist-led biodiversity assessments were conducted across a

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				the preferred alternative (Chapter 8 of the DEIRs) states that WTG positions have been finalised. It is clearly evident from Figures 7.1 and 7.2 in the DEIRs that WTGs remain located in areas of HIGH biodiversity sensitivity or very close to such areas or right on the edge of these sensitive areas. This is evident in the case of both proposed WEFs. These cannot be specifically identified, since the ERM reports do not provide the WTG reference numbers on the aforementioned figures.	broader study area of approximately 25,000 hectares. Based on the outcomes of these assessments, the layout was refined to avoid the most sensitive ecological features, focusing instead on areas where environmental impacts were lower and wind resources remained economically viable. The final proposed project area has been significantly reduced to approximately 6,100 hectares, with an actual disturbance footprint of only ~57 hectares. Site sensitivity verification by specialists confirmed that the area is more impacted than indicated by older, desktop-based datasets— such as the 2010 land cover data used in the Mpumalanga Biodiversity Sector Plan (MBSP). This demonstrates the importance of ground-truthing and confirms that many mapped “natural” areas are already subject to degradation. Comprehensive, multi-tiered mitigation measures have been tailored to each identified sensitivity and are incorporated into the EMPr. These include measures to manage impacts on key habitats, faunal species, and avifaunal corridors, ensuring impacts are reduced to acceptable levels. In addition, a Biodiversity Offset Report (BOR) has been prepared in accordance with the 2023 National Biodiversity Offset Guideline. The BOR applies the full mitigation hierarchy as outlined in Section 24 of

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					NEMA and the EIA Regulations (2014, as amended). The DEIAr layout was informed by specialist input and spatial planning to avoid key features such as Critical Biodiversity Areas (Irreplaceable and Optimal), wetland buffer zones, and avifaunal corridors. Where residual ecological loss remains, the BOR recommends enforceable, measurable biodiversity offsets to ensure no net loss of biodiversity, aligned with national policy and regulatory expectations.
				There is no material acknowledgement in the needs and desirability section of the presence of Species of Conservation Concern, including an endangered antelope and a critically endangered bird species. There is also no mention of the KBA which covers most of the sites. What is the basis for this material omission?	The concern is noted. The presence of Species of Conservation Concern including Martial Eagle, Southern Bald Ibis, Cape Vulture, Yellow-breasted Pipit, Rudd's Lark, and others has been comprehensively documented in the Avifaunal and Faunal Impact Assessments and is reflected in the EIAr and EMPr. Similarly, the overlap with Key Biodiversity Areas (KBAs) and Important Bird Areas (IBAs) has been acknowledged through sensitivity mapping and impact assessments. These sensitivities directly informed turbine micro-siting, Collision Risk Modelling (CRM) and Potential Biological Removal (PBR) thresholds, and species-specific mitigation such as Shutdown-on-Demand (SDoD), buffer zones, and biodiversity offsets. The omission of detailed reference to SCC and the KBA in the Needs and Desirability section does not imply that these factors were

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					disregarded, but rather reflects the structure of the report, where such matters are assessed in depth under the relevant specialist sections.
				4.1.8. Only the TBIA is referenced in relation to the questions on ecological sustainability, thereby ignoring all the other studies associated with biodiversity. This displays a complete disregard for comprehensive biodiversity sensitivity mapping or the integration of significant biodiversity aspects into the EIA processes.	The concern is noted. The Terrestrial Biodiversity Impact Assessment (TBIA) was referenced in the Needs and Desirability section as a representative example of ecological inputs. This reference was not intended to disregard other biodiversity studies but rather to illustrate the consideration of ecological sustainability. All specialist biodiversity studies including the Avifaunal Impact Assessment, Faunal Impact Assessment, and Freshwater Assessment were fully integrated into the EIA process. Their findings are reflected in the Environmental Sensitivity Mapping, the impact assessment chapters of the EIAr, and the Environmental Management Programme (EMPr). These studies collectively informed turbine micro-siting, layout refinements, and project-specific mitigation measures such as Shutdown-on-Demand protocols, ecological buffer zones, and biodiversity offsets.
				4.1.9. The need and desirability section in the DEIRs is myopic and biased as it is weighted heavily in favour of 'need', which refers to time (i.e. is this the right time to undertake the development?) through describing policies that relate to climate change, energy transition, the need for economic growth, just transition, energy diversification, employment creation imperatives and the like. This information is provided in Section 5.1 of the DEIRs – THE NEED AND DESIRABILITY OF RENEWABLE	Section 5.1 of the DEIRs addresses the "Need and Desirability" of the proposed facilities primarily in relation to national energy policy, climate change imperatives, economic growth, energy diversification, and just transition objectives. The emphasis on "need" reflects alignment with the policy context set out in instruments such as the

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				ENERGY FACILITIES. None of these speak to the question of desirability, so the heading of Section 5.1 is misleading. The EAP's motivation is therefore deficient.	Integrated Resource Plan (IRP 2019), the National Development Plan (NDP 2030), and South Africa's international climate change commitments.
				As noted in the DFFE 2017 guideline "desirability" relates to place (i.e. is it the right place for locating the type of land-use / activity being proposed?). This question is not afforded the level of attention given to "need" – there is no equivalent discussion to Section 5.1 on ecological sustainability / natural environmental characteristics, features and sensitivities. These are the main criteria for informing the question: "is it the right place for locating the type of land-use / activity being proposed?" Other questions which are important from a desirability point of view include those related to sense of place, compatibility of land use and possible sterilisation of other economically viable land uses.	The concern regarding the limited discussion of "desirability" in relation to ecological sustainability and land use compatibility is acknowledged. While the DEIRs place emphasis on the "need" for renewable energy, the "desirability" of the proposed WEFs has been addressed through various specialist studies, particularly the Visual Impact Assessment (VIA). The VIA explicitly assesses the impact of the proposed developments on the landscape character and sense of place, identifying that the rural agricultural nature of the area contributes significantly to its identity. The VIA concludes that while the visual impact is moderate to high without mitigation, it can be reduced to moderate with appropriate measures. These include turbine siting, lighting controls, and rehabilitation of disturbed areas.
				4.1.11. The fact that questions relating to "desirability" have been downplayed is starkly demonstrated in the following communication between the EAP and DARDLEA, extracted from the Public Participation Reports. 4. DARDLEA is therefore concerned that the proposed location of the Emvelo Wind Energy Facility and associated grid infrastructure is not compatible with the desired land use. The WEF and all associated infrastructure is not a land use, in accordance with the Mpumalanga Biodiversity Sector Plan (MBSP), that will support the inherent biodiversity values of CBAs.	The statement reflects the incorporation of mitigation measures proposed in specialist reports to reduce impacts, restore habitat where feasible, and support conservation objectives (e.g., buffer enhancements, rehabilitation of disturbed areas). While the term "directly enhance" is aspirational, mitigation measures are scientifically grounded and informed by biodiversity

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				4.1.12. The EAP's response is as follows: "While the departments concern is noted, the development of a wind energy facility would allow the IPP to directly enhance the conservation landscape of the area through the implementation of recommended mitigation measures from the various specialists to improve the ecology of the landscape. As such, we feel that the proposed development could support the biodiversity values of the CBAs." It is not known on what scientific rationale the EAP bases the notion that the WEF development would "allow the IPP to directly enhance the conservation landscape." Certainly, the term "directly enhance the conservation landscape" does not appear in the specialist reports. Rather, this response by the EAP to DARDLEA is merely flowery language aimed at putting the project in a positive light, thereby directing attention away from the fundamental issue raised by the authority, which is that the proposed location of the WEF is not desirable. This view comes from an authority that has far more in-depth knowledge of the situation than the EAP. To minimise this feedback in the manner shown by the EAP is unacceptable, especially in the context of the independence and objectivity that ought to guide the way the EIA process is conducted.	assessments. The EIA process highlights these measures as contributing to residual ecological benefits where possible.
				4.1.13. There is no compelling reason for the projects to be regarded as desirable at the proposed location. Quite the contrary. Whilst renewable energy may be needed for a variety of very commendable environmental reasons (climate change etc.), this applies across all renewable energy projects and is a generic reason. A WEF does not need to be situated at the proposed locations of the two WEFs for the objectives associated with energy security, diversity, climate change etc. to be realised. These potential environmental benefits apply universally to renewable energy projects.	The need for renewable energy is balanced with site-specific environmental constraints. The DEIRs consider REDZ, transmission infrastructure, land-use compatibility, and biodiversity connectivity. Climate change mitigation is not the sole criterion; impact assessments also integrate climate adaptation priorities, connectivity of grassland patches, and ecosystem resilience. Proposed micro-siting and adaptive management measures aim to align renewable energy development with both mitigation and adaptation objectives, consistent with NEMA principles of
				4.1.14. The need and desirability assessment in the DEIRs is myopic for another reason – the assessments fail to recognise the international concern about the loss and degradation of biodiversity. This is particularly important given that biodiversity is	

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				central to climate change mitigation and adaptation – factors that the EAP has failed to recognise and/or integrate into the reports. Incorrectly located renewable facilities as with any inappropriately located development pose high risks of irreversible, adverse impacts on sensitive environmental resources.	sustainability and integrated environmental management.
				4.1.15. Further to the above point, the disproportionate and heavy reliance on climate change mitigation (i.e. strategies to reduce GHG emissions through initiatives such as renewable energy generation) by the EAP as a key motivation for the projects are misplaced. This is because to place more weight on this argument as opposed to the factors that are important for climate change adaptation and resilience, is to present a skewed argument that favours the projects. Such an approach is not defensible, particularly given that the Mpumalanga Biodiversity Spatial Plan (MBSP) specifically incorporates climate change into spatial priorities. For example, maintaining the connectivity of grassland patches / areas is one of the priorities to support climate change adaptation. This issue has been raised in the DARDLEA and MTPA. Notwithstanding, the question of how the projects may compromise climate change resilience and adaptation strategies / policies / plans is not addressed in the Need and Desirability section of the DEIRs.	
				ALTERNATIVES	
				<u>Identification of alternatives inadequate</u> 5.1.1.One of the key objectives for considering alternatives, is to assess the relative significance of impacts across alternatives as a means of identifying the most appropriate alternative (which may be the “no go” option). In the case of the proposed Emvelo WEF and Sheepmoor WEF it is quite possible that the “no go” option should be identified as the preferred option. The assessment of alternatives by the EAP is not balanced and is based on an	The consideration of alternatives, including the “no-go” option, is a legal requirement under the EIA Regulations, 2014 (as amended), and a core principle of Integrated Environmental Management (IEM). The Draft Environmental Impact Assessment Reports (EIArs) for both the Emvelo and Sheepmoor Wind Energy Facilities (WEFs) include an assessment of: • The “no-go” alternative,

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				incomplete and skewed analysis that serves to favour the so-called 'optimised' layout for the proposed WEFs.	• Technology alternatives (e.g. wind vs. solar), • Layout and design evolution alternatives, • Grid connection alternatives. • The "no-go" alternative was assessed as a baseline scenario and remains a valid benchmark against which all other alternatives are evaluated. It is acknowledged that the optimised layout is presented as the preferred alternative. However, this layout was not predetermined. It was the result of an iterative refinement process informed by: • Specialists inputs • Stakeholder and authority feedback • Technical constraints (e.g. wind resource availability, aviation buffers, terrain), • Environmental sensitivities (e.g. CBAs, wetlands, escarpment grasslands).
				5.1.2. With respect to the 'Design Evolution Alternatives' it is clear that the premise on which the consideration of alternatives is based is fatally flawed and this permeates the approach to the EIA as a whole. Section 7.3 (pg. 241 of the DEIRs) has the following statement: "It is important that wind turbines are sited in the optimum position to maximise the wind energy yield whilst minimising E&S impacts as far as possible." This is not the purpose of considering alternatives. Rather it is to determine whether there is an option whereby the proposed developments could take place with least harm. Least harm must be seen in the context of the mitigation hierarchy – to avoid adverse impacts in the first instance, and to minimise impacts where avoidance cannot be fully achieved.	The purpose of assessing design alternatives in the EIA process is to identify the option that results in the least environmental harm, in line with the mitigation hierarchy and the principles of Integrated Environmental Management (IEM). While the Draft EIA Report refers to optimising turbine placement for energy yield, this was not the sole driver of layout decisions. The layout was refined through multiple iterations based on specialist input, stakeholder feedback, and environmental constraints. Avoidance of sensitive areas such as wetlands, Critical

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					Biodiversity Areas (CBAs), and avifaunal exclusion zones was prioritised. Where avoidance was not feasible, mitigation and offset measures were proposed.
				5.1.3. The statement that “No environmental fatal flaws identified in the screening assessment” is offered as a reason for the site selection. Again, no is reference given (pg. 241 of DEIRs). If this statement is supposed to refer to the DFFE screening tool, it is misplaced, since this tool is intended to identify environmental sensitivities and not ‘fatal flaws.’ The fact is that when the EAP observed the high-level of biodiversity sensitivity, this ought to have triggered a process to find an alternative less-sensitive location, but for some inexplicable reason this did not happen. The comments from MTPA note that an alternative site that is far less sensitive from a biodiversity point of view should be identified by the Applicants. This is in line with appropriate due diligence and duty of care towards a highly sensitive environment.	The statement that “no environmental fatal flaws were identified in the screening assessment” was intended to reflect the outcome of the initial desktop sensitivity review, but it is acknowledged that this does not equate to a full assessment of site suitability. The DFFE screening tool is designed to highlight environmental sensitivities not to confirm the absence of fatal flaws. The EIA process subsequently identified high biodiversity sensitivity across the site, including Critical Biodiversity Areas (CBAs), intact grasslands, and threatened species habitats. These findings informed layout revisions and mitigation strategies. While the site is sensitive, the mitigation hierarchy was applied—prioritising avoidance where feasible, followed by minimisation and offsetting. The Final EIA Report includes a full justification for site selection and acknowledges that alternative locations were considered but constrained by land availability, wind resource viability, and technical feasibility. The EAP remains committed to ensuring that the Competent Authority has all necessary information to assess whether the proposed development is environmentally acceptable.
				5.1.4. There is no evidence that an alternative that involves removing all of the turbines located in areas identified as being of	The comment is noted. While the Draft EIA Report includes layout refinements based on

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				high sensitivity as shown on the sensitivity maps in the specialist studies and Figures 7.1 and 7.2 of the DEIRs. By way of one example, had this been done, then it would not be necessary for the AvIA to list so many WTGs that need to be moved or removed.	specialist input, it is acknowledged that a fully modelled alternative layout excluding all turbines from areas of high sensitivity—such as those identified in Figures 7.1 and 7.2—was not presented as a standalone alternative. The Final EIA Report addresses this gap by documenting the rationale for turbine placement and the constraints that limited full avoidance, including wind resource viability, land availability, and engineering feasibility. Several turbines were removed or relocated based on avifaunal and faunal sensitivity findings, but a layout excluding all turbines from high-sensitivity zones was not assessed in isolation
				5.1.5 The discussion relating to alternative technologies is particularly weak. It is argued that wind is more compatible with continued grazing than solar because of the shading effect of solar. It is then noted that solar would pose less of a collision risk for avifauna. Given the sensitivity of avifauna versus agriculture, this should automatically make solar the preferable option. Added to this, solar does not need to be located on an escarpment. This begs the question – why wasn't the option of solar on old discard dumps or coal ash disposal facilities considered, for example? An option such as this potentially offers an income source towards an environmental liability. The motivation to place the proposed Emvelo WEF and Sheepmoor WEF in an environment which is rated as being of very high and high sensitivity over the majority of the site is weak and does not stand up to scrutiny.	The EIA Regulations, 2014 (as amended), require that reasonable and feasible alternatives be considered. Both wind and solar technologies were assessed at a high level in the Draft EIARs. Wind was retained as the focus of this application as it was the technology proposed by the Applicant, with the layout designed to maintain agricultural land use (grazing) alongside the WEF. In accordance with the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended) under the National Environmental Management Act (NEMA), Act 107 of 1998, the consideration of alternatives is a mandatory component of the EIA process. Specifically:

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					• Regulation 21(1)(c) requires the Scoping Report to identify and describe reasonable and feasible alternatives, including location, activity, and technology. • Regulation 23(2)(b) further requires the EIA Report to assess these alternatives in terms of environmental impacts and feasibility. The Draft EIA Reports for both WEFs included a comparative assessment of wind and solar technologies. While solar energy is broadly acknowledged to pose lower collision risks for avifauna, wind energy was found to be more compatible with existing land uses—particularly grazing—due to its minimal ground footprint and reduced shading impacts. This compatibility is a key consideration in rural agricultural landscapes. The relative sensitivity of avifauna and agricultural land use is not a binary determinant of technology preference. In this case, specialist avifaunal studies were conducted to assess collision risk and habitat disruption, and mitigation measures have been proposed. Agricultural viability was also assessed. The conclusion that wind energy is appropriate for the proposed sites reflects a consideration of various factors, and not a dismissal of solar energy's merits. The suggestion to consider degraded land such as discard dumps or coal ash facilities is

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					noted. However, such sites often present significant constraints, including: • Geotechnical instability, contamination, and rehabilitation requirements. • Grid connection limitations, especially in remote or legacy industrial areas. • Land ownership and tenure complexities, which may preclude timely development. The reuse of degraded land must be weighed against technical feasibility, energy yield potential, and project timelines. In this case, the selected sites were identified through a multi-criteria screening process that considered wind resource availability, grid access, landowner willingness, and environmental constraints. The presence of areas rated as “high” or “very high” sensitivity within the proposed footprints does not automatically render the sites unsuitable. The EIA process is designed to: • Identify sensitive features, • Assess potential impacts, • And propose mitigation or avoidance strategies. In both WEF proposals, the layout has been refined where possible, and specialist input

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					has guided the placement of turbines and infrastructure as far as is feasible. Therefore, the assessment of alternative technologies and locations was conducted in line with NEMA and the EIA Regulations. The selection of wind energy and the proposed sites reflects a reasoned balance of environmental, technical, and socio-economic considerations. The process remains procedurally sound and substantively justified.
				<u>5.2. Key information on alternatives is not provided</u> 5.2.1.“A design evolution summary report is presented in Appendix C of this EIA Report.” This statement is factually incorrect. There is no Appendix C attached to the DEIRs or available for download. This means there is no information about how the design evolved and thus no means to assess whether in fact the design and layout has responded to impacts and environmental sensitivities as claimed in response to various comments, as is claimed in the Comments and Responses Report. The fact that documents are referred to by the EAP but which are not available for review by I&APs is further evidence that the public participation process is compromised and prejudicial to I&APs.	This was an erroneous inclusion and the document was not intended to form part of the DEIRs.
				5.2.2 There is no discussion on the consideration of alternative locations in the DEIRs.	This site was selected based on a combination of technical feasibility (e.g. wind resource availability, grid connection proximity), landowner willingness, and environmental screening outcomes.

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					While alternative layouts and technology options were assessed within the selected sites, the consideration of entirely different locations was not undertaken as part of this EIA process. The selected sites were deemed suitable based on the outcomes of the screening tool, specialist studies, and iterative layout refinement to avoid or minimise impacts on sensitive features.
				<u>5.3. Rationale for rejection of 'no development' option is weak</u> 5.3.1. The manner in which alternatives have been addressed is weak. With respect to the 'no development' option, the approach adopted is one of motivating in favour of the projects. It is largely based on the premise that renewable energy is beneficial from the perspective of certain environmental parameters such as climate change. It is also based on the assumption that the land will continue to degrade "due to the prevalence of grazing" (DEIRs, Section 7.1, pg. 239 and 226 respectively). Land degradation does not automatically follow grazing. There is no mention of grazing being a problem or leading to ongoing land degradation in the Agricultural Impact Assessment ("AgIA"), although the TBIA notes that historical grazing activities have caused variable degradation (pg. 53). The issue here is that an assumption that degradation due to grazing will automatically continue ad infinitum ought not to be used as motivation against the 'no development' option. The motivation is neither impartial nor objective. The extent to which the motivation by the EAP is one-sided and weighted in favour of the projects is a serious concern.	The concern regarding the objectivity of the "no development" (no-go) alternative assessment is acknowledged. The Final EIA Report (Section 7.1) does present the no-go alternative, but it is recognised that the rationale is largely framed around the benefits of renewable energy and assumptions about ongoing land degradation due to grazing. While the report states that "the site would likely continue to degrade due to the prevalence of grazing," this is not directly supported by the Agricultural Impact Assessment (AgIA), which does not identify grazing as a current or future threat. The Terrestrial Biodiversity Impact Assessment (TBIA) notes that historical grazing has caused variable degradation but does not confirm that degradation will persist indefinitely. It is acknowledged that degradation due to grazing is not an automatic or universal outcome and that such assumptions should not be used as a primary justification against

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					the no-go alternative without supporting evidence. The Final EIA Report has been updated to clarify that the no-go alternative would avoid additional impacts on avifauna and terrestrial biodiversity and that it remains a valid and important benchmark for comparison. However, the report also notes that the no-go alternative would not contribute to national objectives related to climate change mitigation, energy security, and economic development. These broader policy considerations are part of the need and desirability assessment but should not override ecological concerns without a balanced trade-off analysis. In summary, while the no-go alternative has lower ecological impacts, particularly for avifauna and intact grasslands, the Final EIA Report now presents a more balanced view that recognises both the ecological benefits of no development and the national imperatives driving renewable energy expansion.
				5.3.2 On page 239 (Emvelo) and 226 (Sheepmoor) of the DEIRs, the following bizarre statement is recorded: “Although the proposed development will likely affect the avifaunal community on site, they do not appear to have pushed key species towards extinction in most cases.” Besides the fact that no scientific evidence is given and no scientific research is referenced to support this statement, it is also written in a manner that is unclear and does not make sense. Moreover, this statement is highly problematic, because it downplays the potential advantage	The concern is noted. The “no-go” alternative was assessed in the Draft EIA Reports as required by the EIA Regulations. However, it is acknowledged that the rationale provided was weighted toward the benefits of renewable energy and assumptions about ongoing land degradation. The Final EIA Report clarifies that grazing does not inherently lead to degradation and that the

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				of the 'no development' option when it comes to avifaunal impacts. This is especially so, as the AvIA shows the presence of a Critically Endangered species (Species 23). The risk of loss of even one individual of a species that is Critically Endangered is one too many – and most certainly contributes to an extinction risk. The fact that this is not recognised and given some level of prominence by the EAP is unjustifiable.	Agricultural Impact Assessment (AgIA) did not identify grazing as a fatal flaw. The EAP recognises that assumptions about degradation must be supported by evidence and that the "no-go" option must be evaluated objectively, including its potential to preserve sensitive ecosystems.
				5.3.3. It is stated that the 'no-go' alternative "is likely to lead to continuing loss of grassland habitat from alien plant invasions and agricultural activities (e.g. pg. 4 of Faunal Impact Assessment). Although mitigation could reduce these high negative impacts and produce positive impacts, this is highly unlikely to occur. The no-go alternative is therefore not the preferred alternative." No scientific references or any other evidence for this conclusion is given, even in the form of discussions with ecologists that may work in the area. It is not uncommon to see the argument about the potential for alien invasion to continue 'without' the development and therefore to discount the 'no development / no go option' on this basis. In the absence of reference to any research or other scientific evidence, this is no more than supposition. It is not a scientifically proven fact and the argument should be disregarded on the basis that the entire premise is fundamentally flawed.	The statement in the Draft EIA Report regarding avifaunal extinction risk is acknowledged as poorly phrased and lacking scientific support. The Final EIA Report removes this language and instead references the findings of the Avifaunal Impact Assessment (AvIA), which confirms the presence of Critically Endangered species (e.g., Species 23). The EAP agrees that the loss of even one individual of such species is significant and must be treated with caution. The Final EIA Report includes strengthened mitigation measures and acknowledges the importance of the "no-go" option in preserving avifaunal integrity.
				5.3.4. Moreover, both the MTPA and the DARDLEA note that intact grasslands occur on the site and that such intact grassland areas are crucial for supporting threatened avifauna. What the DEIRs conveniently ignore therefore is the fact that the proposed WEFs therefore pose a direct and serious threat to achieving this biodiversity objective – a factor which has not been recognised by the EAP in the need and desirability assessment.	Both the Mpumalanga Tourism and Parks Agency (MTPA) and DARDLEA have confirmed the presence of intact grasslands on the site, which are critical for supporting threatened avifauna such as the Martial Eagle, Southern Bald Ibis, and Yellow-breasted Pipit. The Final EIA Report recognises that portions of the site fall within Eastern Highveld Grassland, classified as Endangered, and Wakkerstroom Montane Grassland, which supports key biodiversity features. These areas are mapped as Critical

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					Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs). While the Need and Desirability section does discuss national energy priorities, it is acknowledged that the ecological importance of intact grasslands was not sufficiently emphasised in that context. The Final EIA Report has been updated to reflect this, and the layout has been revised to avoid irreplaceable CBAs and sensitive avifaunal zones where feasible. A Biodiversity Offset Plan has also been included to compensate for residual impacts.
				5.3.5. The discussion on alternative technologies is also weak. For example, it is argued that a WEF is more compatible with farming than solar facility would be. Whilst this may have some validity in relation to the selected site, the same can be said for 'no development' option.	The comparison between wind and solar technologies is acknowledged as limited in the Draft EIA Report. The Final EIA Report expands on this by noting that solar PV would require a larger footprint, more water for panel cleaning, and could result in greater habitat loss. However, it is also acknowledged that solar PV poses less collision risk to avifauna, which is a significant consideration given the presence of Critically Endangered and Vulnerable bird species on site. The argument that wind energy is more compatible with grazing is valid for the selected site, but the same compatibility applies to the no development option, which would maintain existing land uses without introducing new infrastructure. The Final EIA Report now presents a more balanced view, recognising that the no-go option avoids

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					ecological risks altogether and remains a valid alternative.
				5.3.6. In the SIA, it is stated in several places (e.g. Sections 4.4.1, 4.9 and 5.2.6 and Table 4.19) that "The No-Development option would represent a lost opportunity for South Africa to supplement its current energy needs with clean, renewable energy." This is considered a gross exaggeration, since the supplementation of the country's energy needs with renewable energy is not dependent on a locating a renewable energy project at the locations proposed for the Emvelo and Sheepmoor WEFs. This motivation applies to any renewable energy project and is not unique to the particular location of these two proposed WEFs.	The statement that the "no development" option would represent a lost opportunity for South Africa to supplement its energy needs is acknowledged as overly broad. While renewable energy is a national priority, the contribution of any single project must be assessed in context. The Final EIA Report now clarifies that the Emvelo and Sheepmoor WEFs are not uniquely critical to national energy security, and that similar benefits could be achieved at less sensitive locations. The updated report also acknowledges that the Just Energy Transition (JET) and REIPPPP goals must be balanced against site-specific ecological constraints. The EAP agrees that the motivation for rejecting the no-go alternative must be based on a site-specific trade-off analysis, not generalised national policy.
				<u>CUMULATIVE IMPACTS</u> 6.1. Assessment of cumulative impacts unclear and inadequate 6.1.1. The significance of the cumulative noise impact (Section 11.2of DEIRs) is regarded as being understated. It is noted that if both Emvelo and Sheepmoor WEFs operate simultaneously, noise levels will increase. The understatement of this impact comes from the score attributed to duration (short-term). This cannot be correct, since if both WEFs operate simultaneously, the increased noise levels will surely persist for the lifespan of these projects. Mitigation measures, which are deemed to reduce these cumulative impacts from high (-ve) to low(-ve) would seem impractical as they are based on moving WTGs and/or Noise	The Final EIA Report acknowledges that cumulative noise impacts from Emvelo and Sheepmoor WEFs are significant. However, the rating of "short-term" duration is inconsistent with the 20–25 year operational lifespan of the projects. This has been revised in the FEIAr to reflect a long-term impact. Mitigation measures such as relocating WTGs or NSRs are acknowledged as impractical. The report now recognises that residual

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				Sensitive Receptors (“NSR”). In the case of the former, the positioning of the WTGs is reported to be finalised (as mentioned elsewhere in these comments). In the case of the latter, the NSRs are residences. Therefore, there is a strong likelihood that the cumulative impact cannot be effectively mitigated and will remain as high (-ve).	cumulative noise impacts may remain moderate to high (-ve), particularly at receptors like NSR E050, E051, and E038. Acoustic treatments and blade noise-reduction technologies are proposed, but their effectiveness is uncertain and site-specific.
				6.1.2. With respect to aquatic ecosystems (Section 11.3 of the DEIRs), it is stated that “The rating below is based on the premise that important or sensitive features will be avoided by the various projects, while the mitigations proposed will ensure that the form and or function of downstream areas remain intact.” Whether this premise / assumption is realistic is uncertain / unknown, especially in the absence of a discussion on how the aquatic systems on the Emvelo WEF site connect to or interact with aquatic systems present on other WEF sites. Therefore, no certainty can be attached to the cumulative impact assessment presented in Section 11.3 of the DEIRs.	The assessment do not explicitly discuss hydrological connectivity between the Emvelo and Sheepmoor WEF sites or other nearby developments. The Final EIA Reports will clarify the assumptions made and include a recommendation for further site-specific hydrological assessments during the pre-construction phase to verify connectivity and inform adaptive management.
				6.1.3. A similar comment to those given above applies to the cumulative impacts discussed in Sections 11.4 and 11.5. It is worth noting the contradiction in Section 11.5. The impact description is: “Some animal species will actively avoid areas near turbines, leading to their further displacement or changes and limiting their movement and distribution patterns across grassland landscapes. Increased vehicle movement on access roads, increased human activities, could further compound these impacts. Consequences of such impacts can result in the loss of populations of faunal SCC; restrict movement of fauna through ecological corridors; and the fragmentation of sub-populations of faunal SCC across high sensitive grassland habitats.” Despite this the impact is rated moderate (-ve) pre-mitigation and low (-ve) post-mitigation. The following statement is made: “Potentially Low positive impacts if enhancement measures, such as avoiding high sensitive areas, alien plant and Oribi management plans are successfully	Since the release of the Draft EIA Reports, a dedicated Oribi Management Plan has been developed and will accompany the Final EIA Reports. This plan includes habitat protection, corridor preservation, anti-poaching measures, and long-term population monitoring, and is aligned with national conservation guidelines.

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				implemented." The conclusions drawn cannot be relied upon with any certainty. Furthermore, the change from a potentially significant adverse impact to a low (+ve) is highly speculative, given that it can only be based on the assumption that the proposed projects are the sole mechanism for achieving alien vegetation control and an Oribi management plan.	
				6.1.4.The same sort of pattern continues throughout the cumulative impact section in the DEIRs. On birds – the cumulative impact can apparently be reversed; be mitigated / managed and there will be no loss of irreplaceable resources. This cannot be correct, since there is a risk of bird mortalities in association with every WEF. The more of these facilities in an area, the greater the risk. It is also stated: "A residual impact of medium negative significance is likely, as the cumulative impact is difficult to mitigate."	The mitigation measures proposed in the DEIRs were developed by qualified avifaunal specialists and are based on site-specific sensitivity mapping and species risk assessments. These measures include turbine micro-siting, avoidance of No-Go areas, marking of overhead lines with bird flight diverters, and the implementation of a post-construction monitoring programme. The applicant is committed to implementing these measures in full, as detailed in the Final EIA Reports and EMPrs, to reduce residual impacts and ensure that cumulative effects are managed to acceptable levels in line with NEMA and biodiversity conservation objectives.
				6.1.5. On visual impacts, mitigation measures focus on lighting as visual intrusion impacts are exceedingly difficult to mitigate. In addition, these impacts are persistent (daytime and nighttime). Notwithstanding the mitigation measures focus mainly on lighting and building materials selection, and are given sufficient weight to reduce the significance from high to moderate (-ve). It is questionable as to whether these mitigation measures are sufficient to warrant this decrease in significance. Put differently, given the height and blade sweep of WEFs and the extent of grid infrastructure, it is unrealistic to expect the visual impact to be reduced from high significance simply on the basis of mitigation	The EMPrs for both WEFs include detailed visual mitigation measures such as the use of motion-sensor and downward-facing lighting, low-pressure sodium lights, and restrictions on lighting intensity and placement to reduce sky-glow and visual clutter. These measures are enforceable through the EMPr and will be monitored by the Environmental Control Officer (ECO) throughout the project lifecycle. While the visual impact remains moderate post-mitigation, these measures

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				measures to reduce lighting and select non-reflective building materials, especially where there are several WEFs (i.e. impact will most likely be more severe due to cumulative effect, especially of WEFs, pylons and powerlines).	are considered effective in reducing the severity of the impact, particularly at night.
				6.1.6 The EAP has not explained the basis for selecting an area of 35kms radius from the sites of the proposed WEFs for the purposes of the cumulative impact assessment. Given that DARDLEA raised concerns about this in their comments dated 17 September 2024, and they listed WEF projects (approved and proposed) located beyond this selected distance of 35kms that ought to be included in assessment of cumulative impacts, this is wholly unacceptable.	The selection of a 35 km radius for the cumulative impact assessment was based on standard practice in wind energy environmental assessments, where this distance is generally considered sufficient to capture overlapping visual, ecological, and avifaunal impacts from nearby projects. The NEMA EIA Regulations (2014, as amended) do not prescribe a specific distance for cumulative impact assessments. Instead, they define a cumulative impact as "the past, current and reasonably foreseeable future impact of an activity, considered together with the impact of activities associated with that activity, that in itself may not be significant, but may become significant when added to the existing and reasonably foreseeable impacts"
				7 ASSESSMENTS OF IMPACT SIGNIFICANCE 31.1 Information gaps and unclear information 7.1.1 There are several information gaps. For example, Figure 6-8 in the Emvelo DEIR (pg. 198) which, according to the figure title, is supposed to show the sensitivity of terrestrial biodiversity is wholly inadequate. It does not show the full Emvelo site – only a portion of Emvelo 1 is included. A legend is unclear, as the colours on the map appear very different to the legend, so areas of different levels of sensitivity are not clearly shown. Furthermore, the legend	It is confirmed that there is no distinction between "Emvelo WEF 1" and "Emvelo WEF 2" — the project is assessed as a single integrated facility. The updated terrestrial biodiversity sensitivity maps have been included in the Final EIA Reports. These maps cover the full project area, include clear legends, and accurately reflect the sensitivity levels and grassland types (i.e. Wakkerstroom Montane Grassland and Eastern Highveld Grassland).

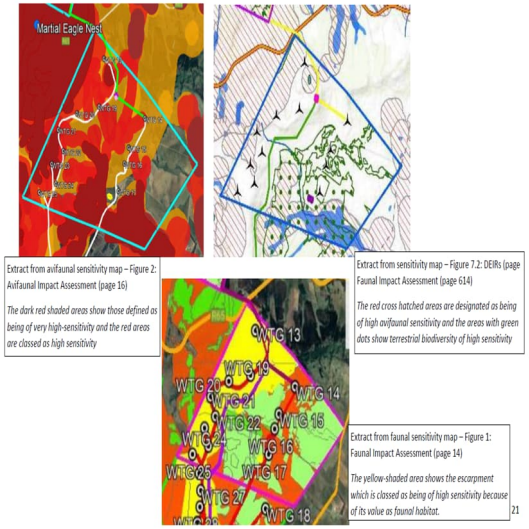
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				does not fully describe grassland types. Montane Grassland = Wakkerstroom Montane Grassland (Least Threatened) and Highveld Grassland = Eastern Highveld Grassland (Endangered). Inclusion of accurate and complete information is required to enable I&APs to easily access and understand sensitivities across the site. No terrestrial biodiversity sensitivity map is provided in Section 6.8 of the DEIR for the proposed Sheepmoor WEF.	These updates aim to improve transparency and accessibility for I&APs and ensure that sensitivities are clearly understood.
				7.1.2. Extremely limited baseline information on tourism is provided in the SIA.	The SIA concludes that the significance of tourism-related impacts is low, both pre- and post-mitigation, due to the absence of major tourism nodes or facilities within the immediate vicinity of the project sites.
				Sensitive features in the PAOI are not shown on a map / diagram in the Bat Impact Assessment study. None of the figures associated with this specialist study are provided and it is therefore not possible to correlate where sensitive areas are located relative to the proposed WEFs infrastructure (WEFs and grid infrastructure).	Updated figures have been included in the Final EIA Reports. These maps illustrate the spatial relationship between sensitive bat habitat features—such as roosting and foraging areas—and the finalised WEF and grid infrastructure layout.
				7.1.4. The Paleontological Assessment (Emvelo only) is wholly inadequate, as is shown by the examples below, which are not to be taken as the only shortcomings in this report.	Camden refers to the substation to which the proposed Emvelo WEF will connect, not the name of the WEF itself. This has been corrected in the Final EIA Report to ensure consistency across all documentation and figures. The footer reference and document versioning inconsistencies have also been addressed in the final report. The updated version includes the correct project name, date, and revised site maps that accurately reflect the Emvelo WEF layout. Regarding the absence of comment from SAHRA, the
				7.1.4.1 Firstly, there is reference to the proposed Camden WEF. This name does not correlate with the DEIRs or the other specialist studies. The site maps are also substantially different (Fig. 1 and Fig. 2, pg.	
				7.1.4.2. The footer of the report is: “Mulilo Emvelo WEF & OHL Rev. 4.doc Umlando 10/03/2025”. The report is dated “19 June, April 2023.” If this report was indeed revised as intimated by the footer information, then why does it not have the correct project names and the correct site maps?	

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				7.1.4.3 There is no comment from the relevant heritage authorities, even though it is stated that section 38 of the National Heritage Resources Act requires a Paleontological Impact Assessment.	Paleontological Assessment has been submitted to SAHRA as part of the Final EIA submission process, in accordance with Section 38 of the National Heritage Resources Act. Their input will be incorporated once received. The SAHRIS Palaeosensitivity Map included in the Draft Report has been revised in the final version to clearly overlay the WEF footprint with the mapped sensitivity zones. This allows for proper spatial correlation and confirms that parts of the site fall within the Very High Palaeosensitivity Zone associated with the Vryheid Formation. The conclusion that the likelihood of fossil discovery is low was based on field observations and the nature of the surface geology. However, to ensure precautionary compliance, a Chance Find Protocol has been included in the EMPr and will be implemented during construction. This protocol ensures that any fossil material encountered will be managed in accordance with SAHRA guidelines.
				7.1.4.4 It is noted that the proposed project is partly underlain by Vryheid Formation rocks, and is therefore classed as a 'Very High Palaeosensitivity Zone' on the SAHRIS Palaeosensitivity Map (Fig.4). Since the site of the proposed WEFs is not shown on this map, it is meaningless, as the sensitive areas cannot be correlated to the site area, although Fig. 5 shows the major part of the area where the WEF have been proposed falls within the SAHRIS highly sensitive zone.	
				7.1.4.5 It is concluded that the chance of finding fossils is low. The basis of this conclusion is unclear. It is also unclear as to whether this applies to both proposed WEFs sites. There is no evidence that this has been discussed with SAHRIS or that comment has been sought from SAHRIS.	
				7.1.4.6 It appears that instead of commissioning a comprehensive study, there has been an attempt to shoe-horn an old and incomplete study so as meet the requirement to address paleontological issues.	
				7.1.4.7 There is no reference to any consultation with the relevant authority – SAHRIS.	
				<u>Mismatch between site sensitivity and impact significance</u> 7.2.1 Biodiversity specialist studies (e.g. aquatic, faunal, avifaunal, bats) show high levels of sensitivity across large areas of the proposed site for both proposed WEFs. There is a consistent lowering of significance ratings post-mitigation despite the fact that no potential changes to the development footprint are likely to be considered. This is based on the fact that in Chapter 8 of the DEIRs, it is stated that the positioning of the WTGs has been	It is important to clarify that while the layout has been refined to avoid key sensitivity areas, the mitigation hierarchy has been applied through specialist input, and further micro-siting will be undertaken prior to construction. This includes walkdowns by specialists to verify final placements and ensure avoidance of residual sensitive features. The mitigation measures—such as

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				finalised. This comment links to those about the mitigation hierarchy.	habitat offsets, alien vegetation clearing, and species-specific management plans—are designed to reduce residual impacts to acceptable levels, even where the footprint remains unchanged. These commitments are formalised in the EMPrs and will be monitored throughout the project lifecycle.
				7.2.2 Fragmentation of habitats and disruption of ecological connectivity is unlikely to be overcome based on the current layout. In addition, critical information is missing on the sensitivity maps (Figure 7.2) such as irreplaceable CBAs and ESAs. Whether a change in this layout will have anymaterial effect on the significance of adverse impacts is a moot point, since the majority of the site for the proposed WEFs cover areas classed as being of very high and high sensitivity, and this sensitivity would have been even more evident had all relevant information been mapped and shown on a single map (some sensitivity features are shown in Figure 7.1 – Site Development Plan). This comment is expanded on in the examples below. These examples are not exhaustive, meaning that not every case where significance rating is potentially understated is noted. (We reiterate that I&APs are constrained and prejudiced by the unreasonably short commenting period and it is simply not possible to raise every concern with the allocated bare minimum commenting period).	Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs) have been mapped and featured in figures accompanying both DEIRs. These sensitivity maps were developed in collaboration with the appointed biodiversity specialists and form part of the integrated site sensitivity verification process. While Figure 7.2 may not consolidate all sensitivity layers into a single map, additional figures such as the Site Development Plan (Figure 7.1) and specialist-specific maps provide further detail. The Final EIA Reports include updated and consolidated sensitivity mapping to improve clarity and accessibility for I&APs. These maps reflect the full extent of ecological sensitivities and are intended to support transparent decision-making. I&APs are encouraged to review the updated figures in the Final Reports.
				7.2.3. The Faunal Impact Assessment (“FIA”) for both proposed WEFs states that the escarpment is the most significant faunal habitat. It is, therefore, highly sensitive (yellow shading in Fig. 2 on pg.16). Notwithstanding this situation, WTGs and access roads traverse this environmentally sensitive area (refer to Figure 7.1 of the DEIRs).	The faunal specialist recommended biodiversity offsets as part of the mitigation strategy. These include alien vegetation clearing at a 1:3 ratio and the implementation of an Oribi Management Plan. A dedicated Biodiversity Offset Report

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					has since been developed and accompanies the Final EIA Reports. This report outlines the offset strategy, target areas, and ecological benefits intended to compensate for residual impacts and support long-term conservation outcomes. I&APs are encouraged to review this updated report for full details.
				7.2.4 Furthermore, the biodiversity impacts will not be limited to the boundary line of sensitive areas as represented on maps – these impacts will extend beyond these boundaries due to factors such as edge effects and disruptions to connectivity / ecological corridors will have widespread effects not confined to any line drawn on a map. Added to this is the grid infrastructure also stretches into and across land that falls within sensitive areas such as the KBA / Important Bird Area ("IBA").	The proposed grid infrastructure traverses areas of ecological sensitivity, including portions of the Key Biodiversity Area (KBA) and Important Bird Area (IBA). However, it is important to highlight that existing Eskom infrastructure is already present within the vicinity of the proposed WEFs. The proposed grid connection has been aligned, where feasible, with existing corridors to minimise additional fragmentation and visual intrusion. Mitigation measures, including micro-siting, bird flight diverters, and offset strategies, have been incorporated into the Final EIA Reports and EMPrs to address these concerns and reduce residual impacts.
				7.2.5 On page 388 of the DEIRs it is stated that a "viable development footprint has been identified within the site. Most suitable areas to minimise biodiversity impacts would be transformed areas, including old lands and currently cultivated areas and degraded areas as well as Montane Grassland areas. As evident in the combined WTG sensitivity map, the optimised layout has largely accommodated the sensitivities and avoided as far as technically possible." These statements are factually incorrect, as examination of Figures 7.1 and 7.2 in the DEIRs clearly show.	The proposed project is not seeking to develop the entire intact grassland patch, only a very small footprint. The resultant loss is thus not deemed to be excessive as the area that will remain undeveloped (i.e. intact grassland) far exceeds the actual hard stand footprint of the project. Were it a mining or agricultural project that would result in the clearance of thousands of hectares of grassland the impact would be more significant.

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					The terrestrial biodiversity impact or risks to ecological processes associated with an access road and turbine footprint would not be deemed excessive within an already modified surrounding landscape (i.e. significant agricultural and mining related land transformation).
				7.2.6 The sensitivity of the site is not accurately captured in the maps in the DEIRs for the proposed WEFs. In particular, the aforementioned sensitive escarpment area is not included in the 'high sensitivity' area in Figure 7.2, which is titled 'Environmental Sensitivity Overlay.' Instead, it has been included in Figure 7.1 which is titled 'Site Development Plan'. This means that environmentally sensitive features have been split across two maps, thereby presenting a disjointed picture of the total extent of sensitive areas. The fact is that if the sensitive features from Figure 7.1 and those from Figure 7.2 are combined, then effectively the entire sites for both proposed WEFs are environmentally sensitive based on a range of features including agricultural, noise, biodiversity (including fauna and avifauna) and freshwater ecosystem characteristics.	The Faunal Impact Assessment, conducted by a qualified specialist, specifically identifies the escarpment as a highly sensitive faunal habitat and provides detailed mapping and mitigation recommendations. These include avoidance of key areas, implementation of an Oribi Management Plan, and biodiversity offsets. The specialist's work is of a high standard and forms the basis for the mitigation hierarchy applied in the EIA. I&APs are encouraged to review the faunal specialist report and its figures in the Final EIA Report for a comprehensive understanding of the sensitivity and mitigation measures proposed.
				7.2.7 Visual sensitivity is not shown in either Figure 7.1 or Figure 7.2, which is a serious omission. It is noted that visual impact was not raised as a concern by I&APs (e.g. pg. 336 and pg. 301 of Emvelo and Sheepmoor DEIR, respectively). Whether or not this issue has been raised by I&APs as yet,it is commonly accepted that visual impacts are a significant issue when it comes to WEFs. There is no justifiable excuse for omitting this information from sensitivity mapping.	The Visual Impact Assessment was conducted in strict accordance with the relevant regulatory guidelines and includes mapped receptor sensitivities, viewshed analyses, and mitigation measures. I&APs are encouraged to consult the updated specialist reports and accompanying figures in the Final EIA Reports for a comprehensive understanding of the sensitivity assessments and the mitigation hierarchy applied.

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				7.2.8 In the case of avifaunal sensitivity 'high sensitivity' areas are shown, whereas the avifaunal specialist indicated both 'very high sensitivity' and 'high sensitivity' zones. This differentiation has been omitted. In the case of the proposed Emvelo WEF, the full extent of sensitive avifaunal areas (i.e. very high + high sensitivity) is not accurately shown in Figure 7.2 of the DEIRs. This is evident for the Emvelo 1 area and is shown in the extracts from the relevant maps overleaf. 	Avifaunal sensitivity maps have been included in the Final EIA Report, which clearly distinguish between high and very high sensitivity zones and accurately reflect the full extent of sensitive areas across the Emvelo WEF site. I&APs are encouraged to consult the avifaunal specialist report and its accompanying figures in the final documentation for a complete understanding of the mapped sensitivities and the mitigation measures proposed.
				7.2.9 CBAs (Irreplaceable and Optimal) and Ecological Support Areas are not specifically shown in the sensitivity map (Fig. 7.2).	I&APs are encouraged to consult the final specialist reports and updated mapping in the Final EIA documentation, where CBAs (Irreplaceable and Optimal) and ESAs are shown in relation to the proposed infrastructure layout. These updates aim to improve transparency and support informed

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					review of biodiversity sensitivities across the site.
				7.2.10. A significance rating of 'moderate' (-ve) in relation to fragmentation of habitat is given post-mitigation (pg. 20 of FIA). The potential loss of Species of Conservation Concern ("SCC") is similarly treated. This cannot be correct if no avoidance measures are under consideration and the development footprint remains the same as pre-mitigation, especially where mitigation measures are not definitive, such as the vague reference to offsets.	To strengthen these measures, a dedicated Biodiversity Offset Report has been developed and accompanies the Final EIA Reports. This report outlines offset strategies, including alien vegetation clearing at a 1:3 ratio and the identification of suitable offset areas in consultation with landowners. Additionally, an Oribi Management Plan has been formulated to guide conservation actions for this priority species throughout the project lifecycle. These documents provide greater clarity and commitment to mitigation and are available for review in the final submission.
				7.2.11 In relation to birds, the AvIA shows very high and high sensitivity over most of the sites. Considering the potential impact: Mortality due to Collisions with Wind Turbines (10.6.3 in DEIRs), it is noted that there is potential for irreplaceable loss of resources. Moreover, it is stated that this impact cannot be reversed, which means that the potential for loss of irreplaceable resources remains. It is therefore unclear as to how the significance can be downgraded to 'moderate' (-ve). It is contended that the significance rating post-mitigation does not adequately correlate with the sensitivity of the bird species associated with the site, especially as there is no certainty that mitigation measures will remove the collision risks entirely.	The Avifaunal Impact Assessment was conducted by a highly experienced and professionally registered specialist with over 15 years of expertise in avian ecology and wind energy impact mitigation. The rating of "moderate (negative)" post-mitigation reflects the application of a robust suite of mitigation measures, including automated and observer-led Shut Down on Demand (SDoD), blade patterning, proactive curtailment, and turbine micro-siting. While it is acknowledged that collision risk cannot be entirely eliminated, the mitigation strategy is designed to substantially reduce the likelihood of impact and is supported by ongoing monitoring and adaptive management provisions in the EMPr. The rating is therefore considered appropriate

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					and defensible within the context of the specialist's methodology and the regulatory framework.
				7.2.12 It is wholly unclear as to how biodiversity impacts can be rated as being of moderate or low negative significance (post-mitigation) when at least 50-60% of the southern area (Emvelo 1) and 70-80% of the northern area (Emvelo 2) overlaps with the Chrissie Pans KBA (Figure 7, pg.24 of AvIA).	It is important to note that the presence of infrastructure within a KBA does not automatically translate to high residual impact, provided that the mitigation hierarchy is rigorously applied and site-specific sensitivities are addressed. The layout was refined to avoid the most critical avifaunal habitats, and mitigation measures were developed in consultation with the avifaunal specialist.
				7.2.13 The significance rating of impacts in the AqIA is problematic. Every impact has the same significance score pre- and post-mitigation (39 and 14 respectively), resulting in all impacts pre-mitigation being rated as being of medium significance and all impacts post-mitigation being rated as low significance (Section 10.3 of the DEIRs). This is improbable, given the dynamics of aquatic ecosystems. The reason for this is partly the result of the significance methodology and rating system serving as a blunt instrument, rather than a means whereby important sensitivity information is highlighted or clearly evident.	Mitigation measures recommended by the aquatic specialist include strict adherence to buffer zones around delineated wetlands and drainage lines, micro-siting of infrastructure to avoid sensitive aquatic habitats, erosion control, stormwater management, and rehabilitation of disturbed areas. These measures are embedded in the Environmental Management Programme (EMPr) and are designed to reduce the likelihood and severity of impacts on aquatic ecosystems. The post-mitigation ratings reflect the anticipated effectiveness of these interventions, and the EMPr includes provisions for ongoing monitoring to ensure compliance and adaptive management where necessary.
				7.2.14 Further to the above point, impacts are too broadly defined. Habitat transformation is but one example. There are different habitats and no doubt the impacts of transformation are not the	The impact titles used in the DEIRs, such as "habitat transformation" or "collision risk," are standardised to ensure consistency

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				same. Therefore, the impact of habitat transformation ought to be considered in relation to the different habitats that could be transformed, the species that occur there etc. Another example worth mentioning is collision of birds with WTGs – it is surely true that different bird species are more vulnerable than others – there may be a difference between birds of prey and insectivores.	across specialist inputs and reporting. However, each impact is accompanied by a detailed description that outlines the specific habitat types affected, the ecological sensitivities of those habitats, and the species likely to be impacted. For example, the terrestrial and avifaunal specialists have differentiated between intact grasslands, escarpment zones, and wetland-associated habitats, and have assessed the impacts accordingly. Similarly, the collision risk impact for birds is not treated uniformly across species. The avifaunal specialist has identified species-specific vulnerabilities, such as those of large raptors (e.g., Martial Eagle, Cape Vulture) versus smaller insectivores, and has recommended targeted mitigation measures. These include turbine micro-siting, blade patterning, and Shut Down on Demand (SDoD) protocols tailored to species behaviour and flight patterns. The impact descriptions and mitigation strategies are therefore nuanced and reflect the ecological diversity of the site, even if the impact titles appear broad at first glance.
				7.2.15 The same above principle applies equally when considering social and heritage impacts. The characteristics and variabilities within environmental and social attributes / resources / receptors that could be impacted must be taken into account when defining, identifying and assessing impacts and the significance of those impacts.	While the impact titles used in the DEIRs may appear broad, each is accompanied by a detailed description that considers the specific characteristics of the affected receptors, including cultural heritage features, community dynamics, and land use patterns. The social and heritage specialists have assessed these impacts in relation to

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					the local context, including the presence of graves, historical structures, and community sensitivities, and have provided mitigation measures tailored to each. Mitigation measures include pre-construction heritage walkdowns, avoidance of identified heritage sites, stakeholder engagement with affected communities, and grievance mechanisms to address concerns during construction and operation. These are embedded in the Environmental Management Programme (EMPr) and are designed to ensure that impacts are managed in a manner that reflects the variability and significance of the resources affected. The assessment approach is therefore considered appropriate and responsive to the diversity of environmental and social attributes present within the project area.
				7.2.16 The impact identification and assessment in the specialist studies associated with biodiversity do not specifically include evaluation of the consequences of the project on the biodiversity frameworks, strategies and plans prepared by the relevant authority, MTPA.	The Final Environmental Impact Assessment Report (DEIAR) now includes a Biodiversity Offset Report (BOR) and an Oribi Management Plan, both developed in accordance with the 2023 National Biodiversity Offset Guideline and informed by provincial conservation priorities.
				<u>7.3 Gaps in impact identification of impacts / missing impacts</u> 7.3.1 It is unclear as to how noise and visual impacts, which constitute another form of habitat disturbance for fauna can be rated as moderate pre-mitigation, in circumstances where little is known about how noise from WEFs affect animal species. It is likely that even less is known about how visual impacts may affect	Noise and visual impacts were assessed in the Noise and Visual Impact Assessments. Noise modelling was conducted for construction and operational phases, with worst-case scenarios considered. Night-time operational noise was rated as high significance pre-mitigation and reduced to

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				faunal behaviour. Under these circumstances the precautionary principle should be invoked. The introduction of a development that is industrial in character into a non-urban, rural and essentially natural environment represents a disruption to the natural living space of faunal species. There is growing scientific evidence that animals are sentient beings. This means that such disruption of the living space of animals is potentially more than just physical.	low with mitigation (e.g., turbine design, scheduling). Visual impacts were rated high pre-mitigation and moderate post-mitigation. While empirical data on faunal responses is limited, the precautionary principle was applied through conservative ratings and mitigation.
				7.3.2 It is stated that there is a lack of empirical data for wind farm impacts on non-volant mammals. How then were impacts on this species identified and the significance determined? Long-term monitoring is suggested as a measure that “may help to better inform on the impacts of future WEF projects on local populations of the highly threatened Oribi species.” This means the potential impacts on the endangered Oribi species are unknown and have not been investigated. If this is the case, why is the precautionary principle not highlighted and followed?	Impact significance was determined using habitat sensitivity, expert input, and known species behavior. A dedicated Oribi Management Plan has been developed, and pre-construction surveys will be conducted. The precautionary principle has informed the mitigation strategy and are clearly stated in the Final EIAr.
				7.3.2 It is stated that there is a lack of empirical data for wind farm impacts on non-volant mammals. How then were impacts on this species identified and the significance determined? Long-term monitoring is suggested as a measure that “may help to better inform on the impacts of future WEF projects on local populations of the highly threatened Oribi species.” This means the potential impacts on the endangered Oribi species are unknown and have not been investigated. If this is the case, why is the precautionary principle not highlighted and followed?	The Oribi Management Plan includes pre-construction habitat verification and seasonal surveys. These will inform final layout and micro-siting decisions. The precautionary principle is reflected in the commitment to avoid high-sensitivity areas and implement adaptive management.
				7.3.3 Trying to assess the impacts on the endangered Oribi species after the event does not meet an acceptable scientific impact assessment standard. This applies even if some pre-construction monitoring were to be conducted. By that time authorisation will be in place, meaning the projects would have been given the go-ahead and it would be too late to reverse this situation were significant and irreversible adverse impacts to be identified during	The Oribi Management Plan includes pre-construction habitat verification and seasonal surveys. These will inform final layout and micro-siting decisions. The precautionary principle is reflected in the commitment to avoid high-sensitivity areas and implement adaptive management.

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				such pre-construction monitoring. Similarly, if it is found during the operational phase that the WEFs have poor compatibility with the presence of Oribi, it will also be too late because the projects will be up and running. It might be easy to say – relocate the Oribi but they may well be central to maintaining a healthy grassland ecosystem. It is precisely for these sorts of circumstances that the precautionary principle exists in NEMA and should be applied in this case.	
				7.3.4 Only one impact has been identified in the FIA for the operational phase of the WEFs. This seems improbable and is most likely the result of combining several impacts into one under the broad topic of 'disturbance' – by various factors such as noise and visual disturbance and disturbance due to fragmentation of habitat. This approach is inadequate. Impacts must be clearly defined, differentiated and assessed in their own right.	The FIA grouped multiple disturbance types under "disturbance." While this simplifies reporting, the Final EIAr disaggregates impacts such as noise, visual intrusion, lighting, and fragmentation. Each is assessed with corresponding mitigation measures and significance ratings.
				7.3.5. Further to the above point, fragmentation of habitat could result in different consequences and responses by faunal species as opposed to noise and visual disturbance and that caused by lighting and traffic. The result is the distinctions between these different 'disturbances' are lost because they have been merged / combined. This poses a risk of a poor correlation between impacts and mitigation measures. It may also lead to incomplete formulation of mitigation measures and inaccurate rating of the significance of impacts. For example, there are no mitigation measures associated with noise disturbance (pg. 20 of FIA), which indicates this impact cannot be mitigated. This does not, however, come through in the significance rating. Put differently, it is not clear which of the listed 'disturbance' impacts is the most significant and the extent to which each of these can be mitigated.	The concern regarding the merging of distinct disturbance types is noted and appreciated. In response, the Final EIA Report has been revised to disaggregate the following disturbance categories: habitat fragmentation, noise disturbance, visual disturbance, lighting, and traffic. Each has been assessed individually with corresponding significance ratings and mitigation measures. Specifically regarding noise disturbance, the initial Faunal Impact Assessment (FIA) did not include explicit mitigation measures. This has since been addressed in the updated EMPr, which now includes construction scheduling to avoid sensitive periods, use of low-noise equipment, and buffer zones around sensitive faunal habitats. These

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					measures are reflected in the revised impact tables. The significance ratings have also been refined to reflect the relative severity of each disturbance type. Habitat fragmentation is rated as having the highest ecological consequence due to its long-term impact on movement corridors and breeding territories. Noise and visual disturbance are rated as moderate, while lighting and traffic are considered low to moderate depending on proximity to sensitive receptors. Each disturbance type is now linked to specific mitigation strategies, ensuring that the mitigation hierarchy is correctly applied. These refinements have been confirmed by the Faunal Specialist and are consistent with best practice and regulatory expectations. The updated assessment improves transparency, strengthens the correlation between impact and mitigation, and ensures that the significance ratings are defensible.
				7.3.6 The risk of loss of SCC (the Oribi which is endangered) has not been specifically assessed in the FIA for the operational phase of the proposed WEFs.	The concern regarding the lack of specific assessment of Species of Conservation Concern (SCC), particularly the Oribi (Ourebia ourebi), during the operational phase is acknowledged. While the Faunal Impact Assessment (FIA) primarily focused on construction-phase impacts, the Final EIA Report and associated specialist inputs have since been updated to address operational-phase risks.

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					The operational phase poses potential indirect impacts to Oribi, including habitat fragmentation, displacement due to turbine activity, and increased human presence. These risks have now been explicitly considered in the revised assessment, and mitigation measures have been incorporated into the Environmental Management Programme (EMPr). These include: • Implementation of the Oribi Management Plan (OMP), which outlines monitoring protocols, habitat protection measures, and adaptive management strategies throughout the operational lifespan of the facility. • Avoidance of high-sensitivity grassland areas identified as potential Oribi habitat through micro-siting and layout refinement. The Faunal Specialist has confirmed that, with the implementation of the OMP and associated mitigation measures, the operational-phase risks to Oribi are considered manageable and within acceptable thresholds. The Final EIA Report reflects this updated assessment and ensures alignment with the precautionary principle and biodiversity conservation objectives.
				7.3.7 The impacts on the KBA have not been identified or assessed. A large portion of the site falls within the KBA (Chrissie Pans KBA), which is of international significance. The implications of locating a WEF within this area are not addressed (e.g. implications for KBA status; compatibility with KBA objectives, KBA linkages to other important biodiversity resources). This KBA is not	The comment is noted. The Final EIA Report (FEIAr) acknowledges that a portion of the project area falls within the Chrissie Pans Key Biodiversity Area (KBA), which is of international importance due to its unique species and threatened ecosystems. The

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				referred to at all in the AqIA. It is mentioned in the AvIA (Section 5.3, pg.23) that the Chrissie Pans KBA regularly holds two geographically restricted species and that quantitative analysis shows that it is 100% irreplaceable in terms of the global persistence of one species. Furthermore, it holds a significant proportion of the global extent of one threatened ecosystem. Given these characteristics and sensitivities, it is unacceptable that the impacts specifically on the KBA were not assessed.	Avifaunal Impact Assessment (AvIA) identifies the KBA as habitat for two geographically restricted species and highlights that one species relies entirely on this area for global persistence. The Terrestrial Biodiversity Assessment similarly recognises the high irreplaceability of the KBA and the presence of threatened ecosystems. While the Aquatic Impact Assessment (AqIA) did not explicitly reference the KBA, the assessment considered all wetlands, drainage lines, and watercourses within the project footprint, including those located within the KBA. Mitigation measures including turbine micro-siting, avoidance of very high sensitivity habitats, buffer zones, and targeted biodiversity management have been developed to minimise impacts on KBA features.
				7.3.8 There is no evidence that biodiversity pattern and process being specifically addressed in the various biodiversity specialist studies. A search of the specialist reports for these terms, as well as biodiversity corridor reveals no results, with one exception. Biodiversity pattern is mentioned in the TBIA (Section 7.4.2) insofar as the discussion on Mpumalanga Biodiversity Sector Plan of 2014 is concerned. The impact of the proposed WEFs on biodiversity functioning in the landscape, as represented by pattern and process has been neglected. Biodiversity pattern and process is not the same thing as ecological processes – it has a wider focus.	The comment is acknowledged and appreciated. The concepts of biodiversity pattern and process are critical for understanding the broader ecological implications of the proposed development. While the Terrestrial Biodiversity Impact Assessment (TBIA) does not consistently use this terminology, the assessment explicitly considers habitat integrity, species persistence, and landscape connectivity in the layout refinement and mitigation strategy. The project area includes intact grassland patches, escarpment zones with high ecological integrity, and Climate Change

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					Corridors identified in the Mpumalanga Biodiversity Sector Plan (MBSP), all of which support landscape-level biodiversity functioning. To safeguard biodiversity pattern and process, turbine layouts have been revised to avoid intact grasslands and Critical Biodiversity Areas (CBAs) where feasible. The Environmental Management Programme (EMPr) incorporates measures to maintain ecological linkages, avoid sensitive areas, and monitor habitat use post-construction. Targeted offset actions and a pre-construction walkdown will further ensure protection of corridors and key habitats. These measures collectively ensure that landscape-level biodiversity pattern and process are maintained and that residual impacts are appropriately managed.
				7.3.9 Page 29 TBIA Some of the red data species are listed within the NEMBA Threatened or Protected Species (“ToPS”), and some are protected by provincial ordinances. Critical habitats include those areas that are known locations for such red data species that are under threat of extinction. MTPA comment considering that cultivated / vegetated lands might be feeding areas for many SCC. Feeding areas for SCC are not noted in the biodiversity specialist studies. This comment from MTPA also shows that the assumption that grazing areas have potential biodiversity benefits, contrary to the assumption that it will lead to ongoing degradation of biodiversity as expressed in the motivation against the ‘no development’ option in both DEIRs.	The TBIA and FIA identify critical habitats for Red Data species, including those protected under NEMBA ToPS and provincial ordinances, with a focus on intact grasslands, escarpment zones, and wetland systems as core habitats for SCC. While cultivated and grazed lands were not explicitly mapped as feeding areas, it is acknowledged that some SCC, such as Oribi, Secretarybird, and Southern Bald Ibis, may utilise disturbed or edge habitats for foraging. Low-intensity grazing areas can retain ecological value, supporting habitat structure, connectivity, and landscape-level biodiversity functioning,

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					provided that unsustainable grazing pressures are managed. To address this, the project layout has been refined to avoid intact grasslands and sensitive habitats where feasible, with turbine micro-siting and access routes minimising disturbance to high-sensitivity areas. The EMPr includes monitoring of SCC habitat use, engagement with landowners to promote sustainable grazing and conservation-compatible land use, and rehabilitation of areas intersected by infrastructure. The Biodiversity Offset Report prioritises functional habitats, including feeding corridors and edge areas, aligning with provincial biodiversity planning tools. These measures collectively ensure that feeding areas and habitat functionality are safeguarded as far as possible, and that residual impacts on SCC are manageable, supporting species persistence across the project landscape.
				7.3.10 The FIAs (pg. 3) mention that an Oribi management plan needs to be developed by a faunal specialist that could involve, amongst other aspects, identifying important Orbi habitat within the project areas. It would be expected that important Oribi habitat would already have been identified as part of the information gathering stage of the EIA processes. Given that this does not appear to have taken place, no confidence can be placed in the prediction of the significance of impacts on this endangered species.	Noted. While full delineation of Oribi habitat was not completed during the initial EIA phase, the project layout was refined using terrestrial sensitivity overlays and field verification to avoid intact grasslands and escarpment zones known to support Oribi and other SCC. The OMP has been developed and incorporated into the EMPr and includes pre-construction baseline surveys, identification of core habitat, movement corridors, and

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					buffer zones, as well as measures to avoid disturbance through turbine micro-siting, restricted access, and seasonal activity windows. In line with the precautionary principle, adaptive management provisions ensure responsive mitigation if Oribi are observed during construction or operation. The OMP also aligns with the Mpumalanga Biodiversity Sector Plan (MBSP) and provincial conservation priorities, supporting the long-term persistence of Oribi populations.
				7.3.11 The impact on hydrological and aquatic systems during the operational phases have not been fully identified and assessed. For example, alterations will have occurred due to stream crossings as well as the introduction of hard surfaces (particularly the buildings) which could affect runoff flows, potential for erosion and ecological functioning in the longer term. Another problem with the way impacts have been assessed is that there is an over-reliance on buffers.	The comment is acknowledged. The Aquatic Impact Assessment provides a detailed evaluation of aquatic features within the project area, including rivers, wetlands, pans, and seeps, and identifies key impact categories such as changes to hydrological regimes, increased erosion potential, water quality alterations, and cumulative impacts. Operational-phase impacts, including runoff from hard surfaces (e.g., substations, buildings, crane pads) and stream crossings, have been assessed in detail. The assessment confirms that turbines and hard infrastructure are avoided in No-Go aquatic zones, and existing disturbed areas are used wherever feasible for access roads. Mitigation measures are embedded within the EMPr and include a stormwater management plan, erosion control structures, revegetation protocols, siting of construction camps at least 50 m from watercourses, ECO monitoring during

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					construction and post-construction, and rehabilitation of disturbed areas with alien vegetation control. Buffer zones, ranging from 35 m for minor watercourses to 105 m for valley-bottom wetlands, are applied based on site-specific sensitivity modelling and are implemented in combination with engineering design, layout refinement, and adaptive management. These measures ensure that operational-phase impacts on hydrological and aquatic systems are minimised, and the project is considered acceptable from an aquatic perspective, subject to full implementation of the EMPr and specialist recommendations.
				7.3.12 The impact on microclimate has not been assessed, even though this was raised by the DARDLEA and MTPA. This is expanded on below.	Acknowledged. Based on experience from similar wind energy projects, any localised effects on temperature, wind, or precipitation are expected to be negligible. Nonetheless, any operational impacts will be monitored through the EMPr, ensuring adaptive management if unexpected changes occur.
				7.3.13 The value and sensitivity of the environmental resources is not incorporated into the significance assessment methodology.	The comment is acknowledged. NEMA and the EIA Regulations require that impact significance considers the sensitivity and importance of the affected environment. The EIA and specialist studies incorporate biodiversity planning tools, ecosystem conservation status, and sensitivity overlays to ensure that high-value and sensitive resources are appropriately considered. These considerations are embedded in the EMPr, including monitoring and adaptive

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					management measures to address residual impacts. Importantly, the methodology used to assess potential impacts associated with the project were presented in the draft EIAs and are generally acceptable for similar projects. The competent authority did not dispute the methodology and we applied the same in the subsequent revisions of the EIA.
				<u>Significance rating not fit-for-purpose</u> 7.4.1 The EAP has provided each specialist with the methodology to be followed in determining the significance of impacts pre- and post-mitigation. As well as the criteria specified in the 2014 NEMA EIA Regulations, specialists are also required to consider need and desirability and indicate if public comments have been included. None of the specialists have specifically commented on need and desirability. It is unclear as to what the EAP expects on this topic and whether specialists received any guidance or briefing in this regard. Most specialists have stated that public comments have not been received (with the exception of the visual specialist) as this is a draft report and has, as yet, not been subject to public comment, and many specialists have not commented on this matter at all.	The assertion that the significance rating methodology is not fit-for-purpose overlooks the structured and transparent framework that has been consistently applied across the specialist studies. The methodology provided by the EAP is aligned with the 2014 NEMA EIA Regulations and incorporates internationally recognised best practices, including a multi-parameter scoring system that evaluates extent, duration, reversibility, magnitude, and probability of impacts both pre- and post-mitigation. The methodology is not only fit-for-purpose but also robust in its ability to differentiate between varying levels of environmental impact. It enables specialists to apply a consistent formula for significance determination, ensuring comparability across disciplines. The presence of colour-coded significance ratings and detailed mitigation hierarchies further enhances clarity and decision-making. While it is acknowledged that not all specialists explicitly commented on need and

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					desirability, this does not reflect a flaw in the methodology itself. Rather, it indicates that this component is addressed at a strategic level within the broader EIA framework, typically by the EAP or planning authorities. Specialists were primarily tasked with assessing biophysical and socio-economic impacts, and their scope may not have required detailed commentary on planning rationale unless directly relevant to their discipline. The draft status of the report inherently limits the availability of public comments at this stage. It is therefore reasonable that most specialists noted the absence of such input. Importantly, the methodology anticipates this and allows for the integration of public feedback during the finalisation phase. The visual specialist's inclusion of public commentary demonstrates that the process is responsive and adaptable. EAP Guidance and Specialist Briefing The EAP has provided a comprehensive methodology and briefing materials to all specialists. The expectation to consider need and desirability and public input was clearly outlined, and the draft nature of the report explains why some elements are pending further development. The final report will incorporate these aspects once the public participation process is complete. In conclusion, the significance rating methodology is both appropriate and effective for the purpose it serves. The

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					current draft reflects a work-in-progress that will be refined with public input and final specialist revisions. The critique in Section 7.4.1 conflates procedural timing with methodological adequacy and does not substantiate a failure in the framework itself.
				7.4.2 The significance rating effectively amounts to a numbers game. A score is allocated to each category within a significance criterion ranging from 1-5. A formula is then applied where the scores for the various criteria (extent, duration, reversibility, magnitude) are added together and multiplied by the probability. The result is that the finer detail of why an impact achieved a particular score becomes blurred. Although this methodology is commonly applied, it is limited because the nuances of the sensitivity of impacts becomes lost. For example, if an impact achieves a high negative score due to extent and/or magnitude and/or irreversibility criteria this would indicate that a sensitive environmental receptor is involved.	The significance rating methodology is not a simplistic numbers game. It combines structured scoring with detailed specialist input to ensure that sensitive environmental receptors are appropriately reflected in the final rating. High scores in magnitude, extent, or irreversibility directly indicate serious impacts, and these are supported by narrative explanations that preserve the nuance behind each rating.
				7.4.3 The rating methodology is mechanistic. Each criterion is given the same weight or priority. Furthermore, the overall categories (High, Moderate, Low) are broad meaning that the scoring ranges are wide (30 points: High 61-100; Moderate 31-60; Low 0-30). The nuances of what underpins the final score is lost in the process. Is it duration or is it extent, or magnitude? Is it appropriate for these criteria to carry exactly the same priority or weight in the significance rating process? Was this question even considered?	The methodology applies equal weighting to ensure consistency across diverse impact types and disciplines. While categories are broad, each score is supported by detailed specialist justification, which clarifies the influence of individual criteria such as extent, duration, or magnitude. This approach maintains transparency and avoids bias, while allowing for refinement through narrative context.
				7.4.4 The value / sensitivity of the environmental attributes is ‘lost’ in the noise of the rating criteria and the calculation method to get a significance rating. This is a significant problem. It is not necessary to blindly adopt a methodology because it is a standard / accepted approach. Furthermore, criteria such as I&AP input,	We appreciate the concern that the significance rating methodology may appear to obscure the sensitivity of environmental attributes and overlook broader strategic inputs. However, the methodology applied in

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				relevant policies, plans and strategies have no influence on the significance rating. In addition, the impact assessment has not considered, in any meaningful way, the implications for achieving or otherwise, conservation targets and the like.	the reports is designed to ensure that sensitivity, stakeholder input, and strategic alignment are fully integrated into the assessment process. The significance rating methodology is not a rigid formula—it is a structured decision-support tool that integrates environmental sensitivity, stakeholder input, and strategic policy alignment. It enables transparent, evidence-based assessments while preserving the nuance and context of each impact. We welcome further input on how these elements can be strengthened in the final report and encourage stakeholders to raise specific concerns during the public participation phase.
				7.4.5 The criterion “magnitude” does make reference to exceedance of a ‘recommended level’ (which is not defined). If magnitude is rated as ‘high’ after mitigation, which is a very critical piece of information because it means that the ‘recommended level’ will often be exceeded (see Table 4.4 of the DEIR), this information is lost, because of the calculation methodology. This fact can be seen in the impacts related to transformation of habitat (e.g. AvIA).	The “magnitude” criterion does reflect exceedance of recommended levels, and a high post-mitigation rating signals that such exceedance may persist. This information is not lost in the calculation; it is explicitly captured in the final significance score and supported by detailed specialist commentary. Impacts such as habitat transformation are assessed with reference to receptor sensitivity and mitigation effectiveness, ensuring that critical thresholds are not overlooked.
				7.4.6.There is no evidence that thresholds such as limits of acceptable change, conservation targets, environmental quality objectives have been systematically used as a basis to judge	Thresholds, conservation targets, and environmental quality objectives are integrated into the assessment process

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				significance. The NEMA 2014 EIA Regulations refer to "non-compliance with accepted environmental quality standard, thresholds and targets" as grounds for identifying an impact as 'significant'. Thus, the thresholds that informed whether a residual impact is or is not acceptable is not provided. Using biodiversity impacts as an example (aquatic, faunal etc.) there appears to be blind acceptance that if the significance post-mitigation shows a reduction relative to pre-mitigation, then this must mean the residual impact is acceptable. This is akin to working in a vacuum. No definitive conclusions about the acceptability of impacts can be drawn in the absence of reference to thresholds / limits of acceptable change. These may be reflected in policies, plans, targets, environmental quality standards. For example, no irreplaceable CBA should be 'lost' – which means that if the residual impact involves such loss – it is not acceptable.	through alignment with national and international frameworks such as the NPAES and biodiversity sector plans. Residual impacts are not deemed acceptable solely based on reduced significance post-mitigation; rather, they are evaluated against ecological thresholds and policy guidance. Irreplaceable CBAs are flagged as no-go areas, and any residual loss in such zones is explicitly considered unacceptable.
				<u>Under reporting of the significance of adverse impacts</u> 7.5.1 The fact that most specialists stated that public / I&AP comments have not been considered in their assessment is a clear demonstration of either lack of oversight by the EAP to ensure the comments were considered or the comments were not passed on to the specialists or it was determined to take no notice of these comments. This means that these comments have had no influence on the consideration of impacts and their significance. Given the nature of the concerns raised by the environmental commenting authorities and some landowners during the scoping phase, this is a material, notable and inexcusable shortcoming.	The EAP is not aware of any specialists stating that public or I&AP comments were not considered in their assessments. Throughout the EIA process, all comments received from commenting authorities and stakeholders that were relevant to specific specialist themes were shared directly with the respective specialists. Specialists were requested to provide responses to these inputs and, where necessary, update their reporting accordingly. The EAP has made every effort to ensure that stakeholder concerns informed the assessment of impacts and the development of mitigation measures.
				7.5.2 The significance rating effectively amounts to a numbers game. A score is allocated to each category within a significance criterion ranging from 1-5. A formula is then applied where the scores for the various criteria (extent, duration, reversibility,	The concern that the significance rating methodology reduces impact assessment to a "numbers game" is noted. However, the applied methodology is a structured and

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				magnitude) are added together and multiplied by the probability. The result is that the finer detail of why an impact achieved a particular score becomes blurred. Although this methodology is commonly applied, it is limited because the nuances of the sensitivity of impacts becomes lost. For example, if an impact achieves a high negative score due to extent and/or magnitude and/or irreversibility criteria this would indicate that a sensitive environmental receptor is involved.	transparent tool that integrates both quantitative scoring and qualitative reasoning. Each score is accompanied by detailed narrative justification, ensuring that the rationale behind the rating is clearly documented. The scoring system does not obscure sensitivity; rather, it highlights it. High scores in magnitude, extent, or irreversibility directly reflect the presence of sensitive environmental receptors. These scores are amplified through the probability multiplier, ensuring that serious impacts are not diluted but elevated in significance. This approach supports consistent, evidence-based decision-making while preserving the nuance of each impact through specialist commentary and mitigation analysis.
				7.5.3 With regard to impacts on avifauna, (DEIRs, Section 10.6.2) the impact “Mortality due to Collisions with Wind Turbines” is rated as high (-ve) pre-mitigation and moderate (-ve) post- mitigation. Firstly, the extent of this impact is likely understated. This is a result of the way ‘Extent” has been framed in the methodology. Extent is not just concerned with the physical boundary where an impact may occur – may affect a wider area or group / community / system. The spatial scale of influence may be wider than the physical limits of a project site, for example. Thus, to properly assess extent, cognisance needs to be given to the context, interactions and interrelationships associated with the environmental attribute under consideration. For example, loss of individuals from a Critically Endangered species may be of national or international significance. It is very likely to be beyond ‘regional in extent. A similar comment applies to the AqIA (pg. 32). Extent is potentially understated because if species of conservation	The “extent” criterion is applied with consideration of both the physical footprint and the ecological reach of the impact. Specialist assessments account for broader spatial implications, particularly where species of conservation concern are involved. Impacts on Critically Endangered species are flagged as potentially national or international in significance, and this is reflected in the scoring and narrative justification. The methodology does not limit extent to site boundaries but incorporates ecological context and interrelationships.

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				concern are lost, this impact could be felt beyond the boundaries of the site, due to knock-on effects.	
				7.5.4 According to the chapter on the "Preferred Alternative" (Chapter 8) "The precise location of the turbines within the WEF site has been finalised and confirmed during the EIA process, following the assessment of technical and environmental constraints" (Section 8.1.1 in DEIRs). It is therefore evident that there is no intention to consider moving / relocating or removing WTGs. The AvIA (for example) has identified that certain WTGs need to be moved or removed due to the level of sensitivity of avifaunal attributes. The post-mitigation significance rating of avifaunal collision impacts is based on this mitigation measure being implemented. This means the post-mitigation significance rating is under-stated. There is no certainty that this will take place and therefore no confidence can be placed in the post-mitigation significance rating.	The post-mitigation significance rating for avifaunal collision impacts is based on the implementation of recommended mitigation measures, including turbine relocation where necessary. While the preferred layout has been refined during the EIA process, flexibility remains to adjust turbine positions in response to specialist findings. The significance rating reflects this intent and is not overstated, as it is contingent on mitigation being carried through to implementation.
				7.5.5 It is quite clear that the post-mitigation significance rating is wholly unreliable. When it comes to biodiversity all of these significance ratings can be regarded as being understated. This is based on the following factual evidence from the DEIRs:	Post-mitigation significance ratings are based on detailed specialist input and clearly defined mitigation measures. These ratings are not assumed to reflect acceptability by default but are supported by ecological thresholds, receptor sensitivity, and policy alignment. Where residual impacts remain moderate or high, they are transparently reported and flagged for further management or avoidance. The methodology ensures that biodiversity impacts are not understated.
				7.5.5.1 In Section 13.1 (Emvelo pg. 400; Sheepmoor pg. 346) it is stated that: "Off-set areas to be determined for any high faunal sensitive areas that are to be developed; these should form part of a long-term conservation programme and to be determine by an off-set specialist" (emphasis added). This recommendation clearly	The recommendation to determine offset areas for any high faunal sensitivity zones does not contradict the claim that the proposed layout avoids such areas. It reflects a precautionary approach should any residual

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				shows that contrary to the claims made in the DEIRs (Table 5-1) that “The proposed layout avoids all high-sensitive areas”, this is in fact not the case.	impacts arise despite avoidance measures. The layout was refined during the EIA process to minimise overlap with sensitive areas, and the offset provision ensures that long-term conservation commitments are in place if development within such zones becomes unavoidable.
				7.5.5.2 Section 8.1.1 (Emvelo pg. 243-244; Sheepmoor pg. 230-231) - whilst the final design of the infrastructure (e.g. dimensions, height etc.) may change “The precise location of the turbines within the WEF site has been finalised and confirmed during the EIA process, following the assessment of technical and environmental constraints.” As noted elsewhere there are WTGs and associated infrastructure in high-sensitivity areas.	While the turbine layout has been refined and confirmed during the EIA process, this was done in response to both technical and environmental constraints. The presence of infrastructure in high-sensitivity areas is addressed through specialist recommendations, including potential relocation and offset measures. The final layout remains subject to refinement during detailed design and permitting stages to ensure alignment with environmental sensitivities.
				7.5.6 It is questionable as to whether the reduction of an impact from ‘high significance’ before mitigation to ‘moderate significance’ after mitigation constitutes minimization of an adverse impact. Moderate implies the impact is neither of high significance nor of low significance, which suggests it is not insignificant. The use of high, moderate and low as measures of significance probably leads to impact significance being understated, especially as such coarse differentiation between these three descriptors is used. Any nuances and specific sensitivities that may need to be highlighted, get absorbed into a somewhat undefined score / generic measure of significance.	A reduction from high to moderate significance reflects a meaningful improvement in impact severity due to mitigation. While “moderate” still indicates a notable impact, it does not imply that the impact is insignificant or acceptable by default. Each rating is supported by specialist analysis and contextual detail, ensuring that specific sensitivities are not lost but addressed through targeted mitigation and management measures.
				7.5.7 The explanation of the severity of shadow flicker impacts is unclear / confusing. With regard to shadow flicker, the Visual Impact Assessment (“VIA”) states that the greatest impact is	The Visual Impact Assessment (VIA) acknowledges that shadow flicker may have a high potential within the 2 km zone,

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				within the 2 km zone and that the topography and vegetation is such that it will do little to mitigate this impact. “This will have a high impact on the critical visual receptors such as the farmsteads and occupied buildings.” There are farmsteads that will be directly impacted as well as some of the main roads that service the area (e.g. R65), which are within the zone of flicker influence. It is then stated that the analysis of potential shadow flicker impacts from the development on the visual receptors indicates that the impacts are expected to be minor. The underlined sections do not seem to correlate.	particularly for sensitive receptors such as farmsteads. However, the conclusion that overall impacts are expected to be minor reflects the limited duration and frequency of flicker events, as well as the spatial distribution of receptors. The assessment integrates both physical exposure and receptor sensitivity, and the findings are supported by modelling and specialist interpretation.
				7.5.8 A further problem is that the acceptability of impacts is often linked to mitigation measures without any statement about the certainty that these will be successful, that they are proven and/or whether they are easy or difficult to implement. This poses a risk of impacts being written up as being acceptable in the EIA ‘provided that all the mitigation measures are implemented’. In the absence of any statement about the certainty of the effectiveness of mitigation measures, a statement such as this is made in a vacuum. If mitigation measures are not proven, then this must be clearly stated – the uncertainties or confidence level given. The effectiveness of mitigation measures is central to significance determination.	Mitigation measures proposed in the EIA are based on established best practice and specialist experience. Where uncertainties exist, they are acknowledged in the relevant specialist studies. The significance ratings post-mitigation reflect the assumption that measures will be implemented as described, and further detail on feasibility and effectiveness is provided where relevant. Implementation will be monitored through the EMPr to ensure accountability and adaptive management.
				7.5.9 As a result of not considering biodiversity pattern and process, the location of the sites in the landscape insofar as ecological corridors and connectivity is concerned, none of the associated impacts have been considered. These would be relevant to the operational phase as such impacts would arise due to the presence of the WEFs and are thus relevant to the post-construction phase. The knock-on effects of disruption to biodiversity pattern and process are not confined to the proposed WEFs sites and are not solely associated with construction activities.	The assessment does consider biodiversity pattern and process, including ecological corridors and landscape connectivity. These aspects are addressed through spatial sensitivity mapping, specialist input, and mitigation planning. Operational phase impacts, such as disruption to movement patterns or ecological functioning, are included in the significance ratings and management measures. The EIA process ensures that impacts beyond the

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					construction footprint are identified and addressed.
				7.5.10 Loss of CBAs is mentioned once in the DEIRs (Table 9.2, pg. 92) where impacts on the aquatic environment are described for the decommissioning phase. Reference to the original specialist report shows that Construction and Decommissioning Impacts were dealt with together. This is incorrect as whilst some impacts may be similar, there will also be impacts that are unique to each of these project phases. The important issue here is that the impact is incorrectly recorded in the main report, that is, the DEIRs. As a result, an incomplete and inaccurate picture of the impacts on a critical environmental resource are represented. This is not acceptable at a DEIRs stage, where provision of accurate information to commenting authorities and other I&APs is critical. Inaccurate information compromises the public participation process and places I&APs at a disadvantage when commenting on the DEIRs.	The DEIRs acknowledge potential impacts on Critical Biodiversity Areas (CBAs), and these are addressed in the relevant specialist studies. While construction and decommissioning impacts may share similarities, they are assessed with consideration of phase-specific characteristics. Any reporting inconsistencies will be corrected in the final EIR to ensure clarity and accuracy. The public participation process remains a priority, and all relevant information will be transparently presented to support informed comment.
				<u>Mitigation measures insufficiently definitive</u> 7.6.1 There is a prevalence of unclear, vague and/or non-specific terminology, thereby rendering the proposed mitigation measures as unimplementable and unenforceable. This is due to lackof clear definition regarding the mitigation measures that are required to effectively avoid adverse impacts, and where these impacts cannot be avoided, to minimize them.	The concern regarding the clarity and enforceability of mitigation measures is acknowledged and has been addressed in the Final EIA Report and EMPr. Each measure clearly identifies the responsible party, implementation timeframe, and monitoring requirements, with defined thresholds for adaptive management. Where avoidance is not feasible, minimization strategies—such as turbine relocation, seasonal construction restrictions, and Shut-Down on Demand protocols—are detailed with supporting rationale from specialist studies. These refinements aim to ensure that mitigation is not only conceptually sound but also practically enforceable and auditable throughout the project lifecycle.

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				7.6.2. Moreover, the information on mitigation measures is wholly inadequate for decision-making purposes, since it is impossible to assess exactly what mitigation is being proposed – and more importantly, the effectiveness of such measures. There is a general lack of definitive terminology (e.g. should instead of must). Examples abound, a few of which are shown below:	The concern regarding the clarity and enforceability of mitigation measures is acknowledged and has been addressed through refinements in the Final EIA Report and Environmental Management Programme (EMPr). While earlier drafts may have included general or conditional language, the final documentation incorporates more definitive terminology, clearer implementation responsibilities, and measurable actions aligned with specialist recommendations. Where avoidance is not feasible, mitigation measures—such as turbine relocation, seasonal restrictions, and Shut-Down on Demand protocols—are now framed with enforceable commitments and linked to monitoring thresholds. These updates aim to ensure that mitigation is both auditable and effective, supporting informed decision-making and regulatory compliance.
				7.6.2.1 On visual impacts: “The impact would be acceptable if effectively mitigated. Mitigation measures are feasible (specifically with regards night lighting, the location of turbines to avoid flicker on affected residential locations and the lack of I&AP concern of the project) and can reduce the visual impact over time” and “It is the opinion of Visual specialist that the visual impacts associated with the proposed Project are of a nature, scale and duration that will require mitigation to slightly reduce the impact during the operational phase.” (see Page 9 of DEIRs).	The comment is noted. The Visual Impact Assessment (VIA), as presented in both the DEIR and Final EIA Report (FEIAr), confirms that while the operational phase of the Emvelo WEF will result in high-magnitude visual impacts over a broad area, these are considered acceptable with the implementation of effective mitigation. Construction and decommissioning impacts are assessed as moderate, short-term, and reversible, while cumulative impacts can be reduced from high to moderate with mitigation. Importantly, no significant visual or aesthetic concerns were raised by I&APs during public participation.

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					The EAP concurs with the VIA findings and confirms that all recommended mitigation measures including strategic turbine placement, minimisation of night lighting impacts (e.g., use of ADLS), use of non-reflective infrastructure materials, and rehabilitation of disturbed areas will be incorporated into the Environmental Management Programme (EMPr). On this basis, the visual impacts are considered acceptable, and the project is supported from a visual perspective.
				7.6.2.2. On traffic impact: "It is recommended that the proposed development be considered favourably from a traffic engineering point of view as the intended construction will have no significant negative impact on the surrounding road network." This statement is followed by a recommendation to (i) undertake a "comprehensive route assessment to verify clearance, load bearing and sweeping radius distances" and (ii) "to develop a Traffic Management Plan based on the final development plan…" (emphasis added). There is a mismatch between the above conclusion (in bold in the ERM report) and the recommendations. It is nonsensical on any reasonable scientific basis to consider a proposed development that is not concerned with upgrading road infrastructure as being "favourable from a traffic engineering point of view". Moreover, such a conclusion cannot be drawn if a final development plan is not in place and a comprehensive route assessment has not been undertaken. The use of the phrase term "be considered favourably" is particularly problematic in an EIA process, since it is value laden and is symptomatic of non-objectivity.	The comment regarding the phrasing of the Traffic Impact Assessment (TIA) conclusions is noted and appreciated. The Final EIA Report (FEIAr) confirms that, based on desktop analysis of the local and regional road network and estimated traffic volumes from comparable projects, the proposed development is not expected to result in significant negative impacts on the surrounding road network, provided that mitigation is implemented. Key recommendations include a comprehensive route assessment to confirm clearance and load-bearing capacity, preparation of a Traffic Management Plan (TMP) informed by the final development layout, and minor upgrades to certain intersections (e.g., R65 and D1264) to accommodate abnormal vehicles. The EAP acknowledges that the wording "can be considered favourably" may appear value-

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					laden in the EIA context. The intent of the specialist's finding is understood to be that the project is feasible from a traffic engineering perspective, subject to the recommended mitigation. These measures will be completed prior to construction and incorporated into the Environmental Management Programme (EMPr). On this basis, traffic impacts are considered manageable and do not constitute a fatal flaw to the project.
				7.6.2.3. On terrestrial biodiversity: The very high sensitivity riverine areas (and buffers) and irreplaceable Highveld Grassland should be avoided in terms of any footprints other than for minimal access.	The comment is noted. The final layout of the Emvelo WEF has been revised to avoid direct infrastructure placement within very high sensitivity riverine areas (including wetlands, drainage lines, and riparian buffers) and to exclude turbines from irreplaceable Highveld Grassland patches, except where technical constraints limit full avoidance. A 30 m buffer around wetlands and watercourses, as recommended by the aquatic specialist, has been incorporated into the design and confirmed in the EMPr.The terrestrial biodiversity assessment confirms the high conservation importance of intact Highveld Grassland, particularly for Oribi, Secretarybirds, and other Species of Conservation Concern (SCC). Avoidance of these areas has been prioritised; where avoidance is not possible, site-specific mitigation, offsets, and species management plans are in place, noting the Biodiversity Offset Report's conclusion that irreplaceable biodiversity cannot be offset and must therefore be avoided as a first principle.

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				7.6.2.4. On noise impacts: The proposed layout (turbine placement) would only be acceptable with the selection of correct mitigation measures…". It is then stated that these mitigation measures "could include a combination of" relocating NSR or selecting wind turbines with a lower noise output. The DEIRs then goes on to state: "The applicant could also change the layout (locating WTG further from NSR, or reducing the number of WTG within 1,000m from NSR) to mitigate the noise impact". As mentioned elsewhere in these comments, the WTG positions are apparently fixed / finalised (Chapter 8 of DEIRs).	The comment regarding the apparent contradiction between mitigation options and layout finalisation is noted. The layout presented in Chapter 8 of the DEIR reflects the preferred configuration at the time of reporting, informed by specialist input and technical feasibility. However, the layout remains subject to micro-siting refinements based on site-specific noise modelling and post-EA walkdowns. Final turbine siting will consider detailed noise modelling, verification of NSR locations, and application of the mitigation hierarchy, prioritising avoidance where feasible. Noise mitigation measures including micro-siting turbines to increase separation from NSRs, selection of low-noise turbine models, operational curtailment if required, and relocation of NSRs where feasible will be implemented through the Environmental Management Programme (EMPr). Pre construction verification and post construction monitoring will ensure compliance. On this basis, noise impacts are considered manageable, and the project is supported from a noise perspective.
				7.6.3. With regard to the AvIA, and the potential WEF collision impacts (pg. 288 of DEIRs), the specialist has indicated "yes" in response to the question: "Can impact be avoided, managed,or mitigated ?" It is not clear whether the "yes" refers to avoidance, management or mitigation and how the specialist understands the difference between these. Suffice to say that whilst accepted mitigation measures are detailed, the efficacy of these probably	The comment is noted. The AvIA applied the mitigation hierarchy avoidance (turbine micro-siting and exclusion of high-risk zones), management (Shut Down on Demand and curtailment protocols), and mitigation (Biodiversity Management Plans, offsets, and long-term monitoring). The Final EIA Report FEIAr confirms that turbine

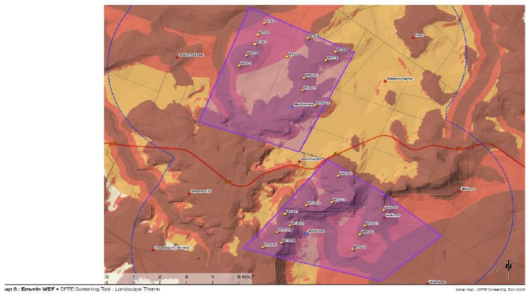
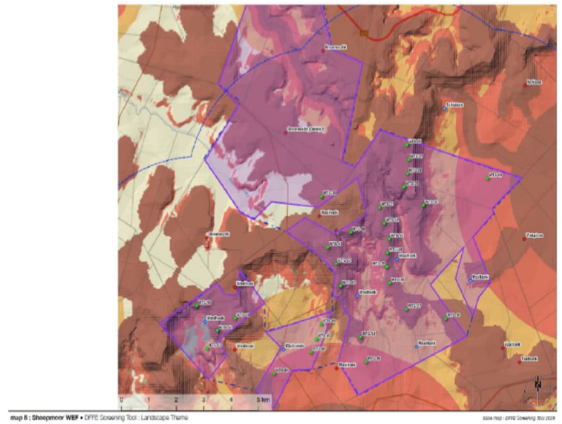
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				varies depending on local conditions and the bird species involved. This is shown in the monitoring report prepared by BirdLife Africa6. This issue is of particular concern when it comes to Species 23. Either the significance rating requires review or the potential impact on this particular SCC needs to be addressed on a stand-alone basis, separate from birds that are of lesser concern – bearing in mind that bird mortalities, even if a SCC is not involved, are undesirable. A similar comment applies to mortalities due to collision with grid infrastructure.	layouts respect no-go zones for key species where feasible. Species of Conservation Concern, including Species 23, are treated separately with stand-alone impact assessments, precautionary buffers, and adaptive mitigation measures captured in the EMPr. Grid infrastructure has been aligned to avoid sensitive habitats where possible, with bird diverters and monitoring in place. Significance ratings have been disaggregated to reflect higher risk for SCC, and residual avifaunal impacts are considered manageable, contingent on full implementation of the recommended mitigation and monitoring measures.
				7.6.4. Further to the above, if the adverse impact involving the potential for mortality through collision can only be reduced from high(-ve) to moderate (-ve), is this really acceptable? Moderate is a somewhat nebulous measure – it is somewhere between 'high' and 'low' – a middle-of-the road result. It could be argued that a 'moderate' rating does not represent minimisation of an impact. If an impact cannot be mitigated to 'low' then can it be said it has been minimised. The answer is no.	The comment is noted. The Avifaunal Impact Assessment (AvIA) and Final EIA Report (FEIAr) acknowledge that certain Species of Conservation Concern (SCC), including Species 23, may retain a residual risk of collision even after the implementation of avoidance, management, and mitigation measures. The post-mitigation significance rating of "moderate" reflects the residual risk after applying the full suite of mitigation measures, including micro-siting, Shut Down on Demand (SDoD), operational curtailment, and targeted monitoring. While a "moderate" rating does not equate to zero impact, it represents a reduction from a high pre-mitigation risk and reflects the maximum achievable minimisation given

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					current technical, ecological, and operational constraints. The EAP confirms that all reasonable efforts have been made to minimise impacts, and that residual risks will be managed adaptively through the EMPr. On this basis, although not fully eliminated, the residual collision impacts are considered acceptable within the context of responsible wind energy development.
				7.6.5 The fact that I&APs did not raise concerns about visual intrusion is not a basis for down-playing this impact. It is evident from these comments that the various shortcomings noted in the public participation process may well have been a contributing factor to the level of feedback from I&APs. The mitigation measures to reduce visual impacts are primarily associated with lighting (see VIA, pg. 54). These would be associated with night-time. The change in landscape character, which will clearly be most evident during the daytime cannot be effectively mitigated. There is mention of placement of turbines, but the WTGs where placement may need to be adjusted are not specified. Furthermore, as mentioned elsewhere, according to the DEIRs, the positioning of WTGs “has been finalized.”7 This leads to the conclusion that removing or moving WTGs is not under consideration and thus specifying this as a mitigation measure holds no weight. The post-mitigation significance rating of impacts where removal or relocation of WTGs is relied upon to reduce adverse impacts will therefore be skewed (appear less significant / adverse than will be the case in reality) and inaccurate / understated.	While limited feedback on visual impacts was received from I&APs, this does not diminish the importance of the issue, and the EIA process does not rely solely on public input to determine significance. The Visual Impact Assessment (VIA) conducted by a qualified specialist assessed both daytime and nighttime impacts, including landscape character, visual exposure, and receptor sensitivity. Mitigation measures extend beyond lighting and include strategic turbine placement informed by topographic screening, distance from key viewpoints, and avoidance of visually prominent ridgelines. The significance ratings reflect a precautionary approach and are based on the current layout, with mitigation measures considered realistic and implementable.
				7.6.6. Despite the extremely limited baseline information on tourism that is provided in the SIA, yet it is concluded that the impact of the proposed WEFs will be low (-ve). This is despite the fact that the Msukaligwa SDF shows that most of the development area “falls	While the Social Impact Assessment (SIA) concludes a low negative significance for tourism impacts, this rating is based on the current absence of formal tourism infrastructure or high-use tourism receptors

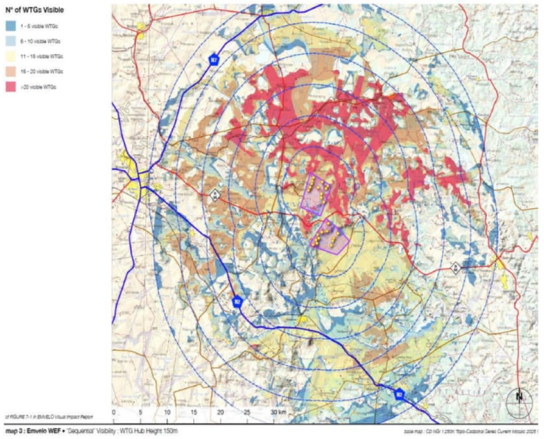
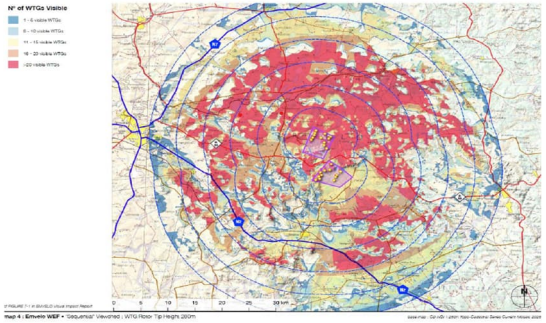
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				within area that consists of tourism, protected area and buffers" (pg. 22 of SIA and reference to fig. 2.7). As the location of the Emvelo WEF is not shown on Figure 2.7, it is not possible to clearly correlate the proposed site location with different elements of the SDF. It is also noted in the SIA (pg. 22) that "Few tourism receptors are located in the immediate study area." The potential constraints that the proposed WEFs may pose in respect of the longer-term tourism potential of the area is not addressed.	within the immediate footprint of the Emvelo WEF. However, the Final EIA Report recognizes that the broader landscape is earmarked for tourism and conservation-related development, and that visual character and sense of place are important to long-term tourism potential. The EAP has committed to refining turbine placement to reduce visual intrusion from key viewpoints and to aligning the project with the strategic intent of the SDF. Furthermore, the EMPr includes provisions for ongoing stakeholder engagement and adaptive management, should tourism-related sensitivities emerge during the operational phase.
				<u>7.7 Mitigation measures do not adequately follow the mitigation hierarchy</u> 7.7.1 The mitigation measures in the AvIA do not appear to have taken cognisance of the most recent information published by BirdLife Africa (February, 2025)8. This report provides insight into the uncertainties and effectiveness of mitigation measures such as buffer zones or 'no go' zones. By way of an example, this report notes that Martial Eagles have been recorded as occasional visitors at most established WEFs.	The Avifaunal Impact Assessment (AvIA) incorporates current conservation knowledge and mitigation best practices, including buffer zones and turbine exclusion areas. While the February 2025 BirdLife Africa report provides valuable insights, the presence of species such as Martial Eagles at operational WEFs is acknowledged and addressed through precautionary siting and monitoring recommendations. The mitigation measures remain adaptable and will be reviewed in light of emerging data during implementation.
				7.7.2. It is noted in the aforementioned BirdLife Africa publication that Martial Eagles were recorded as occasional visitors at most of the WEFs, but few nests were reported near turbines. These birds have particularly large territories, which means that breeding sites may be located near, but not overlapping with WEFs. It has been found	The Avifaunal Impact Assessment acknowledges the large home range of Martial Eagles and the importance of nest buffers. While BirdLife Africa's February 2025 report recommends a 6 km buffer, the assessment incorporates this guidance and

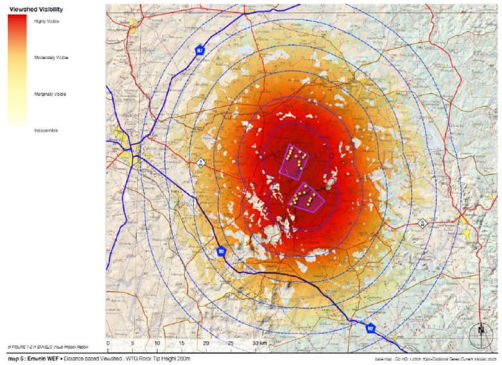
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				that Martial Eagles in the Kruger National Park have an average home range of 108km2, that is a radius of six kilometres, assuming a circular territory. BirdLife Africa recommend a nest buffer of 6km (i.e. radius of 6km). Additional mitigation measures outside of this area are considered necessary because the available data suggests that a nest buffer on its own is not adequate to avoid risk to this species.	recognises that additional mitigation may be necessary. The proposed measures are precautionary and adaptable, and further refinement will be considered during implementation to ensure risks to this species are effectively managed.
				7.7.3. Figure 13 in the AvIA specialist study shows the Martial Eagle nest location and indicates a limited 2.5km no-go buffer for all infrastructure. No specific reference is given as to the basis for this buffer, but it appears that it has been determined from flight risk modelling (see page 51 of AvIA), which reportedly showed that the area defined as 'high-risk class' encompassed approximately 79km2, which is very comparable to the area covered by a 5km circular buffer (78.5km2). This does not correlate with application of a precautionary approach to mitigation, which ought to be applied where there is uncertainty and/or insufficient information to draw definitive conclusions. It is notable that the proposed buffer is substantially less than that recommended by in the aforementioned Bird Monitoring publication (BirdLife Africa 2025). This means that the proposed buffer zone represents an inadequate mitigation measure, even in combination with other mitigation measures such as Shut Down on Demand.	The 2.5 km no-go buffer around the Martial Eagle nest was informed by flight risk modelling and specialist input. While BirdLife Africa recommends a 6 km buffer, the applied buffer reflects site-specific risk analysis and is complemented by additional mitigation measures such as Shut Down on Demand. The precautionary principle remains central to the assessment, and mitigation strategies will be reviewed and adapted as new data becomes available during implementation.
				7.7.4 Off-set areas to be determined for any high faunal sensitive areas that are to be developed; should form part of a long-term conservation programme and are required to be determined by an off-set specialist. Moreover, this recommendation does not meet the requirements of how offsets should be approached and put in place. In a situation where an offset is necessary as a last resort to mitigate irreversible adverse impacts, the guideline of offsets must be followed. This involves ensuring 'no net loss' of the biodiversity elements which have triggered the need for an offset. An offset area needs to be identified and secured, otherwise this mitigation	The recommendation for biodiversity offsets is aligned with national guidelines and reflects a precautionary approach to managing residual impacts on high faunal sensitivity areas. The identification and securing of offset areas will be undertaken by a qualified offset specialist, and the principle of 'no net loss' will guide this process. Implementation will be formalised through the EMPr and relevant permitting conditions

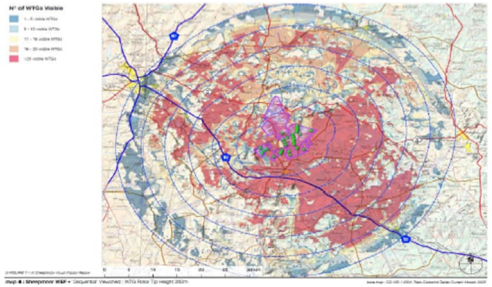
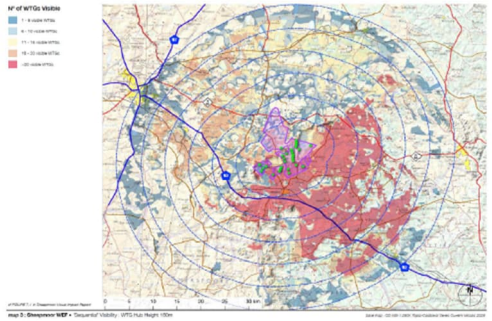
Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				measure is meaningless because of the high probability it will never be implemented.	to ensure accountability and long-term conservation outcomes.
				7.7.5 The FIA the states that “placement of turbines and access roads within the high sensitive areas leaves minimizing and compensation as the two remaining mitigation measures.” This means that avoidance has not been considered as an option; rather the point of departure formitigation is based on the project being implemented at the proposed site. This means the mitigation hierarchy has not been properly considered and applied.	The assertion that avoidance was disregarded is inaccurate. Both EIA reports clearly demonstrate that avoidance was the first step in the mitigation hierarchy. Turbines and infrastructure were excluded from designated no-go zones, and sensitive habitats were buffered and avoided through design alterations and micrositing. The EIA methodology explicitly follows the sequence of avoid, minimise, manage, and compensate, with embedded mitigation measures such as turbine relocation and exclusion zones confirming that avoidance was indeed considered and implemented
				8. VISUAL CONCERNS 8.1.The failure to place a project within a REDZ or a transmission corridor, and the failure to motivate the placement in terms of need and desirability, flies in the face of sound and rational environmental management and results in a material flaw in the environmental impact assessment of the projects. 8.2. Neither of the VIAs provide a Screening Tool Verification Report, which is a requirement for VIAs and EIAs generally. In this regard, see below the Screening Tool Maps of the Landscape Theme from the DFFE website, the first relating to Emvelo WEF and the second relating to Sheepmoor WEF:	A Site Sensitivity Verification was completed in June 2023 for, at the time, and reported in the Emvelo, Rochdale and Sheepmooe WEFs and the Overhead Powerline Alternatives reports. The claim is unfounded. While REDZs and transmission corridors are preferred, they are not mandatory. The Emvelo and Sheepmoor EIAs both undertook full Scoping and EIA processes in line with legal requirements. The need and desirability of each project was comprehensively assessed using the DFFE 2017 Guideline, considering ecological sustainability, socio-economic benefits, and alignment with planning frameworks. The projects were shown to avoid high-sensitivity areas, comply

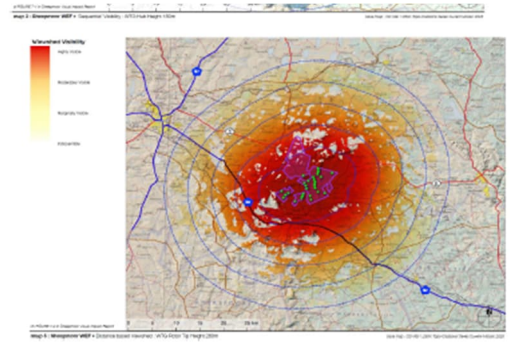
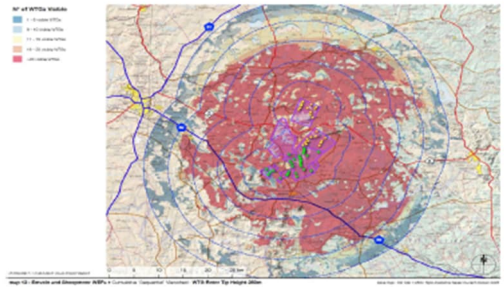
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				 	with environmental legislation, and deliver long-term public interest benefits demonstrating sound and rational environmental management.
				8.3. The Screening Tool maps set out those landscape features sensitive to the visual intrusion of the WEFs. Those sensitive features include topographic ridgelines, rivers and steep slopes for both WEF sites. According to the maps, many of the proposed turbines for both WEFs are located in 'very high' sensitivity areas. The onus is then on the VIA specialists to either verify or dispute the Screening Tool Reports by means of a detailed, project-scale	The comment is noted. The Visual Impact Assessment (VIA) undertaken for both WEF sites included a detailed, project-scale verification of the Screening Tool maps. While the Screening Tool provides a regional overview of sensitive landscape features (including topographic ridgelines, rivers, and steep slopes), the VIA applied on-site

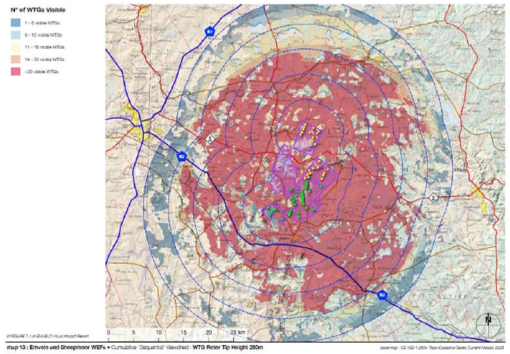
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				mapping. This has not been done and represents a material flaw in the visual impact assessment processes.	surveys, desktop analysis, and photomontage modelling to confirm the sensitivity of these features in relation to the proposed turbine layout. The visual impact assessment process is robust, and no material flaw exists with respect to the verification of sensitive landscape features.
				8.4. The viewsheds in both VIAs are based on a turbine hub height of 150 meters. According to the peer review by Winter and Lawson (2025), attached hereto, a rotor tip height of 260 meters is generally required to be used for the calculation of viewsheds for wind turbines and which results in a far more extensive geographic area being affected by the proposed turbines. The viewsheds for both WEFs have therefore been significantly under-reported on and underestimated in the VIAs. In this regard, see the below maps with respect to the Emvelo WEF. The first map represents the sequential visibility of the wind turbines with a hub height of 150 meters, whereas the second map represents the sequential viewshed of wind turbines with a rotor tip height of 260 meters and the third map represents the distance-based viewshed of wind turbines with a rotor tip height of 260 meters:	The viewsheds in both VIAs is based on the height of the turbines as noted on pg. 31 of both reports (hub height at 150 metres and rotors of 110 metres). “Although, due to the nature of land (topography, grassland vegetation, agriculture, timber, and settlements) immediately adjacent and in the general vicinity of the site, the landscape, although reasonably flat to undulating, provides a low visual absorption capacity (VAC). This is due to the substantial height of the turbines (maximum 250m to tip of rotor blade), the nature of the vegetation cover. The landscape is therefore not readily able to ‘absorb’ the visual change.” Using the rotor tip height of 260 metres, will give a false impression (over reporting) of the theoretical visibility of the turbines as at that off-set reading only the very tip of the turbine would be visible. We always include a lower offset to give a more realistic sense of visibility. It must also to noted that viewsheds are theoretical and not absolute

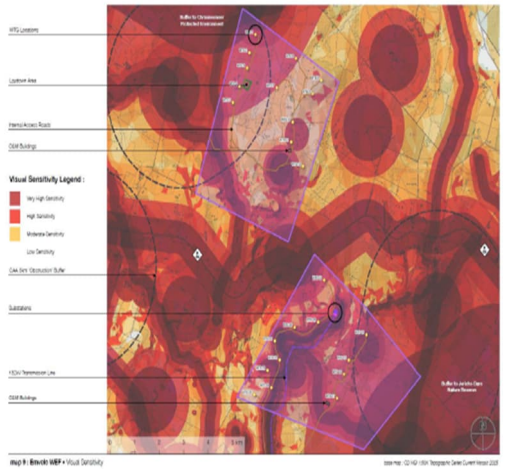
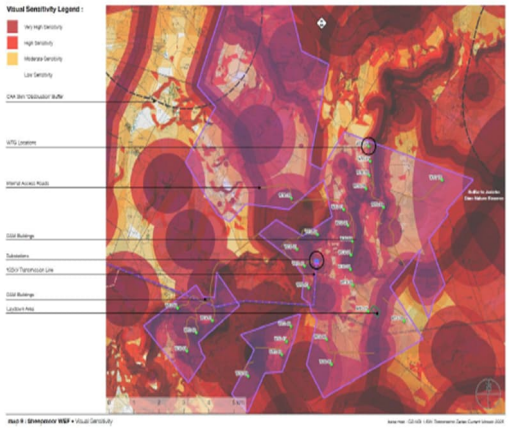
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				 	as they do not include vegetation or structures in the modelling (stated in Figure 7-2 of both reports). Using this method does however, give a reliable indication of the overall visibility and exposure of the project, which for both projects, is indicated as high intrusion and exposure (Figures 7-2 and Section 9.5 in both reports). The rating is based on the worst case scenario, which is assessed in the reports.

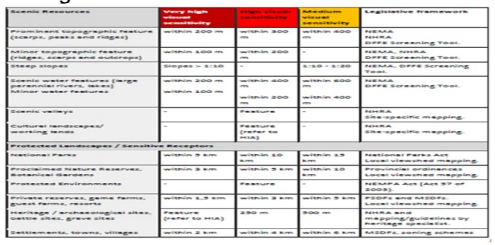
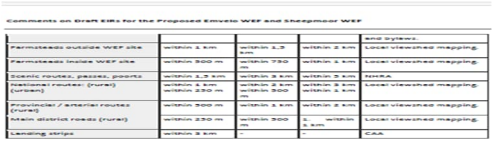
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				 8.5 Furthermore, see the below maps with respect to the Sheepmoor WEF. The first map represents the sequential visibility of the wind turbines with a hub height of 260 meters, whereas the second map represents the sequential viewshed of wind turbines with a rotor tip height of 150 meters and the third map represents the distance-based viewshed of wind turbines with a rotor tip height of 260 meters:	

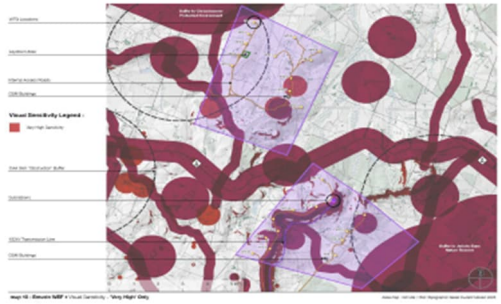
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				 35 Comments on Draft EIRs for the Proposed Emvelo WEF and Sheepmoor WEF 	

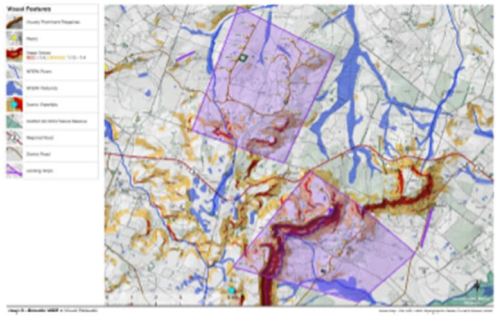
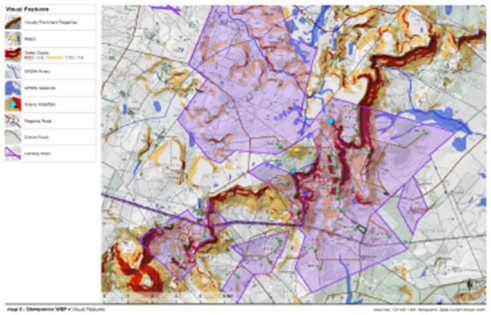
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				 16. The VIAs further fail to represent the combined viewsheds of the WEFs, and which subsequently results in a far greater cumulative visual impacts when taken into account accurately and correctly. This is a fatal flaw in the impact assessment process. External specialists Winter and Lawson 36 Comments on Draft EIRs for the Proposed Emvelo WEF and Sheepmoor WEF (2025) compiled a cumulative sequential viewshed of the Emvelo and Sheepmor WEFs, which can be seen below: 	

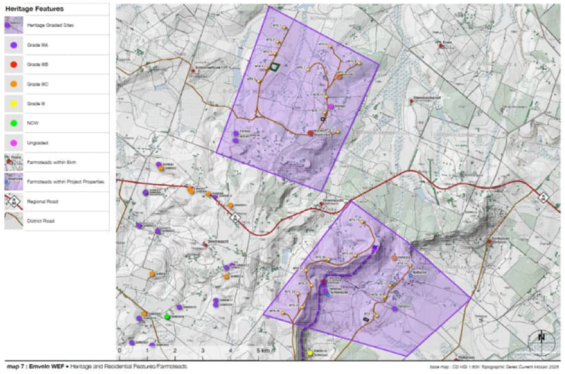
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				8.6.The VIAs further fail to represent the combined viewsheds of the WEFs, and which subsequently results in a far greater cumulative visual impacts when taken into account accurately and correctly. This is a fatal flaw in the impact assessment process. External specialists Winter and Lawson (2025) compiled a cumulative sequential viewshed of the Emvelo and Sheepmor WEFs, which can be seen below: 	The cumulative effect is discussed and mapped in Section 10 and Figures 10-1 (Sequential visibility), 10,2 (Visibility and Exposure) and 10,3 (Flicker analysis) of both reports.
				8.7. The authors of the VIAs have not prepared a visual sensitivity map on which the activities are superimposed as required in terms of Appendix 6 of the EIA Regulations. The purpose of this map is to identify those areas that must be avoided, including buffers. This omission is a fatal flaw as I&APs are unable to identify conflicts in the layouts of the WEFs. This approach withholds critical information from I&APs, preventing them from gaining a meaningful understanding of the projects and the impacts of the projects on the receiving environment which is contrary to the objects and intent of the EIA regime. Visual experts who undertook a peer review of the VIAs prepared a basic visual map with buffers, based on commonly used features including heritage features. In this regard see the below maps, the first of which relates to Emvelo WEF and the second of which relates to Sheepmore WEF:	The sensitivity mapping for landscape character and receptor sensitivities is given in Figure 5 and 6 of both reports. It is true that these sensitivity maps do not give a detailed account of sensitivities and buffers as set out in the Comment column. They do however insdicate general sensitivities across the project sites and must be read in conjunction with the simulations in Figures 9-1 to 9-5. The simulations in our opinion are the best indicator for I&APs to understand the potential visual impact of the WEF, and critical information has not been withheld. Should turbines be relocated a few hundred

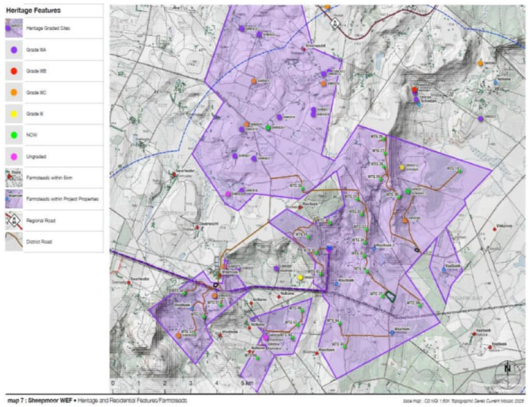
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				  8.8.	metres from the current location, the receiver's cone of vision (i.e. 60-degree angle of undistorted vision that a viewer has, extending from their eyes), would observe a similar number of turbines, at varying heights, in the same context. The potential visual impact would therefore be the same.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				The buffers are based on generic buffers for wind energy facilities, and may vary slightly depending on local contexts, but provide a fairly accurate guide. The Generic Visual Sensitivity Mapping Categories for Wind Turbines are available in the below table:   8.9. The result of the sensitivity mapping illustrates that there are a number of turbines on both the Emvelo WEF (Turbines 10, 11, 14, 19, 21, 22, 23 and 24) and the Sheepmoor WEF (Turbines 27, 29, 30, 31, 32, 33, 34, 35, 39, 40, 42, 49, 50 and 52) that fall within very high visual sensitivity areas. In this regard see the below two maps, the first of which relates to the Emvelo WEF and the second of which relates to the Sheepmoor WEF:	

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				 40 Comments on Draft EIRs for the Proposed Emvelo WEF and Sheepmoor WEF  8.10. According to the external review by Winter and Lawson (2025), many of the turbines in both the Emvelo and Sheepmoor WEFs are located on or near visually sensitive ridgelines and scarp edges with adjacent slopes that are steeper than a 1:4 gradient. Given that each turbines requires a flat hardstand laydown area of up to 1 hectare, the visual implications of the earthworks would be	It is understood that turbines will be located along ridgelines to take advantage of wind patterns, so there would inevitably be a conflict along higher topographic areas.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				significant. Furthermore, some of the proposed access roads traverse these sensitive landforms and steep slopes, as do the connecting powerlines. In this regard, see the below maps, the first of which relates to the Emvelo WEF and the second of which relates to the Sheepmoor WEF. Note here that none of this is included in the VIAs for the WEFs, with steep slopes not even being mapped. This is a material omission from an impact assessment perspective and creates a misleading representation of all visual impacts associated with the two projects.   8.11. With respect to sensitive receptors, the VIAs report that the turbines have been located at least 2km away from any occupied homestead when, in fact, hardly any of the homesteads /	Again the simulations illustrate this. It is also understood that the final location of turbines should not be on steep slopes and would require to be located on flat land, but refer to the proposed mitigation measures below. Point taken. However, give the scale of the project and that the visual focus of the viewer would be commanded by the turbines themselves, and that the mitigation measures are clear, and a condition of approval, regarding the rehabilitation of earthworks areas, the impact of roads from sensitive viewing areas is considered low relative to the overall potential impact caused by the wind turbines. The proposed management measures are listed in Section 10 of the reports. Earthworks requirements are given below for ease of reference: • The mitigation measures during operation will need to focus on effective rehabilitation of the construction area. These specifications must be explicit and detailed and included in the contract documentation (Environmental Management Plan) so that the tasks can be costed and monitored for compliance and result. • It is recommended that that a suitably qualified person, such as a landscape architect, is appointed to give attention to the concept and design of the aesthetic aspects of the project during the detailed design phase of the project prior to construction to integrate the design

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				farmsteads have been mapped at all with the result that many are located within 2km of a turbine. These homesteads / farmsteads should have been recorded in fieldwork by the authors of the VIAs. In this regard, see the below two maps (the first relating to Emvelo WEF and the second relating to Sheepmoor WEF) where the external reviewers have included the additional homesteads, with buffers, based on Google Earth and input from landowners, as well as heritage features which also have visual implications and which are discussed in greater depth below: 	especially the shape of the cut and fill slopes with the surrounding landscape to ensure that the project blends in physically and aesthetically with the environment. The cut and fill slopes should not be steeper than 1:2.5 vertical to horizontal as this allows vegetation to establish more easily. This will also reduce erosion of the soil surface. • Earthworks should be executed so that only the footprint and a small 'construction buffer zone' around the proposed activities are exposed. In all other areas, the naturally occurring vegetation should be retained. • All cut and fill slopes (if any) and areas affected by construction work should be progressively topsoiled and re-vegetated as soon as possible. Disturbed soil must be exposed for the minimum time possible once cleared of vegetation to avoid prolonged exposure to wind and water erosion and to minimise dust generation.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					
				8.12 The selection of viewpoints in the VIAs fall short of what is required for a meaningful understanding of the impact of the WEFs from a visual perspective. Only viewpoints along roads have been identified in the VIAs, without provision for all the sensitive viewpoints, particularly homesteads / farmsteads from which the proposed turbines and powerlines would be visible, including those within 5km of a turbine. Photomontages should also have been included. This is a material flaw in the assessment of visual impacts in the VIAs.	The selected viewpoints are from areas deemed to be the most exposed and experienced in the surrounding public areas. Whilst they do not contain every conceivable viewing point, they are typical of sensitive viewing areas. They are used (in the photomontage simulations) to illustrate the visual effect of the turbines. It is not feasible to visit each homestead/ farmstead within the viewshed. Also, during the public participation process, visual issues were not raised as a significant issue of concern for either of the projects, indicating that people living in and near the proposed WEF are not sensitive to the developments. (Although there was a comment on how we reached a significance rating – see below). Photomontages of the proposed WEFs are given in Figures 9-1 to 9-5 of both reports. These clearly indicate the potential visual

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					impact of the WEFs from key public viewing areas.
				8.13 The authors of the VIAs indicate throughout the reports that there had been a lack of I&AP concern for the projects, with no visual-related objections having been received, and that this therefore reduces the significance of the visual impacts. Objections regarding the visual and scenic impacts of the WEFs have, however, been received during the commenting period and this could have an effect on the final visual impact significance ratings.	The only comment we received related to visual issues was: "If all WEF facilities located within 35km and 55km were incorporated into the assessment, it would stand to reason that the Visual/ landscape cumulative impact could actually be assessed as 'very high'. We addressed that concern, explaining that, according to the EIA Methodology required by the EAP (ERM), the significance of impact is classified as HIGH (the highest rating possible using their methodology). Their method does not have a VERY HIGH category.
				8.14 The VIAs contain the statement that "The combined effect of the proposed WEF project and the existing power infrastructure and associated infrastructure would cause a major change (to) the nature, sense of study and character of the subregions landscape's baseline". 9 The VIAs further indicate that the cumulative visual impact rating would reduce the visual impacts of the WEFs from 'high' to 'moderate' after mitigation. The mitigation measures are, however, insignificant and relate mainly to lighting, painting of structures and maintenance. A more credible assessment would indicate the cumulative visual impact significance as remaining 'high' as there is little opportunity to mitigate the visual impact of the turbines (Winter & Lawson: 2025).	The reduction to Moderate from High (worst case scenario) is primarily due to the project's low receptor sensitivity (a consideration in our impact methodology) and the effective implementation of the proposed mitigation measures, not least the measure regarding lighting, which would significantly reduce potential night-time impacts.
				8.15 The VIAs are brought into question due to the absence of any mapping of visually sensitive landscape features and the associated application of a blanket visual assessment rating. The blanket rating does not differentiate between those turbines with a significant visual impact, and those with less of a visual impact (Winter & Lawson: 2025).	In assessing the visual impact of a collective of objects, it is prudent to determine the impact of the collective and not the individual objects, as the turbines would always be viewed collectively.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				8.16 The conclusion that “the project is deemed acceptable from a visual perspective” without any recommendation on no-go areas, the movement of turbines or the need for micro-siting is not credible in light of the abovementioned failures. Neither is there mentioned of access roads or overhead powerlines to be re-aligned where there is clear traversing of this infrastructure over sensitive landscape features and steep slopes. This conclusion, for both VIAs, can only be attributed to the material failure to map visually sensitive features as required in terms of the EIA Regulations (Winter & Lawson: 2025).	Section 10 in both reports addresses the issues specifically in Section 10.1 With the preparation of the land within the full extent of the Project site(s) onto which activities will take place, the minimum amount of existing vegetation and topsoil should be removed. • Specifications with regards to the placement of construction camps (if required), as well as a site plan of the construction camp, indicating waste areas, storage areas and placement of ablution facilities, should be included in the EMPr. These areas should either be screened or positioned in areas where they would be less visible from the public road north of the Project site. • When possible, construction activities should be limited to between 06:00 and 18:00 or in conjunction with the ECO and neighbours of the Project site. • Adopt responsible construction practices that strictly contain the construction/establishment activities to demarcated areas. • Building or waste material discarded should be undertaken at an authorised location, which should not be within any sensitive areas And Section 10.2 • It is recommended that a suitably qualified person, such as a landscape architect, is appointed to give attention to the concept and design of the aesthetic aspects of the project during the detailed design phase of the project prior to construction to integrate the

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					design especially the shape of the cut and fill slopes with the surrounding landscape to ensure that the project blends in physically and aesthetically with the environment. The cut and fill slopes should not be steeper than 1:2.5 vertical to horizontal as this allows vegetation to establish more easily. This will also reduce erosion of the soil surface.
				8.17. Attached hereto is a copy of the external specialist review by Winter & Lawson (2025) that identifies the above material and fatal flaws in the VIAs. The content thereof should be regarded as an extension of these comments and must be dealt with and responded to by the EAP and relevant specialist as comments on the DEIRs in their own right. The EAP is requested to make these comments and the external specialist review by Winter & Lawson (2025) available to the competent authority and to include complete copies thereof (together with the EAP / Specialist responses thereto) as part of any future reporting in connection with these applications.	The EIA process has incorporated extensive public participation, including multiple rounds of stakeholder engagement, specialist updates, and layout revisions in response to biodiversity and visual sensitivity concerns. All comments received—including those from external specialists—have been documented in the Comments and Responses Report (CRR) and appended to the revised DEIR. The Environmental Assessment Practitioner (EAP) has committed to submitting these comments, along with formal responses, to the competent authority as part of the Final EIA Report. This ensures transparency, regulatory compliance, and a robust decision-making framework.
				HERITAGE CONCERNS	
				9.1. The HIAs are deficient and do not meet the minimum requirements for HIAs outlined in Section 38 (3) of the NHRA for the reasons described below (Winter & Lawson: 2025):	The HIA was scoped to focus on archaeological and palaeontological resources as identified in the Terms of Reference.

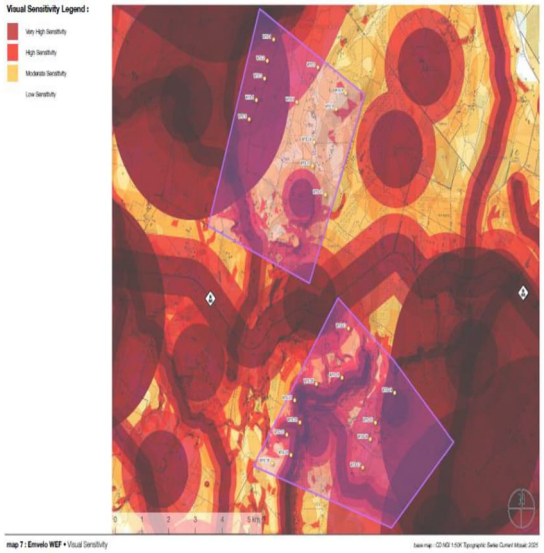
Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				9.1.1. The HIAs are limited in nature addressing only archaeological and paleontological studies with very limited consideration of cultural landscape impacts or issues.	Broader cultural landscape considerations were addressed separately in the Visual Impact Assessment (VIA) and integrated into the overall EIA. If there was a cultural landscape of significance it would have been noted. Cultural landscape is very a broad term. Needs to specifiy
				9.1.2 The HIAs recognise the scenic aesthetic qualities of the affected environment but inexplicably fail to assess the nature and degree of heritage significance of these scenic aesthetic landscape qualities or the impacts of the proposed WEFs on heritage significance. This represents a material shortcoming in both the HIAs for the Emvelo and Sheepmoor WEFs.	The HIA recognises the scenic and aesthetic value of the receiving environment, however, the evaluation of landscape character and associated heritage significance was undertaken in the VIA rather than within the HIA itself.
				9.1.3. Neither of the two HIAs provide a DFFE Screening Tool Verification Report as part of the heritage assessments or a 'heritage sensitivity map' on which the proposed WEF developments are superimposed. This is a fatal flaw in the HIAs.	The omission of a DFFE Screening Tool Verification Report and heritage sensitivity map is noted. These will be prepared and included in the FEIR to align with NEMA EIA Regulations and heritage assessment requirements. These were not a requirement at the time of the first report.
				9.1.4. If the EAP and the authors of the HIAs had prepared the requisite Screening Tool Maps to identify several sensitives required in terms of the EIA Regulations it would be clear that there are several significant landscape features such as topographic ridgelines, rivers and steep slopes on both the Emvelo and Sheepmoor WEF sites. Many of the proposed turbines for both WEFs are located in 'very high' sensitivity areas but this is ignored	The comment regarding the consideration of topographic ridgelines, rivers, steep slopes, and other sensitive landscape features is acknowledged. The Department of Forestry, Fisheries and the Environment (DFFE) Screening Tool was utilised during the initiation phase of the assessment to inform specialist terms of reference, and relevant

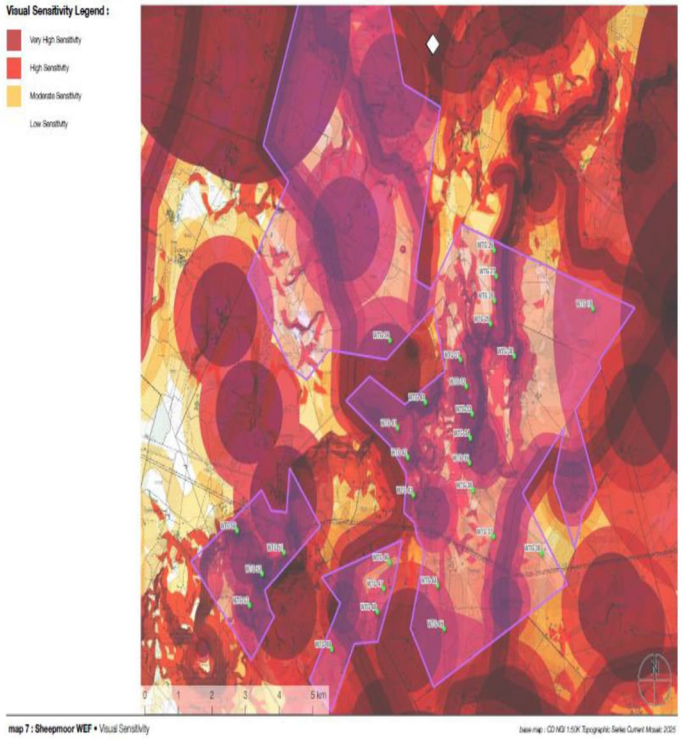
Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				in the HIAs. This is a fatal flaw in the HIAs as it has direct implications for the credible identification, mapping and assessment of heritage resources and cultural landscape significance that stand to be impacted by the WEFs.	heritage sensitivities were subsequently addressed through the Heritage Impact Assessments (HIAs) conducted by independent specialists. Please explain what sensitive topographic ridgelines occur. This is another very broad and misleading comment taking on a generic approach. While the HIAs did not explicitly present the Screening Tool maps within their reports, the specialists conducted site-based assessments, desktop reviews, and incorporated baseline environmental data (including slope, hydrological, and landform features) in their evaluation of potential cultural landscape and heritage resource sensitivities.
				9.1.5. The HIAs do not provide an assessment of cultural landscape significance from a combined historical, architectural, aesthetic, social and archaeological perspective. This is evidenced by the fact that the HIAs fail to include the input of the built environment and cultural landscape specialists; and there is no attempt by the authors of the HIAs to integrate the findings of the VIAs into the assessment of cultural landscape significance.	The comment is acknowledged. The Heritage Impact Assessments (HIAs) focused on known heritage resources within the study area and followed standard practice in line with SAHRA and provincial heritage regulations. While the HIAs did not explicitly integrate the perspectives of built environment or cultural landscape specialists, the assessments considered archaeological, historical, and aesthetic aspects where relevant. Visual Impact Assessments (VIAs) were conducted separately, and findings related to landscape character and visual sensitivity have informed layout and mitigation decisions. The project will continue to implement the EMPr, which includes
				9.1.5. The HIAs do not provide an assessment of cultural landscape significance from a combined historical, architectural, aesthetic, social and archaeological perspective. This is evidenced by the fact that the HIAs fail to include the input of the built environment and cultural landscape specialists; and there is no attempt by the authors of the HIAs to integrate the findings of the VIAs into the assessment of cultural landscape significance.	

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					heritage and visual mitigation measures, and any previously unidentified cultural resources will be addressed in consultation with SAHRA and relevant authorities during construction.
				9.1.6. The HIAs are superficially limited in the scope and depth of the assessment – essentially being limited to the identification, mapping and assessment of some heritage resources such as farmsteads, battle sites, ruins, stone walling, kraals and graves. However, these heritage features are treated in isolation as individual archaeological sites or relics as opposed to their contribution to cultural landscape significance. The failure to assess impacts on cultural landscape significance represents a material shortcoming in the HIAs for both projects.	The comment is acknowledged. The Heritage Impact Assessments (HIAs) primarily focused on discrete heritage resources, including farmsteads, battle sites, stone walling, kraals, and graves, in line with SAHRA and provincial heritage guidelines. While the assessments did not explicitly evaluate the contribution of these features to broader cultural landscape significance, layout refinements and mitigation measures have been informed by visual sensitivity, heritage overlays, and consultation with relevant heritage authorities. The EMPr includes provisions for heritage monitoring, unexpected discoveries, and adaptive management to address any previously unidentified or landscape-level cultural values during construction. This was answered in the management plans where it stated that if the buildings are to be affected in any manner, then they require a built environment assessment.
				9.1.7 The HIAs are titled ‘Heritage Surveys’ which confirms that they are superficial overviews and are not intended to constitute a heritage impact assessment which meets the minimum requirements for HIAs as set out in Section 38 (3) of the NHRA. Indeed, for the reasons stated herein the HIAs do not meet the minimum requirements for HIAs as set out in Section 38 (3) of the NHRA.	This is incorrect and the author does not know what an HIA is.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				9.1.8.The superficiality of the HIAs is compounded by inconclusive findings in the HIAs whereby the grading of certain farmsteads are identified as pending investigation by a built environment heritage specialist. This gap in the assessment represents a further flaw.	Dealt with above. It is not a flaw. If not affected, it requires no further mitigation.
				9.1.9. The combined viewsheds of the two WEFs subsequently results in a far greater cumulative visual impact yet this has not been taken into account by the authors of the HIAs or the EAP due to the under-reporting of viewsheds which results in the true potential impacts on the cultural landscape being significantly underestimated.	Repetitive baseless comment
				9.1.10. Limiting the assessment to individual archaeological sites or relics is totally inadequate for the purposes of compliance with Section 38(3) and Section 38(8) of the NHRA. The HIAs should have – as a bare minimum - included the following key cultural landscape resources / informants: Historical scenic route network; natural features contributing to the scenic or cultural landscape character (water network, topographical conditions); historical settlement patterns spanning the Iron Age, Contact and Colonial Periods; visual settings of heritage features and associated landscape features; and visual-spatial and historical linkages between heritage resources.	These were considered but were not found in the study area.
				9.1.11. None of the above issues have been addressed in the HIAs and therefore I&APs are placed at a distinct disadvantage as materially relevant information regarding the assessment of heritage related impacts is absent. Therefore, the potential impacts on cultural resources and the 'national estate' as defined in the NHRA have not been identified, evaluated or assessed in either the HIAs.	The HIAs have identified and assessed heritage resources in accordance with the requirements of Section 38 of the NHRA at a Phase 1 level. The studies documented archaeological sites, built environment structures older than 60 years, and broader cultural landscape sensitivities, and provided management recommendations where relevant. While it is acknowledged that certain additional thematic or landscape-level

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					assessments could provide further context, these are typically associated with subsequent, more detailed Phase 2 or specialist studies where warranted. Accordingly, it is not accurate to state that potential impacts on cultural resources and the national estate have not been identified or assessed. The HIAs provide sufficient information to enable I&APs and the competent authority to understand the potential heritage impacts of the proposed development at this stage of the EIA process.
				9.1.12. The HIAs identify the Battle of Onverwacht Memorial as a significant heritage resource in marking a significant event in South African history. The HIA reports do not provide a convincing argument as to why this significant historic event is limited to a single heritage feature in the form of an existing memorial. The HIAs are materially deficient in this regard as they ignore the fact that there is a larger cultural landscape associated with the Battle of Onverwacht battlefield which needs to be demarcated and assessed. This has not been done and therefore a significant potential heritage impact has been ignored.	The Phase 1 HIAs identified archaeological resources, built structures older than 60 years, and cultural landscape features within the study area, and provided management recommendations where relevant. While a more detailed thematic or cultural landscape study could provide additional context, this would ordinarily form part of any subsequent specialist investigation if triggered by development impacts. The Phase 1 assessments therefore meet the requirements of the NHRA for this stage of the process. The larger landscape was considered hence the map showing the battle of the day.
				9.1.13. To substantiate and illustrate the flaws in both the VIAs and HIAs reporting the external specialist review by Winter & Lawson (2025) prepared a basic visual sensitivity map with buffers, based on commonly used landscape features including heritage features. In this regard, see below maps, the first of	Your comment has been duly noted

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				which relates to Emvelo WEF and the second of which relates to Sheepmoor WEF: 	

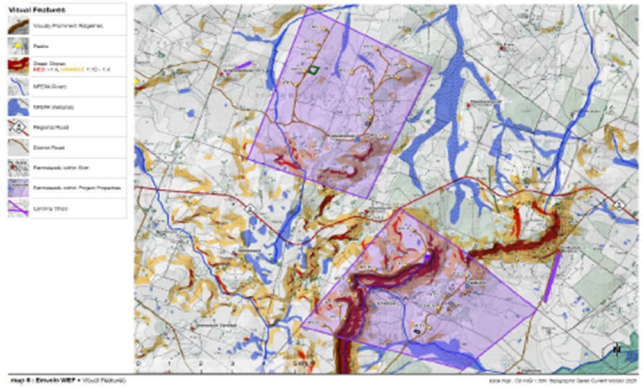
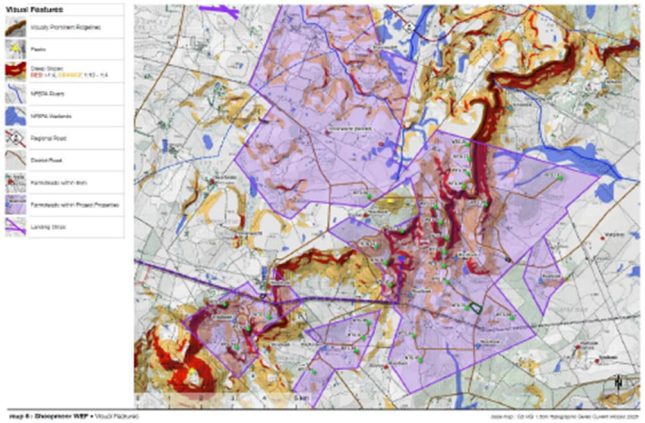
Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					
				9.1.13.1 The buffers are based on generic buffers for wind energy facilities, and may vary slightly depending on local contexts, but provide a fairly accurate guide to informing the mitigation hierarchy based on credible visual and heritage sensitivity mapping. In this regard, see the recommended generic buffers in the table below. It should be noted that the generic heritage buffers are significantly larger than the buffers used in the HIAs. For instance, a buffer of 100m is provided for grave sites and a	Who is Winter and Lawson? I do not know of this report.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				500m to 1.5 km buffer is provided for conservation-worthy farmsteads and other built environment features.	

Scenic Resources	Very high visual sensitivity	High visual sensitivity	Medium visual sensitivity	Legislative framework
Prominent topographic feature (scarps, peaks and ridges)	within 200 m	within 300 m	within 400 m	NEMA NHRA DFFE Screening Tool.
Minor topographic feature (ridges, scarps and outcrops)	within 100 m	within 200 m	-	NEMA, NHRA DFFE Screening Tool.
Steep slopes	Slopes > 1:10		1:10 - 1:20	NEMA, DFFE Screening Tool.
Scenic water features (large perennial rivers, lakes) Minor water features	within 200 m within 100 m	within 400 m within 200 m	within 600 m within 400 m	NEMA DFFE Screening Tool.
Scenic valleys	-	Feature	-	NHRA Site-specific mapping.
Cultural landscapes/ working lands	-	Feature (refer to HIA)	-	NHRA Site-specific mapping.
Protected Landscapes / Sensitive Receptors				
National Parks	within 5 km	within 10 km	within 15 km	National Parks Act Local viewshed mapping.
Proclaimed Nature Reserves, Botanical Gardens	within 3 km	within 5 km	within 10 km	Provincial ordinances Local viewshed mapping.
Protected Environments	-	Feature	-	NEMPA Act (Act 57 of 2003).
Private reserves, game farms, guest farms, resorts	within 1,5 km	within 3 km	within 5 km	PSDFs and MSDFs. Local viewshed mapping.
Heritage / archaeological sites, battle sites, grave sites	Feature (refer to HIA)	250 m	500 m	NHRA and mapping/guidelines by heritage specialist.
Settlements, towns, villages	within 2 km	within 4 km	within 6 km	MSDFs, zoning schemes

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				<table><tr><td></td><td></td><td></td><td></td><td>and bylaws.</td></tr><tr><td>Farmsteads outside WEF site</td><td>within 1 km</td><td>within 1,5 km</td><td>within 2 km</td><td>Local viewshed mapping.</td></tr><tr><td>Farmsteads inside WEF site</td><td>within 500 m</td><td>within 750 m</td><td>within 1 km</td><td>Local viewshed mapping.</td></tr><tr><td>Scenic routes, passes, poorts</td><td>within 1,5 km</td><td>within 3 km</td><td>within 5 km</td><td>NHRA</td></tr><tr><td>National routes: (rural) (urban)</td><td>within 1 km within 250 m</td><td>within 2 km within 500 m</td><td>within 3 km within 1 km</td><td>Local viewshed mapping.</td></tr><tr><td>Provincial / arterial routes (rural)</td><td>within 500 m</td><td>within 1 km</td><td>within 2 km</td><td>Local viewshed mapping.</td></tr><tr><td>Main district roads (rural)</td><td>within 250 m</td><td>within 500 m</td><td>within 1 km</td><td>Local viewshed mapping.</td></tr><tr><td>Landing strips</td><td>within 3 km</td><td>-</td><td>-</td><td>CAA</td></tr></table> 9.1.14. The buffers used in the HIAs are regarded as insufficient from a cultural landscape perspective, and in many cases no buffers have been provided in the HIAs without any valid or cogent heritage motivation for not doing so. For instance, no buffer has been provided for the Battle of Onverwacht Memorial which has been identified as a Grade IIIA heritage resource.	They are not affected thus no buffer needed.
				9.1.15. The VIAs indicate that the turbines have been located at least 2km from any occupied homestead. This is a material misrepresentation and is not correct. In fact, hardly any of the homesteads / farmsteads in the affected area have been mapped at all in the VIAs, and many of these are within 2km of a turbine. These are clearly key sensitive receptors that should have been recorded in fieldwork by the authors of the VIAs but were ignored for no valid reason. This implicates and compromises the efficacy of the HIAs and the heritage assessments undertaken.	The Visual Impact Assessment (VIA) did include mapping of potential sensitive receptors, including homesteads and built structures, using a combination of desktop analysis, aerial imagery, and field verification where access was possible. While it is not feasible to visit every individual homestead or farmstead across the study area, the visual specialist undertook a comprehensive regional mapping exercise to identify and assess visual sensitivity. The 2 km buffer referenced in the VIA reflects a general

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					guideline used to assess potential visual intrusion, but it is not presented as a definitive exclusion zone. Where homesteads were identified within proximity to turbine locations, their visibility and potential impact were assessed using modelling tools and specialist judgement. It is acknowledged that some homesteads may not have been captured due to limitations in access and resolution of available imagery. This does not invalidate the VIA but highlights the need for further site-specific verification during the pre-construction phase.
				9.1.16. The external specialist review by Winter & Lawson (2025) have demonstrated that the HIAs are inadequate by identifying these additional homesteads, with buffers, based on Google Earth and input from landowners, as well as heritage features, which also have visual implications.	Homesteads, etc. were noted form field survey and discussions with landowners.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				 	
				9.1.17. Regarding the mitigation hierarchy the HIA for the Emvelo WEF project concludes that the heritage impact significance rating would be 'low' prior to mitigation and 'low' after mitigation. The following mitigation measures are recommended in the Emvelo HIA:	Your comment has been noted

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				9.1.17.1.Ruins and old farmhouses should preferably not be damaged and will require an assessment by a Built Environment specialist; 9.1.17.2.Any activity within 50m of a grave will require that grave to be clearly demarcated before any construction activity occurs; 9.1.17.3.Isolated stone kraals may be removed / demolished after they have been mapped and photographed; 9.1.17.4.Old farmhouses will have historical middens which need to be excavated and sampled if exposed; 9.1.17.5.ROCH05 will be affected by a wind turbine which will need to be moved away from the site; 9.1.17.6.The OHL is too close to EMVE06 and will need to be moved; and 9.1.17.7.The access road needs to be moved westwards so as not to affect the cemetery.	
				9.1.18 The failure to include any heritage sensitivity mapping (including areas to be avoided and superimposed with the turbine layout), makes it impossible for I&APs to evaluate or determine the effectiveness of the above mitigation measures. Of particular concern is the lack of clarity on the impact of the turbines on the cultural landscape associated with the Battle of Onverwacht with respect to the Sheepmoor WEF and the visual setting of significant heritage features in the receiving environment, none of which has been undertaken. This is a material omission.	The Heritage Impact Assessment (HIA) undertaken for the Sheepmoor Wind Energy Facility included fieldwork by the appointed heritage specialist, who identified, graded, and mapped heritage features within the study area, including those of cultural significance such as grave sites, farmsteads, and broader cultural landscapes. Buffers were applied to these features based on their heritage grading and sensitivity, in accordance with SAHRA guidelines and specialist recommendations. While the Battle of Onverwacht and its associated cultural landscape were considered, no direct visual or physical impacts were identified during the site visit. The full details of the heritage features, their grading, and the mitigation measures proposed are documented in the

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					specialist's report, which forms part of the EIA submission.
				9.1.19. The HIA for the Sheepmoor WEF project concludes that the current layout will not affect any heritage sites. Various heritage impact significance ratings are provided for different categories of heritage resources before and after mitigation: *Graves*: High reduced to low after mitigation. *Iron age settlements*: Moderate reduced to moderate positive after mitigation. Battlefield: Moderate visual impact on sense of place and cultural landscape and archaeological impact reduced to moderate positive after mitigation. *Ruins:* Moderate reduced to moderate positive after mitigation. *Farm buildings:* Moderate reduced to moderate positive after mitigation 9.1.20. The recommended mitigation measures are similar to those proposed for the Emvelo WEF mitigation measures in terms of ruins, farmhouses, stone kraals and historical middens. Additional mitigation measures are outlined below:	
				9.1.20 The recommended mitigation measures are similar to those proposed for the Emvelo WEF mitigation measures in terms of ruins, farmhouses, stone kraals and historical middens. Additional mitigation measures are outlined below: 9.1.20.1. Late Iron Age archaeological sites occurring within the WEF should be mapped and partially excavated if affected; 9.1.20.2. While the battle of Onverwacht occurs on one of the hills of the proposed WEF, minimal development could occur subject to the following: the area is maintained and kept clear of black wattle; the placement of markers related to the battlefield where people were shot or captures; the location of a map of the battle on a central high point; and undertake a metal detector survey of all areas to be affected.	Your comment is noted
				9.1.21. In the absence of any heritage sensitivity mapping including areas to be avoided and superimposed with the turbine layout, it is very difficult to evaluate or determine the effectiveness of the above mitigation measures. Of particular concern is the lack of clarity on the impact of the turbines on the cultural landscape associated	The report is ready to be submitted for comment, after the SSV is included. The continual use of the word 'flawed' is misleading and inserted continuously throughout the comments. Oftehn this is because the author does not understand the

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				with the Battle of Onverwacht and the visual setting of significant heritage features in the receiving environment, none of which has been undertaken. This is a material omission. 9.1.22. The onus is on the EAP to ensure that a comprehensive assessment of impacts on the cultural landscape and the 'national estate' is undertaken before a decision is taken by the competent authority. This has not been done by the authors of the HIAs and this represents a major flaw in the heritage assessments and the HIA reporting for both projects.	process of an HIA. The author is also using terms in a wide and generic term and needs to specifiy.
				9.1.23. It follows that the assessment is incomplete and the HIAs are deficient in the key areas identified herein and as validated by the external specialist review by Winter & Lawson (2025).	
				9.1.24. The omissions in the HIAs demonstrate that the HIA reports do not meet the minimum requirements for HIAs outlined in Section 38 (3) of the NHRA.	
				9.2. Attached hereto is a copy of the external specialist review by Winter & Lawson (2025). The content thereof should be regarded as an extension of these comments and must be dealt with and responded to by the EAP and relevant specialist as comments on the DEIRs in their own right. The EAP is requested to make these comments and the external specialist review by Winter & Lawson (2025) available to the competent authority and to include complete copies thereof (together with the EAP / Specialist responses thereto) as part of any future reporting in connection with these applications.	
				10. AVIFAUNAL CONCERNS	

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				10.1. Avisense Africa (Pty) Ltd undertook and external specialist review of the findings in the AvIAs for the Emvelo and Sheepmoor WEFs by AfriAvian Environmental (“Avisense 2025”). Avisense identified the following flaws in the assessment of impacts on avifauna for the WEFs:	
				10.1.1 The findings are diluted by peripheral detail and repetition, both of which aid no further in I&APs gaining a meaningful understanding of impacts on avifauna as a result of the proposed WEFs. To keep the outcomes of the study clear, the AvIAs should limit data presentation to aspects that are directly relevant to the overall findings of the impact assessment.	The AvIAs follow best-practice guidelines for transparency and completeness. Detailed data presentation ensures traceability and supports informed stakeholder engagement, especially for complex ecological assessments
				10.1.2 The failure to provide raw data renders the final analyses fundamentally questionable. To ensure transparency and accountability in the assessment process, it is imperative that the AvIAs includes, as appendices, the raw transect, VP, and, where applicable, tracking data. Despite our client’s explicit and persistent requests, the EAP has deliberately withheld and refused access to this information. This non-disclosure and lack of transparency severely undermines trust in the EAP and their conclusions, and significantly inhibits I&APs from meaningfully contributing to the present public participation process.	Appendices in the AvIAs include detailed monitoring methodologies and summaries of vantage point and transect data. While raw datasets are not published in full, the assessments are based on four seasons of fieldwork and comply with national EIA protocols
				10.1.3 The AvIAs fail to accurately reflect the current status of the bird species and, instead, relied heavily on outdated, regional red data status classifications. Notably, the Cape Vulture and Lanner Falcon have been recently downlisted to ‘Near Threatened’, while the Blue Korhaan has been uplisted to ‘Vulnerable’ (BirdLife South Africa, unpublished data). Using this outdated information risks producing an assessment that does not capture the true status of the bird populations in the area and consequently the impact of the WEFs on those populations.	The AvIAs rely on the most recent published Red Data Book (Taylor et al. 2015) and IUCN Red List (2022.2), which are recognised as authoritative sources. Unpublished data cannot be used as a basis for formal impact ratings
				10.1.4 The studies depend on combined data from the Emvelo and Sheepmoor WEFs (AfriAvian 2025) which confuses and dilutes the	While some indices are presented jointly for regional context, project-specific impact

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				meaning of the findings. A project-specific report on the assessment of impacts requires the breakdown and analysis of data pertinent to the target project only. Instead, the AvIAs present the same key indices of avian abundance and potential sensitivity to impacts – kilometric abundance, VP passage rates and times, incidental sightings, atlas data – resulting in the same impact assessment outcomes, recommended mitigation and EMPr stipulations. This is wholly inappropriate and represents a material flaw. Only the data directly pertinent to each project should be used to describe project-specific impact profiles and corresponding mitigation and management recommendations	assessments, mitigation measures, and EMPr stipulations are clearly delineated for each WEF
				10.1.5. The AvIAs lack detail on where and how (raptor) nest surveys were conducted. Given the weight attached to the Martial Eagle nest in the outcomes of the overall impact assessment – to the extent that a further year and five more site visits purely focused on the nest location were added to the scope of the study – this is a significant deficiency in the assessments.	The AvIAs include focused surveys on the Martial Eagle nest, with seasonal monitoring and GPS tracking data informing the sensitivity zonation and buffer recommendations
				10.1.6 The same concerns are relevant for the Southern Bald Ibis, Grey-crowned Crane, Blue Crane, and Secretary bird. The survey work conducted should be improved (for raptors, at least as per the methods outlined in Malan 2009), and suitable allowances made in the impact assessment for whatever additional nest sites / colonies / roosts are added to project inventory. This represents a further material deficiency in the assessments.	The AvIAs applied SABAP2 data, vantage point monitoring, and wetland surveys across four seasons. These methods align with BirdLife South Africa's guidelines and are appropriate for the species concerned
				10.1.7. The use of GPS tracking data to define the foraging range of the Martial Eagle pair is noted, however, there is a blatant lack of transparency in how this data is presented and analyzed. This lack of transparency raises concerns about the reliability and credibility of the conclusions drawn from the data. The following questions therefore remained unanswered: How much tracking data was accumulated? How much did the juvenile birds contribute to the total sample? What did the mapped, aggregate sample of tracks	The Martial Eagle tracking data was used to develop flight risk models and sensitivity zones. While raw GPS tracks are not published, the methodology and outcomes are described in detail in Section 5.8 of the AvIAs

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				look like? Precisely how and why were the sensitivity thresholds used applied to the data? Given the significance of this data in the overall outcome of the study, this aspect of the AvIAs should be expanded upon and the data made available in a transparent manner.	
				10.1.8 The AvIAs recommend a 2.5km buffer around the affected Martial Eagle nest to mitigate collision and disturbance impacts. This recommendation falls significantly short of the minimum 6km buffer recommended by BirdLife South Africa. Our external review specialist supports the 6km buffer, referencing insights from Dr. Gareth Tate at the EWT. Dr. Tate, who has been fitting GPS trackers to Martial Eagles and analysing ranging data in relation to collision risks at wind farms, and who emphasizes that the turbine exclusion buffer for Martial Eagles should be at least 6km and is likely to require further expansion in the future. Implementing a protective buffer of no less than 6km is the only suitably conservative measure to effectively mitigate impact risks. This is particularly critical, as the AvIAs acknowledge that the tracked eagle(s) spend 21% of recorded flight time beyond 6km from the nest site.	The 2.5 km buffer is based on site-specific tracking data and field observations. While BirdLife South Africa recommends a 6 km buffer, the AvIAs applied a precautionary approach tailored to observed eagle behaviour
				10.1.9. It is premature to deviate from a 6km buffer of a known nest site, especially considering that “detailed flight risk modelling was not conducted”.	The 2.5 km buffer is based on site-specific tracking data and field observations. While BirdLife South Africa recommends a 6 km buffer, the AvIAs applied a precautionary approach tailored to observed eagle behaviour
				The AvIAs fail to provide critical information on the calculation of protective envelopes around Southern Bald Ibis colonies. The AvIAs neglect to specify the data sources, the volume of data considered, and the methodologies applied to establish sensitivity thresholds. These glaring omissions undermine the credibility and transparency of the assessment process.	The AvIAs identify roost and breeding sites and apply sensitivity thresholds based on habitat modelling and field observations. These are consistent with national screening tool outputs and specialist input

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				10.1.11 The AvIAs lean heavily on the use of remote-triggered turbine curtailment or observer initiated shut down on demand ("SDOD"). It should be noted that while a number of commercial service providers are offering shut-down on demand systems to address avian collision mitigation, and this has been shown to work in some cases (e.g. de Lucas et al. 2012), no studies have yet conclusively proven their effectiveness in unpredictable flight patterns of species or rapid movement surpassing shutdown response times. As Gove et al. (2013) notes, these measures should not be seen as a substitute for location and design considerations to minimize adverse impacts of the WEFs during the impact assessment phase.	SDOD and blade painting are part of a multi-tiered mitigation strategy. The AvIAs acknowledge limitations and recommend ongoing monitoring and adaptive management, including integration into the EMPr
				10.1.12. Furthermore, all turbines should be fitted with SDOD technology from the onset, and that this should include automated SDOD (camera and radar). This technology should be in operation from the moment a blade starts turning. Given the questionability of the success of SDOD, this must be monitored through a monitoring programme throughout the lifetime of the facilities, and which programme should be published for I&AP comment and included in the EMPrs. The outcome of the monitoring reports should be made publicly available throughout the lifetime of the facilities.	SDOD and blade painting are part of a multi-tiered mitigation strategy. The AvIAs acknowledge limitations and recommend ongoing monitoring and adaptive management, including integration into the EMPr
				10.1.13 Similarly, the AvIAs leans heavily on the use of blade painting to mitigate collision risk for priority species. A recent study of avian collision rates at a Norwegian wind farm has found that painting one blade of each turbine black can significantly lower collision rates overall, and reduce fatalities of White-tailed Eagles Haliaeetus albicilla by up to 70% (May et al. 2020). This mitigation practice has huge potential for reducing unexpected impacts at operational wind farms (SAWEA 2025), however, this mitigation measure has not yet been sufficiently tested and verified as effective under all conditions and for all species to use this as an a priori reason to approve development in eagle-sensitive areas.	The AvIAs do not rely solely on blade painting for mitigation. It is one of several measures proposed, and its effectiveness will be monitored post-construction

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				10.1.14 The cumulative avifaunal impacts of the WEFs are assessed in the AvIAs in terms of the known renewable energy projects planned within a 35km radius. There are two potentially significant problems with this – firstly, the 35km radius is an arbitrary threshold that doesn't necessarily reflect the foraging ranges of some of the key affected species (e.g. Cape Vulture), and secondly, how up to date and comprehensive is the mapping provided for other proposed projects? Given the number of WEFs currently proposed and/or approved for the upland grasslands of Mpumalanga, and the ongoing escalation of documented collision mortalities for threatened South African Birds (Perold et al. 2020, BirdLife South Africa 2025), it would more appropriate to assess cumulative impacts of each project on a much larger, landscape scale, at least within a buffer distance of 50km. The cumulative impact assessment includes as a bare minimum all the approved and planned WEFs within at least a 55km radius as referred to in the DARDLEA comments on the Scoping Phases.	The 35 km radius used aligns with current guidelines and reflects the spatial extent of known WEFs. The AvIAs acknowledge cumulative risks and recommend offset strategies and long-term monitoring
				10.2. Attached hereto is a copy of the external specialist review by Avisense Africa (2025) that identifies the above material and fatal flaws in the AvIAs. The content thereof should be regarded as an extension of these comments and must be dealt with and responded to by the EAP and relevant specialist as comments on the DEIRs in their own right. The EAP is requested to make these comments and the external specialist review by Avisense Africa (2025) available to the competent authority and to include complete copies thereof (together with the EAP / Specialist responses thereto) as part of any future reporting in connection with these applications.	The EAP has acknowledged external comments and committed to including responses in future reporting. The AvIAs are subject to independent review and stakeholder engagement as per NEMA regulations
				11. BATS	
				11.1. The Bat (Chiroptera) EIA Reports ("BIAs") by Camissa Sustainability Consulting for the WEFs fall short in material respects of what is required of an impact assessment in terms of the EIA Regulations. These gaps and deficiencies were identified by	11.1.1 The concern regarding the omission of the names of individuals who conducted the groundwork and roost surveys is noted. The

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				external review specialist EJ Richardson in their report (Richardson & Peplow: 2025). In this regard we note the following: 11.1.1. The BIAs fail to include information on who conducted the groundwork and roost surveys. This brings into question the credibility of the data arising from groundwork and roost surveys. 11.1.2. Figures from the BIAs are missing, which prejudices I&APs and precludes meaningful participation in the present public participation process as not all relevant information is available. The missing information was requested by Mr. Silidi of Richard Summers Inc, and 6 PDFs were received on 7 April 2025 despite having been requested on 31 March. The net effect of the EAP's unreasonable delay in providing this critical information is that it deprived I&APs of a significant portion of the 30-day public participation timeframe in which to meaningfully engage on the impacts of the WEFs on bats. This runs contrary to the overall intent and objective of the EIA regime which includes affording I&APs a reasonable opportunity to meaningfully participate in a public participation process by placing all relevant information before I&APs in an open and transparent manner for them to comment on such. 11.1.3. EJ Richardson emailed the EAP on March 31st to request the missing specialist information and is yet to receive a reply. What is the reason for failing to provide this critical information to EJ Richardson? Is accountability and transparency not considered by the EAP to be fundamentally important to the credibility of the current EIA process? 11.1.4. Mr. Meyer is unlikely the only of the I&APs that were not provided material information – figures (Appendices to the BIAs) requested. What measures were taken by ERM to communicate with the entire registered I&AP database to correct this and to ensure that all I&APs have access to the same data for the bare minimum of the full 30-day period? 11.1.5. The reduction of Cumulative Impacts from High Negative Impact to Moderate Negative Impact (cf DEIR 11.7 Bats) with mitigation, is not good enough and is unacceptable. There are enough areas of this country or alternative sites where the risk to	Bat Impact Assessments (BIAs) were undertaken by a qualified and experienced bat specialist, and all fieldwork, including roost surveys and acoustic monitoring, was conducted under the supervision of this specialist in accordance with the relevant protocols. The final DEIRs have been updated to include this information to ensure transparency and to support the credibility of the data presented. 11.1.2 It is acknowledged that the figures and appendices to the BIAs were not initially included in the DEIRs circulated for public comment. Upon request, these documents were provided to Mr. Silidi on 7 April 2025. While the delay in providing the requested information is regrettable, the documents were made available during the public participation period, and the revised DEIRs now include all relevant figures and appendices to ensure that Interested and Affected Parties (I&APs) have access to the complete specialist information. 11.1.3 The delay in responding to Mr. Richardson's request is acknowledged. This was not intentional and is regretted. The EAP has since reviewed internal communication processes to ensure that all future requests for information are responded to timeously. Accountability and transparency remain central to the EIA process, and the revised DEIRs now include all relevant specialist documentation to support meaningful participation.

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				bats can be reduced to Low Impact, which makes these undesirable projects due to their location and the inability to reduce the impact to 'Low'.	11.1.4 Following the identification of missing information, the EAP ensured that the complete set of specialist appendices was uploaded to the ERM public information site and made available to all registered I&APs. 11.1.5 The concern regarding the reduction of cumulative impacts on bats from "high" to "moderate" significance is noted. The significance rating reflects the implementation of a comprehensive suite of mitigation measures recommended by the bat specialist, including turbine micro-siting, curtailment protocols, and the avoidance of known roosting and high-sensitivity areas. While it is acknowledged that some residual risk remains, the mitigation strategy is considered effective and consistent with national best practice. The site selection was informed by multiple constraints, and while alternative locations may exist, the current site has been assessed as suitable with mitigation. The Environmental Management Programme (EMPr) includes provisions for ongoing monitoring and adaptive management to ensure that bat impacts are managed throughout the project lifecycle.
				11.2. Richardson and Peplow identified the following flaws in the BIAs and which result in a disregard for bat sensitivity mapping and no-go areas (Richardson & Peplow 2025): 11.2.1. Turbines and associated infrastructure are located in bat sensitive and no-go areas, which is highly problematic.	11.2.1 The concern regarding the placement of turbines and infrastructure within bat-sensitive and no-go areas is acknowledged. The final layout was refined in consultation with the bat specialist to avoid confirmed no-

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				11.2.2. This is compounded by the absence of clearly presented (legible and accurate) sensitivity mapping in the DEIRs. The absence of consolidated sensitivity mapping is tantamount to obfuscation of a material project impact and is unacceptable. 11.2.3. With respect to the Sheepmoor WEF: Two turbines (WTGs 37 and 45) and the operations and maintenance building are located in bat no-go areas. Figure 7.2 of the BIAs concerning bat sensitivity indicates that some of the turbines' rotor-swept areas intrude on bat no-go areas. Please clearly identify and confirm all the rotor-swept areas of turbines for the Sheepmoor WEF which encroach onto bat no-go areas. This information should be made available to all I&APs for comment, and the failure to do so represents a material omission in the current process. 11.2.4. With respect to the Emvelo WEF: Four turbines (WTGs 3, 4, 5 and 10) are located in bat no-go areas. Again, I&APs are prejudiced as they are forced to engage in the public participation process based solely on Figure 7.3 of the BIAs that sets out the bat sensitivity, as the relevant figures in the bat specialist report were not provided from the outset. This is a material omission and disallows I&APs from engaging meaningfully in the present public participation process. Please clearly identify and confirm all the rotor-swept areas of turbines for the Emvelo WEF which encroach onto bat no-go areas. This information must be made available to all I&APs for comment.	go areas wherever technically feasible. Where infrastructure remains within mapped sensitivity zones, site-specific mitigation measures have been proposed, including micro-siting, curtailment protocols, and monitoring, as detailed in the Environmental Management Programme (EMPr). 11.2.2 It is acknowledged that consolidated and legible sensitivity mapping was not initially included in the DEIRs. This has since been rectified, and all relevant figures from the Bat Impact Assessments (BIAs) have been made available to I&APs via the ERM public information site. The omission was not intentional, and steps have been taken to ensure transparency and accessibility of all specialist data. 11.2.3 With respect to the Sheepmoor WEF, WTGs 37 and 45 were initially located near bat no-go areas. These turbines have since been shifted to avoid direct overlap with mapped no-go zones, and the O&M building has been relocated or mitigation measures applied to reduce potential impacts. Rotor-swept area data has been reviewed and confirmed to fall outside of no-go zones. This information has been included in the revised DEIRs and made available for public comment. 11.2.4 Regarding the Emvelo WEF, WTGs 3, 4, 5, and 10 were assessed in relation to bat sensitivity zones. The final layout confirms that these turbines are located outside of designated no-go areas, and rotor-swept

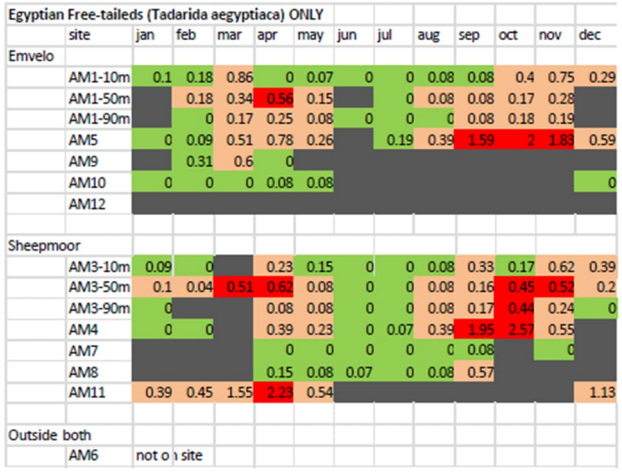
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					areas do not intrude into these zones. The relevant figures have now been included in the updated DEIRs to support meaningful public participation. 11.3.1 The use of Kaleidoscope® Pro for initial species identification is standard practice in South African bat surveys. It is acknowledged that the reference library has limitations, particularly for rare species. Accordingly, all calls were manually verified by the bat specialist to improve accuracy. The assessment reflects a conservative interpretation of the data, and mitigation measures have been designed to account for potential under-detection. 11.3.2 The 1,491 unidentified bat passes are acknowledged. These were retained in the dataset and flagged for further review. While raw data is not typically distributed during public participation, it can be made available upon request to the competent authority or through formal channels. The EMPr includes provisions for ongoing monitoring to improve species-level resolution over time. 11.3.3 The comparison with de Jong et al. (2025) is noted. Differences in species richness may reflect survey duration, habitat variability, and regional ecological factors. The study area was surveyed using accepted protocols, and the results are considered representative of local bat activity. The assessment remains valid within the scope of the EIA process.

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					11.3.4 The limited species mapping in Monadjem et al. (2020) is acknowledged as a reflection of historical survey gaps. The current BIAs contribute new data to this under-surveyed region and support the need for ongoing monitoring and adaptive management. 11.3.5 The comment regarding roost detection is noted. While small and cryptic roosts are difficult to detect, the specialist conducted targeted surveys and habitat assessments to identify potential roosting areas. The absence of confirmed roosts does not imply absence, and mitigation measures have been designed to account for this uncertainty. 11.3.6 The abandoned torbanite mines were identified as potential roosting habitat and have since been flagged for further investigation. The EMPr includes provisions for pre-construction walkdowns and seasonal monitoring to confirm roost presence and inform micro-siting and mitigation.
				11.3. With respect to the number of bat species found, Richardson and Peplow in their 2025 external review identified the following issues in the BIAs: 11.3.1. According to the BIAs on page 4, bat calls “were processed using Kaleidoscope® Pro (Version 5.4.2, Wildlife Acoustics, Inc.). Bats were automatically identified using the embedded “Bats of South Africa Version 5.4.0” reference library and verified by inspecting echolocation files”. The Kaleidoscope South African reference library is inadequate to identify all bat species and only	11.3.1 The concern regarding the limitations of the Kaleidoscope® Pro reference library is noted. The bat specialist used the software as a preliminary tool for call classification, consistent with standard practice in South African bat surveys. All calls were subsequently manually verified to improve accuracy and reduce misidentification, particularly in under-surveyed areas such as

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				identifies the most common bat species. The library should therefore only be used for an initial rough pass, and not for identifying rare bats in under-surveyed CBAs as in the case of the Sheepmoor and Emvelo WEFs. 11.3.2. A note at the bottom of page 7 of the BIAs states that calls were “Exclusive of an additional 1 491 bat passes unable to be identified to a species”. I&APs cannot engage meaningfully with the reports without access to the raw data. These calls could be social calls of the identified species but could also be calls of rarer bats and each should be individually identified. Please provide access to the raw data relied upon in preparing the DEIRs and specialist reports to I&APs for comment. 11.3.3. As a comparison, de Jong et al (2025), surveying for 128 nights in the Telperion Nature Reserve, found 22 species from seven families. Telperion is some distance away from both Emvelo and Sheepmoor WEFs, but both are mainly Highveld Grassland with a heterogenous mix of landscapes (see, for example Figures 4 and 5 of the agricultural specialist reports) and accordingly there should be an approximately similar number of bat species found. This, however, was not the case and brings the credibility of the assessments into question. 11.3.4. Monadjem et al (2020) maps few species in the study area, but this is most likely an artefact of a lack of previous surveys and is not a true reflection of the bat fauna of the area. 11.3.5. The BIAs state on page 2 that most bat roosts are small and cryptic and would not be found. Richardson and Peplow disagree with this and state that a complete lack of bat roosts in a CBA such as the study area in question is extremely unlikely. This further brings the credibility of the assessment into question. 11.3.6. Richardson and Peplow in their 2025 report note that the abandoned torbanite mines in the study area should have been surveyed.	the project sites. The assessment acknowledges the limitations of the reference library and applies a precautionary approach in interpreting the data. 11.3.2 The 1,491 unidentified bat passes are acknowledged and were retained in the dataset for further review. These calls were flagged as unclassified due to limitations in acoustic clarity or reference matching. While raw data is not typically distributed during public participation, it can be made available to the competent authority upon request. The EMPr includes provisions for ongoing monitoring and refinement of species-level identification, which will contribute to improved understanding of bat activity over time. 11.3.3 The comparison with de Jong et al. (2025) is noted. Differences in species richness may reflect survey duration, equipment sensitivity, and habitat variability. The project sites were surveyed using accepted protocols and over a sufficient period to capture representative bat activity. The results are considered valid within the scope of the EIA, and the EMPr includes provisions for continued monitoring to refine species inventories. 11.3.4 The limited species mapping in Monadjem et al. (2020) is acknowledged as a reflection of historical survey gaps. The current BIAs contribute new data to this under-surveyed region and support the need for ongoing

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					monitoring. The precautionary principle has been applied in interpreting the data and designing mitigation measures. 11.3.5 The comment regarding the likelihood of bat roosts in the study area is noted. While small and cryptic roosts are difficult to detect, the specialist conducted targeted surveys and habitat assessments to identify potential roosting areas. The absence of confirmed roosts does not imply absence, and mitigation measures have been designed to account for this uncertainty, including pre-construction walkdowns and seasonal monitoring. 11.3.6 The abandoned torbanite mines have been flagged as potential roosting habitat and will be subject to further investigation. The EMPr includes provisions for pre-construction surveys and adaptive management to ensure that any roosts identified are appropriately protected and that infrastructure placement is revised if necessary.
				11.4. Richardson and Peplow in the 2025 external review identified that there was insufficient data from the static acoustic surveys in the BIAs. In this regard we note the following:11.4.1. Table 1 in the BIAs combine the survey effort of both the Emvelo and Sheepmoor WEFs, as does Figure 1 concerning the placement of survey masts and detectors. Explain why these are not separated as these are separate assessments for separate projects?11.4.2. The South African Bat Assessment Pre-construction Guidelines (www.sabaa.org.za) state that 75% of one year of successful recording data for each site, covering all four seasons, is the	The survey effort for both Emvelo and Sheepmoor WEFs was presented jointly in Table 1 and Figure 1 of the Bat Impact Assessments (BIAs) due to the shared regional context and overlapping ecological characteristics of the study area. However, each project was assessed independently, and species-level data and sensitivity mapping were interpreted separately for each site. The consolidated presentation was

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				minimum acceptable survey level. This is calculated as “the average % recording time over all static monitoring stations deployed on the site over one year”. The BIAs do not state the average recording time, which is a material omission, but rather combine both Emvelo and Sheepmoor data in one and then split the information by species. However, on analysing the information adifferent way a different pattern can be seen. The following is the information from Table 5 (pg. 9) divided into the relevant surveys:	intended to provide a comprehensive overview of the survey effort, but the final DEIRs have been updated to clarify the distinction between the two sites and ensure transparency in the assessment process. The concern regarding the omission of average recording time is acknowledged. The South African Bat Assessment Pre-construction Guidelines were considered during the assessment, and the survey effort met the minimum requirement of 75% coverage across all seasons.



Egyptian Free-taileds (Tadarida aegyptiaca) ONLY													
	site	jan	feb	mar	apr	may	jun	jul	aug	sep	oct	nov	dec
Emvelo													
	AM1-10m	0.1	0.18	0.86	0	0.07	0	0	0.08	0.08	0.4	0.75	0.29
	AM1-50m		0.18	0.34	0.56	0.15		0	0.08	0.08	0.17	0.28	
	AM1-90m		0	0.17	0.25	0.08	0	0	0	0.08	0.18	0.19	
	AM5	0	0.09	0.51	0.78	0.26		0.19	0.39	1.59	2	1.83	0.59
	AM9		0.31	0.6	0								
	AM10	0	0	0	0.08	0.08							0
	AM12												
Sheepmoor													
	AM3-10m	0.09	0		0.23	0.15	0	0	0.08	0.33	0.17	0.62	0.39
	AM3-50m	0.1	0.04	0.51	0.62	0.08	0	0	0.08	0.16	0.45	0.52	0.2
	AM3-90m	0			0.08	0.08	0	0	0.08	0.17	0.44	0.24	0
	AM4	0	0		0.39	0.23	0	0.07	0.39	1.95	2.57	0.55	
	AM7				0	0	0	0	0	0.08		0	
	AM8				0.15	0.08	0.07	0	0.08	0.57			
	AM11	0.39	0.45	1.55	2.23	0.54							1.13
Outside both													
	AM6	not o	site										

11.4.3. With reference to the above, the charcoal cells illustrate areas of serious concern. For the Emvelo WEF, the combined detectors did not monitor for 33 months, and for the Sheepmoor WEF, the combined detectors missed monitoring for 22 months. This means that the Emvelo WEF detectors only managed an average of 61% and the Sheepmoor WEF 74%, which are both under the absolute minimum levels required.11.4.4. In the Emvelo WEF study area during December and January, which are months in which bats are very active, only three detectors out of seven were recording.11.4.5. At the Sheepmoor WEF study area in March, the

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				start of autumn migrations, only two out of the seven detectors were recording. This is indicative of bat monitoring that falls significantly short of what is expected in terms of best practice and the EIA Regulations.	
				11.5. With respect to fruit bats, Richardson and Peplow identify the following issues in the BIAs: 11.5.1. Bats in the family Pteropodidae do not echolocate and cannot be surveyed using acoustic detectors. There is no evidence of any bona fide attempt by the specialists to survey using other methods (infra -red cameras, potential roosting sites, the presence of fig trees, spit-outs, male calling etc.). 11.5.2. Fruit bats are listed as “Low” occurrence, however, most of the study area has not been surveyed for bats before and it is probable that they occur in the riverine valleys at certain times of the year. Further investigation into the potential impacts on Bats in the family Pteropodidae using more effective survey methods is required for the BIAs to serve as defensible impact assessments when measured against the EIA Regulations. 11.5.3. A fruit bat survey must be undertaken due to the sites being located in Mpumalanga.	The bat specialist studies for Emvelo WEF included 12 months of acoustic monitoring across 11 locations, covering all seasons and habitat types. While fruit bats do not echolocate and cannot be detected acoustically, the studies also incorporated roost surveys, landowner interviews, and habitat assessments targeting potential roosting features such as buildings, rocky outcrops, and tree clusters. Although no fruit bat roosts were confirmed, their potential presence was acknowledged, and precautionary buffers were applied to suitable habitats. The Biodiversity Impact Assessment (BIA) identifies fruit bats as high-risk species and includes post-construction fatality monitoring and adaptive management measures to address residual impacts
				11.6. With respect to Figure 3 of the BIAs, the no-go and buffered areas, Richardson and Peplow identify the following: 11.6.1. The BIAs correctly label the CBAs and key bat habitats such as riverine areas as no-go areas (Figure 3 both BIAs), however, the BIAs have not correctly marked the areas between these as no-go areas. 11.6.2. Being volant animals, bats will move from one foraging area to another as insect abundance changes. The buffers mandated in the SABAA pre-construction guidelines assume that	11.6.1 The concern regarding the omission of connectivity between mapped no-go areas is noted. The Bat Impact Assessments (BIAs) correctly identify key bat habitats such as riparian zones and CBAs as no-go areas. However, the areas between these features were not explicitly marked as no-go zones. The bat specialist has acknowledged that bats are volant and use the landscape dynamically, and this has been considered in

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				the area outside the buffer is not suitable for foraging and that the bats will spend most of their time within the buffered areas. However, in cases where key bat habitats are close together, such as in the case of the Emvelo and Sheepmoor WEF study areas, it must be assumed that the bats can and will fly from one key bat habitat area to the other. Thus, if there are narrow spaces between constrained or high sensitivity areas (i.e. no-go and high-risk areas), turbines should not be placed within those areas. 11.6.3. As a result of the above and with respect to the Emvelo WEF, Richardson and Peplow require WTGs 3, 4, 5, 7, 10, 11, 13, 14, 15, 16, 17, 19, 20, 21, 22 and 23 to not be approved as they are situated in areas of high risk for bats. With respect to Sheepmoor WEF, Richardson and Peplow require WTGs 18, 26, 27, 31, 33, 34, 36, 38, 40, 44, 49, 50, 52 and 53 to not be approved as they are similarly situated in areas of high risk for bats. 11.6.4. The BIAs state on page 26 and 27 that, provided all the measures identified therein are adhered to, the project may go ahead without long-term damage to the bat species in the area. There is no valid basis or justification for this conclusion as nearly all the study areas for both WEF sites are identified as no-go, high-risk, or medium-risk to bat species. This should have been identified and integrated into the overall assessment to indicate that the projects are fatally flawed on this basis alone. 11.6.5. Figure 3 of the BIAs must be redrawn to include the in-between areas in formally demarcated buffer zones (where gaps of less than 500m between no-go or high-risk areas), and the site adjusted accordingly. 11.6.6. Following the conclusion by Camissa Sustainability in the BIAs that the proposed projects can be approved (notwithstanding the material deficiencies and omissions in the reporting), ERM has repeated this in the DEIRs. However, ERM has not estimated the impact of the mitigation measures on the projects: there is a very	the sensitivity mapping and layout refinement. The final layout avoids placing turbines in narrow corridors between high-sensitivity zones where feasible, and mitigation measures have been applied to manage residual risk. 11.6.2 It is agreed that bats may move between foraging areas, especially where key habitats are in close proximity. The SABAA guidelines were used as a baseline, and the specialist applied a precautionary approach in interpreting bat movement patterns. Where gaps between no-go or high-risk areas are narrow, turbine placement was reviewed and adjusted where technically feasible. The EMPr includes provisions for ongoing monitoring to validate bat movement and inform adaptive management. 11.6.3 The turbines listed by Richardson and Peplow have been reviewed in light of their location within high-risk bat areas. The final layout reflects adjustments to several of these turbines, including micro-siting and removal where avoidance was feasible. For turbines that remain within high-risk zones due to technical constraints, enhanced mitigation measures have been proposed, including curtailment protocols and monitoring. These measures are detailed in the EMPr and will be implemented throughout the operational phase. 11.6.4 The conclusion in the BIAs that the project may proceed without long-term damage to

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				high chance that, given the high bat usage of the area, the turbines may need curtailment within a very short time (Richardson & Peplow: 2025). This is not dealt with adequately in the DEIRs. 11.6.7. It is unacceptable for the impacts on the bat fauna to be "managed adaptively during the operational phase" (pg. 15 DEIRs), which is a way of saying bats must die before the turbines are curtailed during the operational phase (Richardson & Peplow: 2025). 11.6.8. Pre-construction monitoring has already shown the times of high bat usage, and the turbines should be curtailed during these times from the time the blades start turning (not when the wind farm is connected to the grid). The precautionary principle applies here: regular monitoring must be required as a condition of approval (at a bare minimum) and if the results of such monitoring shows less bat usage and deaths than expected then the curtailment can gradually be reduced if supported by independent expert opinion. The efficacy of this approach is dependent on, firstly, the omissions in the bat assessment reports being addressed and, secondly, a robust bat monitoring programme being prepared and provided to I&APs for comment. This has not been done.	bat populations is based on the implementation of the full suite of mitigation measures recommended by the specialist. While the study area includes high and medium-risk zones, the assessment reflects a precautionary interpretation of the data and assumes full compliance with mitigation. The EMPr includes adaptive management provisions to respond to observed impacts and ensure that bat mortality is minimised. 11.6.5 The recommendation to redraw Figure 3 to include buffer zones between closely spaced no-go or high-risk areas is noted. The mapping has been updated in the revised DEIRs to improve clarity and reflect connectivity between sensitive habitats. This supports more informed turbine placement and enhances the precautionary approach applied in the assessment. 11.6.6 The potential need for curtailment during early operational phases is acknowledged. The DEIRs include a commitment to implement curtailment protocols based on pre-construction monitoring data and seasonal bat activity. The EMPr outlines a framework for adaptive curtailment, supported by ongoing monitoring and specialist review, to ensure that mitigation remains responsive and effective. 11.6.7 The concern regarding adaptive management being interpreted as reactive is noted. The EMPr does not rely solely on post-impact response but includes proactive curtailment

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					measures based on known bat activity patterns. These measures will be implemented from the start of turbine operation, not only once grid connection is achieved, and will be reviewed regularly to ensure effectiveness. 11.6.8 Pre-construction monitoring has identified periods of high bat activity, and curtailment during these times will be implemented from the onset of turbine operation. The precautionary principle has guided the development of the EMPr, which includes a robust bat monitoring programme. This programme will be reviewed by independent specialists and updated as needed. The revised DEIRs include this framework, and it is available for I&AP comment as part of the public participation process.
				11.7. With respect to stakeholder concerns regarding bat impacts that have not been addressed by the impact assessors, Richardson and Peplow note the following in their 2025 external review: 11.7.1. Public participation comment 14 that “The turbulence from the turbines will change the unique condensation characteristics of the area (and thus the insect flight patterns)” and ERM’s comment that the developers will “work to avoid sensitive areas to minimise any negative impacts” is wholly irresponsible and unacceptable. There is nothing in the DEIRs to suggest that this concern has been addressed. Will the inset flight patterns change and, if so, how? 11.7.2. Shut-down-on-demand must be in place for all bat species, especially the Pteropodidae. The phrase “should be considered” in	1.7.1 The concern regarding turbine-induced turbulence and its potential effect on condensation and insect flight patterns is noted. While this specific dynamic was not modelled in the DEIRs, the bat specialist has acknowledged the ecological complexity of the area and incorporated precautionary mitigation measures to address indirect impacts on bat foraging behaviour. These include curtailment protocols during peak insect activity periods and monitoring of bat activity to detect any changes in flight patterns that may arise during operation.

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				the context of the EAPs response to avifaunal concerns, is meaningless and unacceptable as it leaves the implementation of key mitigation measures open to the developer's discretion who will decide not to implement the mitigation on the basis of commercial considerations. This should be a clear-cut obligation imposed on the developer. A choice is wholly inappropriate for an EIA process. 11.7.3. Appropriate (bat) fatality threshold numbers need to be defined and agreed on as per the SABAA guidelines. The developers do need to be warned that this is a highly biodiverse environment, and extra (additional) mitigation measures must be identified and must commence immediately after the first death of a fruit bat or Red Data bat. This is not made clear at all (Richardson & Peplow: 2025). 11.7.4. Where the EAP state that "these concerns will be addressed in the final report": The information is available, and curtailment can and should have been built into the EMPrs immediately. There is no need or valid justification to postpone this exercise to the final EIRs. It is critically important for I&APs to know in advance when and which turbines will be curtailed. This cannot be left to be resolved in the EMPrs at a later stage. This must be undertaken and resolved before any decision is taken by the competent authority and BEFORE the final EIRs are submitted to DFFE for decision-making. I&APs have the right to review and comment on how the concerns have actually been addressed or ignored. This crucial issue cannot be held over and addressed in the final reports. The EAP's approach is inadequate and falls short of the intent and objectives of public participation in the context of an EIA process. 11.7.5. "Minimum rotor sweep of 30 m will not reduce bat mortality": This is not clearly explained in the reports. Since Cape Serotine bats forage at tree height or thereabouts, if the turbine	11.7.2 The recommendation for compulsory Shut Down on Demand (SDoD) for all bat species, including Pteropodidae, is acknowledged. The EMPr has been updated to reflect that SDoD will be implemented as a mandatory measure for all turbines located in medium- and high-risk bat areas. This is not left to developer discretion and will be enforced as a condition of Environmental Authorisation, with monitoring data used to guide the refinement of curtailment protocols. 11.7.3 The need for clearly defined bat fatality thresholds is acknowledged. The EMPr now includes species-specific thresholds aligned with the SABAA guidelines, and additional mitigation will be triggered immediately upon the first confirmed fatality of a Red Data or fruit bat species. These thresholds will be reviewed and validated by independent specialists during the operational phase. 11.7.4 The concern regarding the timing of curtailment planning is noted. Curtailment measures have now been incorporated into the revised EMPrs and are available for public review. These include turbine-specific curtailment schedules based on pre-construction monitoring data. This ensures that I&APs can engage meaningfully with the mitigation strategy prior to submission of the final EIRs. 11.7.5 The comment regarding rotor sweep height is acknowledged. The bat specialist has

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				hub is raised such that the lower tip of the turbine blades is above 30m (50m is more usual to take turbulence into account) it will be above their foraging areas and thus kill less bats. It must be emphasised that this is for one species only, but it might reduce mortality for them. However, this will not change the death rates of Egyptian Free-tailed bats. 11.7.6. Page 4 of the BIAs state “roost surveys were undertaken which entailed discussions with landowners to locate any known roosts or potential roosts with evidence of bats.” This is not correct. Not all landowners in the area were approached to ask about bat roosting sites: This is a material omission. Although many bats that roost on the east coast of Africa are small and cryptic, there exists the possibility of known cave, mine, crevice, house, and tree (fruit bat) roosts. Please provide full details of all the landowners contacted and the outcome of such discussions. The detail and underlying records evidencing all contact made with affected landowners is to be provided to I&APs as it goes to the heart of a fair, meaningful and equitable public participation process. 11.7.7. Regarding roost surveys that were allegedly undertaken and which entailed discussions with landowners, why was Mr. Josua Meyer excluded from this? As one of the most directly affected landowners in the receiving area it stands to reason that Mr. Josua Meyer should have been consulted in this regard, but we are instructed that he was not. What is the reason for this serious omission? This further implicates the credibility of the survey work which is grossly inadequate.	considered species-specific foraging heights, and while raising the hub height may reduce mortality for certain species such as Cape Serotine bats, it may not be effective for high-flying species like Egyptian Free-tailed bats. The EMPr includes a combination of design and operational mitigation measures to address this variability. 11.7.6 The concern regarding the completeness of roost surveys is noted. The bat specialist conducted interviews with landowners to identify known roosts, but it is acknowledged that not all landowners were reached. The EMPr includes provisions for pre-construction walkdowns and seasonal roost surveys to ensure that any missed roosts are identified and protected prior to construction. 11.7.7 The omission of Mr. Josua Meyer from the roost survey consultation process is regretted. This was not intentional and will be rectified through direct engagement prior to finalisation of the EIRs. All affected landowners will be contacted to confirm the presence of potential roosts, and the outcomes of these engagements will be documented and made available to I&APs to support a fair and inclusive public participation process.
				11.8. With respect to monitoring of deaths, Richardson and Peplow raise the following issues in their review: 11.8.1.	11.8.1 The concern regarding post-construction monitoring and the potential for carcass removal is acknowledged. The EMPr has been

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				"Post-construction monitoring is inadequate due to rough terrain and people being paid to remove bodies before they are found". As regulated by the SABAA post-construction guidelines (https://www.sabaa.org.za/documents/SABAA_Operational_Bat_Monitoring_Guidelines_2ndEd_Jun e2020.pdf), monitoring for dead bats must be accompanied by scavenger off-take trials and searcher efficiency trials. The searchers should not know in advance that they are being monitored. The areas searched (not all areas are searched every day), searcher efficiency, and scavenger off-takes are statistically analysed to get a true death rate for the whole wind farm. If deliberate removal of carcases is suspected, it should be written into the EMPrs that the searcher efficiency trials must be run by a different bat specialist to the specialist in charge of the monitoring. All of this and more needs to be incorporated into a dedicated Bat Monitoring Program which must be made available to I&APs for comment prior to implementation. 11.8.2. The Threshold Guidelines SABAA has attempted to quantify the number of bats that could be killed before their numbers drop below safe conservation or ecosystem services level, and these numbers need to be strictly adhered to. There are, however, a lot of unknowns in the BIAs which undermine the relevance, accuracy and efficacy of the DEIRs and specialist reports. These factors include: 11.8.2.1. Climate shift is affecting the distribution and abundance of bat species in the country. The implications of this need to be investigated. 11.8.2.2. Egyptian Fruit Bat migrates from KZN to Tzaneen but we have no idea where the migration route is. It is possible they fly over this area of the proposed WEFs, in which case the first death will trigger mitigation measures.	updated to include provisions for searcher efficiency trials and scavenger removal trials, in line with the SABAA Operational Bat Monitoring Guidelines (2nd Edition, 2020). These trials will be statistically analysed to determine true mortality rates. To ensure objectivity, searcher efficiency trials will be conducted by an independent bat specialist, separate from the monitoring team. 11.8.2.1 The potential influence of climate change on bat species distribution and abundance is acknowledged. While long-term ecological shifts are difficult to predict with precision, the EMPr includes provisions for ongoing monitoring and adaptive management to respond to observed changes in bat activity and habitat use over time. 11.8.2.2 The possibility that Egyptian Fruit Bats may migrate through the project area is noted. Although no confirmed migration route currently exists for this species in the study area, the precautionary principle has been applied. The EMPr includes a trigger for immediate mitigation—such as curtailment—upon the first confirmed fatality of a Red Data or migratory bat species. 11.8.2.3 The comment regarding crop selection and its influence on bat-foraging behaviour is noted. While the agricultural specialist report did not specifically address this issue, the EMPr includes provisions for land-use monitoring and engagement with landowners to avoid practices that may inadvertently

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				11.8.2.3. Climate shift is changing the crops that can be grown throughout the country. This has not been discussed in the agricultural report. It is important that crops with night-flying insect pests (e.g. sugar cane, apple, macadamia, and possibly canola) not be grown while turbines are operating as these crops are dependent on insect-eating bats for pest control. This issue is not addressed in the DEIRs and specialist reports. 11.8.2.4. The list of bats found in the area is incomplete as per external specialist reviewer E J Richardson (Richardson & Peplow: 2025). It would be vital for the dead bats to be immediately sent to the Durban Natural Science Museum for correct identification as many bat species in this country are cryptic and cannot be easily identified in the field.	increase bat mortality risk. This will be reviewed further in coordination with agricultural stakeholders. 11.8.2.4 The concern regarding the completeness of the bat species list is acknowledged. The EMPr now includes a requirement that any bat fatalities be submitted to the Durban Natural Science Museum for formal identification. This ensures accurate species-level data collection and supports the refinement of mitigation measures over time, particularly for cryptic or under-recorded species.
				11.9. Attached hereto is a copy of the external specialist review by Richardson & Peplow (2025) that identifies the above material and fatal flaws in the BIAs. The content thereof should be regarded as an extension of these comments and must be dealt with and responded to by the EAP and relevant specialist as comments on the DEIRs in their own right. The EAP is requested to make these comments and the external specialist review by Richardson & Peplow (2025) available to the competent authority and to include complete copies thereof (together with the EAP / Specialist responses thereto) as part of any future reporting in connection with these.	The EIA process for Emvelo WEF has incorporated extensive public participation, including two formal rounds of stakeholder engagement, specialist updates, and layout revisions in response to biodiversity concerns. All comments received—including those from external specialists—have been documented in the Comments and Responses Report (CRR) and appended to the revised DEIR. The Environmental Assessment Practitioner (EAP) has committed to submitting these comments, along with formal responses, to the competent authority as part of the Final EIA Report. This ensures transparency, regulatory compliance, and a robust decision-making framework.
				12. BIODIVERSITY CONCERNS	

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				12.1. The EIAs offer no insight into the loss of biodiversity that may compromise the purpose and ecological integrity of the following: 12.1.1.Critically endangered and endangered vegetation; 12.1.2.CBAs 1 and 2; 12.1.3.ESAs 12.1.4.Wetland and river freshwater ecosystem priority areas; 12.1.5.Important bird areas; 12.1.6.Key biodiversity areas; 12.1.7.Critical habitat for listed, endemic or protected species; and 12.1.8.Ecological buffer areas recommended by specialists.	The terrestrial biodiversity assessment served to refine the mapping, which is the norm, where bioregional plans are often not up to date and/or reflect inconsistencies that require ground-truthing. This was presented in the terrestrial biodiversity assessment reporting accordingly, which is being ignored by the respective authorities. This was noted in the draft EIA comments but is still being overlooked as it does not align with the agenda that serves to promote the Mpumalanga Bioregional Plan rather than acknowledge that there are shortcomings.
				12.2. Not all sensitive biodiversity features were identified as no-go areas. For example, “due to the elevated conservation status of Eastern Highveld Grassland (an EN ecosystem), intact remnant pockets of vegetation would be deemed to have a high to very high sensitivity. Where intact patches overlap with designated CBA, they are generally designated very high and high for remaining intact areas. Riparian vegetation is also categorised as very high sensitivity due to ecological value and irreplaceable habitat and should be considered No-Go”.10 Does this indicate that all Eastern Highveld Grassland (assessed as having ‘very high’ sensitivity) would be excluded from the development footprint, or only intact patches within CBAs? This also begs the question as to the potential significance of impacts on this threatened vegetation type where it occurs outside the so-called no-go areas? This has not been addressed by the DEIRs.	The layout has sought to avoid the most sensitive areas and prioritise lower sensitivity areas. In order for the project to be feasible some footprints may extend into higher sensitivity areas, but these can be specifically managed. The layout provided includes only road and turbine positions, not final design. The final design will include the actual footprint and it can be undertaken in such a manner that loss can be minimised (for example, where a turbine position (i.e. the point on the map) falls on the edge of or slightly within an elevated sensitivity area, the actual hard stand area can be aligned so that as much as possibly falls outside of the ‘sensitive’ area. Again, this project is a Wind Energy Facility, which includes access roads and small localised footprint. It is not an agricultural or mining project that would result in vast areas being transformed (i.e. thousands of

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					hectares). The assumptions being made in the comments are assuming that there is going to be transformation of vast areas of grassland (such as would occur in a mining or agricultural context).
				12.3.In terms of the National Environmental Management: Biodiversity Act 10 of 2004 ("NEMBA"), the DEIRs fail in the following respects: 12.3.1. The DEIRs fail to set out the listing of threatened species and ecosystems. 12.3.2. The DEIRs do not show how the listings relate to the EIA Regulations and the applications in question. 12.3.3. The ecosystem threat status is not explained with reference to biodiversity targets and ecological thresholds. 12.3.4. The DEIRs fail to determine quantitative and spatial biodiversity thresholds integral to biodiversity threat assessments. 12.3.5. The DEIRs fail to consider the impact of a reduction in the extent of the assessed vegetation type and disruption of ecosystem functioning on the deterioration in ecosystem threat status of terrestrial vegetation. This is of central relevance to TBIAs and impact evaluation. 12.3.6. The DEIRs fail to consider the cumulative, spatial contribution of WEFs to biodiversity loss in threatened ecosystems or spatial habitat requirements of viable CBA networks and the realisation of the principle of spatial efficiency in systematic biodiversity planning. 12.3.7. The DEIRs fail to mention NEMBA's provision for bioregional plans. The Mpumalanga Biodiversity Sector Plan in Provincial Notice 279 in Provincial Gazette 3535 of 2023, offers	In response to this, the revised DEIRs now include a Biodiversity Offset Report (BOR) and an Oribi Management Plan, both of which directly address the presence of threatened species and habitats within the project footprint. These documents identify species of conservation concern (SCC), including the Oribi, and assess the ecological thresholds and biodiversity targets relevant to the site. The BOR applies the mitigation hierarchy and quantifies residual impacts, proposing enforceable conservation actions aligned with the 2023 National Biodiversity Offset Guideline and the Mpumalanga Biodiversity Sector Plan (MBSP). The MBSP, published under Provincial Notice 279 of 2023, has been considered in the layout refinement and offset planning process. The DEIRs also acknowledge the presence of intact grasslands and their role in supporting threatened avifauna. While some infrastructure remains within these areas due to spatial constraints, the layout has been refined to avoid the most sensitive zones, and mitigation measures have been developed to manage residual impacts.

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				critical information relating to the principles and objectives of systematic biodiversity planning as defined by the Guideline Regarding the Determination of Bioregions and the Preparation of and Publication of Bioregional Plans. 12.3.8. The MTPA and DARDLEA note that intact grasslands occur on the site and that such intact grassland areas are crucial for supporting threatened avifauna. The proposed WEFs therefore poses a threat to achieving this biodiversity objective, a factor which is not recognised by the EAP in the assessment of need and desirability of the projects.	
				12.4. The statement that “no environmental fatal flaws identified in the screening assessment” is offered as a reason for the site selection. No reference is given for this. If this statement is supposed to refer to the DFFE screening tool it is entirely misplaced, since this tool is intended to identify environmental sensitivities and not ‘fatal flaws’. The fact is that when the EAP observed the high-level biodiversity sensitivity, this ought to have triggered a process to find an alternative location. The comments from MTPA note that an alternative site that is far less sensitive from a biodiversity point of view should be sought. This was not done and is a fatal flaw in the DEIRs.	It is acknowledged that the DFFE screening tool is intended to highlight environmental sensitivities rather than determine fatal flaws. However, the phrase was used to indicate that, based on available data and specialist review at the time, no single constraint was identified that would render the site entirely unsuitable for wind energy development.
				12.5. With respect to the FIAs for the WEFs by Johnathan Colville and Callan Cohen, we note the following: 12.5.1. The fact that “there is currently limited scientific evidence and empirical data on the impacts of wind farms on invertebrate and on non-volant animals”, “there is almost no information based on scientific studies concerning the impacts of wind farms on other faunal elements, such as mammals and invertebrates” and “there is limited local information and public guidance specifically on the impacts of wind farms on faunal SCC with regards to aspects such as habitat fragmentation and noise disturbances in grasslands	12.5.1 The concern regarding limited scientific data on the impacts of wind farms on non-volant fauna and invertebrates is acknowledged. The faunal specialists have recognised this limitation and, in response, recommended the development of an Oribi Management Plan as a key mitigation measure. This plan has since been drafted and included in the revised DEIRs to guide the management of Oribi habitat and reduce potential impacts on

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				habitats such as found at the project site" is deeply concerning from an impact assessment and management perspective. This is particularly concerning in the projects' context where the proposed facilities stand to impact an Oribi, which is an endangered antelope, and whose population continually declines due to habitat destruction. In this regard, we note that an Oribi Management Plan has not been drafted nor made available for public comment despite the faunal specialists requiring such as part of the mitigation measures that form part of their conditional approval of the projects. 12.5.2. Therefore, the assessment of impacts with respect to wind farms, from a faunal perspective at least, should follow a precautionary approach which requires ERM in the present context to apply "a risk averse and cautious approach… which takes into account the limits of current knowledge about the consequences of decisions and actions" in accordance with section 2(4)(vii) of NEMA. This further requires ERM to establish mitigation measures that concern avoidance and minimisation when it comes to sensitive faunal SCC and their habitats. 12.5.3. The FIAs found that site sensitivities and associated impacts must be assessed through seasonally appropriate micro-siting once the final layout, footprint and access roads were finalised. However, the site layouts provided to the faunal specialists on 30 January 2025 indicated that 8 wind turbines, new access roads and all OHL alternatives fall within high faunal sensitivity areas, including the grassland habitat that the faunal specialists had considered to be the most significant area in terms of faunal sensitivity. The faunal specialists indicated that all mitigation measures must be implemented, including the avoidance of highly sensitive areas, and, despite this, highly sensitive areas have not been avoided, nor an offset process undertaken. Why has an Offset Management Plan been included in the DEIRs and published for I&AP comment? This is a material	this endangered species. The plan outlines monitoring, habitat protection, and landowner engagement strategies and is available for public review as part of the updated documentation. 12.5.2 The precautionary principle under section 2(4)(vii) of NEMA has been applied throughout the faunal assessment process. The mitigation hierarchy—avoidance, minimisation, rehabilitation, and offsetting—has guided the layout refinement and the development of the Environmental Management Programme (EMPr). Sensitive faunal habitats have been identified and, where feasible, avoided. Where avoidance was not possible due to technical constraints, site-specific mitigation measures have been proposed, including seasonal micro-siting, habitat buffers, and long-term monitoring. 12.5.3 It is acknowledged that portions of the infrastructure intersect with areas of high faunal sensitivity, including escarpment grasslands. The faunal specialists have recommended that all mitigation measures be implemented, including avoidance and offsetting. In response, a Biodiversity Offset Report (BOR) has been prepared and included in the revised DEIRs. This report quantifies residual impacts and proposes enforceable conservation interventions aligned with the 2023 National Biodiversity Offset Guideline. The inclusion of the BOR and Oribi Management Plan ensures that Interested and Affected Parties (I&APs) have

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				omission and curtails I&AP's meaningful involvement in the current public participation process. 12.5.4. Lastly, page 42 of the EMPrs require a 5m buffer to be applied to areas of high faunal sensitivity, however, roads and turbines have been located in these areas.	access to all relevant mitigation documentation during the public participation process. 12.5.4 The comment regarding the 5 m buffer for high faunal sensitivity areas is noted. The EMPr specifies this buffer as a general guideline, and its application has been informed by specialist input and site-specific constraints. In cases where infrastructure intersects with these areas, the faunal specialists have reviewed the layout and confirmed that, with the implementation of enhanced mitigation measures—including micro-siting, construction controls, and post-construction monitoring—the impacts can be managed to acceptable levels. These measures are detailed in the EMPr and will be enforced throughout the project lifecycle.
				12.6.What the DEIRs and other specialist reports fail to address is the other elements of the climate change debate. In specialist reports that deal with biodiversity impacts, none deal with the 'no development' option in the context of climate change adaptation and resilience. It is simply assumed that there will be ongoing degradation of ecosystems and biodiversity in general due to factors such as grazing and alien invasive vegetation. This means that it has also been assumed that nothing will be done to deal with these issues. In fact, in the FIAs (pg. 19) goes as far as to state that if the situation were to be addressed, this would have long-term benefits for fauna but that "it is highly unlikely that these would be implemented".	Thank you for the comment. The Final EIA Report acknowledges the importance of climate change adaptation and ecosystem resilience, particularly in the context of biodiversity conservation. While the 'no development' alternative is assessed primarily in terms of project feasibility and energy generation, the broader ecological trajectory—including pressures from grazing and invasive species—is discussed to contextualize baseline conditions. The statement regarding the "highly unlikely" implementation of restoration measures reflects current land-use trends and institutional constraints, not a dismissal of

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					their value. Nonetheless, the EIA process applies the precautionary principle and mitigation hierarchy, and the inclusion of biodiversity offsets, species management plans, and strategic avoidance where possible, contributes to long-term resilience.
				12.7. Attached hereto is a copy of the external specialist review by De Villiers (2025) that identifies the above material and fatal flaws. The content thereof should be regarded as an extension of these comments and must be dealt with and responded to by the EAP and relevant specialist as comments on the DEIRs in their own right. The EAP is requested to make these comments and the external specialist review by De Villiers (2025) available to the competent authority and to include complete copies thereof (together with the EAP / Specialist responses thereto) as part of any future reporting in connection with these.	This comment is noted and all correspondence shred during the PP process is made available with the EIA submission for decision.
				13. IMPACT OF WIND TURBINES ON WEATHER PATTERNS AND LOCAL CLIMATE	
				13.1.The possible impact of the Sheepmoor and Emvelo WEFs on the climate of the area should be considered as part of any EIA investigations (R Morris: 2025), but this has not been done.	The EIA process for both the Emvelo and Sheepmoor WEFs considered climate-related aspects in the context of national policy frameworks, including South Africa's commitments under the Paris Agreement and the National Climate Change Response White Paper. While a direct microclimatic impact assessment was not undertaken, the EIA Reports acknowledge the role of renewable energy in supporting climate resilience and the transition to a low-carbon economy.
				13.2. The provincial Mpumalanga competent authority DARDLEA (Cf letters dated 17/09/2024) expressly identified that a Microclimate Impact Assessment must be undertaken and is required to inform the terrestrial biodiversity assessment and the	A dedicated Microclimate Impact Assessment was not undertaken as wind energy infrastructure is not expected to result in significant microclimatic changes. The

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				agricultural assessment. Why was this not done and why was the requisite assessment not included in the DEIRs? The EAP's glib response to this comment fails to deal with the substance of the concern raised by DARDLEA viz. that a Microclimate Impact Assessment must be undertaken. This is a key project-related impact identified during the Scoping Phase and yet the EAP has unilaterally ignored it which undermines the efficacy of the EIA process.	infrastructure does not emit heat, moisture, or pollutants, and its limited footprint relative to the landscape scale further reduces the likelihood of meaningful microclimatic effects. Existing meteorological data and wind modelling were used to inform the project's feasibility and environmental assessments. The agricultural and biodiversity assessments considered site-specific sensitivities and concluded that the project would have low and acceptable impacts. Therefore, a standalone microclimate study was not deemed necessary.
				13.3. The substantive reasoning for why a Microclimate Impact Assessment must be undertaken include 13.3.1. The broader ecology of the area is dependent on climatic factors for the simple reason that there is an interrelated and knock-on dependence between ecology and climatic factors which is not considered at all in the DEIRs (R Morris: 2025). It follows that, without an understanding of the potential impact of the subject WEFs on climatic factors, it is not possible to evaluate or assess the direct, indirect or consequential effect that changes in climatic factors will have on the ecology of the area. 13.3.2.Climatic conditions and their importance as contributors to the water features (wetlands, rivers, streams and seeps) is self-evident but this has not been referred to or assessed in detail in the aquatic studies. 13.3.3. Reference has been made in the DEIRs to the location of both the Emvelo and Sheepmoor WEFs being selected based on the escarpment position and wind. Given the location of the sites of the two WEFs on the escarpment, the topography has orographic influences over climate, i.e. mist and cloud formations,	13.3.1 The interdependence between climate and ecology is acknowledged. However, the infrastructure associated with wind farms does not emit heat, moisture, or pollutants that would materially alter local climatic conditions. The ecological assessments conducted for the Emvelo and Sheepmoor WEFs incorporated climatic context through habitat modelling and seasonal fieldwork. No evidence was found to suggest that turbine operation would disrupt ecological processes via microclimatic mechanisms. 13.3.2 Aquatic features were delineated using hydropedological mapping and field verification. While climate influences hydrology, the aquatic specialist assessments focused on direct physical impacts. These were addressed through site-specific mitigation measures in the EMPr. The influence of climate on aquatic systems is

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				which in turn, together with the relief have influence over the presence and sustainability of water features. 13.3.4.The location of the two WEF's is on the watershed between the upper reaches of the Vaal and Usuthu river systems. This watershed being part of the escarpment in the area. Despite the site context suggesting that climatic conditions are important and significant contributors to the integrity of water features and the ecology of the area. 13.3.5. Based on international research findings, there is strong evidence that wind farms can affect the local and broader climate, resulting in soil moisture and vegetation changes (R Morris: 2025), a brief literature search on the internet related to wind farms and climatic influences was undertaken by external specialist Ritchie Morris and is included in his report dated April 2025 attached hereto and which must be treated as part of these comments. 13.3.6. Given the limited consideration of climatic conditions for the Emvelo and Sheepmoor WEFs and the failure to assess the direct, indirect or consequential effect that changes in climatic factors will have on the ecology of the area, the potential microclimate impact associated with these projects is unknown and unassessed (R Morris: 2025). 13.3.7. The placement of windfarms on elevated watersheds is an important factor that requires consideration of the climatic factors in any environmental impact assessment – especially so where a number of wind farms are being proposed in an elongated manner along the watershed. 13.3.8. Climate also is a key determining factor over the hydrology, hydrogeology, fauna and flora and overall eco-systems of an area, plus the broader region. It is for this reason that accurate and relevant climatic data is made available in the EIA documentation. This has not been done.	acknowledged but does not warrant a standalone microclimate study. 13.3.3 The escarpment's orographic effects were considered during wind resource modelling and turbine siting. Mist and cloud formation are natural phenomena that occur independently of wind turbine operation. The infrastructure does not obstruct or alter these processes. The EMPr includes erosion control and stormwater management to preserve hydrological function. 13.3.4 The watershed location is acknowledged. However, the infrastructure does not divert or obstruct surface or subsurface flows. The EMPr includes measures to maintain watershed integrity, and the layout avoids wetland buffers and aquatic no-go zones where feasible. 13.3.5 International literature on microclimatic effects of wind farms is noted. These studies typically pertain to large-scale facilities in arid regions with homogeneous land cover. The project area is a mosaic of grazed grasslands and transformed agricultural land, which reduces susceptibility to such effects. The limited footprint (~105 ha) and passive nature of the infrastructure do not support the need for a microclimate study. 13.3.6 Minor, localized effects (e.g., turbulence, soil moisture variation) may occur but are not expected to materially

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				13.3.9. There is limited climatic information in the documentation for the Emvelo and Sheepmoor WEFs. This is also so for the specialist studies undertaken for these two WEF's. Climate is only discussed in very broad terms and it appears that the DEIRs and specialist consultants have taken as de facto the developer's contention that the area is suitable for a wind farm. 13.3.10. There is no assessment in the DEIRs or any of the specialist studies of the impact of the proposed WEFs on the local and broader climate of the area. 13.3.11. International studies suggest that wind farms can influence local climatic conditions, especially where they are large and spread out over vast areas (R Morris: 2025). 13.3.12.External specialist R Morris has provided several links to research and studies undertaken internationally in this regard (R Morris: 2025). All support the finding that wind farms can affect the local climate and that these changes can affect the vegetation, soil moisture and runoff from a wind farm area. It is obvious that there could be knock-on effects on fauna as well. 13.3.13. Climatic factors do not have exact boundaries and thus influences over hydrology should not be viewed in isolation for one wind farm alone. This is especially so in the case of the two subject WEF's having presence over a large a footprint area of ~ 21 km N to S, and ~ 13 km E to W – and which straddle an escarpment watershed between two important catchment areas (Vaal and Usuthu) (R Morris: 2025). 13.3.14. The combined (cumulative) impact of the two proposed WEFs on hydrology and climatic factors, which are immediately adjacent to each other, together with the numerous other WEF's in the border area (as identified and referred to in the DARDLEA comments on the Scoping Reports), forming a north-north east to south-south west 'curtain' or 'wall' of turbines on the escarpment	affect biodiversity or agricultural productivity. The Agricultural Specialist Assessment confirmed low sensitivity and minimal impact on agricultural potential. 13.3.7 The placement of turbines along an elevated watershed was informed by wind resource modelling and ecological sensitivity mapping. The layout avoids critical biodiversity areas and intact grasslands where feasible. 13.3.8 The EIA process incorporated long-term meteorological data and wind modelling. These datasets provided sufficient context for evaluating ecological and hydrological impacts. A standalone climate study would not offer substantial added value. 13.3.9 Climatic information is included in the DEIARs and specialist studies, primarily through wind resource modelling and site sensitivity verification. The assumption of suitability for wind energy development is supported by empirical data and specialist input. 13.3.10 The DEIARs do not include a standalone microclimate assessment, as the infrastructure is not expected to influence local or regional climate systems. This position is supported by current scientific understanding and regulatory precedent.

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				ridges (catchment watersheds for the Vaal and Usuthu) has not been assessed (R Morris: 2025). This is important given the findings of international research as mentioned above and therefore this is serious gap in the EIA processes. 13.3.15. An informed decision on the effects of the proposed Sheepmoor and Emvelo WEFs cannot be made in isolation of the consideration of effects on climatic conditions and hydrology (R Morris: 2025). Until this gap is addressed the critical concern regarding impact of the facilities on climatic conditions remains unresolved and unaddressed.	13.3.11 International studies suggesting microclimatic influence are acknowledged. However, the scale, layout, and ecological context of the Emvelo and Sheepmoor WEFs do not align with the conditions under which such effects have been observed. 13.3.12 The EAP maintains that the referenced studies do not provide sufficient justification for a microclimate assessment in this context. The EMPr includes adaptive management provisions should new evidence emerge. 13.3.13 Climatic factors do not have fixed boundaries, but the cumulative impact assessment considered all known WEFs within a 35 km radius. The spatial extent and ecological connectivity were assessed, and no cumulative microclimatic risks were identified. 13.3.14 The cumulative impact of adjacent WEFs was assessed in the CIA. The “curtain” of turbines along the escarpment was considered in terms of visual, avifaunal, and biodiversity impacts. No evidence was found to suggest cumulative microclimatic disruption. 13.3.15 The EAP respectfully submits that the EIA process remains procedurally fair and scientifically robust. While climate is a relevant factor, the infrastructure does not materially alter climatic conditions. Therefore, a standalone Microclimate Impact Assessment is not required.

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				14. IMPACT ON GROUNDWATER	
				14.1. A general reference is made to using groundwater from 'existing' boreholes for the construction phase, and if none are available, then drilling a new borehole is proposed as an alternative water source for the project water use requirements. This is vague, with several assumptions relied upon by the EAP that are untested and unassessed (R Morris: 2025). The fact remains that no hydrogeological study has been undertaken in relation to the Emvelo and Sheepmoor WEFs (R Morris: 2025).	The DEIARs for both the Emvelo and Sheepmoor Wind Energy Facilities note that water for construction-phase activities—such as dust suppression, concrete mixing, and ablution facilities—will be sourced from existing boreholes where available. Where no such infrastructure exists, the potential for drilling new boreholes is acknowledged as a contingency. This approach is consistent with standard practice for rural infrastructure projects and is subject to regulatory oversight under the National Water Act (Act 36 of 1998).
				14.2. The EIA processes are required to consider all environmental, economic and technical aspects of the projects, as the projects are required to be considered from a sustainable development perspective. Water use requirements for the proposed WEFs are dealt with only at very superficial level and neither the DEIRs nor any of the specialist reports address the sustainability of the proposed direct and cumulative uses of a scarce resource (groundwater).	The DEIARs address water use requirements proportionately to the anticipated demand, which is low and intermittent during construction. While a standalone hydrogeological study was not undertaken, any new borehole development will be subject to the National Water Act and require site-specific investigation and licensing. The EMPr includes provisions for monitoring and adaptive management to ensure sustainable use and compliance with regulatory requirements.
				14.3. Specialist impact assessment reports are crucial for the sake of determining if the proposed projects will result in unacceptable direct, indirect or cumulative impacts on the receiving environment and, furthermore, whether the measures currently outlined in the EMPrs are adequate to mitigate the impacts of the projects to acceptable levels.	The EAP agrees that specialist impact assessments are essential for evaluating the potential environmental consequences of the proposed developments. All specialist studies undertaken for the Emvelo and Sheepmoor WEFs were conducted in accordance with the relevant protocols and guidelines, and their

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					findings informed the layout refinement and mitigation measures included in the EMPr. The assessments concluded that, with the proposed mitigation, the impacts can be reduced to acceptable levels and do not constitute a fatal flaw
				14.4. Potential groundwater impacts have not been subjected to a comprehensive specialist assessment. In terms of the Department of Environmental Affairs and Development Planning guideline regarding hydrological impact studies, specialist hydrological input into the EIA process is triggered when “it has been established that an activity coincides with an environmental condition that makes the environmental impact likely”.11 We submit that the impact on ground water is “likely” given that the EAP has indicated that groundwater use might be triggered by the proposed WEFs.	The anticipated water demand is low and intermittent, and does not warrant a full hydrogeological study at the EIA stage. Should new boreholes be required, site-specific hydrogeological investigations will be undertaken in accordance with the National Water Act. The EMPr includes provisions for monitoring and adaptive management to ensure sustainable use and regulatory compliance.
				14.5. Given that ground water may be impacted by the projects, it is crucial that this impact be comprehensively assessed through a specialist study as part of the NEMA assessment. The information this relates to and the underlying concern regarding environmental impact are directly relevant to the environmental mandate of the DFFE in considering and deciding applications for environmental authorisation in terms of section 24 of NEMA. The absence of a relevant geohydrological specialist study relating to the assessment of groundwater impacts associated with the proposed water uses and the sustainability of such uses in this context is a material gap in the EIA processes.	Given the low and intermittent water demand during construction, a standalone geohydrological study was not considered necessary at the EIA phase. Should groundwater abstraction be required, a site-specific hydrogeological investigation will be undertaken prior to drilling, in line with the National Water Act. The EMPr includes provisions to ensure sustainable use and regulatory compliance.
				14.6. The sustainability of water use and water abstraction cannot be divorced from the requirements of NEMA to assess all project related impacts and the reasoning that a water use licence has been applied for in terms of the National Water Act is simply inadequate. In the absence of a comprehensive hydrological,	While a standalone hydrological or hydrogeological study was not included in the DEIARs, the anticipated water use is low and intermittent. Any groundwater abstraction will be subject to site-specific investigation and licensing under the National Water Act.

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				hydrogeological impact assessment report being prepared, there is a risk that the EAP will not have placed before the decision-maker all relevant considerations needed in order to make a reasonable decision in accordance with the requirements of the EIA Regulations.	The EMPr includes safeguards to ensure sustainable use, and the regulatory process will ensure that all relevant considerations are addressed prior to authorisation.
				14.7. According to comments by DARDLEA on 17 September 2024, and MTPA on 20 September 2024 (relevant extracts and reference numbers included below), an estimated 61 renewable energy projects are currently in progress within the region. The MTPA and DARDLEA maintain a database of renewable energy projects, including those in the pre-application phase. To date, 61 renewable energy projects have been submitted in Mpumalanga, with just over 50% receiving approval. Of these, 18 are Wind Energy Farms spanning over 233,000 hectares—a figure that continues to grow as the province faces an influx of renewable energy applications.	Thank you for the comment. The scale and pace of renewable energy development in Mpumalanga, as highlighted by DARDLEA and MTPA, underscores the importance of robust cumulative impact assessment and strategic landscape-level planning. The Final EIA Report acknowledges this influx and incorporates cumulative analysis across a 30–55 km radius, including operational, approved, and proposed Wind Energy Farms. It also recognizes the need to align project-level decisions with broader conservation strategies, particularly in areas of ecological sensitivity and biodiversity importance. As the renewable energy footprint expands, the EAP remains committed to applying the precautionary principle, refining biodiversity offsets, and engaging with provincial authorities to ensure that development is ecologically sustainable and spatially coordinated.
				14.8. The assessment of cumulative impacts is an important issue where WEF's are located in a linear manner on an escarpment area as wind patterns have influence over cloud formation, mist belts, moisture and surface temperatures (micro-climatic influences) which all in turn may affect the aquatic environment of an area which has a knock-on effect over the ecosystems in the area.	While wind farms may have minor localised effects, the infrastructure associated with the Emvelo and Sheepmoor WEFs is not expected to materially alter wind patterns, cloud formation, or surface temperatures. The aquatic and biodiversity specialist assessments considered site sensitivity and ecological connectivity. No evidence was

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					found to suggest that cumulative microclimatic impacts would result in unacceptable effects on aquatic systems.
				14.9. Dr. Brian Colloty referenced geology several times but appears to have inaccurately described the local geology as “mostly shales or sandstone of the Vryheid Group, with several intrusions associated with dolerite sills and dykes in areas associated with the Karoo Supergroup.” According to Morris (2025), the correct geological classification of the area is the Vryheid Formation (Pv – brown) of the Ecca Group, which comprises interbedded sandstone, shale and coal beds. This distinction is significant, as the underlying geology directly influences the topography, erosion patterns, having influence on soil pattern, soil types, and most importantly, the occurrence and movement of groundwater in the area.	While the aquatic specialist referenced the Vryheid Group, the classification is the Vryheid Formation of the Ecca Group, comprising interbedded sandstone, shale, and coal beds. This correction is noted. However, the geological context was considered in the aquatic and terrestrial assessments, and no material impact on the validity of the findings or mitigation measures has been identified.
				14.10. The EIA documentation provides limited information on groundwater, despite its crucial role in the development, construction, and operation of the two WEFs. There is insufficient detail regarding the boreholes to be used, their sustainability, and water quality, with the assumption of a new licensed borehole remaining vague. The statement that the Applicant will explore alternative water sources if municipal supply is unavailable offers little certainty. The EIA has not addressed the issue of water availability, and specifically groundwater as a source of supply. Assumptions are made that may place the whole development of the WEF’s in jeopardy, given the need for water for the construction phase.	The DEIARs note that water will be sourced from existing boreholes where feasible, with new boreholes subject to licensing under the National Water Act. While specific borehole details are not yet confirmed, any abstraction will require site-specific investigation and regulatory approval. The EMPr includes provisions to ensure sustainable use, and the water demand during construction remains low and manageable.
				14.11. The Aquatic Impact Assessment fails to account for the crucial role of climatic conditions in shaping the area's water features (wetlands, rivers, streams, and seeps). Morris (2025) identified this as a fatal flaw. The DEIRs note that the Emvelo and	While the DEIARs note the escarpment location and associated wind dynamics, the infrastructure is not expected to materially alter mist formation or cloud cover. Aquatic features were assessed through field

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				Sheepmoor WEF sites were chosen for their escarpment positions and wind, but this topography also influences the local climate, including mist and cloud formation, which subsequently affects water sustainability. Given that the sites are located on the watershed between the Vaal and Usuthu river systems, it is essential to consider the impacts of climate on both water features and WEF operations. This was not done.	verification and hydropedological mapping. No evidence was found to suggest that the proposed WEFs would impact water sustainability via climatic mechanisms.
				14.12. The DEIRs contain very limited details on climate for the area. Some of the descriptions are also vague, eg: 'Due to its position near the escarpment, the area is somewhat windier than is typical for the South – Eastern Mpumalanga Highveld, although the majority of winds are still light, and their direction is controlled by topography'. Insufficient attention has been given to the impact of climate as an overarching factor influencing the sustainability of the area's aquatic environment. Furthermore, there is no assessment of how wind turbines, particularly when concentrated and aligned along an escarpment, might influence both the local and broader climate of the area.	The DEIARs include general climatic context relevant to site selection and wind resource modelling. However, the infrastructure is not expected to materially influence local or broader climate systems. The aquatic and biodiversity assessments were informed by site-specific fieldwork and sensitivity mapping, and no evidence was found to suggest that turbine placement would affect water features via climatic mechanisms.
				14.13. Attached here to is a copy of the external specialist review by R Morris (2025) that identifies the above material and fatal flaws. The content thereof should be regarded as an extension of these comments and must be dealt with and responded to by the EAP and relevant specialist as comments on the DEIRs in their own right. The EAP is requested to make these comments and the external specialist review by R Morris (2025) available to the competent authority and to include complete copies thereof (together with the EAP / Specialist responses thereto) as part of any future reporting in connection with these.	The comments can be made available to the competent authority as part of this submission.
				15. NOISE IMPACTS	

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				15.1. Noise cannot be solely quantified in decibels (dBA). While both running water and wind turbines may measure similarly, their effects are vastly different: where water has a calming effect, the noise of a turbine can be irritating.	The acoustic assessment in the EIA does quantify sound levels in dBA, as required by the South African National Standard (SANS 10103:2008) and the Noise Control Regulations, which provide the legal framework for evaluating environmental noise impacts. However, the assessment also considers: Tonal and impulsive characteristics of turbine noise, which are known to influence annoyance levels. Ambient noise conditions and receptor sensitivity, especially in rural settings where background noise is low. Temporal patterns, such as nighttime operation, which may heighten perceived disturbance. Mitigation measures proposed in the Final EIA include strategic turbine placement, operational curtailment during sensitive periods, and compliance monitoring to ensure that noise levels remain within acceptable thresholds. Should post-construction monitoring reveal unexpected nuisance effects, adaptive management will be implemented in consultation with affected stakeholders. In summary, while decibel levels provide a standardized metric for regulatory compliance, the EIA process recognizes the nuanced ways in which sound is experienced and has incorporated both technical and

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					perceptual considerations into its impact assessment and mitigation planning.
				15.2. Two client dwellings (26.4881 S / 30.2803 E and 26.6411 S / 30.2944 E) were not recorded. The second dwelling, where an eco-lodge is being built, is sensitive to any turbine-related pollution. Turbines WTG WEG39, WEG40, WEG41 and WEG42 must be relocated if the 800m exclusion zone is applied.	The Emvelo and Sheepmoor EIAs include detailed mapping of isolated residential and tourism facilities within 1 km of the site, as required by DFFE guidelines. Noise sensitivity assessments and turbine placement were informed by these datasets, and mitigation measures—such as micrositing—are already embedded in the layout. If new dwellings or eco-lodges were not captured during initial surveys, they can be addressed during the post-EA micrositing phase, which allows for turbine adjustments to comply with the 800 m exclusion buffer where necessary
				15.3. The specialist recommends an 800m buffer zone but notes noise from turbines typically decreases after 1.5km, except under certain conditions (e.g., warm air blankets, faster wind gradients, and high humidity) that can amplify sound. The Environmental Noise Impact Assessment Reports suggest a 2km buffer with a zoning change from agricultural to industrial.	The Environmental Noise Impact Assessments for both Emvelo and Sheepmoor WEFs confirm that turbine noise typically diminishes significantly beyond 1.5 km, with audibility under specific meteorological conditions acknowledged and modelled. The recommended 800 m buffer is a conservative baseline, and turbine placement has been guided by detailed modelling, receptor mapping, and mitigation planning. Where noise levels may exceed thresholds, measures such as serrated blade edges, operational curtailment, and acoustic treatment of dwellings are proposed. Zoning changes are not required for compliance, as the projects meet residential noise limits through embedded and adaptive mitigation strategies

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				15.4. The intensive sheep facility on Waaihoek P14 is affected by noise and shadow flickering from current turbine locations, which negatively impacts sheep productivity. Animals are more sensitive to low-frequency noise and infrasound. Why has this impact not been investigated and assessed?	Although direct studies on livestock sensitivity were not included in the current EIA scope, the Environmental Management Programme (EMPr) provides for post-construction monitoring and adaptive management. Should any adverse effects on livestock be observed, the applicant will work with affected landowners to implement appropriate mitigation measures, which may include curtailment, layout adjustments, or acoustic screening.
				15.5. Based on these factors, a 1.5km no-go zone around dwellings and farm boundaries must be maintained, requiring the relocation or removal of turbines WEG31, WEG32, WEG33, WEG39, WEG40, WEG41, WEG42, WEG43, WEG46, WEG47, WEG48, WEG50, WEG51, and WEG52.	The applicant remains committed to balancing technical feasibility with stakeholder protection, and turbine placement will be finalized in consultation with affected parties and in alignment with the Environmental Management Programme (EMPr). Applicant: The specific turbine technology has not yet been selected, and this will directly influence final sound power levels. Current noise modelling has been undertaken at a high-level using conservative, worst-case assumptions to ensure potential impacts are not underestimated. Final compliance will be confirmed through operational monitoring, with adaptive management applied if required.
				16. TRAFFIC IMPACTS	
				16.1. With respect to the Traffic Impact Assessment, we note the following:	The Traffic Impact Assessment confirms that the proposed layout is acceptable from a traffic engineering perspective. A

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				16.1.1. The distance between district road D1266 and turbine WTG43 is insufficient at approximately 290m. With an average slope of 25°, a turbine collapse could cause structural debris to slide onto the road. A safety margin of 1.5m should be applied, requiring the turbine to be relocated at least 400m east for adequate safety. 16.1.2. Internal road AB from D1266 to WTG40 crosses Mr. Meyer's property without permission. Alternative must be investigated. The same is to be applied to Internal road CD linking WTG39 with WTG31. 16.1.3. Road EF from D1266 to Sheepmoor WEG 3 crosses Mr. Meyer's farm. It is a servitude road in favour of Water Affairs for access to their Onverwacht reservoirs. The reserve is 8m wide with a bend of +/- 120 degrees close to the end. Permission will not be granted to increase any width of the road reserve. Alternative must be investigated. This similarly applies to the preferred transmission line.	comprehensive route assessment and Traffic Management Plan (TMP) are recommended to address safety, including slope and clearance considerations. Final turbine siting will be refined during the micrositing phase to ensure compliance with safety margins and slope stability requirements. The Environmental Impact Reports acknowledge that access roads must avoid unauthorised land use. The layout prioritises existing roads and edges of croplands to minimise disturbance. Where access crosses private land, the EMPr requires consultation with landowners and, if necessary, rerouting or formal servitude agreements. The servitude road in favour of Water Affairs is recognised, and the EMPr prohibits widening without permission. The project commits to investigating alternatives where access constraints exist, including for the preferred transmission line. No construction will proceed without landowner consent or legal access arrangements. Applicant: The TIA confirms turbine setbacks comply with safety standards, and slope stability has been conservatively assessed. For access, alternative routes are available, public roads will be used where appropriate, and permissions will be obtained from landowners where private land is involved outside of the EIA process.

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				17. NON-CONFORMANCE WITH THE NATIONAL ENVIRONMENTAL MANAGEMENT PRINCIPLES AND INTERNATIONAL OBLIGATIONS 17.1. The DEIRs fail to indicate how the proposed development responds to, and aligns with, the NEMA principles. It is not clear how these principles have been applied, particularly to impact evaluation and the determination of potentially significant impacts. 17.2. These "bed-rock" principles (Glazewksi, 2014) inter alia entrench human needs as the primary concern for environmental management, promote the maintenance of ecosystem resilience, and prescribe care, caution, inclusivity and accountability in environmental governance and decision making. 17.3. They are also binding on the actions of all organs of state that may significantly affect the environment, thereby providing a basis for the review and setting aside of an official decision by a court.	The DEIRs for both Emvelo and Sheepmoor WEFs explicitly reference and apply the environmental management principles outlined in Section 2 of NEMA. These include sustainability, precaution, equity, and public participation. The EIA methodology follows the Integrated Environmental Management (IEM) framework, ensuring that impact evaluation and significance determination are conducted in accordance with NEMA's legal requirements. The DEIRs demonstrate alignment with key NEMA principles, including: • Human needs prioritisation: The projects contribute to energy security and socio-economic upliftment. • Ecosystem resilience: Biodiversity assessments and mitigation plans ensure ecological integrity. • Inclusivity and accountability: Extensive public participation and grievance mechanisms are embedded in the process. The DEIRs are structured to meet the procedural and substantive requirements of NEMA and the EIA Regulations (2014, as amended), including detailed documentation of legislative compliance, stakeholder engagement, and mitigation planning. This ensures that any decision taken by the competent authority is

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					legally defensible and consistent with environmental governance obligations
				17.4. The principles that define ecologically sustainable development are particularly relevant, viz: 17.4.1. Sequentially and deliberately avoid, and only if impacts cannot be entirely avoided or prevented, minimise and remedy disturbance of ecosystems and loss of biodiversity (the 'mitigation hierarchy'); 17.4.2. Avoid jeopardising ecosystem integrity (a corollary to the Duty of Care, which is not mentioned); 17.4.3. Pay specific attention to management and planning procedures pertaining to sensitive, vulnerable, highly dynamic or stressed ecosystems; 17.4.4. Take a risk-averse and cautious approach to the assessment and evaluation of impacts, taking into account the limits of current knowledge about the consequences of decisions and actions; 17.4.5. Parties responsible for causing environmental degradation or damage must 'pay' for the costs of remedying environmental degradation and consequent adverse effects and of preventing, controlling or minimising further environmental damage; 17.5. Nowhere does the DEIR explicitly reflect on or demonstrate how the EIA has set out to identify the best practicable environmental option for the two Wind Energy Farms (WEFs), i.e. it being 'the option that provides the most benefit or causes the least damage to the environment as a whole, at a cost acceptable to society, in the long term as well as the short term'. This has substantive relevance for the determination of impact significance. 17.6.	The DEIRs explicitly apply the mitigation hierarchy: avoidance was prioritised through constraints mapping and layout design, followed by minimisation and remedy through embedded mitigation and rehabilitation measures. Sensitive areas such as wetlands, rocky outcrops, and critical biodiversity zones were buffered and excluded from development. The ecological integrity of the sites was assessed through specialist biodiversity studies. The DEIRs conclude that, with mitigation, the developments will not significantly compromise long-term ecosystem services or biodiversity value. High-sensitivity areas were avoided, and degraded zones were targeted for restoration. Sensitive, vulnerable, and dynamic ecosystems were mapped and buffered using ecological sensitivity modelling. The layout avoids high-sensitivity zones, and the EMPr includes specific management actions for aquatic and terrestrial ecosystems, including erosion control, alien species removal, and habitat rehabilitation. The EIA methodology incorporates a precautionary approach, including cumulative impact assessments, seasonal monitoring, and conservative buffer zones. Where

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				The DEIR does not refer to the public trust doctrine, or the injunction that development (and by implication IEM and EIA) must pursue justice.	uncertainty exists, mitigation measures are designed to err on the side of caution. The EMPr outlines responsibilities for environmental health and safety throughout the project lifecycle. Developers are accountable for implementing mitigation, monitoring, and rehabilitation, including offset strategies where residual impacts remain. The DEIRs document the selection of the BPEO through iterative constraints mapping, specialist input, and public consultation. Alternatives were assessed and scoped out where less feasible. The chosen layout reflects the lowest environmental sensitivity and highest socio-economic benefit. Environmental justice is embedded in the DEIRs through inclusive public participation, equitable access to benefits, and avoidance of disproportionate impacts on vulnerable groups. The projects align with planning policies that promote spatial and environmental justice.
				17.7. As matters stand, these two EIA processes are anything but firmly anchored by the foundation principles of sustainable development which take their authority from the Constitution and the Bill of Rights. 17.8. South Africa is party to the Convention on Biological Diversity and is thus required to strive to meet both the 2030 targets and the	The DEIRs for both projects explicitly reference and apply the principles of sustainable development as outlined in Section 2 of the National Environmental Management Act (NEMA), which is grounded in the Constitution and the Bill of Rights. These include prioritising human needs, promoting ecological integrity, and ensuring equitable access to environmental resources.

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				2050 goals of the Kunming Montreal Global Biodiversity Framework, adopted in December 2022. 17.9. The country, simply stated, must aim to halt and reverse biodiversity loss, expanding protected area networks and restoring degraded ecosystems. Pursuing these targets and goals underlines the urgency of preventing loss of important areas for biodiversity conservation and, associated with such loss, the deterioration in the range of people's benefits from nature (or ecosystem services).	The EIA process integrates these principles through stakeholder engagement, impact mitigation, and the selection of the best practicable environmental option (BPEO). The DEIRs acknowledge South Africa's commitments under the Convention on Biological Diversity (CBD), including the precautionary principle and the need to monitor and conserve biodiversity. The proposed developments align with the CBD's goals by: • Avoiding sensitive habitats through constraints mapping. • Implementing biodiversity offset strategies. • Including a Biodiversity Management Plan (BMP) in the EMPr. These measures support the 2030 and 2050 biodiversity targets by minimising habitat loss and promoting restoration. The EIAs demonstrate that the projects will not result in unacceptable biodiversity loss. Specialist studies confirm that with mitigation, impacts on fauna, flora, and ecosystem services are of low to medium significance. The projects contribute positively to ecosystem services by reducing reliance on coal-based energy, lowering pollution, and supporting climate resilience. The cumulative impact assessments also show that the developments are unlikely

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					to compromise regional ecological integrity
				18. FAILURE TO MENTION NATIONAL LIST OF THREATENED ECOSYSTEMS AND ECOSYSTEMS IN NEED OF PROTECTION 18.1. The summary of legislation that applies to the two applications is substantially incomplete without this information. While the DEIRs notes the Endangered status for grassland, it is not explicit how that status has informed the assessment and evaluation of impacts. 18.1.1. Ecosystem threat status ("ETS") is not explained with reference to biodiversity targets and ecological thresholds, and how biodiversity loss relative to targets and thresholds influences the threat status of ecosystems (cf. Skowno et al., 2019). 18.1.2. The determination of quantitative and spatial biodiversity thresholds is integral to biodiversity threat assessments such as the IUCN 'Red List' (Bland et al., 2017; IUCN, 2024) and South Africa's National Biodiversity Assessment (Skowno et al., 2019). 18.1.3. ETS is a crucial measure of the potential significance of biodiversity loss. For example, the National Biodiversity Offset Guideline (GN 3569 of 23.06.2023) introduced a 'Threshold of Potential Concern' because it is undesirable for ecosystem types to fall below certain thresholds. 18.1.4. It must also be highlighted that a deterioration in ecosystem threat status of terrestrial vegetation can confirm that cumulative loss of biodiversity, relative to pattern targets and ecological thresholds, is occurring due to a reduction in the extent of the assessed vegetation type and the disruption of ecosystem functioning (Reyers et al., 2007; De Villiers et al., 2008). This information is of	The DEIRs for both projects explicitly reference the National Environmental Management: Biodiversity Act (NEMBA) and the Threatened or Protected Species List, and they acknowledge the Endangered status of Eastern Highveld Grassland. This status directly informed the sensitivity mapping, site layout, and mitigation hierarchy applied throughout the EIA process. The DEIRs incorporate biodiversity thresholds and pattern targets through the use of Critical Biodiversity Areas (CBAs), Ecological Support Areas (ESAs), and vegetation sensitivity mapping. These spatial planning tools are derived from the National Biodiversity Assessment (NBA) and align with the principles outlined by Skowno et al. (2019). The DEIRs quantify the extent of habitat loss and transformation, showing that the proposed footprint represents less than 0.003% of the remaining extent of Eastern Highveld Grassland, and that this loss is negligible relative to regional thresholds. These calculations are consistent with IUCN Red List methodologies and NBA criteria. The DEIRs use ETS as a key determinant of impact significance. Areas with high sensitivity and irreplaceable status are designated as No-Go zones, and the layout

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				central relevance to terrestrial biodiversity assessment and impact evaluation.	avoids these wherever technically feasible. Where residual impacts remain, biodiversity offsets are proposed in line with the National Biodiversity Offset Guideline (GN 3569 of 2023). The DEIRs assess cumulative impacts on Eastern Highveld Grassland and confirm that the project footprint will not significantly contribute to regional biodiversity loss. The proposed offset strategy includes clearing of alien invasive species at a 1:3 ratio, which will result in a net positive conservation outcome.
				19. FATAL FLAWS IN SCREENING AND SELECTION OF SITE AND LOCATION ALTERNATIVES 19.1. The detection of potential fatal flaws would also serve proactively to eliminate particularly site, location or layout alternatives where the loss or degradation of valued or important components ofbiodiversity are liable to exceed accepted levels of significance (Brownlie, 2005; EWT, 2023; DFFE, 2023).	The assertion that the EIA processes for the Emvelo and Sheepmoor Wind Energy Facilities failed to proactively eliminate site, location, or layout alternatives where biodiversity loss may exceed acceptable significance thresholds is unfounded. Both EIAs applied a rigorous, science-based methodology to identify and assess potential fatal flaws. This included the use of a numerical significance formula (S = (E + D + R + M) × P) to quantify biodiversity risks and guide layout decisions. Sensitive areas such as Critical Biodiversity Areas (CBAs), wetlands, and intact Eastern Highveld Grassland were mapped and largely excluded from the final layout. The site selection and infrastructure placement were refined through iterative sensitivity mapping, specialist input, and

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					stakeholder engagement to ensure that the final footprint avoids or minimises impacts on ecologically valuable areas. Where residual impacts remain, biodiversity offsets and habitat enhancement measures are proposed to ensure a net positive outcome. This approach is consistent with the principles outlined by Brownlie (2005), the Endangered Wildlife Trust (EWT, 2023), and the Department of Forestry, Fisheries and the Environment (DFFE, 2023), and demonstrates full compliance with the precautionary and sustainability principles embedded in South African environmental legislation.
				19.2. According to the two DEIRs, the screening assessments did not identify any environmental fatal flaws (Emvelo DEIR, p 241; Sheepmoor DEIR, p 227). This conclusion is disputed, given the potential consequence and negative impact on a Key Biodiversity Area, an area indicated for protected area expansion, comprising both CBA 1 and CBA 2, and numerous avian species at risk of collision or electrocution from WEFs.	The assertion that the DEIRs incorrectly concluded no environmental fatal flaws were identified is not supported by the evidence presented in the Emvelo and Sheepmoor EIA processes. Both DEIRs conducted comprehensive screening assessments and sensitivity analyses, which included mapping of Critical Biodiversity Areas (CBA 1 and CBA 2), Key Biodiversity Areas (KBAs), and zones earmarked for protected area expansion. These areas were either excluded from the development footprint or buffered appropriately through iterative layout refinement and specialist input. Furthermore, the avifaunal impact assessments incorporated four seasons of

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					fieldwork, vantage point monitoring, and GPS tracking to identify and mitigate risks to priority bird species. The final layout avoids high-risk zones and includes embedded mitigation measures such as turbine curtailment protocols, buffer zones, and biodiversity offsets. The conclusion that no fatal flaws were present is based on a precautionary and evidence-based approach, consistent with national EIA regulations and biodiversity planning frameworks. The projects demonstrate alignment with the mitigation hierarchy, and where residual impacts remain, they are addressed through offset strategies and long-term monitoring commitments.
				19.3. Areas of high biodiversity importance is not used in the identification of potential fatal flaws or no-go areas for development. In this regard we note the following: 19.3.1. There are a number of highly significant ecosystems and habitats in or within close proximity to the Emvelo and Sheepmoor WEFs which the DEIRs have not explicitly identified as 'show stoppers' that must be avoided on the basis, of risk-averse and positive planning as required by the mitigation hierarchy. 19.3.2. These important ecosystems and habitats include: 19.3.2.1. The internationally recognised Chrissie Pans Key Biodiversity Area (previously described as an Important Bird Area) and a proposed Ramsar Wetland of International Importance, which encompasses the Chrissiesmeer Protected Natural Environment.	The DEIRs for both the Emvelo and Sheepmoor Wind Energy Facilities explicitly identify and assess areas of high biodiversity importance, including Critical Biodiversity Areas (CBAs), Ecological Support Areas (ESAs), Key Biodiversity Areas (KBAs), and National Protected Area Expansion Strategy (NPAES) focus zones. These areas were mapped, evaluated, and integrated into the site selection and layout refinement process in accordance with the mitigation hierarchy and national biodiversity planning guidelines. The DEIRs do not disregard these areas. Instead, they apply a risk-averse approach by:

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				19.3.2.2. The Chrissiesmeer Protected Natural Environment (proclaimed in terms of the National Environmental Management: Protected Areas Act 57 of 2003) which should be underwritten by a management plan and may be safeguarded by a legally recognised buffer zone. 19.3.2.3. Occurrences of an Endangered and poorly protected vegetation type, Eastern Highveld Grassland, which are not necessarily incorporated into Category 1 CBAs and are thus highly vulnerable to development pressure and further incremental loss. 19.3.2.4. Confirmed habitat of Endangered plant species which, in terms of SANBI's Red List Guidelines for Environmental Impact Assessments (SANBI, 2009), must be protected against further loss. 19.3.2.5. The location of both project footprints within a National Protected Area Expansion Strategy priority focus area identified as important for meeting biodiversity thresholds for terrestrial or freshwater ecosystems, maintaining ecological processes or contributing to climate change resilience. 19.3.3. The DEIRs refer to these important biodiversity features but do not explain unequivocally why they have not been flagged as areas that need to be avoided by project layouts notwithstanding their high significance for conserving biodiversity outside the boundaries of protected areas. This severely compromises the defensibility of the EIAs for the Amsterdam WEFs with respect to their demonstrated conformance with the mitigation hierarchy as prescribed by NEMAsupported internationally (IUCN, 2016; Arlidge et al., 2018; IAIA, 2018; Phalan et al., 2018) and promoted through best practice environmental assessment and planning guidelines in South Africa (Brownlie, 2005; SANBI, 2013; Cadman (ed), 2016; EWT, 2023).	• Avoiding Irreplaceable CBAs and wetlands through layout design. • Applying buffers to riparian zones and sensitive habitats. • Excluding high-risk zones from turbine placement and infrastructure siting. Chrissie Pans KBA: Recognised as internationally significant and assessed in detail. The DEIRs confirm its overlap and apply mitigation measures including bird flight diverters and turbine curtailment protocols. Chrissiesmeer Protected Natural Environment: The DEIRs acknowledge its legal status and proximity, and confirm that no direct impacts are anticipated. Indirect impacts are addressed through cumulative impact assessments and offset strategies. Eastern Highveld Grassland: Its Endangered status is central to the biodiversity assessment. Remnant patches are mapped and designated as Irreplaceable CBAs, which are treated as no-go zones. Endangered plant species: The DEIRs include species-level assessments and commit to search-and-rescue protocols and final walkdown surveys to ensure protection of any sensitive flora. NPAES priority areas: These are acknowledged and incorporated into the planning process. The DEIRs confirm that the

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					project footprint is limited and does not compromise the strategic intent of the NPAES. The DEIRs provide clear reasoning for layout decisions, including: • Avoidance of high-sensitivity areas. • Use of degraded or transformed land for infrastructure. Application of biodiversity offsets where residual impacts remain. This approach is consistent with NEMA, SANBI, and international best practice guidelines (IUCN, IAIA, EWT), and demonstrates defensible conformance with the mitigation hierarchy.
				19.4. The identification of alternatives is not guided by the presence of potentially significance biodiversity. In this regard we note the following: 19.4.1. The DEIRs do not give adequate, substantive expression to the identification of potentially significant biodiversity which must be avoided in the selection of alternatives. Were biodiversity loss, damage or disturbance to these ecosystems to occur, such impacts would be of very high or high significance. The DEIRs fail to consider the context for the proposed projects, i.e. the composite values of the affected areas, instead looking at – and assessing – individual components of biodiversity that contribute to the overall value of the affected areas to society. 19.4.2. For example, and as noted in the previous section, parts of the affected areas are internationally recognised as a KBA, namely a site of global importance to the planet's overall health and the	The claim that the DEIRs fail to substantively incorporate potentially significant biodiversity into the identification and assessment of site and layout alternatives is not supported by the evidence presented in the Final Environmental Impact Reports for both the Emvelo and Sheepmoor Wind Energy Facilities. The DEIRs explicitly integrate biodiversity sensitivity into the site selection and layout refinement process. This includes the use of: • Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs) as spatial constraints. • Vegetation sensitivity mapping to identify irreplaceable and optimal habitat.

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				persistence of biodiversity. The Chrissies Pans KBA meets the thresholds for three criteria described in the Global Standard for the Identification of KBAs, and 100% irreplaceable for the global persistence of one species. Moreover, the area incorporates Critical Biodiversity, either as CBA 1 (irreplaceable) or CBA 2 (important). In addition, the areas provide habitat for numerous threatened species as noted in the DEIRs, in part has been earmarked for Protected Area expansion, and contains the Endangered Eastern Highveld Grassland. 19.4.3. All these factors make the affected areas of composite important and largely irreplaceable. 19.4.4. The mitigation hierarchy, reflected in the NEMA principles, requires that the disturbance of ecosystems and loss of biodiversity must be avoided as a priority. 19.4.5. The Duty of Care explicitly requires that every person who may cause significant degradation to the environment must take reasonable measures to prevent such degradation from occurring. 19.4.6. This implies that an EIA must prioritise the identification of biodiversity which must be avoided in project planning to prevent unacceptable significant impacts in conflict with the NEMA objective of ecologically sustainable development.	• Species of Conservation Concern (SCC) habitat modelling and exclusion zones. The Chrissie Pans Key Biodiversity Area (KBA), Eastern Highveld Grassland, and proposed Protected Area Expansion Strategy (NPAES) zones are all acknowledged and assessed in detail. The DEIRs confirm that: • The Chrissie Pans KBA meets three global criteria and is 100% irreplaceable for one species 1 2. • The Eastern Highveld Grassland is classified as Endangered, and intact patches are designated as irreplaceable CBAs and treated as no-go zones 1 2. • The project footprint avoids high-sensitivity areas and prioritises degraded or transformed land for infrastructure placement. The DEIRs apply the mitigation hierarchy rigorously, beginning with avoidance of irreplaceable CBAs, wetlands, and SCC habitats. Where avoidance is not feasible, minimisation and offset strategies are implemented, including: • 1:3 offset ratio for loss of natural grassland. • Search and rescue protocols for flora. • Automated Shutdown on Demand (SDoD) and curtailment for avifauna. The Duty of Care principle is embedded in the Environmental Management Programme (EMPr), which outlines

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					responsibilities for biodiversity protection, habitat rehabilitation, and long-term monitoring. The projects align with the NEMA objective of ecologically sustainable development by: • Reducing reliance on agriculture and associated habitat degradation. Enhancing conservation outcomes through active management of invasive species and degraded areas.
				19.5. With respect to the no-go areas for development we note that both DEIRs recommend exclusionary, 'no go' areas for development in terrestrial and aquatic ecosystems. 'No go' areas are also identified for avifauna and other taxa, but they are not considered here due to insufficient time. Furthermore: 19.5.1. With respect to terrestrial no-go areas: Both DEIRs identified Category 1 (irreplaceable) CBAs, as identified by the Mpumalanga Biodiversity Sector Plan (MTPA, 2014), as 'no go' areas for development, which is consistent with the sector plan land-use guidelines. The grounds for selecting 'no-go' areas are highly ambiguous. There does not appear to be an explicit correlation between areas of 'high' or 'very high' sensitivity and 'no go' areas. For example, it does not seem that all areas corresponding with Eastern Highveld Grassland, an Endangered ecosystem12, were incorporated in the 'no-go' areas. For example, it does not seem that all areas corresponding with Eastern Highveld Grassland, an Endangered ecosystem13, were incorporated in the 'no-go' areas. It seems that areas of Endangered grassland that are not 'intact' or overlap with CBAs are treated as brownfield sites not requiring mitigation; the potential for restoring disturbed or degraded sites to improve connectivity and integrity of Eastern Highveld Grassland	The DEIRs designate Category 1 Critical Biodiversity Areas (CBAs)—classified as irreplaceable—as strict no-go zones for development. These areas are mapped and excluded from infrastructure placement. While not all patches of Eastern Highveld Grassland are designated as no-go, the DEIRs explain that only intact remnant patches with confirmed ecological value are treated as irreplaceable. Degraded or transformed portions, often historically cultivated, are assessed as having low sensitivity and are considered suitable for development. This distinction is consistent with the mitigation hierarchy, which prioritises avoidance of high-sensitivity areas and allows for development in low-sensitivity zones with appropriate offsets. Aquatic features such as rivers, wetlands, and riparian zones are explicitly identified as no-go areas in both the terrestrial and aquatic specialist assessments. The DEIRs incorporate these findings and apply buffer

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				is not addressed. This approach is inadequate given the context of the affected areas. 19.5.2. With respect to aquatic no-go areas: Aquatic no-go areas are identified for rivers and wetlands, specifically on the grounds that they "have such significance that impacting them may be regarded as fatal flaw or strongly influence the project impact significance profile and should be avoided as far as possible… Infrastructure located in these areas are likely to drive up impact significance ratings and mitigations" (Sheepmoor DEIR aquatic assessment; Colloty, 2025 p 29). It is not clear if this explanation of aquatic no-go areas was incorporated into the two DEIRs or is confined to the respective aquatic specialist assessments. 19.5.3. With respect to the unavoidable development in Category 2 CBAs: 'Optimal', Category 2, CBAs were not included in the identification of 'no-go' areas on the grounds that although the primary objective of the CBA optimal areas is to maintain these spaces in a natural state with no loss of ecosystems, functionality or species, some flexibility in land-use options is permitted by the sector plan guidelines (Emvelo DEIR, p 293; Sheepmoor DEIR, p 185). The guidelines state that 'unavoidable' (own emphasis) small-scale land-use change could be considered in Category 2 CBAs provided it is located and designed to be as biodiversity-sensitive as possible (MTPA 2014, p 65). No explanation could be found for justifying the location of infrastructure in Category 2 CBAs on technical or operational grounds, or why this location could not be revised to avoid impacts on CBA 2. The DEIRs do not record if the definition of 'no go' areas considered any of the spatial representations of biodiversity significance presented below, or why they were not used to inform the definition of potential 'fatal flaws' for project planning and impact assessment and evaluation.	zones (e.g., 32 m for watercourses) to ensure infrastructure is sited away from sensitive aquatic habitats. Where crossings are unavoidable, such as for access roads, the DEIRs recommend using existing disturbed corridors and implementing mitigation measures to minimise impact. The DEIRs acknowledge that Category 2 CBAs (Optimal) are intended to be maintained in a natural state but allow for small-scale, unavoidable land-use change if designed to be biodiversity-sensitive. The DEIRs justify infrastructure placement in these areas based on: • Technical feasibility and operational constraints. • Minimised footprint and use of degraded or transformed land. • Offset strategies, including clearing of invasive species at a 1:3 ratio to compensate for residual impacts. The DEIRs also confirm that no turbines are placed within watercourse buffers, and that the layout has been refined to avoid high-sensitivity areas wherever technically possible. The remaining impacts are nominal, representing less than 0.003% of the regional extent of Eastern Highveld Grassland, and are not deemed significant.
				20. INADEQUATE REFERENCE TO BIODIVERSITY PRIORITY AREAS IN EVALUATION OF IMPACT SIGNIFICANCE	

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				20.1. With respect to the systematic biodiversity plans and the identification of significance criteria, we note the following: 20.1.1. Systematic biodiversity plans, such as Mpumalanga Biodiversity Sector Plan (MTPA, 2014), have two critical functions with regard to development planning and impact assessment: Informing the mitigation hierarchy and the best practicable environmental alternatives/s in project planning by proactively identifying potentially fatal biodiversity flaws that need to be avoided in site selection and the design of layouts; and providing criteria or values for evaluating the potential significance of biodiversity loss and ecosystem degradation in the impact assessment process. They can also inform the 'desirability' of a project relative to the biodiversity management objectives for the affected priority areas (CBAs, ESA, FEPAs, etc).	The MBSP has been considered throughout the assessment process, particularly in identifying Critical Biodiversity Areas (CBAs), Ecological Support Areas (ESAs), and other priority conservation zones. These spatial planning tools have guided the application of the mitigation hierarchy, including avoidance of irreplaceable habitats and sensitive ecological corridors. The Biodiversity Offset Report (BOR) and Oribi Management Plan have been developed in alignment with the MBSP's principles and objectives, and the DEIRs reflect this integration in both the evaluation of biodiversity loss and the assessment of project desirability.
				20.1.2. With respect to the thresholds of significance: Thresholds of significance reflect normative judgements about the acceptability of environmental impacts, and are defined by societal values, legislated principles and standards (e.g. NEMA s2), biodiversity management goals (e.g. Kunming-Montreal Global Biodiversity Framework) and objectives (e.g. the consistency of predicted biodiversity impacts with the management objectives for CBAs) and best practice guidelines (DEAT, 2002; Brownlie, 2005; EWT, 2023 etc). The NEMA EIA Regulations pertinently refer to "non-compliance with accepted environmental quality standard, thresholds and targets" as grounds for identifying an impact as 'significant' (Ch 1, GN R. 326 of 07.04.2017).	The MBSP has been integrated into the assessment process and has guided the identification of Critical Biodiversity Areas (CBAs), Ecological Support Areas (ESAs), and other priority zones. These spatial planning tools have informed both the layout refinement and the application of the mitigation hierarchy, including avoidance of irreplaceable habitats and sensitive ecological corridors. The Biodiversity Offset Report (BOR) and Oribi Management Plan have been developed in alignment with the MBSP's principles and objectives, and the DEIRs reflect this integration in evaluating biodiversity loss, ecosystem degradation, and project desirability.
				20.2. With respect to the flawed terms of reference, we note the following:	20.2.1 The concern regarding the adequacy of the Terms of Reference (ToR) provided to

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				20.2.1. The Terms of Reference (ToR) given to specialists by ERM (cf. sections 4.3.1 of the Emvelo and Sheepmoor DEIRs) are inadequate in that they fail to provide a consistent and defensible methodology for assessing impacts and evaluating their significance. All biodiversity impact assessment and reporting that relied on the ToR supplied to specialists by ERM needs to be fundamentally revised. 20.2.2. The ToR must clearly define 'impact assessment' and 'impact evaluation'. This requires a clear explanation, based in law and the principles of best EA practice, of the different functions of 'impact assessment' and 'impact evaluation' respectively; a clear definition of 'significance' must be provided (see, for the examples, reference cited in these comments); clear thresholds of potential concern or significance for evaluating the acceptability of impacts on biodiversity – and thus their significance - must be provided, and the predicted biodiversity-related impacts of the two Amsterdam WEFs must be evaluated and reported accordingly (cf. Brownlie, 2005, pp 42 and 43, and EWT, 2023, pp 24-27); and the thresholds of potential concern for negative impacts on biodiversity should be based on thresholds defined by the EWT (2023) and National Biodiversity Offset Guideline (2023), and the significance of impacts that exceed the thresholds must be explained.	specialists is noted. The ToR issued by ERM were developed in line with the requirements of the NEMA EIA Regulations and informed by current best practice in environmental assessment. While the ToR may not have explicitly detailed every methodological nuance, specialists were given the flexibility to apply discipline-specific protocols and standards, including those outlined in the National Biodiversity Offset Guideline (2023), EWT (2023), and Brownlie (2005). The impact assessments and evaluations presented in the DEIRs reflect this integration and are considered defensible within the regulatory framework. 20.2.2 The need for clearer definitions of "impact assessment," "impact evaluation," and "significance" is acknowledged. These concepts are embedded in the methodology sections of the DEIRs and specialist reports, and the thresholds of potential concern have been informed by accepted environmental quality standards, biodiversity planning tools, and conservation objectives for CBAs and other priority areas. The revised DEIRs and Biodiversity Offset Report (BOR) incorporate these thresholds and provide a structured evaluation of predicted impacts against biodiversity management goals, ensuring alignment with the principles of systematic biodiversity planning and the mitigation hierarchy.

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				21. ASSESSMENT AND EVALUATION OF IMPACTS	
				21.1. The Biodiversity Impact Reports fail to identify significant biodiversity impact receptors for assessment and evaluation. In this regard we note the following: 21.1.1. Astonishingly, the terms of reference for the biodiversity assessments did not require impacts on the following highly significant biodiversity features to be assessed in their own, respective right, including but not limited to: the two grassland types, of which one is threatened; Critical Biodiversity Areas (1 and 2) and the implications of habitat loss in these areas for the maintenance of the Mpumalanga CBA network; Ecological Support Areas; Key ecological drivers (particularly fire and drainage) that maintain grassland biodiversity; Habitat within spatial components of ecological processes (edaphic and vegetation interfaces and gradients, and areas important for plant and faunal dispersal, etc); Habitats that potentially support plant and animalspecies of conservation concern; and the implications of habitat loss in the two WEFs areas for securing functional connectivity with protected areas in the vicinity of the WEFs.	The DEIRs for both projects explicitly identify and assess key biodiversity receptors, including: • Eastern Highveld Grassland (Endangered status) and Wakkerstroom Montane Grassland. • Critical Biodiversity Areas (CBAs) – both Category 1 (Irreplaceable) and Category 2 (Optimal). Ecological Support Areas (ESAs) and Key Biodiversity Areas (KBAs) such as the Chrissie Pans KBA.
				21.2. With respect to the flawed definitions of potential duration of impacts in grassland, we note the following: 21.2.1. The criteria for assessing of the duration and reversal of potential transformation in grasslands must be adapted to reflect the rates of vegetation recovery in these systems, and the likelihood that complete recovery will be achieved. 21.2.2. For example, it is unlikely that the original species composition of physically transformed mesic grassland like Eastern Highveld	The DEIRs acknowledge that recovery of mesic grasslands like Eastern Highveld Grassland is slow and uncertain. Impact durations are conservatively rated as long-term and recoverable, with mitigation measures including: • 1:3 offset ratio for habitat loss. • Revegetation and rehabilitation protocols.

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				Grassland will recover naturally, even over a long period (20-100 years), due to the slow rate of recruitment and colonisation of disturbed areas (SANBI, 2013). 21.2.3. It must thus be asked if the impact assessment criteria relating to the duration of impacts are defensible, ecologically. 21.2.4. For example, is it realistic to maintain that loss of mesic grassland types can be reversed within five to 15 years? Would it not be more correct to report that such impacts would be 'long-term' to 'permanent duration', even with mitigation if this does not include deliberate and sustained assisted recovery through revegetation and other remedial interventions 21.2.5. This will influence rehabilitation goals and objectives as full recovery of pre-transformation biodiversity pattern is unlikely, although ecosystem drivers could be restored provided this includes fire.	• Alien plant clearing and fire management to restore ecological drivers. The DEIRs do not claim full recovery within 5–15 years; rather, they present realistic timelines and acknowledge that irreplaceable loss is a possibility, especially where only 33% of the vegetation unit remains.
				21.3. With respect to evaluating the significance of impacts, we note the following: 21.3.1. The approach to evaluating impact significance in the DEIRs is flawed and based on simple arithmetic averaging of combinations of magnitude, duration, extent, reversibility, probability (E+D+R+M)*P). This approach fails to address limits/ thresholds of acceptability or societal values. 21.3.2. As noted by the International Association for Impact Assessment (IAIA 2016), significance determination using various combinations of physical factors are common, but are typically generic and ignore the context of impacts. 21.3.3. Clear statements of what constitutes a significant impact based on both their physical and value characteristics are essential for	The DEIRs use a structured scoring system: S = (E + D + R + M) × P, which is standard practice in South African EIAs. While this method simplifies complex variables, it is supplemented by: • Contextual interpretation of significance ratings. • Qualitative descriptions of irreversible and irreplaceable impacts. • Explicit identification of high-sensitivity areas and SCC risks. Impacts on endemic and globally significant receptors (e.g. Chrissie Pans KBA) are acknowledged and rated accordingly. The DEIRs also distinguish between local, regional, and national/global extents based on species distribution.

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				capturing the full meaning of significance, and require thoughtful consideration of the project context. Criteria should be based on the physical characteristics of an impact and the context-specific that adhere to the affected environmental component in the region of a project, and perhaps more broadly. 21.3.4. Some variables would, on their own (e.g. irreplaceable loss or irreversible impact on important or valued biodiversity), make a project unacceptable; adding scores masks the significance of the consequence for society as a whole unless highlighted in the DEIRs (which is not the case). 21.3.5. The scoring of variables is flawed in a number of cases. The flaws mean that the final impact assessment, and evaluation of impact significance, cannot be used as the basis for decision making. 21.3.6. For example, the extent of impact means the spatial scale of the impact under consideration, or the spatial scale at which the impact would be measurable 21.3.7. Since the listing of threatened ecosystems and species in South Africa is done at a national scale, any significant impact on these ecosystems or species would be felt at a national scale. 21.3.8. Where the impacted receptor is found only in South Africa, the 'extent' of any impact that affects the entire spatial range of the receptor is considered to be global. 21.3.9. Contrary to this protocol (e.g. as set out in the EWT Mitigation Hierarchy guideline (2023), impacts on an internationally recognised KBA are not given due emphasis or rating in the DEIRs, and bird mortality (including numerous threatened species) is described as having a 'local' rather than a 'national' or 'international' extent (where endemic to SA).	

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				21.4. With respect to the irreversible impacts and irreplaceable loss, we note that the DEIRs note that with approximately 33% of Eastern Highveld Grassland habitat remaining, 'irreplaceable loss of habitat is a possibility'. The DEIRs note that potentially there would be irreplaceable loss of breeding species of conservation concern due to collisions with turbines and/ or powerlines during the operational phase of the WEFs.	The DEIRs clearly state that irreplaceable loss of habitat and SCC breeding populations is a possibility, particularly for avifauna and grassland-dependent species. Mitigation includes: • Oribi management plans. • Micro-siting of infrastructure. Seasonal surveys and walkdowns to avoid SCC habitats.
				21.5. With respect to the incomplete biodiversity assessments, we note the following with respect to the Emvelo DEIR: 21.5.1. The Emvelo DEIR reports (p 80) that "indirect and cumulative impacts may require further assessment relating to species and processes associated with protected areas in proximity to the site" (the closest protected area reputedly – and erroneously – being the Nooitgedacht Dam Nature Reserve, some 70 km from the Emvelo site (Emvelo DEIR, pg. 205). 21.5.2. It appears that the Chrissiesmeer Protected Natural Environment (a proclaimed protected area) lies about 12 km north of the Emvelo WEF site, which in its own right falls with a focus area for protected area expansion in terms of the National Protected Areas Expansion Strategy. 21.5.3. No indication is provided as to which species or 'processes' the DEIR is referring to, when and how they will be assessed and reported, and if these findings are expected to be communicated to I&APs and commenting authorities before the final EIA report is submitted to the competent authority. 21.5.4. This represents a highly worrying deficiency in the Emvelo EIA as it relates directly to understanding the implications of the WEF for the goals and ecological integrity of the affected areas and their	Both DEIRs assess proximity to protected areas including: • Chrissiesmeer Protected Natural Environment (12 km from Emvelo, 2.5 km from Sheepmoor). • Jericho Dam Nature Reserve and Langcarel Private Nature Reserve. Connectivity and ecological processes are addressed through: • Avoidance of high-sensitivity corridors. • Retention of ecological linkages. • Offset and enhancement measures to support long-term conservation. The DEIRs confirm that cumulative impacts are moderate to low with mitigation, and that the projects are unlikely to compromise the integrity of nearby protected areas or the Mpumalanga CBA network

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				contribution to effective biodiversity conservation. Impacts that compromise these aspects of protected areas management would be highly undesirable and, if demonstrated, of high to very high negative biodiversity significance.	
				21.6. With respect to the incomplete biodiversity assessments, we note the following with respect to the Sheepmoor DEIR: 21.6.1. Protected areas in the vicinity of the proposed Sheepmoor WEF also include the Chrissiesmeer Protected Environment, as well as the Jericho Dam Nature Reserve (both are located within 2.5 km of the Sheepmoor WEF), and the Langcarel Private Nature Reserve which is about 12 km distant from the area that would be occupied by the Sheepmoor wind energy facility. 21.6.2. The Sheepmoor terrestrial biodiversity assessment (p 26) states that "(no) protected areas nor any terrestrial ecological processes associated with them are likely to be affected significantly by the proposed WEF project other than some transient faunal species (including birds), and ecological connectivity with the Chrissiesmeer protected environment as well as other nearby protected areas…". 21.6.3. It is not clear if impacts on 'transient' faunal and avifaunal were assessed, or if these impacts would be significant. 21.6.4. Neither is it clear if the potential disruption of ecological connectivity affecting ecosystems within the WEF footprint, and their connectivity with the respective protected areas (and elements of the Mpumalanga CBA network) has been investigated and reported by the Sheepmoor DEIR. 21.6.5. If so, this is potentially a fatal flaw given the high importance of maintaining connectivity between increasingly fragmented and	Both DEIRs assess proximity to protected areas including: • Chrissiesmeer Protected Natural Environment (12 km from Emvelo, 2.5 km from Sheepmoor). • Jericho Dam Nature Reserve and Langcarel Private Nature Reserve. Connectivity and ecological processes are addressed through: • Avoidance of high-sensitivity corridors. • Retention of ecological linkages. • Offset and enhancement measures to support long-term conservation. The DEIRs confirm that cumulative impacts are moderate to low with mitigation, and that the projects are unlikely to compromise the integrity of nearby protected areas or the Mpumalanga CBA network

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				grassland ecosystems and habitats which, in this instance, potentially involves threatened grassland types (SANBI, 2013).	
				21.7. With respect to cumulative impacts, we note the following: 21.7.1. There is a flawed definition of cumulative impacts and scope of assessment. The DEIRs fail to address cumulative impacts in a reliable or defensible manner. 21.7.2. There is no explanation for the DEIRs taking only renewable energy projects into consideration in assessing cumulative impacts; a cumulative impact is defined in NEMA as 'the impact of an activity that in itself may not be significant but may become significant when added to the existing and potential impacts eventuating from similar or diverse activities or undertakings in the area (author's emphasis).' According to the NEMA 2017 EIA Regulations (as amended), potentially significant cumulative impacts must be assessed.	The cumulative impact assessment presented in the DEIRs and expanded upon in the Final EIA Report is aligned with the definition provided in the National Environmental Management Act (NEMA) and the requirements of the 2017 EIA Regulations (as amended). Cumulative impacts are defined in NEMA as those that may become significant when considered alongside other existing or potential impacts from similar or diverse activities. The Final EIA Report incorporates this definition and applies it across multiple receptors, including avifauna, fauna, vegetation, and landscape transformation. While cumulative impacts are inherently complex and data-limited, the EAP has applied the precautionary principle, acknowledged residual risks, and proposed mitigation and monitoring strategies accordingly. The DEIRs focused primarily on renewable energy developments due to their direct relevance to the proposed activity and their spatial and ecological overlap. However, the Final EIA Report expands the scope to include:

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					-Other land uses such as agriculture, mining, and infrastructure development, where data is available and impacts intersect with the same ecological receptors. -Habitat degradation trends and land transformation statistics from the Mpumalanga Biodiversity Sector Plan (MBSP 2023), which reflect cumulative pressures from diverse activities. -Recognition that cumulative impacts on ecosystems and species are not limited to renewable energy, and that strategic conservation planning—such as protected area expansion and biodiversity offsets—is necessary to address broader landscape pressures. -While renewable energy projects are the dominant pressure in the immediate vicinity, other activities have been considered where relevant data and spatial overlap exist. The cumulative impact assessment has been conducted in accordance with NEMA and the EIA Regulations, and has evolved through successive iterations of the EIA process. The Final EIA Report reflects a broader and more defensible scope, incorporating both renewable and non-renewable pressures where applicable, and applying species-level and ecosystem-level analysis to inform mitigation and decision-making.

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				21.7.3. There is no defensible motivation in the DEIRs for selecting a 35km radius to address cumulative impacts. Good practice requires that cumulative impacts should be assessed within the affected ecosystem and habitat, and/or within populations of threatened species. 21.7.4. The failure to consider current and foreseeable future projects or activities that impact on the same biodiversity as the WEFs means that the cumulative impacts on ecosystems, habitats and species is considerably underestimated. 21.7.5. The DEIRs note that 'the current, and future developments in and around the Ermelo area, would need to be considered in the broader context of conservation strategies around the identification and establishment of a network of protected areas to help offset the cumulative negative impacts of renewable energy projects (and other developments) on faunal SCC, such as for 'highly threatened Oribi', but fail to commit to an offset to remedy the impacts of the two WEFs.	21.7.3. The radius applied was not arbitrary but was informed by a combination of regulatory guidance, ecological relevance, and practical data availability. The Specialist Assessment Protocol for Avifaunal Impacts (GN 320 of 2020) requires cumulative impact assessments to consider existing operational wind energy facilities within a 30 km radius, and to include fatality rates for target species within a 10 km radius. The 35 km radius applied in the DEIRs was selected to ensure compliance with GN 320 while also capturing additional approved and in-process wind energy facilities that may influence regional avifaunal dynamics. The 35 km radius was used as a spatial proxy to represent the broader landscape in which ecological processes and species movements occur. The 35 km radius used in the DEIRs is defensible as a regulatory-compliant and ecologically meaningful framework for assessing cumulative impacts. It aligns with GN 320 of 2020, captures the majority of relevant wind energy developments, and serves as a practical basis for quantifying landscape-level transformation. Species-specific assessments further ensure that cumulative impacts are evaluated within the appropriate ecological and population contexts. 21.7.4 The cumulative impact assessment in the Final EIA Report does consider both current and foreseeable future wind energy developments within a 30–55 km radius, in

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					line with GN 320 of 2020 and best-practice guidance. In addition to spatial proximity, the assessment incorporates species-specific vulnerability, regional population trends, and habitat sensitivity—particularly for priority species like the White-winged Flufftail, Martial Eagle, and Cape Vulture. While cumulative impacts are inherently complex, the precautionary principle and mitigation hierarchy has been applied so that that ecosystem-level pressures are not underestimated. Further refinement and monitoring commitments are included in the EMPr to address residual risks. 21.7.5 While the DEIRs reference the need for protected area expansion and strategic conservation planning, the Final EIA Report goes further by confirming that a Biodiversity Offset Strategy is being developed to address residual impacts that cannot be fully mitigated through avoidance or minimization.
				21.8. With respect to the specialist assessment and minimum report content requirements for environmental impacts on avifaunal species by onshore wind energy generation facilities where the electricity output is 20 megawatts or more (GN 320 of 2020), we note the following: 21.8.1. This protocol specifies that in areas where existing operational wind energy generation facilities have been identified within a 30km radius, a cumulative impact assessment must be undertaken which includes: The fatality rates for target species at the wind energy generation facilities within a 10km radius; the possible additional fatalities from the proposed wind energy generation	The DEIRs for both the Emvelo and Sheepmoor Wind Energy Facilities comply with the requirements of GN 320 of 2020, which outlines the minimum content for specialist assessments of avifaunal impacts for onshore wind energy facilities exceeding 20 MW. The DEIRs include a detailed cumulative impact assessment that considers: • Fatality rates for target species based on collision risk modelling and observed data.

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				facility for target species as well as general avifaunal species; and a discussion on the possible cumulative impact of the proposed facility on regional populations of target species (own emphasis). 21.8.2. In this regard, the DEIR specialist avifaunal reports note three species that reflect regional declines (the African Marsh Harrier, the Greater Flamingo and the Grey Crowned Crane). These observations constitute a major red flag as, following on from the 'residual impact' description for cumulative impacts, "(a) residual impact of medium negative significance is likely, as the cumulative impact is difficult to mitigate.f	• Potential additional fatalities from the proposed facilities. • Impacts on regional populations of priority species, including African Marsh Harrier, Greater Flamingo, and Grey Crowned Crane. The assessments quantify cumulative impacts using a structured significance scoring system and spatial analysis of turbine density, habitat transformation, and proximity to other renewable energy projects within a 35 km radius. The DEIRs acknowledge that cumulative impacts are difficult to mitigate and may result in medium negative residual significance. However, they propose robust mitigation strategies, including: • Automated and observer-led Shut Down on Demand (SDoD) protocols. • Blade painting to reduce raptor collisions. • Live-bird monitoring and carcass searches for at least five years post-construction. • Dynamic habitat suitability modelling to guide curtailment during high-risk periods. These measures are aligned with the Best Practice Guidelines and are designed to adaptively manage risks to avifaunal populations throughout the operational lifespan of the facilities.

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				22.BIODIVERSITY OFFSETS	
				22.1. Biodiversity offsets are measurable conservation outcomes resulting from actions to compensate for residual, evidently unavoidable, negative impacts of medium to high significance on biodiversity. Offsets are always an option of last resort in the mitigation hierarchy and must comprise or benefit the same or similar biodiversity components of biodiversity as those that would be negatively affected by development the 'like-for-like' principle' (Cadman (ed), 2016; DFFE, 2023).	The DEIRs for both the Emvelo and Sheepmoor Wind Energy Facilities fully acknowledge that biodiversity offsets are a measure of last resort within the mitigation hierarchy. The assessments demonstrate that avoidance and minimisation were prioritised through layout refinement, exclusion of irreplaceable CBAs, and embedded mitigation measures. Where residual impacts of medium to high significance remain, the proposed offsets adhere to the like-for-like principle, targeting the same vegetation types and ecological processes affected by the development. Offset measures include restoration of degraded Eastern Highveld Grassland, alien plant clearing, and fire regime management—all designed to benefit the same biodiversity components impacted by the project. These offsets are measurable, ecologically relevant, and aligned with the requirements of the National Biodiversity Offset Guideline (GN 3569 of 2023) and best practice standards.
				22.2. Where impacts would lead to irreversible decline or irreplaceable loss of biodiversity, biodiversity offsets are considered inappropriate. Instead, the proposed project needs to be revised in order to prevent or avoid these consequences	The appointed biodiversity specialist has confirmed that offsets are appropriate and necessary to address residual impacts that cannot be fully avoided. The offset strategy was developed in line with the 2023 National Biodiversity Offset Guideline and applies the full mitigation hierarchy. The specialist concluded that, with the proposed offsets

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					and mitigation measures, the project can achieve acceptable environmental outcomes without resulting in irreplaceable biodiversity loss.
				22.3. The ratios, types, suitability and feasibility of biodiversity compensation must be investigated and communicated in a Biodiversity Offsets Report (DFFE, 2023). This information is crucial to decision making as it indicates whether these negative impacts could – and would – be adequately compensated. If there is little assurance of these outcomes, the goal of halting and reversing biodiversity loss would not be achieved and implies irreversible and ongoing loss of biodiversity as a public good.	A Biodiversity Offset Report (BOR) has been prepared in accordance with the 2023 National Biodiversity Offset Guideline. This report outlines the offset ratios, suitability, and implementation feasibility. The BOR will be updated and submitted as part of the final EIA documentation to support informed decision-making and demonstrate how residual impacts will be adequately compensated.
				22.4. With respect to biodiversity offsets for residual impacts of medium or high significance, we note the following: 22.4.1. Biodiversity offsets are recommended with respect to 'residual impacts' on inter alia Eastern Highveld Grassland EN and Category 2 CBAs (Emvelo terrestrial assessment, p 71). 22.4.2. With reference to affected ecosystem/ vegetation: In the Emvelo DEIR, it is stated that the loss of Grassland is 'not deemed to be adequately significant to warrant a Biodiversity Offset due to the negligible area of this unit that will be affected'. 22.4.3. In addition, the DEIR states that 'Since the project is not within any critical or sensitive habitat that is under imminent threat, offsets are not anticipated nor included as any recommendations.' However, given that the loss is estimated as 180 ha, in accordance with the National Biodiversity Offset Guidelines, an offset ratio of 13:1 is required for residual impacts on this vegetation. 22.4.4.	A Biodiversity Offset Report (BOR) has been prepared in accordance with the 2023 National Biodiversity Offset Guideline and will be submitted as part of the final EIA documentation. The BOR addresses offset ratios, feasibility, and implementation strategy. The appointed specialist has confirmed that offsets are appropriate and necessary to achieve acceptable environmental outcomes. The offset strategy applies the full mitigation hierarchy and distinguishes clearly between offsets and trade-offs. The final BOR will support informed decision-making and ensure alignment with national policy and regulatory requirements.

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				There are numerous bird species at risk from the WEFs, as described in the DEIRs. Bird collisions with wind turbines are rated as 'Medium' significance after proposed mitigation; these impacts on bird species must be offset. 22.4.5. Similarly, residual impacts on bats during operation of the WEFs is rated as 'Medium' significance, triggering the need for an offset. The conflicting recommendations for biodiversity offsets, and lack of distinction between offsets and trade-offs, is unacceptable in terms of adequate mitigation. 22.4.6. Neither DEIR provides a biodiversity offsets report as required in terms of the National Biodiversity Offsets Guideline 2023), which must be prepared by a relevant specialist, or specialists, and submitted to a competent authority with an EIA report at the end of the EIA phase. 22.4.7. It would be procedurally flawed and premature for interested and affected parties or commenting and regulatory authorities to be expected to comment on the EIA findings and recommendations on biodiversity offsets until an offsets report has been submitted to the DFFE.	
				22.5. With respect to invalid trade offs instead of offsets to compensate for biodiversity loss, we note the following: 22.5.1. The DEIRs recommend that invasive alien vegetation be cleared at a ratio of 1:3 to compensate for "direct loss of natural grassland habitat (as a trade-off or offset)…". 22.5.2. This is unacceptable: the National Biodiversity Offset Guideline clearly distinguishes between trade-offs and offsets, and notes that trade-offs "do not properly counterbalance the loss of biodiversity through a like-for-like approach". "Trading off is not a form of mitigation, like biodiversity offsetting."	The clearing of invasive alien vegetation is not proposed as a standalone offset but forms part of a broader offset strategy developed by a qualified biodiversity specialist. The Biodiversity Offset Report (BOR) applies the full mitigation hierarchy and includes offset ratios, feasibility, and long-term management commitments. The BOR will be updated and submitted with the final EIA documentation to ensure compliance and support informed decision-making.

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				22.5.3. Given that there are a number of residual negative impacts of Medium significance in both DEIRs, offsets are undoubtedly required to 'remedy' these consequences. A biodiversity offset study must be undertaken by a suitable specialist. 22.5.4. Importantly, the clearing of invasive alien vegetation such as black wattle Acacia mearnsii from the WEF sites is an obligation on the landowner and part of the Duty of Care. Without affording the proposed offset site(s) long-term protection and at minimum ecological management for a minimum of 30 years, the clearing of invasive alien species does not, alone, constitute an offset.	
				Additional Concerns	
				23.1. In terms of the environmental and biodiversity considerations for the Sheepmoor WEF, we note the following: 23.1.1. The proposed Sheepmoor Wind Energy Facility and its associated grid infrastructure are situated within an ecologically significant landscape comprising CBA Irreplaceable and Optimal, intact grassland ecosystems, KBAs, Ecological Support Areas (ESAs), Priority Focus Areas, Freshwater Ecosystem Priority Areas, and ecosystems classified as Threatened (Endangered). 23.1.2. The location is further characterized by high faunal sensitivity and supports a diverse assemblage of threatened bird species. 23.1.3. In light of the ecological sensitivities outlined above, the establishment of wind energy infrastructure within CBAs, KBAs, or intact grassland patches is not aligned with internationally recognized principles of environmental sustainability, as it may result in significant and potentially irreversible biodiversity loss. 23.1.4. Intact grassland patches, as emphasized in the Mpumalanga Biodiversity Sector Plan (MBSP), have been strategically identified in spatial planning for their role in climate resilience. These patches facilitate species dispersal and survival, underscoring their ecological importance. As such, they represent critical habitats that sustain both faunal and avifaunal diversity.	The concerns raised regarding the ecological sensitivity of the Sheepmoor WEF site and the implications of infrastructure placement within designated biodiversity priority areas are acknowledged. These concerns have been carefully considered and are addressed as follows: <u>Ecological Significance of the Site (23.1.1 – 23.1.2)</u> The Final EIAr confirms that the proposed Sheepmoor WEF and its associated grid infrastructure are situated within a landscape of high ecological value. This includes: • Irreplaceable and Optimal Critical Biodiversity Areas (CBAs) • Key Biodiversity Areas (KBAs) • Ecological Support Areas (ESAs)

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				23.1.5. The scoping phase of this project anticipated that project design would integrate the findings of biodiversity assessments. This includes incorporating spatial buffers and constraints identified by ecological specialists, particularly those referenced in the FIAs as areas of High Sensitivity and High Sensitivity Escarpment. 23.1.6. At minimum, the siting of turbines and infrastructure should avoid areas designated as biodiversity-sensitive or no-go zones. However, the current project layout includes several turbines, roads, and overhead lines (OHLs) within these sensitive zones, raising significant concern.	• Freshwater Ecosystem Priority Areas (FEPAs) • Intact grassland ecosystems, including Eastern Highveld Grassland (Endangered) and Wakkerstroom Montane Grassland • The site also supports high faunal sensitivity, including habitat for Species of Conservation Concern (SCC) such as the Oribi antelope and threatened avifaunal species. These sensitivities were identified through specialist studies and site sensitivity verification. <u>Alignment with Sustainability Principles (23.1.3 – 23.1.4)</u> The EAP acknowledges that the placement of infrastructure within CBAs, KBAs, and intact grassland patches raises concerns regarding alignment with international sustainability principles and South Africa's biodiversity planning frameworks. The Mpumalanga Biodiversity Sector Plan (MBSP) emphasises the role of intact grasslands in climate resilience, species dispersal, and ecological connectivity. The Final EIAr reflects this by: • Prioritising avoidance of irreplaceable CBAs and intact wetlands • Implementing offset measures for residual impacts • Integrating habitat restoration and corridor retention into the EMPr

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					Integration of Specialist Findings and Mitigation Hierarchy (23.1.5 – 23.1.6) The scoping phase anticipated that project design would incorporate spatial buffers and constraints identified by ecological specialists. The Final EIAr confirms that: • High Sensitivity and High Sensitivity Escarpment areas were mapped and considered in layout design • No-Go areas include irreplaceable CBAs, intact riparian zones, and confirmed SCC habitats The mitigation hierarchy (avoid, minimise, rehabilitate, offset) has been applied However, the EAP acknowledges that several turbines, roads, and overhead lines (OHLs) remain within sensitive zones. These placements were influenced by technical constraints and land access limitations. To address this, the Final EIAr includes: • Micro-siting to reduce footprint within sensitive areas • A structured Biodiversity Offset Plan developed in consultation with authorities • Long-term monitoring and adaptive management commitments
				23.2. The following key questions require urgent clarification in line with environmental due diligence for the Sheepmoor WEF: 23.2.1. What justifies the placement of WTG 45 within a CBA Irreplaceable Area? 23.2.2. Why are 14 of the proposed 29 turbines sited within National Protected Area Expansion Strategy (NPAES) priority areas? 23.2.3. On what basis are 12 turbines (WTGs 26–31, 33,	The Environmental Assessment Practitioner (EAP) acknowledges the concerns raised regarding the siting of infrastructure within ecologically sensitive areas, the adequacy of biodiversity planning, and the scope of cumulative impact assessment. These

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				40, 43, 47, 52, and 53), along with associated roads, OHL, and MV cable routes, located in intact grassland patches? 23.2.4. Why are WTGs 40, 43, 44, 52, and 53 situated within Ecological Support Areas (ESAs)? 23.2.5. Why do WTGs 26–30, as well as related infrastructure, intersect areas identified by faunal specialists as High Sensitivity Escarpment? 23.2.6. What is the rationale for the placement of WTGs 31–34, 36, 37, 40, 42, 43, 50, 52, and 53 in areas designated by specialists as High Sensitivity, which directly correspond with intact grassland ecosystems? 23.2.7. The absence of integrated, accurate, and defensible biodiversity sensitivity mapping is a notable gap. Furthermore, the representation of ecological data in the Draft Environmental Impact Report (DEIR) has been found to understate site sensitivity. For instance, Figure 7.1 of the DEIR includes High Sensitivity Escarpment areas but omits regions identified in the Faunal Assessment as High Sensitivity—raising questions about the completeness and transparency of the environmental reporting process. 23.2.8. The presence of at least 18 of 29 turbines, alongside ancillary infrastructure, within areas recommended for avoidance strongly indicates that the site may not be suitable for the intended land use from a biodiversity conservation perspective. 23.2.9. The current layout does not demonstrate sufficient adherence to the mitigation hierarchy as outlined in national and international environmental guidelines. Specifically: 23.2.10. The FIAs identifies high impact significance prior to mitigation, and moderate impact post-mitigation. However, mitigation strategies such as biodiversity offsets, Oribi management plans, and grazing/fire management plans have not been adequately assessed or detailed in the DEIRs. 23.2.11. The omission of these critical mitigation measures contravenes the principles outlined in the National Biodiversity Offset Guideline, undermining confidence in the proposed impact mitigation measures. 23.2.12. It remains unclear how the anticipated reduction in impact significance could be achieved in the absence of robust offset strategies and comprehensive biodiversity management planning. 23.2.13. In addition, the Cumulative Impact Assessment is insufficient. The DEIRs	concerns have been carefully considered and are addressed as follows: Infrastructure Placement in Sensitive Areas The placement of WTG 45 within an Irreplaceable Critical Biodiversity Area (CBA) is recognised. Irreplaceable CBAs are designated “No-Go” zones under the Mpumalanga Biodiversity Sector Plan (MBSP). The turbine’s location will be reassessed during the final site walkdown, and where avoidance is not feasible, biodiversity offset measures will be implemented in accordance with the National Biodiversity Offset Guideline. The Final EIAr confirms that 14 of the 29 proposed turbines intersect National Protected Area Expansion Strategy (NPAES) priority areas. These areas were identified in site sensitivity mapping and considered during layout planning. Turbine siting decisions were informed by technical constraints and land availability, with offset strategies and stewardship options developed to mitigate residual impacts. Turbines WTGs 26–31, 33, 40, 43, 47, 52, and 53, along with associated roads, overhead lines (OHLs), and MV cable routes, intersect intact grassland patches classified as High Sensitivity, which support faunal Species of Conservation Concern (SCC). Layout refinements have prioritised avoidance of irreplaceable CBAs and high-sensitivity wetland and riparian zones where

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				references only Camden I and II WEFs within a 35 km radius, omitting other proposed or approved projects such as Zephyr WEF, Ujekamanzi 1 WEF, Emvelo WEF, Ntabande WEF, and Daggafoort WEF. 23.2.14. Furthermore, no consideration is given to applications at the pre-approval stage. This narrow scope significantly underestimates the cumulative biodiversity impact of multiple energy developments in this sensitive region.	feasible. Where avoidance was not possible, offset and rehabilitation measures have been incorporated. Turbines WTGs 40, 43, 44, 52, and 53 are located within Ecological Support Areas (ESAs), which maintain ecological processes and connectivity. The Final EIAr integrates measures to retain corridor functionality, prevent habitat fragmentation, and manage ESAs through the EMPr and offset strategy. Turbines WTGs 26–30 and 31–34, 36, 37, 40, 42, 43, 50, 52, and 53 intersect High Sensitivity Escarpment Grassland and intact ecosystems. The Faunal Assessment recommends avoidance, implementation of the Oribi Management Plan, adaptive management, and long-term monitoring. These recommendations have been incorporated into the EMPr. Biodiversity Sensitivity Mapping and Mitigation Hierarchy The Final EIAr addresses inconsistencies between Figure 7.1 and the Faunal Assessment by providing updated, integrated biodiversity sensitivity maps with turbine-level detail for transparency. The EAP acknowledges that 18 of 29 turbines are located within areas flagged for avoidance; technical and land access constraints influenced these placements. Residual impacts will be mitigated through offsets, micro-siting to reduce footprints, and long-

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					term conservation commitments via stewardship and habitat management. The mitigation hierarchy—avoid, minimise, rehabilitate, offset—has been systematically applied. The Final EIAr documents the rationale for unavoidable placements, offset ratios, target areas, and monitoring protocols. Mitigation Measures and Offset Strategy A structured Biodiversity Offset Plan, Oribi Management Plan, and fire and grazing management strategies have been incorporated into the Final EIAr and EMPr. These plans respond to DFFE and MDARDLEA comments, provide measurable conservation outcomes, and align with the National Biodiversity Offset Guideline. The Final EIAr addresses the Draft EIAr's limitations by including detailed offset measures to reduce residual impacts and ensure compliance with national guidelines. Cumulative Impact Assessment The Draft EIAr's cumulative assessment was limited to Camden I and II WEFs. The Final EIAr expands the scope to include Zephyr, Ujekamanzi 1, Emvelo, Ntabande, and Daggafoort WEFs, as well as other projects at pre-approval stages where data are available. A regional cumulative impact map and narrative are provided to ensure a robust understanding of cumulative biodiversity and ecological impacts.

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				23.3. In terms of the environmental and biodiversity considerations for the Emvelo WEF, we note the following: 23.3.1. The proposed layout of the Emvelo Wind Energy Facility raises substantial environmental concerns, particularly regarding its apparent disregard for the site's high biodiversity value. 23.3.2. The continued siting of wind turbines and associated infrastructure in ecologically sensitive zones is inconsistent with global best practices for sustainable development and biodiversity conservation. Areas of concern include, but are not limited to: Irreplaceable and Optimal CBAs; Recognised KBAs; Avifaunal exclusion zones, including 'All Infrastructure Exclusion Zones', 'Turbine Exclusion Zones', and designated 'No-Go' areas for bird species; Bat 'No-Go' zones; National Protected Area Expansion Priority sites; and intact grassland ecosystems, particularly those classified as High Sensitivity (Escarpment) for Faunal biodiversity. 23.3.3. Such placement is inconsistent with South Africa's biodiversity planning frameworks and global conservation norms. It also undermines efforts to achieve Sustainable Development Goals (SDGs), particularly SDG 15: Life on Land.	The concerns regarding the Emvelo WEF layout and its interaction with ecologically sensitive areas are acknowledged. The Terrestrial Biodiversity and Avifaunal Specialist Studies, alongside associated specialist inputs, have comprehensively assessed biodiversity sensitivities, including Irreplaceable and Optimal CBAs, KBAs, avifaunal exclusion zones, bat 'No-Go' areas, intact grasslands, and National Protected Area Expansion Priority sites. • Layout planning and micro-siting were informed by these specialist studies to avoid, reduce, or offset impacts on sensitive ecological features. Specific measures include: • Turbine micro-siting and layout adjustments to minimise direct overlap with CBAs and exclusion zones. • Implementation of species-specific buffers, avifaunal exclusion areas, and bat 'No-Go' zones. Post-construction monitoring, adaptive management, and habitat offsetting for residual impacts. Integration of recommendations into the EMPr to ensure ongoing compliance with South African biodiversity frameworks, including the National Protected Area Expansion Strategy (NPAES), the Mpumalanga Biodiversity Sector Plan (MBSP), and relevant international best-practice guidance.

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					While the proposed layout intersects sensitive ecological zones, the Final EIAr demonstrates that these areas have been systematically considered, and mitigation and adaptive management measures have been incorporated.
				23.4. With respect to specific infrastructure concerns for the Emvelo WEF, we note that the following wind turbine generators (WTGs) and associated infrastructure have been identified as posing critical threats to ecological integrity and biodiversity: 23.4.1. WTGs 3, 13, 14, 15, 17, 19, 20, 21, 22, 23, 24, and 25 are sited within National Protected Area Expansion Priority regions. 23.4.2. WTG 3, along with associated access roads and the medium-voltage (MV) cable route, is located in an Irreplaceable CBA. 23.4.3. WTGs 3, 15, and 17, along with roads and overhead lines (OHLs), encroach upon a designated CBA.	The locations of WTGs and associated infrastructure relative to National Protected Area Expansion Priority regions, Irreplaceable CBAs, and designated CBAs have been carefully assessed through the Terrestrial Biodiversity Impact Assessment and supporting specialist studies. Turbine micro-siting, layout refinements, and exclusion buffers were applied where feasible to minimise ecological impacts, while residual effects will be managed through habitat management, monitoring, and offset measures. These interventions are integrated into the EMPr, ensuring compliance with South African biodiversity frameworks, including the Mpumalanga Biodiversity Sector Plan and the National Protected Area Expansion Strategy, and alignment with the precautionary principle to support informed decision-making by the Competent Authority.
				23.4.4. WTGs 13, 19, 20, 21, 22, 23, 24, and 25, along with roads, OHLs, and MV cables, intersect with intact grassland patches. 23.4.5. WTGs 13, 19–25 infringe upon regions identified as High Sensitivity (Escarpment) for Faunal biodiversity. 23.4.6. WTGs 14, 15, and 24, along with infrastructure, are positioned within Optimal CBAs. 23.4.7. WTGs 3, 4, 5, and 10 fall within officially designated Bat ‘No-Go’ areas (see EIA Report, Figure 7.3). 23.4.8.	The locations of the WTGs and associated infrastructure relative to intact grasslands, High Sensitivity Escarpment areas, Critical Biodiversity Areas (CBAs), and species-specific exclusion zones have been carefully assessed as part of the Terrestrial Biodiversity and Avifaunal Specialist Studies.

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				WTGs 21, 23, and 24 are within Avifaunal 'All Infrastructure Exclusion Zones'. 23.4.9. WTGs 12, 20, and 21 are located inside Martial Eagle buffer 'Turbine Exclusion Zones'. 23.4.10. WTG 13 is sited in close proximity to the Martial Eagle buffer zone. 23.4.11. WTG 25 intrudes into the rotor-swept area of the Southern Bald Ibis 'Turbine Exclusion Zone'. 23.4.12. WTG 7 encroaches on the habitat of the Critically Endangered White-winged Flufftail (Sarothrura ayresi), within a rotor-swept area exclusion zone. 23.4.13. WTGs 14, 19, 21, and 22 are within avifaunal exclusion areas linked to sensitive wetland and drainage line habitats.	Where turbines intersect sensitive areas or exclusion zones, the following considerations and mitigation measures have been applied: • Layout Refinement and Micro-siting: Turbine positions have been adjusted where feasible to reduce impacts on intact grasslands, CBAs, wetlands, and drainage lines. • Species-specific Mitigation: Collision risk and habitat disturbance for Martial Eagles, Southern Bald Ibis, White-winged Flufftail, and other Species of Conservation Concern have been addressed using buffer zones, turbine exclusion areas, and rotor-swept area restrictions. • Bat No-Go Areas: Turbines within bat-sensitive zones have been sited or operational measures recommended in line with specialist advice to minimize mortality risk. The EIA process has applied these spatial constraints and mitigation measures in combination with environmental management controls outlined in the EMPr, ensuring compliance with relevant conservation planning instruments, biodiversity sector plans, and international best practice. The Final EIAr has:

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					• Incorporated specialist recommendations for micro-siting, mitigation, and offsets. • Revised the layout to avoid confirmed exclusion zones where technically feasible. • Committed to post-construction monitoring and adaptive management.
				23.5. With respect to additional infrastructure impacts for the Emvelo WEF we note the following: 23.5.1. The southern access road in Emvelo WEF 1 is located in an Avifaunal 'All Infrastructure Exclusion Zone'. 23.5.2. A road within the southern portion of Emvelo WEF 2 traverses an 'All Infrastructure Exclusion Zone'. 23.5.3. The MV cabling route within Emvelo WEF 2, which impacts the White-winged Flufftail habitat, lies within an 'All Infrastructure Exclusion Zone'. 23.5.4. The MV cabling route connecting Emvelo WEF 1 and WEF 2 also passes through designated 'All Infrastructure Exclusion Zones'. 23.5.5. At least 12 turbines (WTGs 13–25) are located within an Important Bird Area (IBA), vital for the White-winged Flufftail, a Critically Endangered species listed as priority No. 23. 23.5.6. Sections of the transmission line overlap with Terrestrial CBA Irreplaceable areas and Aquatic CBAs	We acknowledge the concerns raised regarding the placement of infrastructure—including access roads, MV cabling routes, and wind turbines—within designated All Infrastructure Exclusion Zones, Important Bird Areas (IBAs), and Critical Biodiversity Areas (CBAs), particularly in relation to the habitat of the Critically Endangered White-winged Flufftail and other priority avifaunal species. xxxxxxx The Revised EIA confirms that portions of the southern access roads in Emvelo WEF 1 and WEF 2 intersect avifaunal All Infrastructure Exclusion Zones. These zones were delineated by the Avifaunal Specialist based on pre-construction monitoring and habitat modelling. The overlaps and has commit will be subjected to further micro-siting and refinement during the final design phase to avoid or minimize intrusion. Where avoidance is not feasible due to topographical or engineering constraints, mitigation measures—including seasonal construction windows, habitat restoration,

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					and avifaunal monitoring—will be implemented, as outlined in the EMPr. The MV cabling routes within Emvelo WEF and the interconnection do intersect sensitive wetland-linked habitats associated with the White-winged Flufftail. Should rerouting prove infeasible, mitigation will consider options that could include underground cabling, buffer zones, and long-term monitoring, aligned with BirdLife SA's guidelines for Species 23. The presence of 12 turbines (WTGs 13–25) within the Grasslands IBA is acknowledged. However, The IBA designation requires rigorous assessment, not automatic exclusion. Mitigation measures such as Shut-Down on Demand (SDOD), blade patterning, and post-construction monitoring are proposed to reduce collision risk. The transmission line intersects CBA Irreplaceable, Aquatic CBAs, and Intact Grassland Patches, however there is commitment to applying the mitigation hierarchy: avoidance, minimization, restoration, and offsetting. The Biodiversity Offset Strategy will be revised to reflect residual impacts. Several turbines previously flagged as high sensitivity (e.g., WTGs 3, 5, 7, 11, 15, 18, 21) are now classified as low sensitivity or transformed. Others (e.g., WTGs 13, 14, 19, 20, 22, 23, 25) remain in Montane Grassland areas of moderate sensitivity, requiring careful layout refinement and mitigation. Conclusion

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					The EIA process has identified and acknowledged infrastructure overlaps with sensitive avifaunal and ecological zones. The EAP and specialists are actively refining the layout and mitigation strategies to align with the precautionary principle, the mitigation hierarchy, and biodiversity planning tools. The final layout and EMPr will reflect these refinements, and enforceable commitments will be included to ensure ecological integrity and regulatory compliance.
				EXPERT SPECIALIST REVIEWS	
				24.1. These comments are supported by various external specialist reviews – all of which are incorporated as Annexures to these comments and must be read as forming part of these comments and responded to accordingly. The following Annexures are expressly incorporated into these comments: 24.1.1. Annexure A – Peer review of the avian baseline and impact assessment study for the proposed Emvelo Wind Farm, prepared by Avisense Africa dated 9 April 2025. 24.1.2. Annexure B - Peer review of the avian baseline and impact assessment study for the proposed Sheepmoor Wind Farm, prepared by Avisense Africa dated 9 April 2025. 24.1.3. Annexure C – External Biodiversity Peer Review prepared by Charl De Villiers, undated. 24.1.4. Annexure D - Expert Comment on Hydrogeological and Hydrological Issues with reference to Climatic and Aquatic Factors related to the Proposed Wind Energy Facilities – Emvelo and Sheepmoor, prepared by Richie Morris dated 6 April 2025. 24.1.5. Annexure E - Comments on bat specialist reports prepared by E. J. Richardson dated April 2025. 24.1.6. Annexure F - Emvelo and Sheepmoor Wind Energy Facilities and Overhead Powerlines: Review of Visual and Heritage Specialist Studies prepared by Sarah Winter in association with Quinton Lawson dated 8 April 2025.	
				CONCLUDING COMMENTS	
				25.1. It is clear from the content of these comments that the EIA processes did not meet the requirements of the NEMA principles,	The EIAs for Emvelo and Sheepmoor WEFs were undertaken in accordance with the

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				the objectives of Integrated Environmental Management and of the EIA process itself.s	2014 NEMA EIA Regulations (GNR 326), incorporating specialist studies, legal compliance requirements, and meaningful stakeholder engagement. While interpretations of impact-benefit weighting may differ, the process adhered to statutory requirements and procedural best practice, ensuring that decision-making is informed, transparent, and defensible.
				25.2. In addition, principles related to mainstreaming biodiversity in EIA process do not appear to have informed the approach to this EIA process. Similarly, sustainability-led EIA principles are also not seen to be embedded in the EIA process for the proposed Emvelo and Sheepmoor WEFs.	The EIAs integrated biodiversity considerations through detailed specialist assessments, including mapping of Critical Biodiversity Areas, Ecological Support Areas, and species of conservation concern. Sustainability principles were embedded via application of the mitigation hierarchy (avoidance, minimisation, mitigation, and offsetting where applicable) and alignment with NEMA Section 2 principles. These measures reflect a sustainability-led approach consistent with national policy and international best practice
				25.3. There are numerous weaknesses and shortcomings in the DEIRs including information gaps (incomplete / missing information), gaps in the identification of impacts, inaccurate and cursory treatment of environmental sensitivities, understating of the significance of, in particular, biodiversity impacts, poor application of the mitigation hierarchy, to mention a few.	The DEIRs and supporting reports comprise extensive specialist input across multiple disciplines. The mitigation hierarchy was applied in accordance with NEMA Section 2 principles, with avoidance, minimisation, and mitigation measures evaluated for all identified impacts. Any perceived gaps or omissions are addressed in the Final EIA documentation, and the iterative nature of EIA allows for refinement and incorporation of stakeholder input prior to decision-making.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				25.4. There is no compelling reason for the projects to be regarded as appropriate in the proposed location. Quite the contrary. Whilst renewable energy may be needed for a variety of very commendable environmental reasons (climate change etc.), this applies uniformly or universally to such facilities.	Site selection for Emvelo and Sheepmoor WEFs was informed by a multi-criteria analysis considering wind resource availability, grid connection feasibility, landowner willingness, and cumulative environmental sensitivities. While renewable energy benefits are broadly applicable, NEMA requires consideration of the "best practicable environmental option" (Section 2(4)(b)), which was applied through comparative assessment of alternatives and site-specific impact-benefit evaluation.
				25.5. It is contended, that the recommendation to authorise the proposed projects based on a skewed motivation weighted towards climate change, energy needs and socio-economic benefits. These are not unique to this location. Wherever a renewable energy project is located, the associated benefits will accrue. This means that to trade-off such benefits against adverse effects, including the potential loss of unique and irreplaceable resources is wholly inappropriate and cannot be reasonably justified.	
				25.6. The imbalanced motivation is exacerbated by arguing that the actual physical footprint of the wind turbines and associated infrastructure will occupy a small area of land compared to the total project area. This shows a fundamental misunderstanding of how natural systems operate. Impacts are not contained to the physical footprint of individual components of that development. The entire site will be impacted. The WTGs and associated roads will dissect and fragment the landscape. Then there is the height of the turbines – there is the extent of blade sweep to consider, as well as edge effects. Thus, the footprint of the projects is not just the space it occupies on the ground, but the aerial space it occupies, both vertically and horizontally.	The EIAs explicitly considered both the direct and indirect spatial impacts of turbine placement, associated roads, and infrastructure, including fragmentation, edge effects, and aerial habitat impacts. The specialist studies quantified and evaluated these effects to inform mitigation measures, consistent with accepted EIA methodologies and international guidance.
				25.7. It is inconceivable that an EAP would recommend the authorisation of a proposed projects where the majority of the site shows very high and high environmental sensitivity. This runs counter to the intention of EIA and to the principles of environmental sensitivity. In fact, the fact that most of the site is	The concern regarding the high sensitivity of the proposed development site is acknowledged. The site includes multiple overlapping ecological features of national and provincial importance, including:

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				either of very high or high sensitivity is an immediate 'red flag'. Effectively, this is a fatal flaw.	• Critical Biodiversity Areas (CBAs) – Irreplaceable and Optimal • Key Biodiversity Areas (KBAs) • Intact Grassland Patches • National Protected Area Expansion Strategy (NPAES) Focus Areas • Important Bird Areas (IBAs) • Climate Change Corridors • Habitat for Species of Conservation Concern (SCCs) These sensitivities were identified through specialist assessments and have informed the iterative refinement of the project layout. The layout was revised to avoid the most critical ecological features where technically feasible. Where avoidance was constrained by engineering, land-use, or grid connection requirements, mitigation and offset measures were proposed in line with the mitigation hierarchy under Section 2(4)(a)(i) of NEMA. The precautionary principle has been applied through: • Exclusion of turbines from formally delineated no-go zones (e.g., Martial Eagle nest buffers, Southern Bald Ibis roost corridors). • Implementation of Shut Down on Demand (SDoD) and blade patterning for turbines in medium and high-risk zones.
				25.8. A site that shows the level and extent of sensitivity as in this case should be avoided for the purposes of 'hard' development that is semi-industrial in character. This ought to be self-evident. This is in direct opposition to the precautionary principle and the need to protect and sustain vulnerable ecosystems – as these constitute part of the Earth's life support system.	

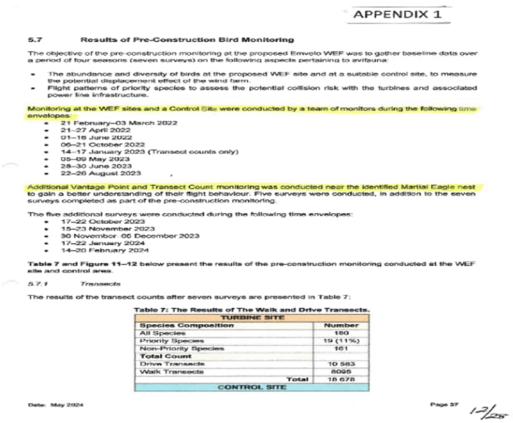
Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					• Development of a Biodiversity Offset Report (BOR) aligned with the 2023 National Biodiversity Offset Guideline. • Inclusion of an Oribi Management Plan, with further surveys and adaptive management measures. While the site is sensitive, the EIA process has sought to balance ecological protection with national renewable energy objectives. The Final EIA Report transparently documents all constraints, trade-offs, and mitigation strategies, enabling the Competent Authority to make an informed decision.
				25.9. The proposed development is incompatible with the environmental sensitivity of the site and therefore the recommendation ought to be to refuse the development.	The EIAs provide a comprehensive evaluation of environmental, social, and economic considerations, applying statutory principles, mitigation hierarchy, and best practice impact management. The Final EIA documentation, incorporating stakeholder input and refined mitigation measures, supports informed decision-making by the competent authority, consistent with NEMA Section 24 and related regulations. While sensitivity is recognised, the assessments demonstrate that impacts can be managed within acceptable limits, subject to conditions and monitoring

TABLE 7-8 INTEREST AND AFFECT PARTY J MEYER COMMENTS ON DRAFT EIA REPORT

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
1.	Josua Meyer	15 August 2025	Revised Draft EIAr	A - AVIFAUNAL 1. THE AVIFAUNAL SPECIALIST REPORT of MAY 2025 IS FATALLY FLAWED.	
				1.1. AfriAvian signed an NDA (non-disclosure agreement) with the applicant, Mulilo, concerning the tagged data of two martial eagles. That is an undisputed CONFLICT OF INTERST? Mr Lloyd Barnes of Mulilo also made the shocking confession in the meeting held on the farm Onverwacht on Monday, 4/08/2025 that he and AfriAvian collective define the shaped exclusion zones for the Southern Bald Ibis. This puts AfriAvign integrity and credibility under supreme suspicion and is contradictory to the DECLARA TION they signed as independent specialist	The concern regarding the signing of a non-disclosure agreement (NDA) and the potential implications for specialist independence is noted. NDAs are a common professional requirement when sensitive ecological or conservation data are shared between parties and serve to safeguard the integrity of datasets rather than to influence specialist judgement. The exclusion zones applied in relation to Southern Bald Ibis nesting sites were developed by the avifaunal specialist through the application of their professional expertise and in accordance with established biodiversity guidelines. While the Applicant was informed of the zones, this was for purposes of layout refinement and not for co-determination of technical boundaries. The

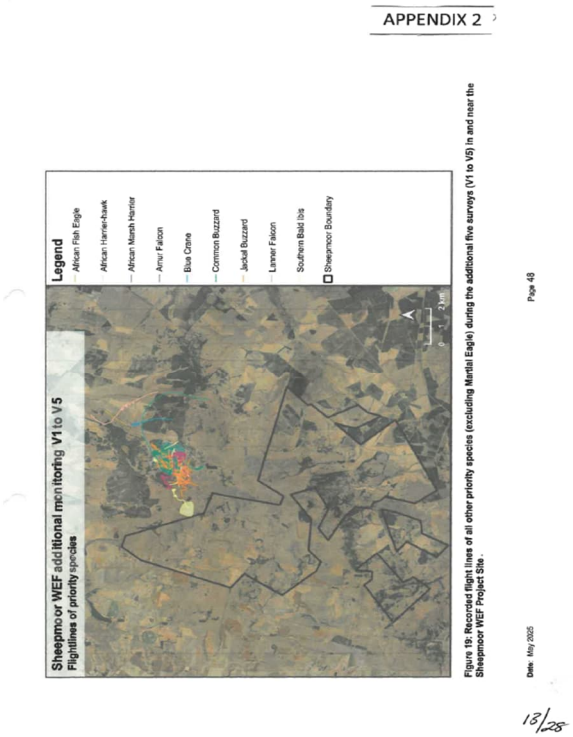
Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					independence declaration remains valid and consistent with regulatory requirements.
				1.2. An investigation of the validity on the fitting of the satellite tracking devices (tagging) to the two Martial Eagles were done by Mr Theo Mol, the ornithologist of MTPA. Mr Moll conclusion was without a doubt that the project of the applicant, MULILO, in partnership with EWT, was done without valid permits and is therefore illegal, if not criminal. Mulilo is in partnership with EWT to fit the satellite device on the Martial Eagle. They are therefore collectively accountable for their partner's misconduct irrespective who did it. Attempts to shift the blame cannot legalize the misconduct nor the tagged data obtained from the misconduct irrespective weather the data is useful information or not. What aggravate the situation is that the tagged data was withheld from the I&AP and used selectively by AfriAvian.	Allegations regarding the absence or invalidity of permits for the tagging of Martial Eagles have been raised, and it is acknowledged that the competent authority is ultimately responsible for determining the validity of such authorisations. The avifaunal specialist has clarified that the data incorporated into the assessment were relevant, scientifically useful, and applied solely for the purpose of evaluating potential risks to Martial Eagles and associated species of concern. The EIA process itself is not the platform to adjudicate on permit compliance, which falls under the jurisdiction of the permitting authority. It is therefore considered appropriate that the data remain within the assessment as part of the best available information, with any compliance-related concerns to

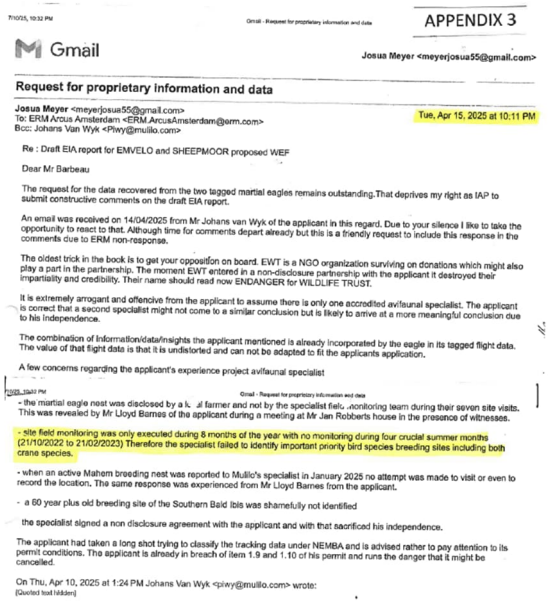
Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				AfriAvian used data in their May 2025 report of a Martial Eagle tagged near Verkykerskop. Due to the local misconduct, use of those data in AfriAvian report should be subject in providing a valid permit by the applicant under which that Martial Eagle was tagged there. Therefore, the used of the illegal tagged data in the specialist reports is not permissible. Everything which made used or any reverence to the tagged data of the Martial Eagle must be remove from all the avifaunal assessment reports for Sheepmoor and Emvelo WEF	be addressed directly with the permitting authority. Applicant: The Southern Bald Ibis exclusion zones were determined by independent specialists, and the applicant's role did not influence their scientific assessment.
				1.3. AfriAvian claimed that their site surveys were conducted over all four (4) seasons of the year. The detail in their specialist report confirm that the site surveys were only conducted during eight (8) months of the year which exclude the four essential summer months from 21 October	It is recognised that the avifaunal specialist surveys did not cover a continuous 12-month cycle but were spread across multiple months with targeted coverage during key ecological periods. The primary focus on Martial Eagles was informed by the identification of this species as a priority risk receptor, given its conservation status and

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				to 21 February. (Appendix 1)  APPENDIX 1 5.7 Results of Pre-Construction Bird Monitoring The objective of the pre-construction monitoring at the proposed Emvelo WEF was to gather baseline data over a period of four seasons (seven surveys) on the following aspects pertaining to avifauna: • The abundance and diversity of birds at the proposed WEF site and at a suitable control site, to measure the potential displacement effect of the wind farm. • Flight patterns of priority species to assess the potential collision risk with the turbines and associated power line infrastructure. Monitoring at the WEF sites and a Control Site were conducted by a team of monitors during the following time-envelopes: • 21 February–03 March 2022 • 21–27 April 2022 • 01–16 June 2022 • 06–21 October 2022 • 14–17 January 2023 (Transect counts only) • 05–09 May 2023 • 28–30 June 2023 • 22–26 August 2023 Additional Vantage Point and Transect Count monitoring was conducted near the identified Martial Eagle nest to gain a better understanding of their flight behaviour. Five surveys were conducted, in addition to the seven surveys completed as part of the pre-construction monitoring. The five additional surveys were conducted during the following time envelopes: • 17–22 October 2023 • 15–23 November 2023 • 30 November -06 December 2023 • 17–22 January 2024 • 14–20 February 2024 Table 7 and Figure 11–12 below present the results of the pre-construction monitoring conducted at the WEF site and control area. 5.7.1 Transects The results of the transect counts after seven surveys are presented in Table 7: Table 7: The Results of The Walk and Drive Transects. TURBINE SITE Species Composition / Number All Species 180 Priority Species 19 (11%) Non-Priority Species 161 Total Count Drive Transects 10 583 Walk Transects 8095 Total 18 678 CONTROL SITE Date: May 2024 Page 37 The visit in January 2023 was only a drive through. The five (5) additional surveys were only conducted close to the Martial Eagle breeding nest as confirmed in figure 19. Their bird monitoring specialist, Mr Jason Boyce, conducts a further site survey on 16 / 17 December 2024. According to Mr Johans van Wyk from Mulilo the White-winged Flufftail was targeted.	territorial use of the area. While additional comprehensive seasonal data would have provided greater breadth, the methodological approach applied is in line with recognised specialist practice for avifaunal studies in the wind energy context. The exclusion zones generated for Martial Eagles are therefore considered defensible, being derived from the best available data supplemented by professional ecological inference and established risk-mitigation principles.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				Therefore, data compiled from the site surveys is fatally flawed and unsuitable to compile any shaped exclusion zones for the priority bird species, especially the Southern Bald Ibis.	
				1.4. AfriAvian added the following highly disputable statement to their May 2025 avifaunal report (Par 5.8 page 38) 'These additional surveys were done to cover the expanded WEF during which time all other bird species were also recorded across the entire project site during this time` Why was this only revealed now and not in their reports of May 2024 and March 2025? Where is the detail which was obtained of all the other bird species across the entire site during that time, recorded? Why was this detail, if it exists at all, not separate documented as the detail in figure 19 where all other priority species flight paths obtained during the five (5) additional surveys near the Martial Eagle nest, documented?	The May 2025 report represented an updated iteration of the avifaunal assessment and included supplementary information obtained during intervening surveys. While these surveys were not explicitly documented in earlier report versions, they were undertaken with the purpose of refining and improving the dataset available for the final assessment. The absence of detailed survey logs in the appendices does not, in itself, invalidate the data or the conclusions derived therefrom. The final specialist report is considered to incorporate the most up-to-date and relevant information available at the time of reporting, which was relied upon to inform the environmental assessment process.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				If AfriAvian claiming that it was incorporated with previous site visits data then the question automatic arises way was the same not done with figure 19? Again, AfriAvian always notified the landowners when they intend to do site surveys. No such notification was given during the additional five (5) surveys near the martial eagle's nest. The conclusion is obvious no notification was necessary because there were no such site surveys executed during that time. Those five additional surveys clearly targeted the martial eagle and concentrated around their breeding site from an observation point on the R65. Recorded flight lines of all other priority species (excluding Martial Eagle) in figure 19 of both AfriAvian reports confirms that the additional five (5) surveys were only centralized around the	

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				martial eagle's nest. (Appendix 2)  Above contradict the claim from AfriAvian that surveys during the additional five (5) surveys were also done across the entire project site.	

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				The conclusion is that AfriAvian fraudulently forged this in reaction to the email dated 15/4/2025 where this misconduct was first brought under their attention. It is obvious the reason why this statement did not feature jn their previous two reports. May 2024 and March (Appendix 3). 	

APPENDIX 3

Gmail

Josua Meyer <meyerjosua55@gmail.com>

Request for proprietary information and data

Josua Meyer <meyerjosua55@gmail.com> Tue, Apr 15, 2025 at 10:11 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Bcc: Johans Van Wyk <Plwy@mullio.com>

Re : Draft EIA report for EMVELO and SHEEPMOOR proposed WEF

Dear Mr Barbeau

The request for the data recovered from the two tagged martial eagles remains outstanding.That deprives my right as IAP to submit constructive comments on the draft EIA report.

An email was received on 14/04/2025 from Mr Johans van Wyk of the applicant in this regard. Due to your silence I like to take the opportunity to react to that. Although time for comments depart already but this is a friendly request to include this response in the comments due to ERM non-response.

The oldest trick in the book is to get your opposition on board. EWT is a NGO organization surviving on donations which might also play a part in the partnership. The moment EWT entered in a non-disclosure partnership with the applicant it destroyed their impartiality and credibility. Their name should read now ENDANGER for WILDLIFE TRUST.

It is extremely arrogant and offencive from the applicant to assume there is only one accredited avifaunal specialist. The applicant is correct that a second specialist might not come to a similar conclusion but is likely to arrive at a more meaningful conclusion due to his independence.

The combination of information/data/insights the applicant mentioned is already incorporated by the eagle in its tagged flight data. The value of that flight data is that it is undistorted and can not be adapted to fit the applicants application.

A few concerns regarding the applicant's experience project avifaunal specialist

- the martial eagle nest was disclosed by a l. .l farmer and not by the specialist field monitoring team during their seven site visits. This was revealed by Mr Lloyd Barnes of the applicant during a meeting at Mr Jan Robberts house in the presence of witnesses.

- site field monitoring was only executed during 8 months of the year with no monitoring during four crucial summer months (21/10/2022 to 21/02/2023) Therefore the specialist failed to identify important priority bird species breeding sites including both crane species.

- when an active Mahem breeding nest was reported to Mullo's specialist in January 2025 no attempt was made to visit or even to record the location. The same response was experienced from Mr Lloyd Barnes from the applicant.

- a 60 year plus old breeding site of the Southern Bald Ibis was shamefully not identified

the specialist signed a non disclosure agreement with the applicant and with that sacrificed his independence.

The applicant had taken a long shot trying to classify the tracking data under NEMBA and is advised rather to pay attention to its permit conditions. The applicant is already in breach of item 1.9 and 1.10 of his permit and runs the danger that it might be cancelled.

On Thu, Apr 10, 2025 at 1:24 PM Johans Van Wyk <plwy@mullio.com> wrote:
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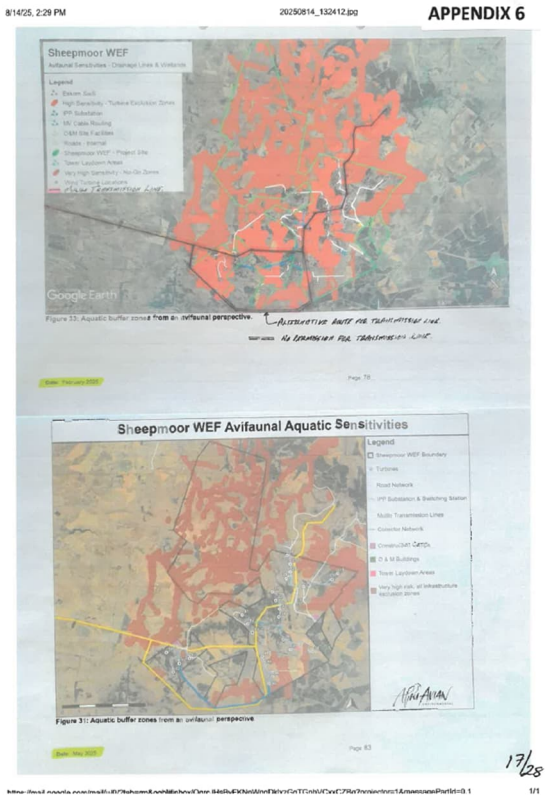
Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				1.5. AfriAvian also added the following statement to his May 2025 avifaunal report (Par 5.8 page 38) 2025 'In addition, from December 2024 to February 2025 additional targeted wetland surveys were conducted ..... and again all other bird species were also recorded across the entire project site during this time.' And again, why was this survey not mentioned in their previous avifaunal specialist report of March 2025? And again, where are the detail flight paths of all the other bird species which were allege recorded across the entire project site during the site surveys from December 2024 to February 2025? And again, why was this detail, if it exists at all, not separate shown as is the case with detail in figure 19? And again, as landowners we received only one notification of a site survey during above mentioned period from AfriAvian bird monitoring specialist, Mr Jason Boyce. He mentioned that his	The additional wetland surveys undertaken between December 2024 and February 2025 were included in the final reporting phase to strengthen the assessment of species utilising wetland habitats, particularly species of conservation concern. While raw transect data, including detailed flight paths, were not presented as appendices, the conclusions of the survey were integrated into the specialist report and factored into the impact assessment. With regard to the Grey Crowned Crane nest, no active nesting was confirmed during the official survey visits, despite anecdotal reports from landowners. The findings of the final specialist report are therefore considered to represent the best available information, consolidated from multiple survey efforts across the study period, and provide a reasonable basis for the conclusions reached.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				site survey during 16/17 December 2024 targeted mainly the wetlands for the white-winged flufftail. Nevertheless, if multiple wetland surveys were done during that period, then AfriAvian scandalous failed to allocate the active Grey Crowned Crane breeding nest. (Appendix 4) Even after they were informed of the active nest on 15/01/2025? (Appendix 5) It appears to be another unethical attempt by AfriAvian to rectify the absence of their summer site surveys. In the meantime, they shamefully exposed their flawed site surveys.	

				3/16/25, 9:55 AM 20250127_065127.jpg APPENDIX 4 	

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					
				1.6. The aquatic turbine exclusion buffer zones around the drainage lines and wetlands from the	The adjustment of turbine exclusion buffers around drainage lines and wetlands in the May 2025 Avifaunal

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				avifaunal perspective are deleted by AfriAvian in their May 2025 specialist report. Motivation given by AfriAvian for such a drastic adjustment is highly disputable. The scenario did not change since their March 2025 report because there was no substantial change in the May 2025 aquatic specialist report that justified it. The March 2025 was supposed to be the final avifaunal report. It was the last opportunity for any adjustments and this should have been done in that report if necessary. The additional three (3) months extension could not be foreseen. The reason becomes obvious when the February 2025 (Figure 33) and May 2025 (Figure 31) reports are compared. Mulilo had a problem and needs to obtain a restriction free corridor for	Specialist Report was based on updated ecological data and alignment with the final delineation of aquatic features. The avifaunal specialist refined the buffer strategy to reflect species-specific habitat use and flight behaviour, incorporating additional wetland survey data collected between December 2024 and February 2025. These surveys aimed to improve the understanding of bird movement patterns in relation to aquatic habitats and were used to inform the final layout. While the aquatic specialist's core findings remained consistent between the March and May 2025 reports, the avifaunal team applied a more targeted approach to buffer design. This included shaped buffers informed by empirical data and ecological modelling, which are increasingly used in environmental assessments to balance ecological

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				their transmission line. (Appendix 6)  The adjustment further justifies the four (4) proposed turbines on the farm Windhoek which were in narrow spaces between constrains.	protection with technical feasibility. The shaped buffers were designed to avoid unnecessary exclusion of areas where risk was determined to be low, while maintaining protection for high-sensitivity zones. The final layout was developed through an iterative process that considered ecological constraints, engineering requirements, and stakeholder input. Turbine placement in narrow corridors between sensitive areas was reviewed, and where feasible, adjustments were made to avoid overlap with high-risk zones. The Environmental Management Programme (EMPr) includes provisions for pre-construction walkdowns by specialists to verify habitat sensitivity and refine turbine siting accordingly.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				Specialist recommended that turbines should be excluded in narrow spaces < 500 m between constrains, no-go and high-risk areas, because birds and bats are free foragers with unpredictable flight behaviour. This adjustment is therefore unethical, unprofessional, and highly controversial.	
				1.7. AfriAvian denied knowledge about the tagging of a female martial eagle when they wereapproached on 11 December 2024	The concern regarding AfriAvian's initial response about the tagged female Martial Eagle and its subsequent use in the May 2025 avifaunal report is noted. The tracking data was used to inform the delineation of exclusion zones and to better understand the movement patterns of the species within the project area. This data contributed to the development of shaped buffers and risk modelling, which are standard tools in avifaunal impact assessments. While the initial communication may have led to confusion, the inclusion of

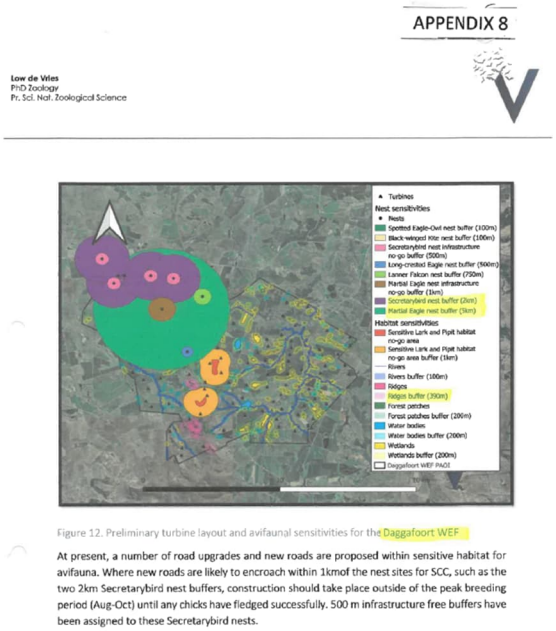
Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				(Appendix 7)  In the meantime, AfriAvian used that data selectively in their specialist's report but inexplicable neglected to inform us that it exists.	the data in the final report was intended to strengthen the scientific basis of the assessment. The specialist's role is to interpret available ecological data to inform mitigation strategies, and the use of tagged data once verified was consistent with that objective. The EAP coordinated the integration of specialist inputs and ensured that the final report reflected the most current and relevant information available at the time of submission.

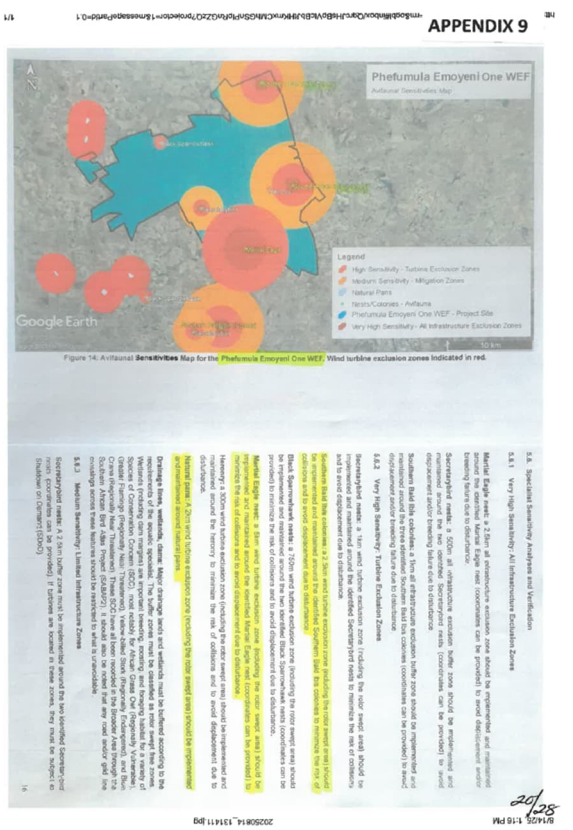
Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				Not very transparent but highly suspicious behaviour of AfriAvian.	
				1.8. AfriAvian claimed in his March 2025 and May 2025 specialist report (Par 5.8.7.1) that a flight risk modelling of the martial eagles tagged data was not conducted due to the limited number of birds and temporal span of the tagged data. The same data seems to be sufficient to conduct sophisticated models for mitigation recommendation on the movement of the Martial Eagle? Highly contradictory approach.	The observation that flight risk modelling was not conducted, yet the same data was used to inform mitigation recommendations, is noted. However, the interpretation that this is contradictory is not accurate. AfriAvian stated in their March and May 2025 specialist reports that formal flight risk modelling was not undertaken due to the limited sample size (two tagged individuals) and the temporal span of the data. This limitation meant that a statistically robust predictive model could not be developed with high confidence. However, the available GPS tracking data still provided valuable insight into the movement patterns, foraging range, and habitat use of the tagged Martial Eagles.

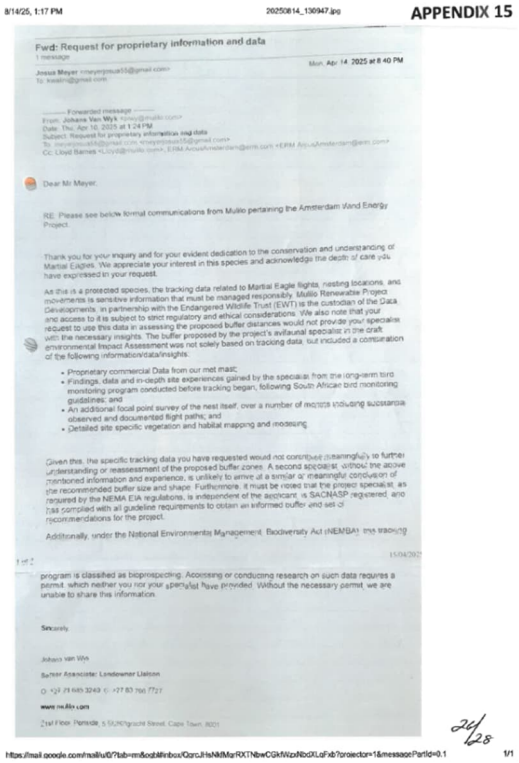
Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					These insights were used to inform precautionary mitigation measures, including the delineation of shaped exclusion zones and turbine siting recommendations. This approach is consistent with standard avifaunal assessment practice, where even limited but verified data can be used to guide risk-informed decisions, provided it is interpreted conservatively and transparently. The EAP was informed by the Endangered Wildlife Trust (EWT) that the tagging was conducted under a valid permit issued in terms of the Mpumalanga Nature Conservation Act, 10 of 1998. If any irregularities in the permitting process are later confirmed, they would be addressed by the relevant conservation authority. However, this does not automatically render the data

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					unusable or unsuitable for inclusion in the EIA process. The data was used to strengthen the scientific basis of the assessment and to support the development of defensible mitigation strategies
				1.9. The recommended exclusion buffer for the Martial Eagle by AfriAvian is primary based on the illegal obtained satellite data and cannot be used in both their May 2025 final reports. The only alternative is to return to the more proven circular buffers around breeding sites which are general accepted by most avifaunal specialists. The Martial Eagle specialist of EWT, dr Gareth Tate, recommended a circular no-go buffer zone around a Martial Eagles nest of six (6) km. Dr Andrew Jenkins of Avisence recommended the following buffer in his peer review report of 9 April 2025: "Application of a larger protective buffer around the Martial Eagle nest (of at least 6 km) is the	The recommendation of a shaped exclusion buffer for the Martial Eagle in the May 2025 Avifaunal Specialist Report was based on site-specific data, including GPS tracking information, habitat use, and observed flight behaviour. While the data set was limited in size, it provided valuable insight into the spatial ecology of the tagged individuals and was used to inform a precautionary, risk-based approach to turbine siting. The use of shaped buffers, rather than fixed-radius circular buffers, reflects a growing trend in avifaunal impact assessments where empirical data is available. This approach allows for more

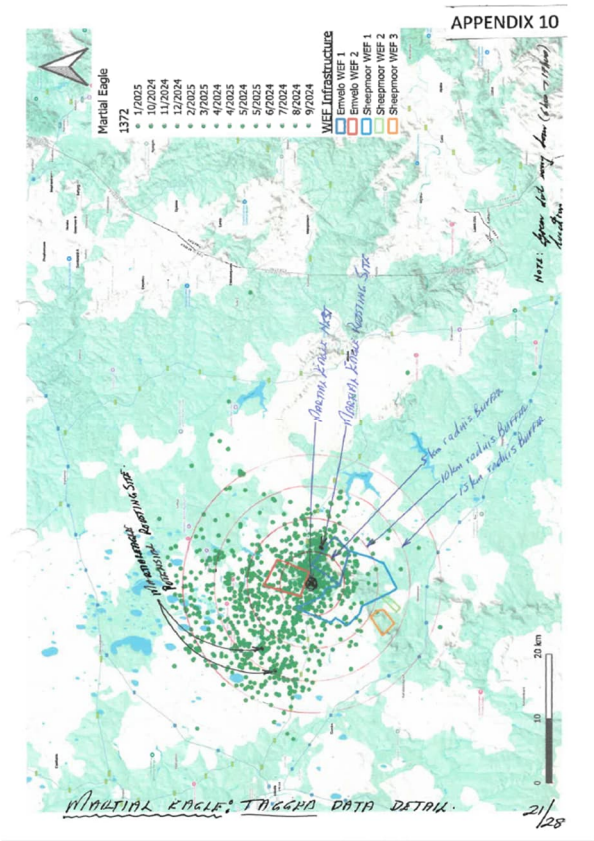
Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				only, appropriately conservative way to mitigate impact risk in this instance, especially given that the report acknowledge that the tracked eagle spent 21% of the recorded flight time > 6 km away from the nest site." The avifaunal specialist Dr Low de Vries from Volant applied a buffer zone of five (5) km around the Martial Eagle nest on the Daggafoort	accurate alignment of exclusion zones with actual habitat use and movement corridors, rather than applying uniform distances that may not reflect local conditions. The shaped buffer applied in this case was developed to avoid high-use areas while maintaining flexibility in layout design. It is acknowledged that other specialists, including Dr Gareth Tate (EWT), Dr Andrew Jenkins (Avisense), and Dr Low de Vries (Volant), have recommended circular buffers of 5–6 km in other contexts. These recommendations are based on broader conservation principles and are valid in the absence of site-specific data. However, in this case, the shaped buffer was informed by actual tracking data and was applied conservatively to reduce collision risk. The suggestion that the data was “illegally obtained” is noted. The EAP and applicant were informed by the

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				WEF. (Appendix 8)  Ironically, AfriAvian themselves applied a five (5) km buffer zone around the Martial Eagle nest in their avifaunal specialist report for the Phefumula	Endangered Wildlife Trust (EWT) that the tagging was conducted under a valid permit issued in terms of the Mpumalanga Nature Conservation Act, 10 of 1998. If any irregularities in the permitting process are confirmed, they would be addressed by the relevant conservation authority. This does not automatically render the data unusable or unsuitable for inclusion in the EIA process. The data was used to strengthen the scientific basis of the assessment and to support the development of defensible mitigation strategies. The data and methodology used to assess avifaunal impacts particularly those relating to the Martial Eagle are scientifically credible, precautionary in nature, and aligned with best practice in environmental assessment. The Environmental Management Programme (EMPr) includes provisions for ongoing monitoring and adaptive management to

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				Emoyeni One WEF. (Appendix 9)  The satellite flight data of the two eagles was unjustified withheld from the I&AP's by Mulilo.	ensure that the mitigation measures remain effective throughout the project lifecycle.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				(Appendix 15)  8/14/25, 1:17 PM 20250814_130947.jpg **APPENDIX 15** **Fwd: Request for proprietary information and data** 1 message Joosa Meyer <meyerjosua55@gmail.com> Mon, Apr 14, 2025 at 8:40 PM To: kwalrn@gmail.com ---------- Forwarded message --------- From: Johann Van Wyk <johann@mulilo.com> Date: Thu, Apr 10, 2025 at 1:24 PM Subject: Request for proprietary information and data To: meyerjosua55@gmail.com <meyerjosua55@gmail.com> Cc: Lloyd Barnes <Lloyd@mulilo.com>, ERM Acres Amsterdam <ERM.AcresAmsterdam@erm.com> Dear Mr Meyer, RE: Please see below formal communications from Mulilo pertaining the Amsterdam Wind Energy Project. Thank you for your inquiry and for your evident dedication to the conservation and understanding of Martial Eagles. We appreciate your interest in this species and acknowledge the depth of care you have expressed in your request. As this is a protected species, the tracking data related to Martial Eagle flights, nesting locations, and movements is sensitive information that must be managed responsibly. Mulilo Renewable Project Developments, in partnership with the Endangered Wildlife Trust (EWT) is the custodian of the Data, and access to it is subject to strict regulatory and ethical considerations. We also note that your request to use this data in assessing the proposed buffer distances would not provide you/ specialist with the necessary insights. The buffer proposed by the project's avifaunal specialist in the draft environmental Impact Assessment was not solely based on tracking data, but included a consideration of the following information/data/insights: • Proprietary commercial Data from our met mast; • Findings, data and in-depth site experiences gained by the specialist from the long-term bird monitoring program conducted before tracking began, following South African bird monitoring guidelines; and • An additional focal point survey of the nest itself, over a number of months including successful observed and documented flight paths; and • Detailed site specific vegetation and habitat mapping and assessing. Given this, the specific tracking data you have requested would not contribute meaningfully to further understanding or reassessment of the proposed buffer zones. A second specialist, without the above mentioned information and experience, is unlikely to arrive at a similar or meaningful conclusion of the recommended buffer size and shape. Furthermore, it must be noted that the project specialist, as required by the NEMA EIA regulations, is independent of the applicant, is SACNASP registered, and has complied with all guideline requirements to obtain an informed buffer and set of recommendations for the project. Additionally, under the National Environmental Management: Biodiversity Act (NEMBA) this tracking 15/04/2025 1 of 2 program is classified as bioprospecting. Accessing or conducting research on such data requires a permit, which neither you nor your specialist have provided. Without the necessary permit, we are unable to share this information. Sincerely, Johann van Wyk Senior Associate: Landowner Liaison O: +27 21 670 3249 C: +27 83 766 7727 www.mulilo.com 21st Floor, Portside, 5 Buitengracht Street, Cape Town, 8001 24/28 https://mail.google.com/mail/u/0/?ik=m&cbl=inbox/QgrcJHsNkMqrRXTNbwCGkfWzxNbdXLqFxb?projector=1&messagePartId=0.1 1/1 This data was selective used by AfriAvian in his reports to conduct no-go zones. These buffers	

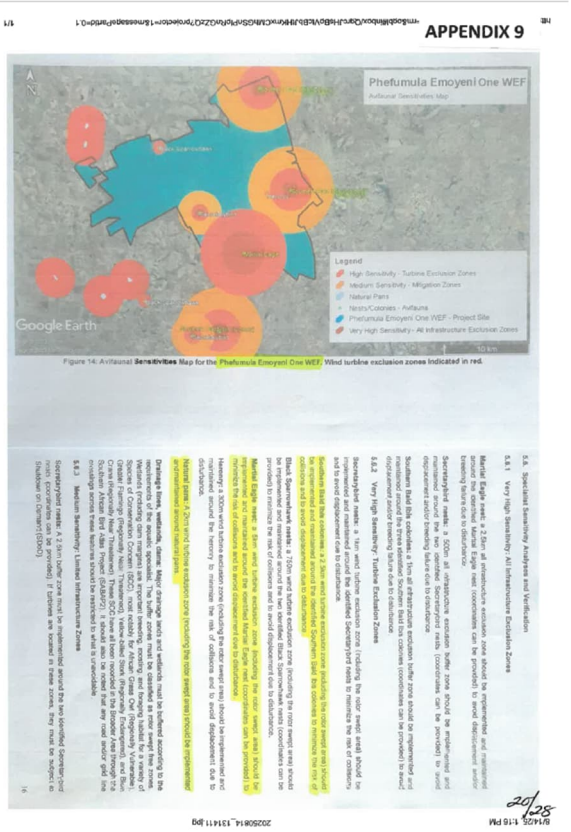
Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				and collusion risk modelling depends highly on several unproven assumptions. The same data of the tagged eagles were eventually obtained through MTPA. The hourly daytime positions of the female martial eagle (1372) were plotted and gave a clear indication where the female eagle moved during the 14-	

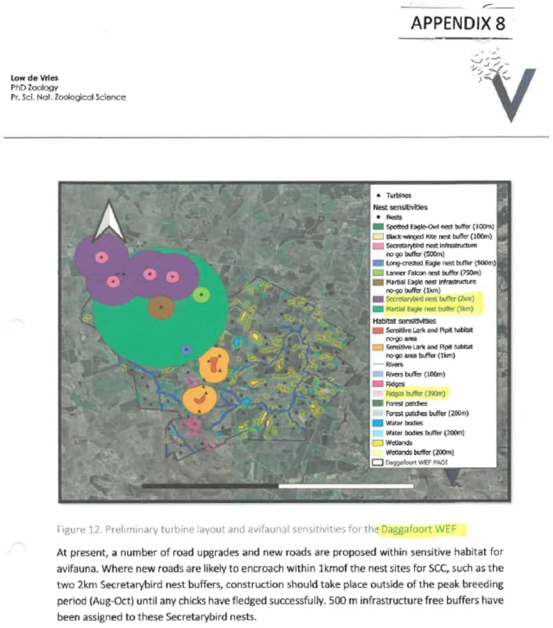
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				month period. (Appendix 10)  It reveals clearly that recommended buffers of AfriAvian is inadequate and that was the	

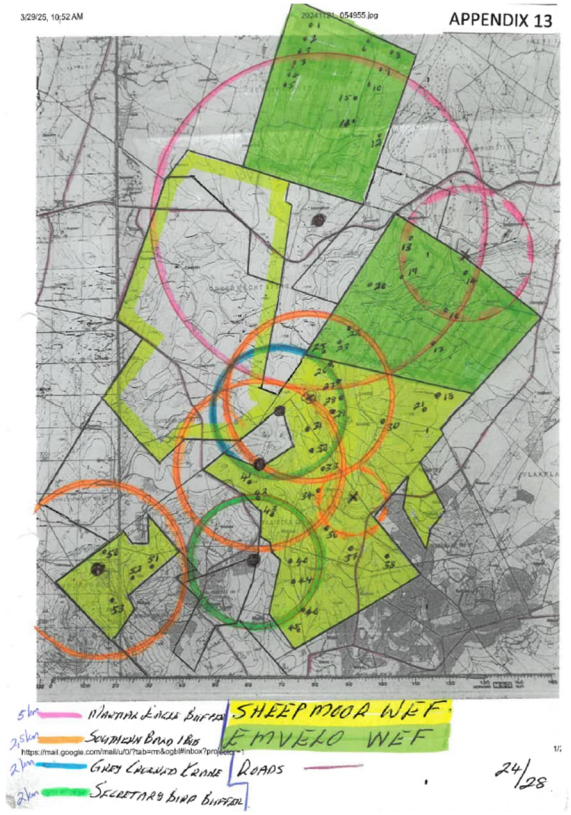
Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				predominant reason while Mulilo refused to reveal the data to the I&APs. The flight data obtained from the tagged female martial eagle clearly indicates that the shaped no-go zone calculate by AfriAvian is totally inadequate and absurd. According to the tagged data a no-go zone often (10) km radius will be more appropriate to secure the survival of the two Martial Eagles	
				1.10. On the 15 January 2025 an active breeding nest of a Grey Crowned Crane was reported to	A - AVIFAUNAL 1. THE AVIFAUNAL SPECIALIST REPORT of MAY 2025 IS FATALLY FLAWED. TAhe concern regarding the signing of a non-disclosure agreement (NDA) and the potential implications for specialist independence is noted. NDAs are a common professional requirement when sensitive ecological or conservation data are shared between parties and serve to safeguard the integrity of datasets rather than to influence specialist

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				AfriAvian. (Appendix 5)  	judgement. The exclusion zones applied in relation to Southern Bald Ibis nesting sites were developed by the avifaunal specialist through the application of their professional expertise and in accordance with established biodiversity guidelines. While the Applicant was informed of the zones, this was for purposes of layout refinement and not for co-determination of technical boundaries. The independence declaration remains valid and consistent with regulatory requirements. Allegations regarding the absence or invalidity of permits for the tagging of Martial Eagles have been raised, and it is acknowledged that the competent authority is ultimately responsible for determining the validity of such authorisations. The avifaunal specialist has clarified that the data incorporated into the assessment were relevant, scientifically useful, and applied solely for the purpose of evaluating potential

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				Although it is an endangered bird species the reported breeding nest, in the middle of a natural pan, was not investigated nor recorded by AfriAvian in their report of March 2025 and May 2025. AfriAvian also failed to allocate this breeding site during their claimed wetland site surveys in December 2024 to February 2025. A clear example of their defective site surveys. AfriAvian applied a two (2) km buffer around similar natural pans in their avifaunal report for the Phefumula Emoyeni One WEF project.	risks to Martial Eagles and associated species of concern. The EIA process itself is not the platform to adjudicate on permit compliance, which falls under the jurisdiction of the permitting authority. It is therefore considered appropriate that the data remain within the assessment as part of the best available information, with any compliance-related concerns to be addressed directly with the permitting authority. Applicant: The Southern Bald Ibis exclusion zones were determined by independent specialists, and the applicant's role did not influence their scientific assessment. It is recognised that the avifaunal specialist surveys did not cover a continuous 12-month cycle but were spread across multiple months with targeted coverage during key ecological periods. The primary focus on Martial

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				(Appendix 9)  APPENDIX 9 Phefumula Emoyeni One WEF Google Earth Figure 14: Avifaunal Sensitivities Map for the Phefumula Emoyeni One WEF. Wind turbine exclusion zones indicated in red. Dr Low de Vries of Volant recommended a circular no-go zone of three (3) km around a	Eagles was informed by the identification of this species as a priority risk receptor, given its conservation status and territorial use of the area. While additional comprehensive seasonal data would have provided greater breadth, the methodological approach applied is in line with recognised specialist practice for avifaunal studies in the wind energy context. The exclusion zones generated for Martial Eagles are therefore considered defensible, being derived from the best available data supplemented by professional ecological inference and established risk-mitigation principles. The May 2025 report represented an updated iteration of the avifaunal assessment and included supplementary information obtained during intervening surveys. While these surveys were not explicitly documented in earlier report versions, they were undertaken with the purpose of refining and improving the

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				Wattle Crane nest and a 1 km turbine exclusion zone around the Grey Crown Crane (Appendix 8)  APPENDIX 8 Low de Wies PhD Zoology Pr. Sci. Nat. Zoological Science Figure 12. Preliminary turbine layout and avifaunal sensitivities for the Daggafoort WEF At present, a number of road upgrades and new roads are proposed within sensitive habitat for avifauna. Where new roads are likely to encroach within 1kmof the nest sites for SCC, such as the two 2km Secretarybird nest buffers, construction should take place outside of the peak breeding period (Aug-Oct) until any chicks have fledged successfully. 500 m infrastructure free buffers have been assigned to these Secretarybird nests. Therefore, a circular no-go buffer of 2 km is more appropriate around the breeding site of the Grey Crowned Crane because wetland buffer	dataset available for the final assessment. The absence of detailed survey logs in the appendices does not, in itself, invalidate the data or the conclusions derived therefrom. The final specialist report is considered to incorporate the most up-to-date and relevant information available at the time of reporting, which was relied upon to inform the environmental assessment process. The additional wetland surveys undertaken between December 2024 and February 2025 were included in the final reporting phase to strengthen the assessment of species utilising wetland habitats, particularly species of conservation concern. While raw transect data, including detailed flight paths, were not presented as appendices, the conclusions of the survey were integrated into the specialist report and factored into the impact assessment. With regard to the

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				alone not big enough. (Appendix 13) 	Grey Crowned Crane nest, no active nesting was confirmed during the official survey visits, despite anecdotal reports from landowners. The findings of the final specialist report are therefore considered to represent the best available information, consolidated from multiple survey efforts across the study period, and provide a reasonable basis for the conclusions reached. The adjustment of turbine exclusion buffers around drainage lines and wetlands in the May 2025 Avifaunal Specialist Report was based on updated ecological data and alignment with the final delineation of aquatic features. The avifaunal specialist refined the buffer strategy to reflect species-specific habitat use and flight behaviour, incorporating additional wetland survey data collected between December 2024 and February 2025. These surveys aimed to improve the understanding of bird movement patterns in relation to

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					aquatic habitats and were used to inform the final layout. While the aquatic specialist's core findings remained consistent between the March and May 2025 reports, the avifaunal team applied a more targeted approach to buffer design. This included shaped buffers informed by empirical data and ecological modelling, which are increasingly used in environmental assessments to balance ecological protection with technical feasibility. The shaped buffers were designed to avoid unnecessary exclusion of areas where risk was determined to be low, while maintaining protection for high-sensitivity zones. The final layout was developed through an iterative process that considered ecological constraints, engineering requirements, and stakeholder input.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					Turbine placement in narrow corridors between sensitive areas was reviewed, and where feasible, adjustments were made to avoid overlap with high-risk zones. The Environmental Management Programme (EMPr) includes provisions for pre-construction walkdowns by specialists to verify habitat sensitivity and refine turbine siting accordingly. The concern regarding AfriAvian's initial response about the tagged female Martial Eagle and its subsequent use in the May 2025 avifaunal report is noted. The tracking data was used to inform the delineation of exclusion zones and to better understand the movement patterns of the species within the project area. This data contributed to the development of shaped buffers and risk modelling, which are standard tools in avifaunal impact assessments.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					While the initial communication may have led to confusion, the inclusion of the data in the final report was intended to strengthen the scientific basis of the assessment. The specialist's role is to interpret available ecological data to inform mitigation strategies, and the use of tagged data once verified was consistent with that objective. The EAP coordinated the integration of specialist inputs and ensured that the final report reflected the most current and relevant information available at the time of submission. Applicant: The I&APs query related to whether another female had been tagged after the initial tagging of the female and juvenile in April 2024. The avifaunal specialist's response was valid, as no such tagging was known, or took place, at the time, and it was

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					appropriate to confirm and verify the information. The observation that flight risk modelling was not conducted, yet the same data was used to inform mitigation recommendations, is noted. However, the interpretation that this is contradictory is not accurate. AfriAvian stated in their March and May 2025 specialist reports that formal flight risk modelling was not undertaken due to the limited sample size (two tagged individuals) and the temporal span of the data. This limitation meant that a statistically robust predictive model could not be developed with high confidence. However, the available GPS tracking data still provided valuable insight into the movement patterns, foraging range, and habitat use of the tagged Martial Eagles.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					These insights were used to inform precautionary mitigation measures, including the delineation of shaped exclusion zones and turbine siting recommendations. This approach is consistent with standard avifaunal assessment practice, where even limited but verified data can be used to guide risk-informed decisions, provided it is interpreted conservatively and transparently. The EAP was informed by the Endangered Wildlife Trust (EWT) that the tagging was conducted under a valid permit issued in terms of the Mpumalanga Nature Conservation Act, 10 of 1998. If any irregularities in the permitting process are later confirmed, they would be addressed by the relevant conservation authority. However, this does not automatically render the data

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					unusable or unsuitable for inclusion in the EIA process. The data was used to strengthen the scientific basis of the assessment and to support the development of defensible mitigation strategies The recommendation of a shaped exclusion buffer for the Martial Eagle in the May 2025 Avifaunal Specialist Report was based on site-specific data, including GPS tracking information, habitat use, and observed flight behaviour. While the data set was limited in size, it provided valuable insight into the spatial ecology of the tagged individuals and was used to inform a precautionary, risk-based approach to turbine siting. The use of shaped buffers, rather than fixed-radius circular buffers, reflects a growing trend in avifaunal impact assessments where empirical data is available. This approach allows for more

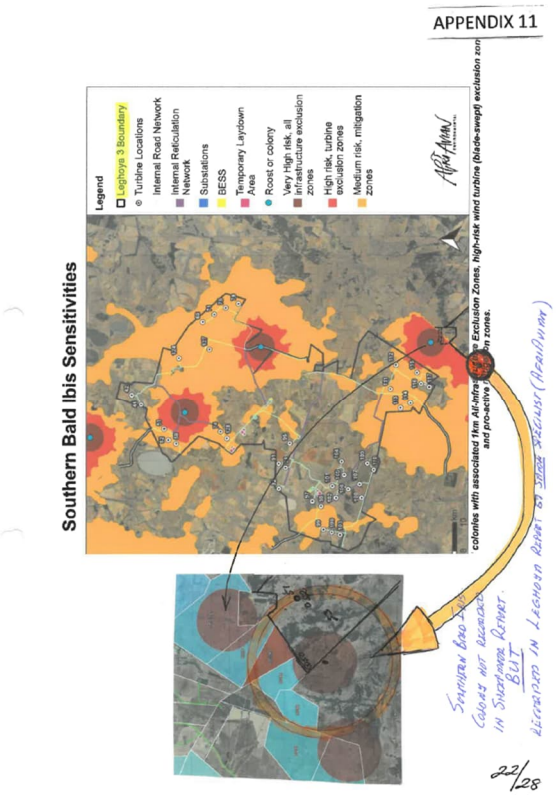
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					accurate alignment of exclusion zones with actual habitat use and movement corridors, rather than applying uniform distances that may not reflect local conditions. The shaped buffer applied in this case was developed to avoid high-use areas while maintaining flexibility in layout design. It is acknowledged that other specialists, including Dr Gareth Tate (EWT), Dr Andrew Jenkins (Avisense), and Dr Low de Vries (Volant), have recommended circular buffers of 5–6 km in other contexts. These recommendations are based on broader conservation principles and are valid in the absence of site-specific data. However, in this case, the shaped buffer was informed by actual tracking data and was applied conservatively to reduce collision risk. The suggestion that the data was “illegally obtained” is noted. The EAP and applicant were informed by the

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					Endangered Wildlife Trust (EWT) that the tagging was conducted under a valid permit issued in terms of the Mpumalanga Nature Conservation Act, 10 of 1998. If any irregularities in the permitting process are confirmed, they would be addressed by the relevant conservation authority. This does not automatically render the data unusable or unsuitable for inclusion in the EIA process. The data was used to strengthen the scientific basis of the assessment and to support the development of defensible mitigation strategies. The data and methodology used to assess avifaunal impacts particularly those relating to the Martial Eagle are scientifically credible, precautionary in nature, and aligned with best practice in environmental assessment. The Environmental Management Programme (EMPr) includes provisions for ongoing monitoring and adaptive management to

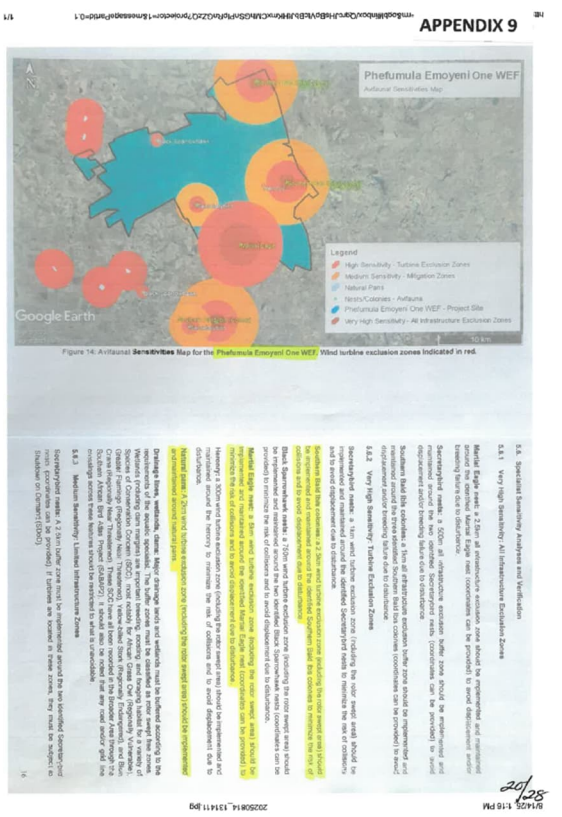
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					ensure that the mitigation measures remain effective throughout the project lifecycle. Applicant: The recommended buffers are based on independent, scientifically robust assessments tailored to this site, and not on arbitrary distances applied elsewhere. Each project has unique conditions and data, and in this case the buffers reflect site-specific specialist expertise and best-practice methodology. Comparisons to other projects are therefore not appropriate. Buffer zones from other projects (e.g., Daggafoort, Ntabande) cannot be directly applied here. Each site has unique habitats, species sensitivities, and monitoring data; copying buffers from higher-sensitivity projects without site-specific evidence does not meet

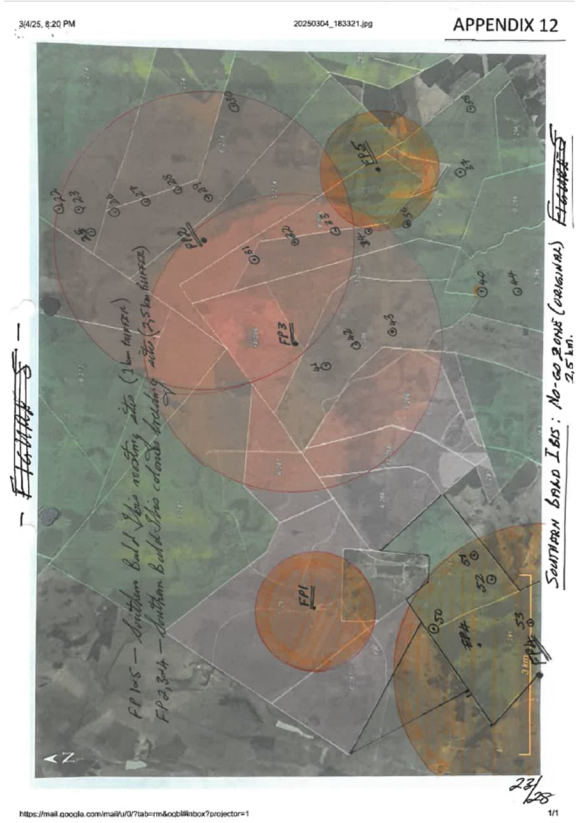
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					minimum avifaunal reporting requirements. Applicant: The presence of Grey Crowned Cranes is acknowledged, and specialist surveys followed standard protocols over multiple seasons. Protection is provided through wetland buffers in place, turbine setbacks, and operational monitoring, with adaptive measures applied if active nests are confirmed during construction or operations, noting that cranes do not always breed in the same locality year on year. Buffer zones from other projects (e.g., Daggafoort, Ntabande) cannot be directly applied here. Each site has unique habitats, species sensitivities, and monitoring data; copying buffers from higher-sensitivity projects without site-specific evidence does not meet

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					minimum avifaunal reporting requirements. Furthermore, Dr. Low de Vries is a bat specialist and SACNASP-registered Zoological Scientist, and his expertise does not necessarily qualify him as an avifaunal specialist for site-specific bird assessments.
				1.11. AfriAvian failed to allocate a breeding site of the Southern Bald Ibis colony on the Windhoek farm (Previous Sheepmoor WEF 3) during their first site surveys. This breeding site was pointed out to AfriAvian bird monitoring specialist during their first site surveys but they failed to confirm it. Another proof of their defective site surveys.Ironically, AfriAvian recorded this breeding colony in their Leghowa 3 WEF avifaunal specialist report of May	Applicant: The reference to AfriAvian's prior survey omissions on a different project (Windhoek/Sheepmoor 3) is not directly relevant to the current process. For the Emvelo/Sheepmoor WEF, avifaunal concerns have been comprehensively assessed and addressed, including the implementation of Southern-Bald Ibis buffer zones totaling almost 2,000 ha—well above current industry norms of 1 km. These measures go beyond standard requirements and are specifically designed to mitigate potential impacts on Southern Bald Ibis colonies, demonstrating a conservative and

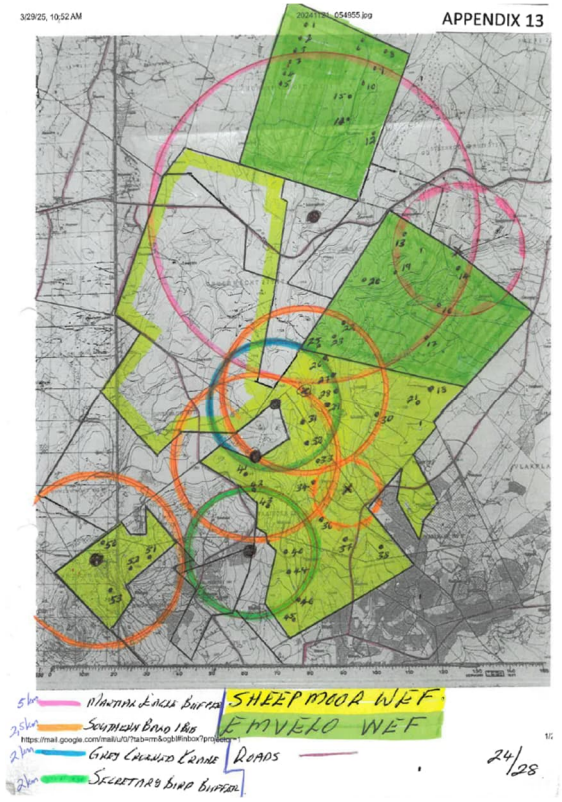
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				2025 for RedCap (Appendix 11).  AfriAvian make used of the opportunity to adjust several controversial details in their May 2025	responsible approach to avifaunal protection. While it is claimed that AfriAvian was made aware of the Southern Bald Ibis breeding site during prior surveys, the omission in their report does not undermine the current assessment. For the Emvelo/Sheepmoor WEF, all relevant avifaunal concerns have been thoroughly identified, assessed, and mitigated. AfriAvian's 2.5 km buffer in Phefumula Emoyeni One was a high-level, scoping-phase measure, and cannot be directly compared to our site-specific FEIR assessment, which reflects different location, colony sizes, habitat use, and multi-level mitigation. The shaped buffers referenced cannot be applied here, as our assessment is based on comprehensive, site-specific data covering all seasons and reflects conservative, over-buffered mitigation tailored to the actual colonies and habitat.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				report, this important location of another Southern Bald Ibis colony site was inexplicable not added? AfriAvian applied a 2,5 km circular buffer around the Southern Bald Ibis breeding colonies in their avifaunal report for the Phefumula Emoyeni One	

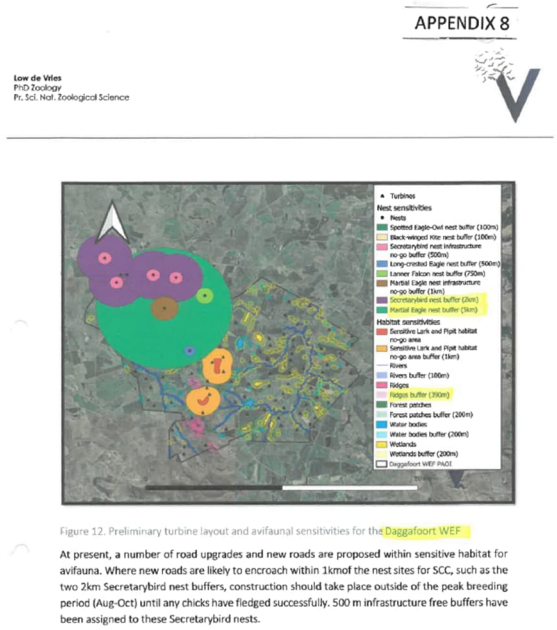
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				WEF project. (Appendix 9)  APPENDIX 9 Phefumula Emoyeni One WEF Google Earth Figure 14: Avifaunal Sensitivities Map for the Phefumula Emoyeni One WEF. Wind turbine exclusion zones indicated in red. AfriAvian also originally recommend a 2,5 km circular exclusion zone around the two Southern	

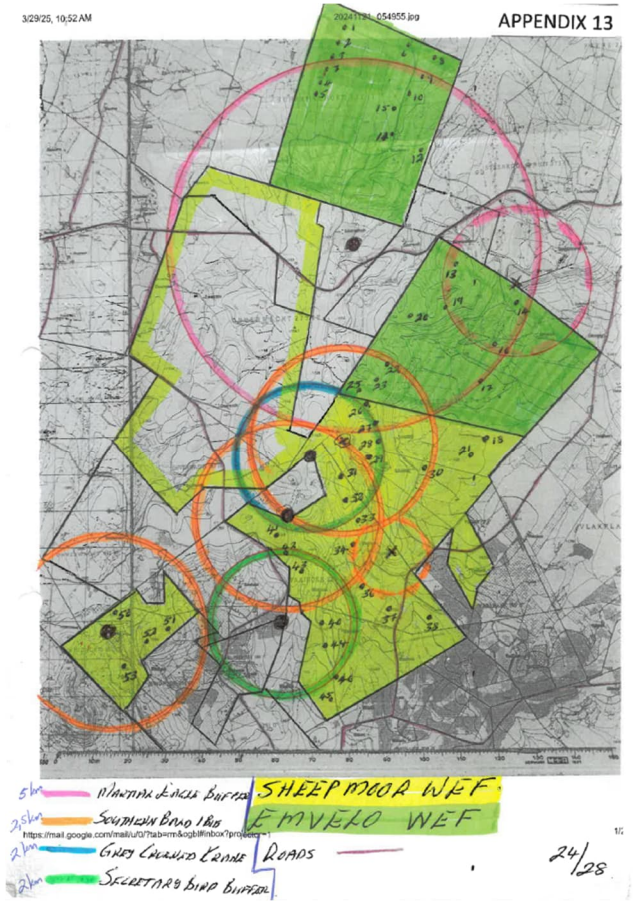
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				Bald Ibis colonies, FP2 and FP3, in the Sheepmoor and Emvelo WEF's. (Appendix 12)  	

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				Mr Lloyd Barnes of Mulilo and AfriAvian apparently collectively define afterwards the current shaped buffers. They also rely strongly on the flawed site survey data which excluded the four (4) summer months of the year. These two actions are not acceptable. Therefore, the shaped exclusion zones are unacceptable and a circular buffer of 2,5 km as originally applied by AfriAvian must be reinstated around all three (31 Southern Bold Ibis colonies	

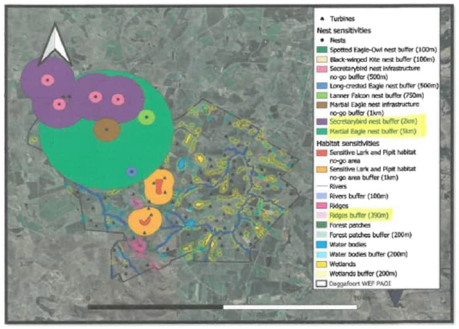
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				sites. (Appendix 13) 	
				1.12. AfriAvian failed to allocate a Secretarybird breeding nest on the farm Klipfontein as pointed	The concern regarding the Secretarybird nesting site on the farm Klipfontein is

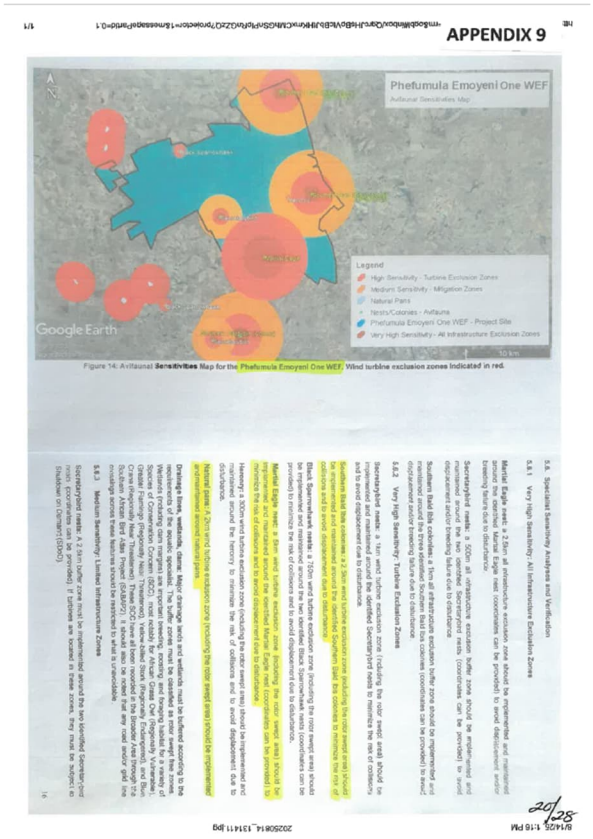
Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				out to them by Mr Pikkie Vorster. Although the nest might not have been active duringtheir site visits, it was clearly identified in photo presented by Mr Vorster and should have been recorded. The thorn three where the nest is located was unfortunately damaged by a runaway veldfire in October 2024. The tree has fortunate recovered and hopefully will be used again as a breeding site because still moved around in the area. AfriAvian recommend a one (1) km turbine exclusion zone around the Secretary bird nest in their Leghoya WEF scoping report which is totally inadequate. The avifaunal specialist Dr Low de Vries from Volant applied a buffer zone of two (2) km around the Secretary bird nest in his Daggafoort	noted. The avifaunal specialist conducted multiple site visits across seasons and recorded nesting sites based on confirmed field observations. While the nest in question may have been pointed out during a site visit, it was not confirmed as active or occupied at the time of assessment. In line with standard practice, only verified nesting sites are formally recorded in the impact assessment. The specialist's recommendation of a 1 km turbine exclusion zone around Secretarybird nests is based on species-specific flight behaviour, habitat use, and collision risk modelling. This buffer is consistent with national guidelines and has been applied in other wind energy assessments. It is acknowledged that other specialists, such as Dr Low de Vries, have applied more conservative buffers (e.g., 2 km) in different project

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				WEF specialist report. (Appendix 8)  APPENDIX 8 Low de Wies PhD Zoology Pr. Sci. Nat. Zoological Science Figure 12. Preliminary turbine layout and avifaunal sensitivities for the Daggafoort WEF At present, a number of road upgrades and new roads are proposed within sensitive habitat for avifauna. Where new roads are likely to encroach within 1kmof the nest sites for SCC, such as the two 2km Secretarybird nest buffers, construction should take place outside of the peak breeding period (Aug-Oct) until any chicks have fledged successfully. 500 m infrastructure free buffers have been assigned to these Secretarybird nests. 8) Therefore, a 2 km turbine exclusion zone is more appropriate buffer around the Secretary bird	contexts. Buffer distances vary depending on terrain, species sensitivity, and available data. In this case, the buffer strategy was developed using site-specific ecological data and a precautionary approach. The Environmental Management Programme (EMPr) includes provisions for pre-construction walkdowns to verify sensitive habitats, including potential nesting sites. Should the Secretarybird nest be confirmed as active during this phase, turbine siting will be reviewed and adjusted accordingly to ensure adequate protection. The project team remains committed to implementing scientifically defensible mitigation measures and to ensuring that turbine placement respects

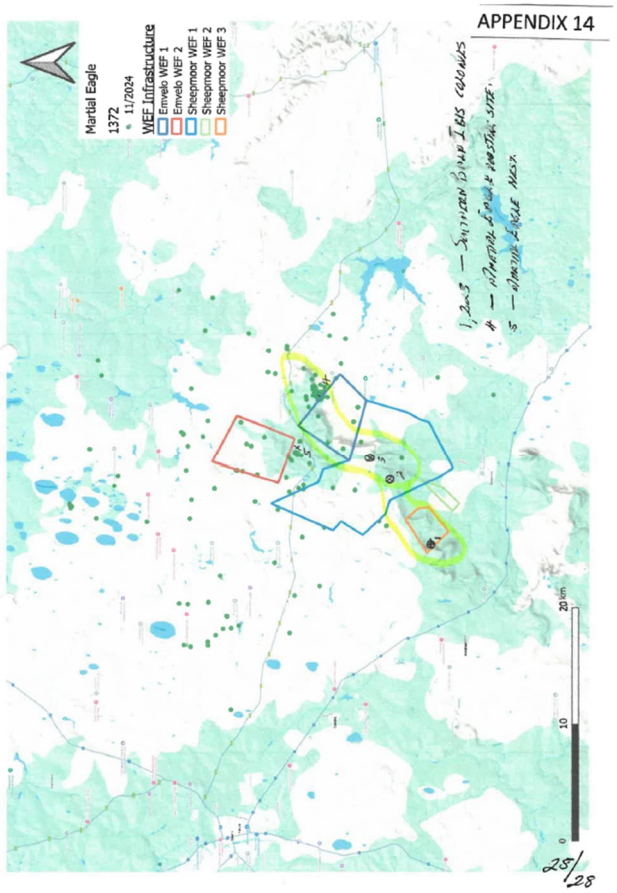
Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				nesting site (Appendix 13) 	ecological sensitivities and supports the conservation of priority species.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				1.13. Above put the integrity, credibility, and independence of the AfriAvian report under severe suspicion and recommendations for turbine exclusion zones around priority bird species in their reports should be rejected and replaced by circular buffers as applied by other specialists. (Appendix 13) Martial Eagle = 5 km circular buffer (APPENDIX 8/9) Grey Crowned Crane = 2 km circular buffer (APPENDIX 9) Southern Bald Ibis = 2,5 km circular buffer (APPENDIX 8 / 9) Secretary bird = 2 km circular buffer (APPENDIX 8/9)	The recommendation to reject AfriAvian's turbine exclusion zones and replace them with circular buffers is noted. The avifaunal specialist applied shaped buffers in this assessment based on site-specific data, including terrain, land use, and observed flight behaviour of priority bird species. This approach reflects current best practice in avifaunal impact assessments, where shaped buffers are increasingly used to align exclusion zones with actual habitat use and movement corridors, rather than applying uniform distances that may not reflect local ecological conditions. The shaped buffers applied for the Martial Eagle, Southern Bald Ibis, Grey Crowned Crane, and Secretarybird were informed by species-specific risk assessments and are supported by mitigation measures outlined in the Environmental Management Programme (EMPr). These include turbine micro-siting, pre-construction walkdowns, and

				APPENDIX 8 Low de Vries PhD Zoology Pr. Sci. Nat. Zoological Science  Figure 12. Preliminary turbine layout and avifaunal sensitivities for the Daggafoort WEF At present, a number of road upgrades and new roads are proposed within sensitive habitat for avifauna. Where new roads are likely to encroach within 1kmof the nest sites for SCC, such as the two 2km Secretarybird nest buffers, construction should take place outside of the peak breeding period (Aug-Oct) until any chicks have fledged successfully. 500 m infrastructure free buffers have been assigned to these Secretarybird nests.	adaptive management protocols to ensure that sensitive habitats are protected. The credibility and independence of the specialist were confirmed through their professional registration, declaration of independence, and adherence to the requirements of Appendix 6 of the EIA Regulations. The specialist's methodology and findings were incorporated into the final EIA Report.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				 APPENDIX 9 Figure 14: Avifaunal Sensitivities Map for the Phefumula Emoyeni One WEF. Wind turbine exclusion zones indicated in red.	
2				2. <u>Ridgeline Buffers</u>	

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				Steep rocky ridgelines spread across the entire escarpment where the Sheepmoor WEF and Emvelo WEF are located. According Dr Low de Vries of Volant Environmental those ridgelines serve as sensitive habitat for avifaunal for the following reasons	
				2.1. Great perching sites for raptors to use as vantage point when searching for prey	The ecological sensitivity of steep rocky ridgelines within the Emvelo and Sheepmoor Wind Energy Facility project areas is acknowledged. These landforms are recognised as important habitat features for avifaunal species, particularly raptors and priority species such as the Southern Bald Ibis and Martial Eagle. Their role as perching, nesting, and flyway corridors is well established and supported by both field observations and specialist input. The avifaunal specialist considered topographic features, including ridgelines, in the development of exclusion zones and turbine siting recommendations. The presence of active nesting sites in proximity to
				2.2. Flyways for raptors and large priority species which use the thermals created by the change in topography to move around.	
				2.3. Nesting and roosting sites.	
				This is proven by the currently three (3) active nesting sites of the Southern Bald Ibis, the nesting and roosting site of the Martial Eagle located around the steep ridgelines. (Appendix 14)	

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					ridgelines was factored into the sensitivity mapping and layout refinement process. While shaped buffers were applied in this project, they were informed by site-specific data, including flight behaviour and habitat use, and were designed to avoid high-risk areas. In addition, the bat specialist recommended a 200 m turbine-free buffer around rocky outcrops, which are common along ridgelines. This recommendation was incorporated into the Environmental Management Programme (EMPr), and turbine siting was reviewed to ensure compliance with this buffer where feasible. The EMPr also includes provisions for pre-construction walkdowns to verify sensitive features and refine turbine placement accordingly.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				The bat specialist also calls for a 200m no-go buffer around rocky outcrops in Table 8 of his report as is the case on majority ridgelines. Dr Low de Vries of Volant Environmental applied in his avifaunal report for Ntabande WEF a 390m turbine free buffer around those ridqelines. Similar ridqelines occur in the Emvelo and Sheepmoor proposed WEF's and the same practice should be applied to protect the avifaunal.	It is noted that in other projects, such as the Ntabande WEF, a 390 m buffer was applied around ridgelines. Buffer distances vary between projects depending on species presence, terrain, and available data. In this case, the buffer strategy was developed using a precautionary, site-specific approach and is considered appropriate given the ecological context and mitigation measures in place. The final layout avoids direct placement of turbines on confirmed nesting sites and incorporates spatial buffers to reduce disturbance and collision risk. The project team remains committed to ensuring that turbine siting respects ecological sensitivities and supports the conservation of priority species.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				3. <u>Remotely triggered turbine curtailment and observer-based Shutdown on Demand (SDoD) short falls.</u>	
				All the turbines must be provided with remote radar curtailment if application is succeeded. Manually SDoD will be inefficiently on its own because	The concerns raised regarding the limitations of observer-based Shutdown on Demand (SDoD) and the need for radar-assisted curtailment are acknowledged. The avifaunal specialist has recommended a multi-tiered mitigation strategy that includes both observer-based SDoD and, where feasible, the implementation of automated curtailment systems such as radar-triggered shutdowns. These measures are designed to reduce collision risk for priority species, particularly large-bodied and less manoeuvrable birds such as the Southern Bald Ibis and Martial Eagle. It is recognised that observer-based SDoD has operational limitations,
				3.1.1. most of the turbines is in remote and difficult accessible areas. It will be challenging to transport the people every day in time to all the turbines. The liability of the human factor playing on their cell phones or sleeping is also a reality	
				3.1.2. the movement of people to the turbines will increase human traffic as well as criminal activities and is not advisable with respect to the ground nesting species.	
				3.1.3. the fog on the escarpment becomes very dense with limited sight.	
				3.1.4. The visibility is during thunderstorms also limited	

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				The turbine radar curtailment must be proven as effective and WTG must be equipped and tested before the rotor starts turning.	especially in remote or difficult-to-access terrain, and under conditions of poor visibility such as fog or thunderstorms. These limitations are well understood in the wind energy sector and are addressed through the integration of complementary mitigation tools, including turbine micro-siting, buffer zones, and post-construction monitoring. The Environmental Management Programme (EMPr) includes provisions for evaluating the effectiveness of SDoD and adjusting protocols as needed. The project team is aware that radar-based curtailment systems are still evolving in terms of species-specific effectiveness and operational reliability. While such systems have shown promise in international applications, their performance in high lightning-risk areas and complex topography such as the escarpment requires careful consideration. The EMPr includes a commitment to test and calibrate any
				There is no clear indication which turbines will be fitted with radar SDoD. All electronic devices are in danger to be damage by lightning because the WEF will be in a high intensity lightning zone. It runs the risk to be ineffective and must be tested in short intervals with enough stock as backup. There are no official studies or report that confirms the effectiveness of above measures and devices with the enfaces on the effected priority species within this project. Most species tend to cover more distance in flight then the time the turbine rotor takes to stop. (The southern bold ibis fly between forage and roosting sites at speed of 40-50 km/hr)	

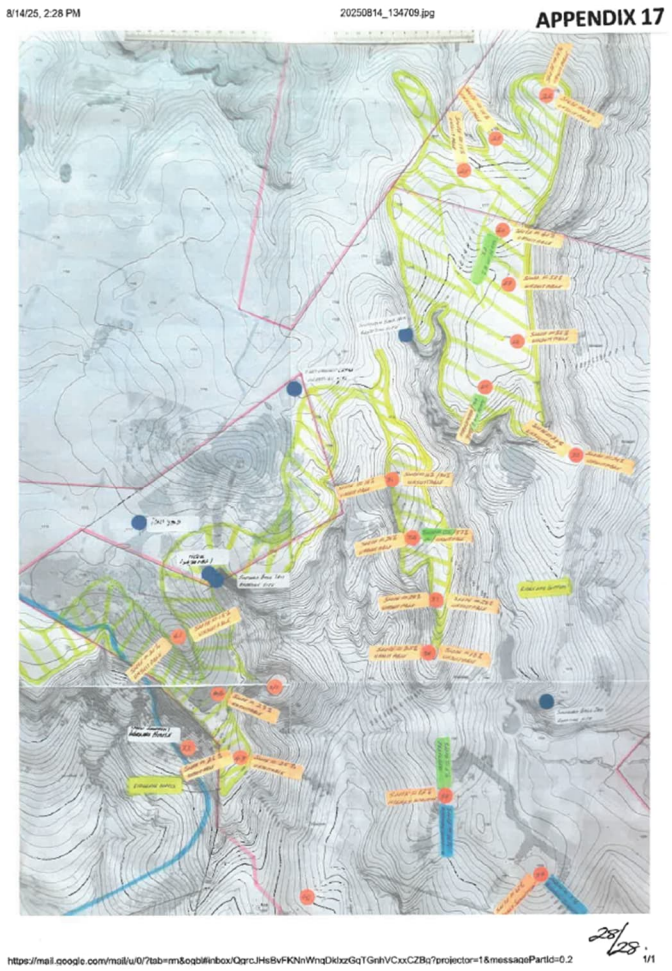
Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					installed radar systems prior to commissioning and to maintain sufficient redundancy and backup to ensure operational continuity. It is also acknowledged that certain species, including the Southern Bald Ibis, may fly at speeds that reduce the reaction time available for turbine shutdown. This is precisely why the mitigation strategy does not rely solely on SDoD or radar systems. Instead, it combines spatial avoidance (through buffer zones), turbine siting outside of high-risk corridors, and operational curtailment to reduce cumulative risk. In summary, the mitigation strategy reflects a precautionary and layered approach. While no single measure is sufficient on its own, the combined application of spatial, operational, and technological tools is considered

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					appropriate and consistent with current best practice in avifaunal impact mitigation for wind energy facilities.
				4. <u>Mitigation short falls</u>	
				4.1. The principal that preventative considerations should always be consider before mitigation measures are implemented. (Gove et al. 2013)	The principle of prioritising preventative considerations before implementing mitigation measures is fully supported and has guided the Environmental Impact Assessment (EIA) process.
				4.2. Turbines should be excluded in narrow spaces < 500m between constrains, no-go and high-risk areas, because birds are free foragers with unpredictable flight behaviour.	The Avifaunal Specialist Report has assessed the spatial constraints posed by narrow corridors between no-go and high-risk areas, and recognises the importance of maintaining sufficient buffer zones to accommodate the unpredictable flight behaviour of free-ranging bird species.
				4.3. Mitigation measures recommended by AfriAvian is not proven and based on computer models	The mitigation measures proposed by AfriAvian are grounded in a precautionary, science-based approach

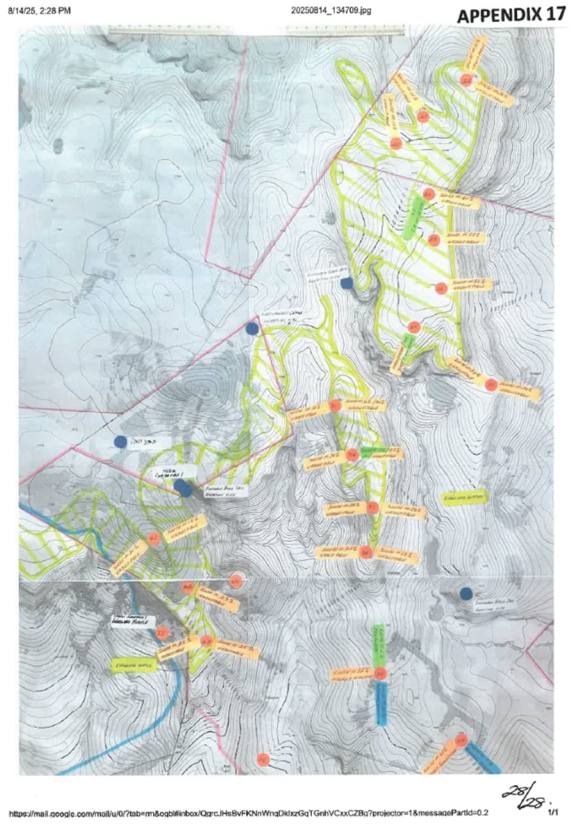
Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				with several assumptions without accredited field test conducted to guarantee effectiveness.	that integrates empirical field data, expert avifaunal knowledge, and advanced spatial modelling techniques. While it is acknowledged that some of these measures—such as flight risk modelling and turbine exclusion zones—are informed by predictive tools, they are not arbitrary. These models are calibrated using site-specific data, including GPS tracking of priority species (e.g., Martial Eagle), direct field observations, and habitat sensitivity mapping.
				4.4. Martial Eagle mitigation models and recommendations must be removed from report because the data used it is illegal obtained.	
				4.5. As pointed out by AfriAvian in their avifaunal report that bigger bird (cranes, bald head ibis etc.) with high wing loading is less manoeuvrable in flight and will be in danger to collide even with non-rotating turbines and powerlines.	The avifaunal specialist has incorporated a suite of mitigation measures specifically designed to reduce this risk. These include the strategic micro-siting of turbines away from known flight paths

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				4.6. AfriAvian also confirmed in their avifaunal report that some birds (cranes, ex) have better sight in the lateral field of view than frontal which increase the risk of collusion even with the non - rotating turbine and powerlines.	and sensitive habitats, the application of blade patterning to enhance turbine visibility, and the implementation of avifaunal exclusion zones based on species-specific habitat use and movement data. To further mitigate collision risk, all turbines located within medium and high avifaunal sensitivity zones will be subject to compulsory Shut Down on Demand (SDoD) protocols. These include both automated systems (using radar and camera-based detection) and proactive curtailment during periods of high bird activity, such as early mornings, late afternoons, and during seasonal migrations. These measures are supported by international best practice and are embedded in the Environmental Management Programme (EMPr)
				4.7. The monitoring of birds been killed by the turbine as included in the BMP and mitigation recommendations are not reliable and distorted figures are recorded. According to me. Kate Webster of Vulpro, the reporting of bird deaths caused by turbines are covered up by rewarding farm workers for removing carcasses to decrease the numbers found. Mulilo already made them guilty to similar practices by not reporting the shooting of the juvenile martial eagle and signing NDA with avifaunal specialist.	
				B - GAMEFARM	

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				We are in progress expanding our existing commercial hunting partnership with Lloyd Safaris. Our target is the international market for commercial hunting which has big potential for expansion and created good revenue with permanent jobs. We are busy establishing a game farm on our farm Waaihoek (P3, P4 and P12) International hunters have become very sensitive for windfarms and any visible wind turbine will have a negative effect on our investment. The following proposed turbines 40,41,42,43,44,45,46,50,51,52 and 53 are not acceptable due to the visual pollution. Due to the game farm in progress no additional transmission line can be allowed over the applicable properties. The existing farm workers house insite the proposed game farm is in the process to be moved to site XX on plan. (Appendix 17).	The VIA includes mitigation measures such as strategic siting, use of topography to reduce visibility, and maintaining appropriate setbacks from homesteads and high-use areas. These measures have been incorporated into the Environmental Management Programme (EMPr) to ensure that visual impacts are managed throughout the project lifecycle. With respect to the transmission line, it is noted that final alignment and servitude agreements will be subject to landowner engagement and negotiation. No transmission infrastructure will be constructed without the necessary legal agreements in place

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				The following proposed wind turbines, 41,42 and 43, is therefore not acceptable due to shadow flickering and noise pollution. The proposed substation behind turbine 42 is also not acceptable due to the potential noise.	
				D - VISUAL IMPACT	
				1. All visual impact as mention in B and C must be addressed.	Your comment has been noted
				2. My mechanic stays on the farm Windhoek in NSR 2. His daughter is on chronical medication for her heart and epileptic. The shadow flickering caused by nearby turbines will trigger her epileptic with fatal consequences. Turbines 51,52 and 53 need to be relocated.	The Visual Impact Assessment (VIA) has considered the potential effects of shadow flicker, including its impact on sensitive receptors such as individuals with photosensitive medical conditions. Mitigation measures have been incorporated into the Environmental Management Programme (EMPr) to ensure that turbine placement and operational protocols minimise the risk of shadow flicker.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				3. Majority of both WEG is located on the verge of the escarpment which are unacceptable because (Appendix 17)  	

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				3.1. The construction works for the infra structure and platforms will need major earthworks with an irreversible negative effect on the nature.	Applicant: The construction will follow detailed designs and specialist recommendations, with adequate financing allocated to implement best-practice earthworks and rehabilitation measures. All disturbed areas will be restored under the guidance of ecological specialists to minimise long-term impacts.
				3.2. The access roads to turbines will have steep gradients which will cause major erosion if not concreted paved and side drains.	Applicant: Access roads will be engineered to specialist-approved standards, including appropriate gradients, drainage, and surfacing where required. Erosion control measures will be implemented to ensure long-term stability and prevent environmental damage.
				3.3. Proposed turbines will be highly visible which are going to change the sense of place negatively.	The Visual Impact Assessment (VIA) has considered the potential impact of turbine visibility on the surrounding landscape and sense of place. The VIA includes a detailed assessment of visual

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					receptors, landscape character, and the degree of visual intrusion, and proposes mitigation measures to reduce the impact where feasible. These include careful siting of turbines, use of existing topography to screen views, and maintaining appropriate setbacks from sensitive receptors. All mitigation measures recommended in the VIA have been incorporated into the Environmental Management Programme (EMPr), which will guide implementation during construction and operation.
				3.4. Biodiversity specialist prescribes in his report that the rocky outcrop must be avoided but is blindly ignore by the applicant.	The BOR provides a framework for managing residual impacts through targeted mitigation, micro-siting, and offset measures. It also includes commitments to post-construction monitoring and habitat management to ensure ecological integrity is maintained. Interested and Affected Parties (I&APs) are encouraged to consult the revised

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					BOR, which forms part of the final EIA submission,
				3.5. All turbine positions on slopes more than the maximum 14% as specified in Table 0.5 of the draft EIA report must be condemned.	
				D - BATS	
				1. No detail of the specialist in the Appendix	
				1.1. Appendix 1 - Figures	The revised Bat Specialist Report includes updated and corrected bat buffer zones. These buffers were applied during the layout refinement process to ensure that turbine placement avoids high-sensitivity bat habitat wherever technically feasible. The updated report reflects the specialist's ground-truthed findings and provides spatial verification of buffer application.
				1.2. Appendix 2 - CV of Specialist	
				1.3. Appendix 3 - Specialist declaration	
				1.4. Appendix 4 - SACNASP certificate.	
				2. Specialist did not consult with the local farmers to allocate possible roosting sites for bats.	
				3. There are abandoned natural roosting site on the escarpment for bats in the way of rocky outcrops,	

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				cliffs, caves, and redundant torbanite mines that have not been investigate by the bat specialist.	
				4. The Bat specialist prescribe in Table 8 of his report that rocky outcrops are no-go areas with 200m buffer. This is blindly ignored by the applicant.	
				E-ARGRICULTURAL	
				1. This income from turbines on the owner's farm got the danger to kept unproductive farmers longer on it. This will put food security of the whole country on the long run in danger.	The footprint of wind energy infrastructure typically occupies less than 2% of the land, allowing agricultural activities to continue uninterrupted on the remaining 98%. Studies show that wind farms can enhance financial stability for farmers, enabling reinvestment into productive agriculture.
				2. A influx of construction workers and work seekers can be expected which will lead to an instability in workforce and communities.	he project includes a Stakeholder Engagement Plan and a Community Health, Safety and Security Plan to manage workforce integration. A “locals first” employment policy and restrictions

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					on overnight stays are in place to minimise social disruption.
				3. The upgrading of road is positive but will lead to easier movement for criminals with criminal activities to escalate rapidly.	Security enhancements such as CCTV cameras and coordinated efforts with local landowners are planned to mitigate crime risks. Improved roads also benefit farming logistics and emergency response.
				4. Gard's used during construction and afterwards is in many cases part of the criminal activities.	All personnel will be vetted, and a Code of Conduct will be enforced. Contractors are liable for damages and misconduct, with dismissal protocols aligned with labour legislation.
				5. The slaughter of bats will have negative effect on the control of insects which then will lead to increased virus animal diseases, (bloutong)	Bat monitoring and mitigation measures are included in the Biodiversity Management Plan. While some mortality may occur, the impact is considered low and manageable with ongoing monitoring.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				6. It is proven that the ultra-low sound and vibration produces by the wind turbines, has a negative effect on the bee colonies. They eventually disappear. This negatively influence the pollination of agriculture crops. It will also have a negative influence on the biodiversity of the grasslands.	No evidence was found in the EIA to support claims of wind turbines causing bee colony collapse. The site design avoids sensitive habitats, and biodiversity monitoring will track any unforeseen impacts.
				7. The presence of wind turbines make crop spraying impossible. The spraying drome are not powerful enough to follow the landscape profile, very sensitive for wind and much more time consuming than crop spraying by aeroplane. This are not a feasible alternative for crop spraying as claimed in specialist report. The crop sprayer requires at least a 1,5 km clearance next to the site where it is spraying. Turbines 31, 41 Ind 43 are too close to my crop lands must be relocated	Ground-based and drone spraying are viable alternatives. The small footprint of turbines does not significantly hinder agricultural operations, and turbine placement has been adjusted to avoid key crop areas.
				8. Turbines and powerlines lead tp the increase of veld fires due to movement of people as well as possible failure of turbines. Due to the inaccessible mountainous area of the escarpment air support (bombers) is frequently use to assist	Fire risk is acknowledged and mitigated through agreements with landowners, fire management protocols, and compensation mechanisms. The layout

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				in with veldfires. It will not be possible due to the turbines. Veldfires can then easily escalate into the neighbouring plantation with huge financial consequences.	avoids high-risk zones, and strategic planning supports fire response.
				9. Turbines are likely to change the rainfall pattern especially from the east. The lifesaving dew and mist will disappear which will escalate the midsummer drought.	There is no scientific evidence in the EIA or supporting literature that wind turbines alter rainfall patterns or eliminate dew/mist. The claim remains speculative and unsubstantiated.
				F- MICROCLIMATE	
				The basic scientific mechanism underlying microclimates is that wind turbines alter the surface meteorology through decreased wind speeds and turbulent mixing (Keith et aL, 2004; Armstrong et al., 2014) - Wind farms alter the local microclimate by increase near- surface temperatures when the descending blades of the wind turbines bring drier air down and the ascending blades of the wind turbines move moister air up. The turbulence generated by wind turbine rotors enhance this vertical mixing	The potential for wind energy facilities to influence local microclimates through mechanisms such as vertical mixing, changes in surface temperature, and altered humidity levels is recognised in international literature. However, under South Africa's current Environmental Impact Assessment (EIA) framework governed by the National Environmental Management Act (NEMA), microclimate impacts are not listed as a mandatory

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				- increase in near-surface temperatures cause lower humidity rates and higher evaporation rates downwind of the turbine - lower humidity reduces soil moisture levels significantly (3 to 4,5%), leading to drier - conditions downwind, which impact on crop yields and plant health - dew point is the temperature at which air becomes saturated with moisture. Since the occurrence of dew is contingent on near-surface moisture and atmospheric stability, the presence and duration of dew within wind farms, particularly downwind of turbines, is negative impacted by the lower humidity that turbine-induced mixing bring about - wind farms aggravate the soil drying in grassland areas, which have impacts on grassland ecosystems - these microclimate changes also influence other ecosystem processes, including greenhouse	specialist study unless specific thresholds or site sensitivities trigger such a requirement.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				- gas emissions and the carbon intensity of electricity generation. Reference - Embry-Riddle Aeronautical University - "Wind Turbines Affect Humidity Over Crop Fields, New UAS Measurements Confirm" - MDPI - "Wind Farms and Humidity" - ERAU - "Wind Turbines Affect Humidity Over Crop Fields" - I E R - "Wind Farms Raise Temperatures at the Surface level" - Gang Wang - "Wind farms dry surface soil in temporal and spatial variation" - Gang Wang - "Wind turbine operation influences near surface air temperature and humidity" - Lee M Millar - "Climatic Impacts of Wind Power" Turbines are likely to change the rainfall pattern especially from the east. The lifesaving dew and mist will disappear which will increase the midsummer drought on all my properties.	

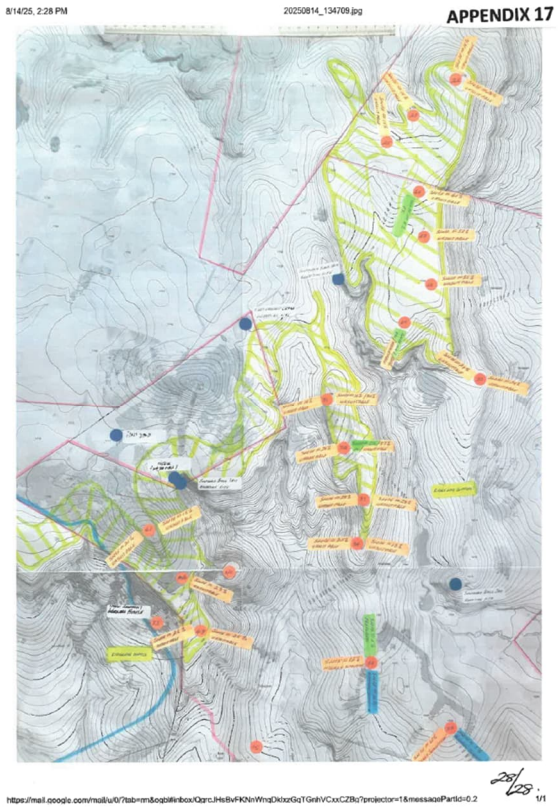
Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				Above will have a negative influence on all my properties and needs detail microclimate investigation by specialist as previous requested my Mpumalanga Department.	
				G - CONTRAVERSAL CONDUCT by APPLICANT / EAP.	
				1. No specialist contacted me as registered I&AP because Mulilo abstain my contact details from them. Josua Meyer Trust was shown as I&AP on the list but without any contact detail. This was confirmed by the Sosial specialist when accidental met at Mr Jan Robberts place. Only the avifaunal specialist notifies us before conducting site surveys.	There is no legal requirement in the EIA Regulations for individual specialists to contact I&APs directly. In addition, the Protection of Personal Information Act, 2013 (POPIA) restricts the disclosure of personal information, including contact details, to third parties without the explicit consent of the data subject. The Avifaunal Specialist contacted affected landowners directly prior to fieldwork as this was considered necessary for site access arrangements.
				2. No public meetings took place concerning the Sheepmoor / Emvelo proposed WEF.	The comment regarding the absence of public meetings is acknowledged. In terms of the EIA Regulations, 2014 (GN R982 of 2014, as amended), Regulation

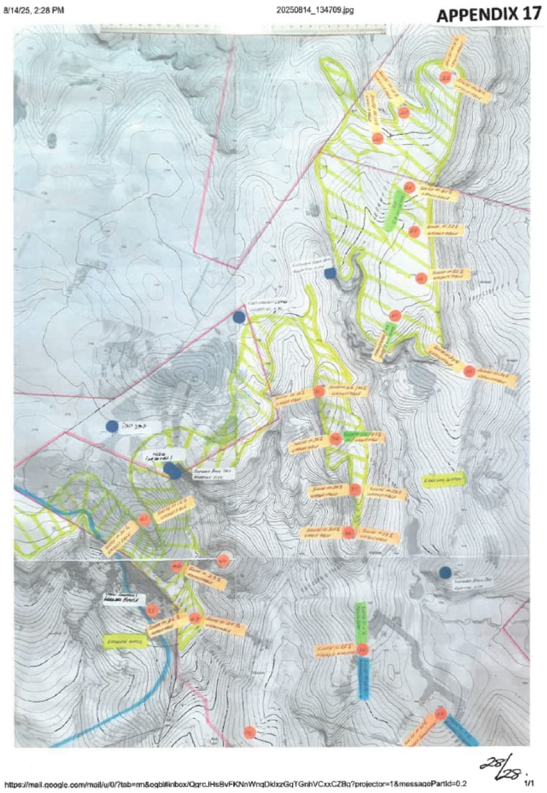
Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					41 outlines the methods through which I&APs must be notified of the availability of reports and opportunities to comment. These methods include written notices, site notices, newspaper advertisements, and direct communication with registered I&APs. The Regulations do not prescribe that public meetings must always be held, but rather that appropriate and reasonable measures must be taken to notify and provide I&APs with an opportunity to participate meaningfully. For the Sheepmoor / Emvelo Wind Energy Facility, public participation was undertaken through a combination of: • Direct written notifications (emails and registered post) to all I&APs on the database, • Newspaper advertisements, and • The placement of site notices at strategic public locations.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					No formal public meetings were convened, as the level of interest expressed during the initial phases of engagement did not indicate the need for such meetings. Instead, individual engagements with affected landowners and I&APs were arranged where specific requests were made or where project-specific clarification was required.
				3. Mulilo signed an NDA with EWT and AfriAvian concerning the tagged data of the martial eagle to kept detail secret and hidden from the I&AP's.	Applicant: There was no attempt to "silence" MTPA; any NDAs discussed are standard practice to protect sensitive species data, not to prevent regulatory engagement.
				4. The tagged data of the martial eagles was used selectively in the avifaunal report but Mulilo refuse to share the tagged data with the I&AP's. That prevent the I&APs from their right to obtain independent evaluations.	Applicant: The tagged data used in the avifaunal specialist report support scientifically robust conclusions, and the resulting mitigation measures remain valid and effective in protecting the species.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				5. There was also an attempt from Mulilo to silence MTPA by approaching them to sign an NDA.	Applicant: Meeting requests were managed professionally; the August 4 meeting reflected scheduling constraints and project realities, not any deliberate delay linked to data disclosure.
				6. The applicant used illegal obtained data in their avifaunal specialist report and the EAP allows it.	The EAP was given no indication that any data was obtained unlawfully or without proper authorisation. Furthermore, the EAP has affirmed under oath the correctness of the information provided and the inclusion of all stakeholder inputs and specialist recommendations.
				7. My request for 'n meeting with Mulilo in February 2025 was denied by them. After my third request Mulilo eventually meet with us on the 11th hour, 4 August 2025. Coincidental just after we revealed the illegal status of the tagged data. Almost 6 months later!!	The public participation process for the Emvelo WEF was conducted in full compliance with Chapter 6 of the EIA Regulations (2014, as amended), including two formal rounds of stakeholder engagement. All Interested and Affected Parties (I&APs) were notified of opportunities to engage, and meetings with stakeholders—including

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					regulatory authorities and community representatives—were held throughout the process. While the timing of specific meetings may have coincided with emerging concerns, the record shows that Mulilo submitted a formal request for an extension to the Final EIA submission to accommodate additional biodiversity reporting and stakeholder input. The Comments and Responses Report (CRR) includes all historical and current comments, ensuring transparency and procedural fairness
				8. Mulilo ignore the biodiversity specialist instruction to avoid the rocky outcrops by locating majority of turbines on the verge of the rocky outcrops. (Appendix 17)	The BOR outlines the ecological importance of rocky outcrops and includes mitigation measures to manage residual impacts, including micro-siting, habitat buffers, and post-construction monitoring. Interested and Affected Parties (I&APs) are encouraged to consult the revised BOR, which provides detailed justification for layout decisions

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					and the measures proposed to ensure ecological integrity is maintained
				9. Mulilo ignore the Bat specialist requirement of a 200m turbine free buffer around the rocky	The revised Bat Specialist Report includes updated and corrected bat buffer zones. These buffers were applied

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				outcrops by locating majority turbines right on the verge of the rocky outcrops (Appendix 17)  	during the layout refinement process to ensure that turbine placement avoids high-sensitivity bat habitat wherever technically feasible. The updated report reflects the specialist's ground-truthed findings and provides spatial verification of buffer application.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				10. Mulilo blindly ignore Social specialist mitigation recommendations in his report (Table4.12/13/14) to engage with I&APs about concerns on powerline and turbine placements	All mitigation measures recommended by the Social Impact Assessment (SIA) and Visual Impact Assessment (VIA), including those outlined in Tables 4.12, 4.13, and 4.14 of the SIA, have been considered and incorporated into the Environmental Management Programme (EMPr).
				11. Mulilo decide on the transmission line route without consent or agreements from the affected land owners.	Servitude agreements are negotiated directly between the project proponent (in this case, the applicant) and affected landowners, typically after the EIA process has confirmed the environmental acceptability of the proposed route. These agreements detail the location, extent, access arrangements, and maintenance responsibilities associated with the transmission infrastructure. The absence of signed servitude agreements at the EIA stage does not invalidate the assessment, as the EIA is intended to

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
					inform decision-making and guide subsequent landowner engagement.
				12. Mulilo went further and just draw an alternative transmission line route through Mr Braam Moody farm. He was never part of the proposed windfarm nor contacted by Mulilo.	The draft EIA report included an alternative grid connection layout and this is not the preferred route. Mr B Moodie's opposition to any overhead lines crossing his land has been noted. The applicant is committed to engaging with yourself following a decision on the EA, in order to ensure that the layout aligns with your operations
				13. When landowners disagree with Mulilo they were threatened with the court. It happened with Mr Jan Robberts and Mr Pikkie Vorster	Applicant: The applicant refutes this. The applicant has endeavoured to engage professionally with I&APs.
				14. Request for the relevant documentation concerning the extension of 3 month to submit EIA report was blindly ignored. It was reluctant reveal only after insisting for it during meeting on 4/08/2025. Almost 2 months later!!	Applicant: The request for documentation relating to the application for extension was supplied to the I&AP.

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				15. Response of EAP on DARDLEA requesting microclimate report in scoping report comments that such report was not previously done in RSA is to say the least unprofessional and unacceptable.	A dedicated Microclimate Impact Assessment was not undertaken as wind energy infrastructure is not expected to result in significant microclimatic changes. The infrastructure does not emit heat, moisture, or pollutants, and its limited footprint relative to the landscape scale further reduces the likelihood of meaningful microclimatic effects. Existing meteorological data and wind modelling were used to inform the project's feasibility and environmental assessments. The agricultural and biodiversity assessments considered site-specific sensitivities and concluded that the project would have low and acceptable impacts. Therefore, a standalone microclimate study was not deemed necessary.
				16. Mulilo tray to cover up the shooting of the juvenile martial eagle by not reporting it nor opening a case.	Applicant: The Applicant, in conjunction with the EWT and local authorities, ensured that the case was managed

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				Mulilo's modus operand! has proven as very controversial and not transparent Therefore, we appeal to DFFE to preserve this escarpment with its unique environment and very sensitive ecosystems for our children and reject this application in its totality.	accordingly and ethically. Allegations made by landowners are misleading.

8. COMMENTS AND RESPONSES REPORT FOR THE INITIAL DRAFT EIA REPORT

This comments and responses section has been updated throughout the duration of the initial Draft EIAr and comments has been collated by thread and not by date. Responses have been formulated collaboratively by the Environmental Assessment Practitioner (EAP), in consultation with the relevant specialists and the project applicant, to ensure that the responses are informed, accurate, and reflective of the multidisciplinary inputs received during the assessment process.

TABLE 8-1~~1~~ COMMENTS FROM INTIAL DRAFT EIA DARDLEA

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
32.	DARDLEA Robyn Luyt	10 April 2025 Per Email	Draft EIAr	According to your paragraph 2.2, "There have been changes to the approved Plan of Study for the EIA. The Emvelo WEF will now include properties that were also evaluated during the scoping process for the Rochdale WEF. The DFFE has confirmed that this approach is reasonable and has allowed	Noted. The consolidation of the southern portion of the Emvelo WEF site into the proposed Sheepmoor WEF application is consistent with the iterative and adaptive nature of the EIA process as provided for under NEMA and the 2014 EIA Regulations (as amended). These changes arose primarily due to technical and geographical considerations, including

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				both the Rochdale and Emvelo WEFs, together known as the Amsterdam Cluster, to move forward to the EIA phase". However no written confirmation of DFFE's agreement to continue to the EIA phase under such circumstances has been provided. How has compliance with Appendix 2 of the EIA Regulations, as well as the rights of all Interested and Affected Parties, including landowners on and directly adjacent to the site, been accounted for, given that the layout and the affected farm portions are substantially different to what was provided in the Scoping Report for the proposed Emvelo Wind Energy Facility and associated Grid Connection? Furthermore it is understood that the Rochdale application has been withdrawn, but the Rochdale site boundary has been retained and is now included as part of the Emvelo site.	constraints from Civil Aviation Authority (CAA) buffers and environmental sensitivities, which necessitated a reconfiguration of the initial Sheepmoor WEF layout. The properties now incorporated into the Sheepmoor WEF were previously included in the screening and scoping assessments for the Emvelo WEF. These assessments formed part of the approved Plan of Study for Scoping and were placed in the public domain, with registered I&APs given the opportunity to comment. Thus, the affected properties were subject to environmental scrutiny, and stakeholder rights to participate have been upheld. To ensure procedural fairness and compliance with Appendix 2 of the EIA Regulations, all registered I&APs from the Rochdale, Emvelo, and Sheepmoor applications were consolidated into a single stakeholder database. These I&APs were notified of the release of the Draft EIAs for both the Sheepmoor and Emvelo WEFs via newspaper notices (Mpumalanga News, 5 March 2025; The Highvelder, 7 March 2025) and bespoke communications. This approach ensured that all parties were informed of project developments and given adequate opportunity to comment. Importantly , the DFFE was consulted regarding the proposed consolidation and did not raise any objection. In correspondence from Ms. Milicent Solomons (DFFE) to Mr. Lloyd Barnes (applicant), dated 17 February 2025, the Department stated: “In terms of the EIA Regulations, 2014 (as amended) we do not see any prohibition of the proposed process, incorporating the 20% of the

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					Rochdale site into the Emvelo application. The project scope and the relevant assessments will have to comply with all legislative requirements." The transcript of this communication has been attached to appendix 9 of this report. While this correspondence referenced a separate consolidation, the principle it affirms is directly applicable: that consolidation of components between WEF applications is legally permissible, provided that public consultation and assessment obligations are met. All relevant components have now been fully assessed in the Draft EIA Report for the Sheepmoor WEF, and there has been substantial compliance with the principles of procedural fairness under PAJA, the Constitution, NEMA, and the 2014 EIA Regulations. Stakeholder engagement has been comprehensive, and all changes have been transparently communicated and assessed. We respectfully submit that the EIA process remains procedurally fair and legally compliant, and that the Department may now proceed to evaluate the application for Environmental Authorisation on its substantive merits.
33.				Further to the above, it is noted that the comments and response report that is included in the draft EIA only includes comments from I&APs on the draft Scoping Report for Emvelo WEF. This confirms the Department's reservations about process being followed. The change in sites, site	Noted. While the Rochdale WEF is no longer being pursued as a standalone application, approximately 20% of the original Rochdale development footprint (representing two turbines) has been incorporated into the proposed Emvelo WEF. These areas were previously subject to screening and scoping under the Rochdale WEF Plan of Study and Scoping Report,

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				layouts, and subject properties is not without consequence. It compromises the relevance of the Scoping Phase and the reporting in the Scoping Report which I&APs have commented on, where the location, composition and size of the project sites changes fundamentally between the completion of the Scoping Phase and the current EIA phase. The project sites identified and assessed during the Scoping phase are not the same as those now being considered in the draft EIA for Emvelo WEF. Since the current Emvelo WEF site (that considered in the draft EIA) now includes the same site / location as the original Rochdale WEF site, the Department is of the view that the comments provided on the Rochdale WEF draft Scoping Report should have been included and responded to in the draft EIA for the Emvelo WEF, but this has not been done.	which were made available to the public during that phase. This consolidation of project areas enhances efficiency, avoids unnecessary duplication, and promotes integrated environmental management. The decision to exclude the majority of the Rochdale WEF area was based on findings during the scoping process, including technical and environmental constraints—specifically, aviation safety concerns raised by the Civil Aviation Authority, avifaunal sensitivities, and the proximity of a landing strip. These constraints rendered the Rochdale WEF technically and economically unviable as a separate facility. Furthermore, the email from Ms Milicent Solomons (DFFE), dated 17 February 2025, confirms that the Department saw no prohibition in incorporating the remaining viable portion of Rochdale into the Emvelo WEF application. Her correspondence—based on consultation with the Chief Directorate: Integrated Environmental Authorisations—clearly stated: “In terms of the EIA Regulations, 2014 (as amended), we do not see any prohibition of the proposed process... The project scope and the relevant assessments will have to comply with all legislative requirements.” With respect to I&AP engagement and procedural fairness: all stakeholders registered under the Rochdale, Emvelo, and Sheepmoor WEF applications were consolidated into a single I&AP database. All I&APs were duly notified of the availability of the in the initial Draft EIArs for Emvelo and Sheepmoor WEFs through newspaper advertisements (Mpumalanga News – 5 March 2025; The Highvelder – 7 March 2025) and direct communication. All were

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					afforded the opportunity to comment. This approach ensured full transparency and inclusivity, in line with the requirements of the Constitution, PAJA, NEMA, and the 2014 EIA Regulations. Importantly, while comments on the Emvelo Draft Scoping Report were included in the current CRR, the issues raised during the Rochdale Scoping Phase were also integrated and addressed in the updated project layout and EIA assessment. The site components retained from Rochdale had already undergone environmental scrutiny and were scoped in or out accordingly. As such, the integration of those previously assessed areas into the Emvelo EIA has occurred with full consideration of earlier public input. All legislative requirements for a procedurally fair and legally compliant EIA process have been met. The Department is respectfully advised that the process followed is both substantively and procedurally sound. The application for Environmental Authorisation can now be considered on its merits, in accordance with NEMA and the applicable EIA.
34.				DARDLEA is not supportive of development of WEFs (or any non-compatible land use) within Critical Biodiversity Areas and Key Biodiversity Areas, or within intact grassland patches. The Mpumalanga Biodiversity Sector Plan (MBSP) specifically incorporated climate change into spatial priorities through the prioritisation of the connectivity of remaining intact grassland patches in the province, as they provide habitat for species to thrive, and allow for their dispersal. Intact grasslands are crucial for supporting threatened fauna and avifauna. The MBSP	DARDLEA's concerns regarding the development within Critical Biodiversity Areas (CBAs), Key Biodiversity Areas (KBAs), and intact grassland patches are acknowledged. As part of early project planning, development screening and specialist assessments were conducted across an area of approximately 25,000 hectares. Based on the findings, the layout was refined to avoid the most environmentally sensitive features wherever feasible, and to focus development within areas where potential environmental impacts could be better managed while ensuring that wind resource potential remains economically viable.

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				was adopted in 2023, and in Provincial Notice 279 of 2023 - which states that "The MBSP is a planning tool that has been developed to manage biodiversity resources of the province by setting strategic objectives to ensure that spatial biodiversity and climate change priorities are effectively incorporated into land-use and development planning, environmental assessments and authorisations, and natural resource management within Mpumalanga Province - the links to the various reports and shape files were made available, including the MBSP technical report (https://mtpa. maps. arcgis. com/sharing/rest/content/items/fc6d8f9e 7 ef84d2f87f86b91 e8e9f87 al data), which details the scientific method used to identify Intact Grassland Patches. Intact Grassland Patches are important source areas in terms of metapopulation dynamics.	The current proposed project area has been reduced to approximately 6,150 hectares, with a total disturbance footprint of only ~48 hectares. Site sensitivity verification, conducted during fieldwork, revealed that the area is more heavily impacted than indicated by desktop-based mapping, which relied on outdated 2010 land cover data from the Mpumalanga Biodiversity Sector Plan (MBSP). This ground-truthing effort highlighted the extent of historic degradation and current land-use pressures, particularly from overgrazing. Notably, according to a WhatsApp and email survey conducted by the applicant on 16 May 2025 among landowners and occupiers of the Wind Turbine Generator (WTG) properties, 50% confirmed year-round livestock grazing (cattle and sheep) in areas that are uninhabited, uncultivated, or beyond formal boundaries. Further, 58% of the intact grassland areas, including sections of CBA: Irreplaceable and Optimal, are currently under grazing pressure, which has resulted in widespread degradation and fragmentation, as confirmed by the terrestrial biodiversity specialist team. While it is acknowledged that intact grassland areas are of high conservation value, particularly for faunal species of conservation concern (SCC)—as stated in the Faunal Impact Assessment (FIA)—the layout has been revised to avoid intact grasslands and other key sensitivities where feasible. Where infrastructure remains in such areas due to geotechnical or engineering constraints, site-specific mitigation, biodiversity offset measures, and species management plans (e.g., for Oribi and priority avifauna) have been developed and incorporated

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					into the Environmental Management Programme (EMPr). The EMPr ensures alignment with provincial biodiversity planning tools and reflects a tiered and location-specific approach to mitigation. The high-sensitivity escarpment area—described in the Final EIA as "likely of general importance for a range of faunal groups, representative of a large contiguous and ecologically intact area of mostly good-quality montane grassland"—has been treated with particular caution. Informed by detailed habitat modelling and fieldwork, the project layout and mitigation hierarchy aim to ensure that residual impacts are reduced to acceptable levels, and that ecological connectivity and functionality are maintained or enhanced through offset and management interventions.
35.				DARDLEA therefore remains concerned that the proposed location of the Emvelo Wind Energy Facility and associated grid infrastructure is not compatible with the desired land use.	Land use compatibility concerns are noted. Independent specialist assessment, by a range of specialists as required by the various specialist protocols (and in line with best practice), have concluded that the location of the development, and the current layout is acceptable with mitigation. The proposed preferred alternative route mostly follows an already existing Eskom 400kV, as well as other linear infrastructure and disturbed areas. According to a WhatsApp and email enquiry conducted by the applicant on 16 May 2025 among WTG landowners and occupiers, 100% of the proposed farm portions confirmed the use of areas that are either uninhabited, uncultivated, or located beyond their property boundaries for year-round livestock grazing (cattle and sheep). This indicates that 97% of the intact grasslands present on site,

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					along with significant portions of Critical Biodiversity Area Irreplaceable and Optimal areas are currently being grazed. This has led to widespread overgrazing of grassland areas on site, as corroborated by the findings of the terrestrial specialists. A transcript of the WhatsApp chats with landowners/occupiers confirming this information can be provided to the Competent Authority upon request to the applicant. We acknowledge DARDLEA's concern regarding the compatibility of the proposed Emvelo WEF and associated grid infrastructure with the desired land use of the area. As outlined in the Biodiversity Offset Report (BOR), the project has been carefully designed in line with national policy and legislative frameworks, including the application of the full mitigation hierarchy as required under NEMA and the 2023 National Biodiversity Offset Guideline. Ecological sensitivities and land use priorities were thoroughly considered during the layout refinement process, which avoided Critical Biodiversity Areas, wetland buffers, and agricultural land of high value wherever possible. The project is supported by specialist assessments, and residual impacts are addressed through enforceable biodiversity offsets to secure long-term conservation outcomes without undermining regional development objectives. We remain open to further engagement with DARDLEA to ensure alignment between renewable energy development and the region's land use vision.
36.				During the Scoping process, you confirmed - in response to our comments - that the layout would be optimised by incorporating the buffers and constraints provided by specialists, including those identified in the Faunal Assessment as High Sensitivity and	Noted. The final layout (dated 05 May 2025) reflects efforts to avoid sensitive areas; however, due to spatial and technical constraints, some infrastructure remains in areas identified as highly sensitive in the Faunal Assessment. Where avoidance was not

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				High Sensitivity Escarpment. You further confirmed that the following would be addressed: the location of turbines and associated infrastructure in bat sensitive and bat no-go areas; the location of the laydown area in a sensitive aquatic feature; and the location of a number of turbines in avifaunal exclusion zones. However it is noted that turbines, roads and OHLs are still proposed within all the aforementioned areas, which is not supported. The areas of concern are outlined below.	possible, mitigation is provided in the EMPr including the Oribi Management Plan and the BOR. Additionally an enquiry conducted on 16 May 2025 with landowners and occupiers confirmed that the sensitive escarpment area is currently grazed year-round, leading to overgrazing and reduced habitat suitability for Oribi. This aligns with findings from the Terrestrial Ecology assessment. A transcript of the WhatsApp chats with landowners/occupiers confirming this information can be provided to the Competent Authority upon request to the applicant.
5.1				WTG 3, as well as associated roads and MV cable route, is located in a CBA Irreplaceable area.	Avoidance of Critical Biodiversity Areas (CBAs) was a key principle in the layout planning. WTG 3, its associated road, and MV cable route were reviewed and relocated where feasible into more disturbed areas to minimise impacts within the CBA: Irreplaceable zone. Where full avoidance was not technically or spatially possible, site-specific mitigation was developed in consultation with the terrestrial specialist. The road alignment was confirmed as ecologically acceptable, with additional mitigation measures incorporated into the EMPr to address any residual impacts.
5.2				Turbines (ie. WTGs 3, 15 and 17), as well as roads and OHLs are located in a Key Biodiversity Area (KBA) that is untransformed.	Noted. During the layout refinement process, turbines WTG 3, 15, and 17 along with associated roads and overhead lines (OHLs) were reviewed in light of their location within untransformed Key Biodiversity Areas (KBAs). As a result, WTG 15 was removed from the final layout, and WTG 3 was shifted outside of the CBA Irreplaceable area. Where complete avoidance of KBAs was not technically or spatially feasible, site-specific mitigation measures were developed with input from biodiversity

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					specialists. These include habitat management, monitoring protocols, and impact minimisation strategies, all incorporated into the EMPr. In recognition of the broader avifaunal sensitivity of the area, additional measures such as turbine curtailment, shut-down on demand, and blade patterning have been proposed to reduce collision risk and disturbance to bird species.
5.3				A number of turbines (ie. WTGs 13, 19, 20, 21, 22, 23, 24 and 25), as well as associated roads and a portion of the OHL and MV cable route are still located in Intact Grassland Patches.	The placement of turbines WTG 13, 19, 20, 21, 22, 23, 24, and 25, as well as associated roads, overhead lines (OHLs), and MV cable routes within intact grassland patches, was carefully assessed during the layout refinement process. Where avoidance was technically or spatially feasible, infrastructure was relocated. As a result, WTG 21 was shifted to avoid intact grasslands, and WTG 24 was removed from the final layout. OHL and MV cable alignments were also optimised to avoid intact grasslands where possible, following existing Eskom infrastructure and other linear features such as farm fences. Despite these efforts, some infrastructure remains within intact grassland patches. These turbines are located within the windiest parts of the site, which are essential for the project's energy yield and economic viability. The final layout reflects a significant reduction in infrastructure within sensitive areas and includes robust site-specific mitigation measures—developed in consultation with biodiversity specialists—outlined in the EMPr. These measures will be fully implemented and monitored to minimise and manage ecological impacts throughout the project lifecycle.

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					The total disturbance to intact grassland is approximately 13 hectares, representing only 0.0004% of the total intact grassland mapped in Mpumalanga Province. Moreover, the Biodiversity Offset Report addresses this residual loss by proposing the conservation and management of ecologically equivalent or higher-value grassland areas, with the aim of maintaining landscape connectivity and species persistence. The Mpumalanga Biodiversity Sector Plan (MBSP) was considered during screening and scoping. While the MBSP maps intact grasslands, it does not provide strategic objectives or land-use restrictions for these areas. The areas where turbines are proposed are designated as “Other Natural Areas” in the MBSP, which allows for greater flexibility in permissible land uses. The terrestrial specialist therefore deemed the proposed development appropriate in these locations.
5.4				Notably, the same eight (8) turbines (WTG 13, 19, 20, 21, 22, 23, 24 and 25), roads, and portions of the OHL are located in areas identified as High Sensitivity (Escarpment) for Fauna (as per Figure 7.1). To clarify, the Intact Grassland Patches coincide with the area identified as High Sensitivity (Escarpment) for Fauna.	The concern is noted. The Faunal Impact Assessment (FIA) acknowledged the ecological importance of the high sensitivity escarpment area, which represents a large, contiguous area of mostly good-quality montane grassland. As stated in the FIA, “the high sensitive escarpment area is likely of general importance for a range of faunal groups.” The placement of infrastructure within this area was carefully considered by the terrestrial ecologist in the context of the site’s topography, habitat distribution, and avoidance of no-go areas. While parts of the infrastructure intersect with high sensitivity areas, complete avoidance was not feasible due to technical, engineering, and spatial constraints. Importantly, infrastructure was sited to

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					avoid the most critical features (e.g. wetlands, cliffs, and Oribi hotspots), and mitigation has been incorporated to reduce residual impacts. From an ecological perspective, the long-term impact of wind energy infrastructure given its relatively low surface footprint and allowance for continued low-intensity land use (e.g. grazing) is of low to moderate significance, particularly when compared to alternative land uses such as mining or intensive agriculture. Furthermore, the transition to renewable energy is likely to yield broader positive environmental outcomes, including reduced greenhouse gas emissions and reduced pressure on biodiversity from fossil fuel-driven climate change. The Biodiversity Offset Report addresses impacts on faunal species by securing and managing plateau grassland habitats that provide essential ecological services, such as foraging, shelter, and movement corridors, for species like Oribi, thereby reducing residual impacts and supporting long-term population viability.
5.5				Turbines (ie. WTGs 14, 15 and 24), as well as associated roads, OHL and MV cable route, are located in CBA Optimal areas.	Acknowledged. The presence of WTGs 14, 15, and 24 along with associated roads, overhead lines (OHL), and MV cable routes—within Critical Biodiversity Area (CBA) Optimal zones was carefully evaluated during the layout optimisation process. Avoidance of CBAs was a primary design principle, and placement within CBA Optimal areas occurred only where spatial or technical constraints limited further avoidance. As a result, WTG 15 and WTG 24 were removed from the final layout, and WTG 14 was repositioned to border an already invaded portion of the CBA.

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					CBA Optimal areas, while sensitive, are intended to allow for limited, biodiversity-compatible land uses. The terrestrial specialist confirmed that the affected areas were partially transformed or degraded, reducing the ecological risk. Residual impacts are addressed through targeted mitigation and monitoring measures detailed in the EMPr, including ongoing biodiversity monitoring in collaboration with specialists. To further address impacts on CBAs, the Biodiversity Offset Report proposes securing and managing ecologically equivalent or higher-value grassland areas to maintain ecosystem services such as water regulation, soil stability, and climate resilience—thus reducing residual impacts and supporting long-term ecological integrity.
5.6				Turbines are located in No-Go areas for Bats (WTGs 3, 4, 5 and 10), based on you Figure 7 .3 for Bat sensitivity in the EIA Report (noting that the Figures in the Bat Specialist Report dated February 2025 were not provided, and it was therefore not possible to confirm whether rotor swept areas of the remaining turbines, which appear to be located very close to No-Go areas, intrude on No-Go areas).	Turbines 3, 4 and 5 are located in low and medium sensitivity areas. The turbine blades are also not within the blade tip buffers.

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					 Turbine 10 is also in a low sensitivity area and not within the blade tip buffer. No turbines blades extend into No-Go Areas.

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
5.7				The following eight (8) turbines are located in sensitive Avifaunal "All infrastructure Exclusion zones" and in Avifaunal 'Turbine Exclusion Zones":	
5.7.1				WTGs 21, 23 and 24 are located in "All Infrastructure Exclusion Zones" (Yellow-breasted Pipit habitat).	Noted. WTGs 21 and 23 have been moved outside of the Very High Risk All Infrastructure Exclusion Zones (Yellow-breasted Pipit habitat). Note that WTG 24 has been removed from the revised WEF layout completely.
5.7.2				WTGs 12, 20 and 21 are located in a 'Turbine Exclusion Zone" (Martial Eagle nest buffer), and WTG 13 is located too close to this zone.	Noted. WTGs 12, 20 and 21 have been moved outside of the Avifaunal Turbine Exclusion Zone (Martial Eagle nest buffer), and WTG 13 has been micro sited to be located further away with the rotor swept area also not intersecting with this zone.
5.7.3				WTG 25 is located within the rotor swept area of the "Turbine Exclusion Zone" (Southern Bald Ibis colonies and associated flight behaviour).	Noted. WTG 25 has been micro sited to be located outside of the Avifaunal Turbine Exclusion Zone with the rotor swept area also not intersecting with this zone (Southern Bald Ibis colonies and associated flight behaviour).
5.7.4				WTG 7 is located within the rotor swept area of the "Turbine Exclusion Zone" (Species 23 habitat).	Noted. WTG 7 has been moved outside of the Avifaunal Turbine Exclusion Zone with the rotor swept area also not intersecting with this zone (Species 23 habitat).
5.7.5				WTGs 14, 19, 21 and 22 are located in the "Turbine Exclusion Zones" (Avifaunal habitat associated with drainage lines and wetlands).	Noted. Upon further interrogation of the Aquatic Specialist's delineation of aquatic features on site as well as the no-go buffers assigned to each aquatic feature, it was determined that the avian habitat associated with aquatic bird species recorded on site aligns largely with the delineated features and associated buffer areas as identified and mapped by the Aquatic Specialist. Aquatic sensitivity data also corresponds to the avifaunal high-risk zones specifically, and as such the avifaunal study

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					therefore retained its identification of high-risk turbine exclusion zones as it relates to avifaunal habitat associated with wetlands, while it elected to adopt the Aquatic Specialist's delineation and assigned sensitivity of drainage lines. Therefore, based on the revised WEF layouts, WTGs 14, 19, 21 and 22 are no longer located in the turbine exclusion zones for avifaunal habitat associated with drainage lines and wetlands.
5.8				Further to the location of turbines in Avifaunal No-Go areas, the following infrastructure is located in "All infrastructure Exclusion Zones":	
5.8.1				The road in the southern portion of Emvelo WEF 2	Noted. This road in the southern portion of the Emvelo WEF 2 project site has been removed from the revised WEF layout completely.
5.8.2				The MV Cabling Route in Emvelo WEF 2 (traversing Species 23 habitat)	Noted. This MV cable has been removed from the revised WEF layout completely and no longer traverses Species 23 habitat.
5.8.3				The MV Cabling Route that runs between Emvelo WEF 1 and Emvelo WEF 2	Noted. This MV cable has been removed from the revised WEF layout completely.
5.8.4				The road in the southern part of Emvelo WEF 1	Noted. This road in the southern portion of the Emvelo WEF 1 project site still traverses the southern fringes of an All Infrastructure Exclusion Zone; however, this proposed road follows an existing gravel road on the property and is therefore acceptable. It should be noted that as this existing road is located within is located within Yellow-breasted Pipet habitat. This road exists unformalized and without maintenance and management. An EMPr will prescribe management measures, in relation to the use of this road. This will ultimately have a positive impact, due to the management of activities and maintenance within a sensitive environment. Something which is currently left unmanaged.

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					A Water Use License Application will be undertaken.
5.9				Twelve (12) turbines (ie. WTGs 13 to 25, acknowledging that WTG 13 is located on old lands, fall within an Important Bird Area (IBA). While we are aware that Birdlife has replaced the IBAs with the IUCN KBAs, which represent areas of global importance required to meet global thresholds, both DARDLEA and MTPA still regard IBAs as important regionally, as they play a valuable role in the identification of important avifaunal areas.	Noted. Although these turbines are located within an IBA, it should be noted that none of these listed turbines are located within a Very High Risk All Infrastructure Exclusion Zone. Note that WTGs 12, 13, 14, 19 and 20 that are located within a High Risk Avifaunal Turbine Exclusion Zone will be subjected to compulsory SDoD as well as diurnal proactive curtailment fully implemented throughout the lifespan of the proposed WEF. The Biodiversity Offset Report acknowledges the placement of turbines within the IBA and addresses residual impacts by securing and managing offset areas that support habitat for priority bird species, thereby maintaining ecological functions such as foraging and breeding, and contributing to the regional conservation objectives still associated with IBAs.
5.10				It is notable also that all turbines proposed on untransformed land (ie. WTGs 3, 13, 14, 15, 17, 19, 20, 21, 22, 23, 24 and 25) are located within National Protected Area Expansion Priority areas.	Acknowledged. It is noted that all turbines proposed on untransformed land (WTGs 3, 13, 14, 15, 17, 19, 20, 21, 22, 23, 24 and 25) fall within areas identified as National Protected Area Expansion Strategy (NPAES) priorities. The layout was developed with the objective of avoiding sensitive areas wherever technically and spatially feasible. Where avoidance was not possible, infrastructure placement was guided by a precautionary approach informed by biodiversity sensitivity mapping, field surveys, and specialist input. Notably, several turbines (e.g. WTG 13) are located in already transformed areas or in zones of lower ecological sensitivity within the broader NPAES context.

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					Site-specific mitigation measures have been developed in consultation with the terrestrial and faunal specialists, and these are comprehensively outlined in the EMPr. The planning and assessment process has recognized and incorporated the importance of conservation of these zones, and appropriate mitigation has been put in place to manage and minimize ecological impact.
5.11				Significant portions of the transmission line are located in Terrestrial CSA Irreplaceable areas and Aquatic CBAs.	Acknowledged. Significant portions of the transmission line route were initially identified within Terrestrial Climate Change Support Areas (CSA) Irreplaceable and Aquatic Critical Biodiversity Areas (CBAs). In response, the alignment was refined through iterative layout planning in consultation with biodiversity specialists to avoid these areas where feasible. Where complete avoidance was not possible due to technical constraints, such as topography, grid connection requirements, or land use conflicts, site-specific mitigation measures were proposed. As the physical footprint of pylons is minimal, the terrestrial biodiversity impact is limited to small, localised areas. Furthermore, overhead transmission lines are capable of spanning ecologically sensitive habitats with minimal ground disturbance, thereby reducing fragmentation and habitat loss. All proposed mitigation measures are detailed in the EMPr and will be implemented and monitored to ensure that biodiversity values within CSA Irreplaceable and Aquatic CBA areas are appropriately protected throughout the life of the project.

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37.				The significant reduction in the Turbine Exclusion Zone in relation to Martial Eagle is very concerning (compared to the Scoping Phase, the Turbine Exclusion Zone is substantially smaller). While the Avifaunal assessment confirms that Martial Eagle tracking data were collected from one adult and one juvenile bird from the nest site located adjacent to the Emvelo WEF Project Site from Eagles that were tagged in April/May 2024, Paragraph 5.8.7.1 of the Avifaunal Report states that: "Given the temporal span of data at the time of analysis (8 months) and data representing a limited number of birds, detailed flight risk modelling was not conducted. However, given the tracking data did incorporate both an adult and juvenile bird over the pre-breeding, breeding and post-breeding periods, the data offered a unique opportunity to gain some understanding of flight risk as it pertains to certain variables". The report further states that in the 8 months of tracking, results indicated that 24% of time was spent within 3-9km of the nest site, and that "the 15% cluster of time spent between 6-9 km was associated with a likely roost site located approximately 6 km away that was frequented pre-breeding (April) and post-breeding (Oct - Nov)". Following from this:	
6.1				It is premature to deviate from the 5km Birdlife buffer, or even the 6km EWT buffer, advocated for Martial Eagle nests, given that detailed flight risk modelling has not been conducted due to insufficient tracking data.	Noted. The flight risk model and sensitivity zonation for Martial Eagle were developed using a combination of tracking data, focused field observations, and high-resolution environmental predictor variables. While the model incorporates GPS data from one adult (13 months, 6380 transmitted locations) and one juvenile individual (5 months, ~1450 transmitted locations) at the project site, it also includes tracking data (12 months, ~5850 transmitted locations) from a second adult male Martial Eagle monitored at a comparable highland grassland site. This second dataset extended to approximately 12 months and exhibited a remarkably similar spatial use pattern, which is included in the figures reporting on space use. Together, these datasets provided a robust basis for assessing spatial flight activity in relation to nest proximity and landscape features. In addition to the tracking data, over 37 hours of direct Martial Eagle flight observations were recorded near the nest site during 60 hours of targeted pre-construction surveys. This effort
6.2				The tracking data has not been availed for interpretation, therefore it is not possible to verify how the data informed the Avifauna specialists' sensitivity thresholds.	

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					produced a substantial dataset of localized flight behavior, which was used to train a flight risk model (FRM) using an artificial neural network (ANN). The ANN was developed using a suite of predictor variables representing topography and focal site characteristics (distance from nest, perch sites, etc.). This enabled a data-driven approach to modelling spatial risk beyond traditional buffer methods. Regarding the delineation of high and medium sensitivity zones: the original high-risk zone (~80 km²) closely mirrors the area of a 5 km circular buffer recommended by BirdLife South Africa and EWT. However, based on the tracking and observation data showing that ~75% of recorded activity occurred within 3 km of the nest, a more precautionary Very High Risk zone (~31 km²) was delineated, within which no wind turbines will be permitted. The Medium Risk zone (~148 km²) now incorporates a more stringent mitigation regime than conventional practice, including both automated Shutdown-on-Demand (SDOD) and dynamic diurnal curtailment during periods of expected eagle activity. Importantly, the risk classification framework was not adjusted to reduce turbine constraints, but rather to reflect biologically informed risk thresholds derived from empirical data. The risk model thresholds themselves remained unchanged; what changed was the delineation of more conservative spatial zones to better reflect the observed space use and mitigate risk more effectively. While we acknowledge the limitations inherent in working with a small sample size — which is a known challenge for this species — the modelling approach integrates multiple lines of evidence and has prioritized precaution in delineating turbine

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					exclusion zones and mitigation areas. The intent is to implement a risk-responsive mitigation hierarchy that reduces potential collisions. Refer to Section 5.8.7.1 of the updated Avifaunal Specialist Report for additional information on Martial Eagle tracking data considered in this study. Additionally; the Martial Eagle Tracking data and study is being co-ordinated by the Endangered Wildlife Trust (EWT). The applicant is restricted from sharing this data with the public, given the protection status of the species and the requirement to obtain a permit, in terms of NEMBA, to collect, utilize and study the data obtained. The applicant was contacted by Mr. Tommie Steyn (Control Scientist: Terrestrial Systems), from the MPTA, requesting the ME data. This request is being complied with and the applicant has provided the EWT with permission to share the data. Mulilo remains committed to engaging and working with the MTPA.
6.3				It is concerning that a "likely roost site" is located within 6km of the known nest site, and that this has not been investigated further and included in the sensitivity thresholds. It is not revealed in any of the studies where the likely roost site and/or potential alternate nest site is located, therefore it is not possible to assess which turbines would accordingly need to be removed.	Noted. The flight risk model and sensitivity zonation for Martial Eagle were developed using a combination of tracking data, focused field observations, and high-resolution environmental predictor variables. While the model incorporates GPS data from one adult (13 months, 6380 transmitted locations) and one juvenile individual (5 months, ~1450 transmitted locations) at the project site, it also includes tracking data (12 months, ~5850 transmitted locations) from a second adult male Martial Eagle monitored at a comparable highland grassland site. This second dataset extended to approximately 12 months and exhibited

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					a remarkably similar spatial use pattern, which is included in the figures reporting on space use. Together, these datasets provided a robust basis for assessing spatial flight activity in relation to nest proximity and landscape features. In addition to the tracking data, over 37 hours of direct Martial Eagle flight observations were recorded near the nest site during 60 hours of targeted pre-construction surveys. This effort produced a substantial dataset of localized flight behavior, which was used to train a flight risk model (FRM) using an artificial neural network (ANN). The ANN was developed using a suite of predictor variables representing topography and focal site characteristics (distance from nest, perch sites, roosts, etc.). This enabled a data-driven approach to modelling spatial risk beyond traditional buffer This tracking data indicated the concentrated activity of the Martial Eagle (i.e., up to 20% of time spent) at a location situated approximately 6 km away from the known nest site, which at the time of assessment is confirmed to be a roost based on the amount of time the tracked birds spent at this site, specifically during the summer months (November to March). A site inspection conducted in May 2025 confirmed the absence of an alternate nest at this location. Consequently, this FRM data was analysed further and resulted in a slightly expanded high risk zone for Martial Eagle incorporating as a precautionary approach both the nest and the regularly used roost site. Following from this revised sensitivity mapping and based on the updated WEF layout, WTGs 12, 13, 14, 19 and 20 now appear to be located in what is delineated as a high-risk turbine exclusion zone. Although these turbines will be subjected to compulsory ASDoD as well as diurnal proactive curtailment, it is the specialist's recommendation

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					that these affected turbine positions be reconsidered during the detailed design phase, post-EA (should such EA be granted) prior to construction. Refer to Section 5.8.7.1 of the updated Avifaunal Specialist Report for additional information on Martial Eagle tracking data considered in this study.methods.
6.4				Therefore, as per our comments on the Scoping Report, we maintain that the Martial Eagle nest buffer must be in accordance with the Bird Life and EWT minimum recommendation of 5-6km.	Noted. Refer to the response provided in 6.1 and 6.2 above.
38.				The mitigation proposed to reduce the mortality from collision with wind turbines states that "Analysis of Mattia/ Eagle tracking data has revealed strong correlations between flight activity and variables such as time of day, wind speed, and temperature. These correlations will be further refined prior to the wind farm becoming operational'. The requirement for ongoing correlations to finalise a flight risk model for Martial Eagles further corroborates our view that reducing the Turbine Exclusion Zone at this stage is premature, and that resident Martial Eagles will be at risk of collision as a result.	Noted. Refer to the response provided in 6.1 and 6.2 above.
39.				DARDLEA is not in agreement with the mitigation proposed in respect of Shut Down on Demand (SDoD) to reduce bird mortality due to collisions with the wind turbines, as provided in the EMPr. It states that "Wind turbines (WTGs) located within the medium risk zones (as indicated in Section 6.5 of	Noted. Diurnal and nocturnal SDoD will be fully implemented on all authorized WTGs throughout the lifespan of the proposed WEF. The Avifaunal Specialist Report has been updated to include the following compulsory mitigation measures as recommended for inclusion in the EMPr:

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				this report (the Avifaunal Report]) must be subject to Shut Down on Demand (SDoD), either Observer SDoD or Automated SDoD, as well as proactive curtailment based on environmental and weather conditions conducive to bird flight activity. Analysis of Martial Eagle tracking data has revealed strong correlations between flight activity and variables such as time of day, wind speed, and temperature. These correlations will be further refined prior to the wind farm becoming operational". Given the conservation value of the area and the species it supports, the following must be compulsory in the event that any turbines are authorised: All wind turbine generators (WTGs) - and not just those in 'medium risk zones' - must be subjected to SDoD, which must include Automated SDoD (camera and radar) to accommodate misty conditions and night flying species, as well as proactive curtailment based on environmental and weather conditions. SDoD and radar technology must be in operation at the onset of commercial operation date (COD). SDoD success must be monitored throughout the lifetime of the facility, where monitoring data during operation will continuously inform the SDoD needs for each turbine. Furthermore, the Shut Down on Demand (SDoD) programme must be developed and included in the EMPr.	• All wind turbine generators (WTGs) – located in both 'high risk zones' and 'medium risk zones' - must be subjected to SDoD, which must include Automated SDoD (camera and radar) to accommodate misty conditions and night flying species, as well as proactive curtailment based on environmental and weather conditions. • SDoD and radar technology must be in operation at the onset of commercial operation date (COD). • SDoD success must be monitored throughout the lifetime of the facility, where monitoring data during operation will continuously inform the SDoD needs for each turbine. • The Shut Down on Demand (SDoD) programme must be developed and included in the EMPr, post-EA (should such EA be granted) during the detailed design phase prior to construction. Specific details of the SDoD programme will be included in a comprehensive Biodiversity Management Plan (BMP) which will be developed and implemented prior to the commercial operational date of the facility.
40.				In our comments on the Scoping Report, we required that appropriate bird fatality thresholds (turbine collision, as well as power line collision and electrocution) be	The EMPr has been updated accordingly. Refer to responses below for specific details.

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				defined in the EIA report and incorporated in the EMPr. However this has not been done. Instead, the EMPr states that "If estimated annual collision rates indicate unacceptable mortality levels of priority species, i.e. if it exceeds mortality thresholds as determined by the avifaunal specialist in consultation with BLSA and other avifaunal specialists, additional measures will have to be implemented which could include shut down on demand or other proven measures". This approach is not accepted, for the following reasons:	
9.1				Appropriate fatality thresholds triggering the need for additional mitigation action need be defined so that action is immediate.	Noted. The Avifaunal Specialist Report has been updated to include Potential Biological Removal (PBR) estimates alongside Collision Risk Model (CRM) outputs for all wind priority species recorded on site. This approach enables a scientifically defensible method of establishing species-specific annual fatality thresholds. The PBR framework provides an estimate of the maximum number of individuals that can be removed from a population annually without affecting its viability. By pairing these values with our site-specific CRM fatality predictions—which incorporate the effect of avoidance behaviour and mitigation effectiveness—we can assess whether predicted collision mortality falls within acceptable biological limits. The ratio of predicted annual fatalities (CRM) to allowable removals (PBR) is expressed as a percentage threshold, which serves as a practical trigger for additional mitigation. If operational monitoring indicates that annual fatalities are approaching or exceeding PBR-based thresholds, this will trigger an immediate review and escalation of

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					mitigation measures, such as extending curtailment periods, adjusting SDOD protocols, or refining exclusion zones. This framework ensures that mitigation is responsive, data-informed, and conservation-aligned, with threshold exceedance serving as a clear and proactive management trigger. Refer to Section 5.8.8 of the Avifaunal Specialist Report for full details on PBR integration and species-specific thresholds.
9.2				No timeframes for reporting and implementing additional mitigation measures have been included in the EMPr.	Noted. The EMPr included in the Avifaunal Specialist Report has been updated to include the following: Quarterly reports must be submitted to all relevant authorities and NGO's during the operational phase throughout the lifespan of the facility. • Annual independent audits must be undertaken by an ECO during the operational phase throughout the lifespan of the facility. • A comprehensive Biodiversity Management Plan (BMP) that is to be developed and implemented prior to the commercial operational date of the facility, must prescribe the minimum reporting requirements as well as details for 'internal' reporting timelines. • Additional mitigation measures, when required during operations, are to be implemented timeously in accordance with the practicality and associated ease of implementation. All revised mitigation measures should be implemented within a period of maximum six (6) months.
9.3				In these comments we have already advocated for SDoD to be implemented on all authorised turbines. The statement is	Noted. In addition to compulsory SDoD to be implemented on all authorised turbines across the project sites, both diurnal and/or nocturnal proactive curtailment will be implemented for certain species,

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				therefore not clear about what the additional mitigation action options are.	where recommended. Blade patterning is also recommended for all authorised turbines.
41.				The following limitations specified in Paragraph 2.5.4 are noted with concern, especially in respect of the impact of the proposed facility on Oribi, an Endangered antelope, that has seen a continued decline due to habitat destruction: • "Despite increasing prevalence, there is currently limited scientific evidence and empirical data on the impacts of wind farms on invertebrate and on non-volant mammals (Docrat, 2023; Helldin et al., 2012; Klich et al., 2024; Lopucki and Mroz, 2016; Tolvanen et al., 2023). This is especially evident for South Africa, where except for birds, there is almost no information based on scientific studies concerning the impacts of wind farms on other faunal elements, such as mammals and invertebrates. Consequently, there is limited local information and published guidance specifically on the impacts of wind farms on faunal SCC with regards to aspects such as habitat fragmentation and noise disturbances in grassland habitats such as found at the project site. • The impacts from wind farms in South Africa should therefore ideally follow a precautionary approach. and provide mitigation measures around avoidance and minimisation, when it comes to sensitive faunal SCC and their associated habitats. This is especially important as	Considering this, a precautionary approach was adopted throughout the assessment process, with a strong emphasis placed on avoidance and minimisation of impacts to sensitive faunal species of conservation concern (SCC), including the Endangered Oribi. These have been incorporated in the updated EMPr, including offset planning and detailed management interventions, to ensure long-term conservation outcomes.

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				new wind farm developments that will occur in remote areas with limited access roads are likely to have impacts at the population level of faunal SCC (Helldin et al., 2012)".	
42.				The Faunal Impact Assessment dated 6 March 2025 (still in Draft Format), and the faunal site sensitivity verification undertaken in May 2023, concluded that site sensitivities and potential impacts, particularly on high sensitive areas, would need to be assessed through seasonally appropriate micro-siting once the final footprint area and sizes for turbines and access roads were finalised. However, the final layouts provided to the faunal specialists on 30 January 2025 indicated that eight wind turbines, new access roads and all OHL alternatives fall within areas of high faunal sensitivity, including the area of escarpment grassland habitat that the faunal specialists had considered to be the most significant area of fauna/ sensitivity. The faunal specialists however concluded that the proposed development "can be approved in terms of the specific theme of this terrestrial animal species assessment: on the condition that all mitigation measures are implemented, including the avoidance of high sensitive areas, off-setting of high sensitive areas that are developed, and the implementation of an alien plant and Oribi management plans as stipulated here and in various other EMPrs". However, the high sensitive areas have not been avoided, no offset process has been	An Oribi survey and management plan has been developed and presented as a mitigation to help identify/confirm areas of high sensitivity and help mitigate any possible impacts on this SCC. Although the proposed Oribi management plan is somewhat post-hoc, we had taken this on good faith and considered it as a mitigation when assessing impact scores. The Biodiversity Offset Report (BOR) has been developed in accordance with the 2023 National Biodiversity Offset Guideline and applies the full mitigation hierarchy as prescribed under Section 24 of the National Environmental Management Act (NEMA) and the EIA Regulations (2014, as amended). While full avoidance of sensitive areas was not feasible due to technical and spatial constraints, the project layout was refined to limit development in ecologically significant zones as far as practically possible. Robust mitigation measures have been embedded to minimise further minimise impacts on birds, ecosystems, and fauna. Additionally, the development of an Oribi Management Plan, and grazing/fire management measures, are recognised as necessary and are being progressed in line with the framework set out in the 2023 National Biodiversity Offset Guideline. The BOR provides a structured offset pathway to address residual impacts, including those relating to Oribi habitat and other fauna of concern. Crucially,

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				investigated or provided in the EIA report, nor has it been demonstrated that an offset would even be feasible. Also, no Oribi Management Plan has been drafted.	the BOR quantifies and offsets any remaining ecological loss through targeted, enforceable biodiversity offsets, securing measurable conservation outcomes and ensuring no net loss of biodiversity, in line with national policy objectives and regulatory expectations.
43.				Again, the "Faunal Management Plan" on Page 165 of the EMPr states that "Off-set areas to be determined for any high faunal sensitive areas that are to be developed; these should form part of a long-term conservation programme", and then goes on to state that an Oribi Management Plan must be developed by a faunal specialist. Neither an offset nor an Oribi Management Plan have been included in the EIA Report. Furthermore, Page 42 of the EMPr states that a 5m buffer must be applied to Areas of High Sensitivity for Fauna, however roads and turbines have been located in these areas.	The concern is noted. The EMPr acknowledges the presence of areas of high faunal sensitivity within the proposed development footprint and prescribes that offsets may be required should development be unavoidable in these areas. It also makes provision for the development of an Oribi Management Plan by a qualified faunal specialist, should Oribi presence or suitable habitat be confirmed within areas affected by infrastructure placement. As part of the iterative site refinement process, efforts were made to avoid the most sensitive faunal areas, as identified by the specialist assessments. However, where full avoidance was not technically feasible—particularly for linear infrastructure such as roads or cabling—site-specific mitigation and management measures have been incorporated into the EMPr to minimise residual impacts. This includes, but is not limited to, the use of low-impact construction techniques, rehabilitation commitments, and operational-phase activity restrictions. Regarding the 5 m buffer for areas of high faunal sensitivity, it is acknowledged that some infrastructure elements, such as roads and turbines, intersect with these zones. These cases were subject to specialist review and deemed acceptable with the implementation of enhanced mitigation measures as detailed in the EMPr. It is important to note that the

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					5 m buffer serves as a general guideline and must be applied contextually in line with specialist input and site-specific constraints.
44.	Cumulative Impact Assessment:				
13.1				In Point 6 of our comments dated 17 September 2024 on the draft Scoping Report we stated that: "We are concerned that cumulative impacts will not be dealt with adequately. While the Department of Fisheries, Forestry and the Environment has set a limit of 30km for the assessment of cumulative impacts, this should be viewed as a minimum requirement. Due to the extremely sensitive habitat within which all wind farms in the region have either been authorised or are currently in process, it is our view that all authorised and in-process wind farms in the Gert Sibande District should be included in the assessment of cumulative impacts. Currently, these include Ujekamanzi WEF 1, Ujekamanzi WEF 2, Ummbila Emoyeni WEF (authorised, and within 55km); Phefumula Emoyeni WEF (within 40km); Mukondeleli WEF (authorised), ZephyrWEF (within 30km), as well as Camden I and II, Sheepmoor WEF and Rochdale WEF. The cumulative assessment must, inter alia, identify the species and habitats most at risk of cumulative impacts, and identify key uncertainties. The definition of cumulative impacts as per the EIA Regulations is "the past, current and reasonably foreseeable future impact of an activity, considered together with the impact of activities	Noted. The EIA Report and associated specialist assessments incorporate cumulative impact assessments in line with national guidance, with the standard 30 km radius treated as a minimum rather than a fixed threshold. It is important to clarify that there is no legislated or scientifically fixed threshold for a cumulative impact radius. Instead, the radius should be ecologically justified and context specific. In this case, a 35 km radius was applied for both the avifaunal and bat specialist cumulative assessments, in recognition of the movement ecology of priority species and the density of surrounding wind energy developments. For avifauna, the 35 km cumulative radius included all authorised, in-process, and proposed wind energy facilities reasonably expected to interact with the project's area of influence, such as Camden I & II, Zephyr, Emvelo, Ujekamanzi I, Daggafoort, and Ntabande. The assessment considered spatial overlap, species-specific sensitivity, habitat connectivity, and flight behavior of species of conservation concern. For bats, two cumulative radii were applied to accommodate differences in ecological behavior: • 35 km for resident and non-migratory bat species, reflecting expected foraging ranges • 150 km for migratory species, specifically the Natal long-fingered bat (Miniopterus natalensis),

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				associated with that activity, that in itself may not be significant, but may be significant when added to the existing and reasonably foreseeable impacts eventuating from similar or diverse activities". A comparative assessment of the impacts of this proposed facility, in relation to and in conjunction with, adjacent and surrounding renewable energy facilities should therefore be provided in the EIA Report". Your responded in the comments and response report as follows: "As per the DFFE guidelines related to cumulative impacts, all specialists will be requested to provide an assessment of the potential cumulative impacts of the proposed project, and all other renewable energy projects within the prescribed radius, on the environment. These cumulative impact assessments will be incorporated into the EIAr for adjudication during the EIA comment period". DARDLEA again reiterates that a radius of 30 km is insufficient to adequately address the cumulative impacts of similar developments in a region comprising sensitive and important high-elevation habitats that are known to be used by avifauna for breeding, particularly considering the magnitude of these structures, as well as the vast distances that bird (and bat) species can travel. Although the avifauna specialist assessed cumulative impacts for a 35 km radius, we believe that	to account for their broader movement and migration routes. These radii were selected based on best available ecological understanding and aimed to ensure that the species and habitats most vulnerable to cumulative impacts were identified and assessed. The findings and recommended mitigation measures are fully integrated into the EIA Report and EMPr, with adaptive management and monitoring protocols in place to manage residual and cumulative risks.

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				cumulative impacts need to be assessed for a much wider area.	
13.2				Even though Section 4.3.3 of the EIA Report confirms an understanding of the definition of cumulative impacts, the EIA Report only identifies three (3) WEFs (i.e. Sheepmoor WEF, Camden I WEF and Camden II WEF) within 35 km of the proposed Sheepmoor WEF. However there are actually and additional three (3) (1 Approved, Le . Zephyr WEF, and 2 In Process, i.e. Ntabande WEF and Daggafoort WEF). Within a 55 km radius there are an additional 2 WEFs (1 Approved, i.e. Ukekamanzi 1 WEF, and 1 In	The importance of a robust and comprehensive cumulative impact assessment (CIA) is fully acknowledged, The cumulative impact assessment undertaken for the proposed WEF did identify and assess cumulative impacts from other known WEFs within a 35 km radius, in line with ecologically justified parameters and best practice guidance. These include Sheepmoor, Camden I and II, Zephyr, Ntabande, and Daggafoort WEFs. The 35 km radius used in the assessment reflects a deliberate extension beyond

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				Process, i.e. Phefumula One). Over and above the WEFs that are either approved or in process, there are also an additional four (4) within 35km and two (2) within 55km that are at preapplication stage. This brings the potential number of turbines within a 35 km radius to 442 (not 192 as indicated in the EIA Report), and 551 within a 55 km radius.	the minimum 30 km guidance issued by DFFE, and was selected in consultation with the specialist teams to ensure adequate representation of overlapping zones of influence, particularly for species with known ranging behaviors such as large raptors, cranes, and bats. In terms of project status, the cumulative assessment included all approved and in-process WEFs for which sufficient public domain information was available at the time of reporting. Projects at the pre-application stage were not formally included in the quantitative cumulative turbine count, as many of these are still under development and do not yet have finalised layouts, turbine numbers, or impact information. However, their potential contribution to future cumulative impacts is acknowledged as a limitation and flagged as a key uncertainty in the CIA. The difference in turbine numbers (442 vs. 192) likely stems from inclusion of pre-application and conceptual phase developments in external tallies, which were not yet publicly confirmed or finalised at the time of the EIA compilation. It is standard practice to focus CIA on projects that are sufficiently advanced to provide spatially explicit and reasonably foreseeable data, in line with the NEMA definition of cumulative impacts.
13.3				The potential cumulative impact on avifauna as a result of these approved and proposed turbines in the landscape is substantial. Preliminary predictions of potential bird collisions (per key species of conservation concern) for all the approved and proposed WEFs within a 55 km radius, indicate	Noted. The specialist is curious as to how these fatality figures, as a result of potential bird collisions with turbine infrastructure, were calculated. Also, are these fatality figures based on estimations before or after mitigation? Considering that it is referred to as being a ‘precautionary’ prediction based on bird collision monitoring data recorded at

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				fatalities of approximately 222 Cape Vultures (Endangered), 40 White Backed Vultures (Critically Endangered), 60 Martial Eagles (Endangered), 60 Black Harriers (Endangered), 40 Secretarybirds (Vulnerable) and 747 Jackal Buzzards (Near Threatened). This is a precautionary prediction, using the latest (2023) bird collision monitoring data at existing operational wind farms in South Africa, based on the average number of bird collisions per turbine per year over a 30 year WEF lifespan, prior to any mitigation measures being implemented. Furthermore, the Bird life South Africa Occasional Report Series 3: Summary of Bird Monitoring Reports from Operational Wind Energy Facilities in South Africa (February 2025), indicates that at current fatality rates due to collisions with wind turbines, fatalities of Martial Eagles may already be exceeding the Potential Biological Removal (PBR) rate.	existing operational wind farms in South Africa (none of which are located in Mpumalanga), one questions the level of mitigation that is being implemented or the lack thereof at most of these existing facilities. Following from the information provided in this comment, it is noted that these fatality rates are also based on an operational period of 30 years. Furthermore, one should keep in mind that although a large number of wind farm projects are being proposed / approved, not all projects will be realised as several factors could influence / hinder the development process beyond the EIA process and issuing of EA, should such EA be granted.
13.4				DFFE also requires that "the cumulative impact assessment for all identified and assessed impacts must indicate the following: (a) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land". The EIA Report does not accurately quantify the size of the identified impacts, i.e. hectares of cumulatively transformed land. The overall footprint size of this, and all other similar proposed and approved renewable energy facilities within a 35 km radius is 167	The EIA process has recognised this requirement and has included project-specific transformation footprint estimates for the Sheepmoor Wind Energy Facility (WEF) based on the full build-out scenario. Furthermore, as part of the cumulative impact assessment (CIA), the avifaunal, bat, and biodiversity specialists considered the spatial extent and likely overlap of ecological disturbance footprints for approved and in-process wind energy developments within a 35 km radius. However, it is acknowledged that the EIA Report did not explicitly aggregate and present a total hectare figure representing the cumulative transformed land

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				138.69 ha (Approved: 33 060.73 ha, In Progress: 47 567.96 ha, Pre-Application: 108 554.19 ha).	area across all facilities in a manner consistent with DFFE's suggested formatting (i.e., in hectares per project stage). This has since been addressed: the cumulative transformation footprint has been recalculated and tabulated, based on the best available data for: • Approved projects (33,060.73 ha), • In-progress projects (47,567.96 ha), • Pre-application projects (108,554.19 ha), Totalling an estimated 167,138.69 ha within the 35 km cumulative assessment radius. It is important to note that the cumulative footprint figure reflects project application areas or lease areas, not the actual physical disturbance footprint, which remains significantly lower (typically <5% of the project area). Nevertheless, this aggregated transformation area has now been incorporated into the final Cumulative Impact Assessment and EIA Report, with an explanation of methodology and limitations, to ensure alignment with DFFE's requirements and support transparent decision-making.
13.5				This is a substantial development footprint and is likely to have highly significant cumulative impacts in terms of the fragmentation of intact grassland patches and possible loss of critical biodiversity areas (CBAs). Our internal Mpumalanga Renewable Energy Risk Map indicates that as much as one third of the entire cumulative footprint of wind energy facilities within a 35 km radius, is made up of Critical Biodiversity Areas (CBAs), and intact	The concern regarding the cumulative fragmentation of intact grassland patches, CBAs, and climate change corridors is acknowledged and has been carefully considered in both the specialist assessments and the layout optimization process. While the cumulative project area across multiple WEFs may appear extensive, the actual disturbance footprint of a wind energy facility is relatively limited. The physical infrastructure footprint (including turbine foundations, roads, and OHL pylons) constitutes a small fraction of the overall site

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				grassland patches. Furthermore, at least one quarter of this cumulative footprint area makes up important climate change corridors, which serve an important function to allow species to move in response to climate change.	area. Turbines are spaced widely apart, and associated infrastructure has been concentrated in already transformed or degraded areas as far as technically feasible, thereby reducing incremental habitat fragmentation. The terrestrial specialist confirmed that the footprint of the proposed infrastructure does not represent a barrier to faunal movement or metapopulation processes, particularly for wide-ranging species. Additionally, grassland vegetation between infrastructure components will remain largely intact and functionally continuous, supporting landscape-level connectivity and species dispersal in the context of climate change. Nevertheless, the layout was refined to minimise impacts on mapped intact grassland patches, CBAs, and corridors, and all areas of overlap were subject to additional specialist scrutiny. Where residual impacts could not be avoided, site-specific mitigation and management measures have been proposed. The project supports the implementation of provincial tools such as the Mpumalanga Biodiversity Sector Plan (MBSP) and acknowledges the importance of strategic, landscape-level planning for climate resilience and biodiversity conservation. The EMPr also outlines provisions for adaptive management should cumulative pressures increase over time.
13.6				The Visual / Landscape Impact Assessment states that "the significance of the cumulative impact of these projects on the visual environment during their operational phase is assessed to have a high magnitude over the long-term", and further states that	The Visual Impact Assessment (VIA) incorporated known existing, approved, and proposed WEFs within a 35 km radius, in line with accepted visual impact assessment practice and the distance within which turbines are most likely to contribute meaningfully to visual cumulative effects.

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				no real mitigation is likely to reduce this residual impact. If all WEF facilities located within 35km and 55km were incorporated into the assessment, it would stand to reason that the Visual/ landscape cumulative impact could actually be assessed as "very high".	It is important to clarify that, notwithstanding the number of turbines within the broader landscape, the application of the formal EIA assessment methodology did not yield a rating of “Very High” for cumulative visual impact. As reflected in Table 10: Visual Impact of the Cumulative Effect, the significance of the unmitigated impact was rated as “High”, which is the highest possible rating within the applied impact rating framework. With mitigation, this was reduced to “Moderate”. Similarly, the magnitude (intensity) of the impact was assessed as “High”, and not “Very High,” even when considering cumulative scenarios. The specialist further noted that visibility and perceived landscape intrusion decline substantially with distance, and that inclusion of WEFs beyond the 35 km radius would not significantly alter the impact rating due to: • Reduced visual detectability at distances beyond 35 km, especially under typical atmospheric and lighting conditions; • The limited number of sensitive receptors at such ranges where cumulative visual impacts would be discernible; • The design of the WEF, sought to align infrastructure within areas of higher visual absorption capacity and existing disturbance. While residual cumulative impacts remain, they are consistent with renewable energy development scenarios, and are not considered prohibitive from a landscape or visual standpoint when balanced

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					against national imperatives for clean energy transition and climate resilience.
13.7				DARDELA is therefore of the view that the EIA Report does not adequately assess the cumulative impacts of this proposed facility, in relation to current and future similar renewable development facilities in the surrounding area.	Noted. The cumulative impacts of the proposed Emvelo Wind Energy Facility were assessed in accordance with the requirements of Appendix 3 of the 2014 EIA Regulations (as amended), which require that cumulative impacts be identified and evaluated. The assessment included a detailed cumulative impact analysis based on all known existing, approved, and formally proposed wind energy facilities within a 35 km radius, which is consistent with standard practice and aligns with the NEMA EIA Regulations. The following was undertaken: • A full list of all known wind energy developments (operational, approved, and in formal application phases) within the 35 km study area. • Cumulative visual, avifaunal, bat, and biodiversity impacts were assessed in consultation with specialists, including a quantitative estimation of potential cumulative collision risk for birds, and an expanded 150 km assessment radius for migratory bats, as per the bat specialist study. • The cumulative assessment also considered landscape-scale impacts on Critical Biodiversity Areas (CBAs), intact grasslands, and climate change corridors, including

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					spatial overlay analysis of all known WEFs and their infrastructure footprints. While it is acknowledged that additional WEFs may be at early, pre-application stages, the EIA Regulations limit the cumulative impact scope to existing, approved, or formally submitted applications. Projects that are speculative or not formally submitted cannot be reliably assessed due to insufficient publicly available data on layout, turbine numbers, and infrastructure details.
45.				In our comments on the draft Scoping Report, due to concerns surrounding the unique micro climate in the areas and the potential impact of this WEF on precipitation and soil moisture, we recommended that a micro-climate assessment be undertaken to inform the terrestrial biodiversity study as well as the agricultural assessment. This impact has however not been considered in the EIA Report.	The Agricultural Site Sensitivity Verification confirmed that only active croplands are of high sensitivity, with the rest of the site being medium sensitivity due to soil constraints. The Agricultural Specialist Assessment found that over half the site is unsuitable for cropping, and that land exclusion due to the WEF footprint is minimal, resulting in a low and acceptable impact on agricultural potential. While minor, localized microclimate effects (e.g. turbulence, soil moisture) may occur, they are not expected to materially affect biodiversity or agricultural productivity. Therefore, a standalone Microclimate Assessment was not deemed necessary.
46.				There are a number of concerns related to the EMPr. The following points highlight some (not all) of the pertinent examples:	
15.1				The current application is for the WEF and associated Grid, but in paragraph 2.1.2 is states that "Due to the complexity related to the routing of the transmission line, it will not form a part of this application. The intention is for the internal project cabling to follow the road network to the on-site facility substation".	The EMPr has been updated to clarify the routing of the transmission line and the intention for the internal project cabling to follow the road network to the on-site facility substation.

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
15.2				On Page 24, the requirement is that "During the pre-construction phase, the temporary construction camps and laydown areas must be located outside of the water courses (including the 45 m buffer)". The conservation importance of the wetlands on site for bird species, especially the Critically Endangered Species 23, has not been effectively incorporated into the EMPr. Very specific buffer requirements have been modelled by the avifaunal specialist for this purpose.	The EMPr has been updated to incorporate the avifaunal specialist's recommended buffer zones around wetlands, including the 45 m buffer from watercourses, as part of the pre-construction phase requirements. Temporary construction camps and laydown areas will be strictly located outside these buffers to avoid disturbance and habitat degradation. These measures will be monitored and enforced throughout construction to ensure the protection of sensitive wetland habitats and associated avifauna, in alignment with best practice and regulatory requirements.
15.3				Paragraph 5.3.1 requires that "Vegetation clearance must preferably be phased as required to work in certain areas, rather than clearing of the entire site initially. If this is not practical and the entire site is cleared at the start of the contract, it is to be stabilized immediately to control dust". How does this accommodate the requirement to avoid displacing avifauna and fauna?	The phased vegetation clearance approach outlined in Paragraph 5.3.1 is specifically designed to minimise disturbance and displacement of avifauna and fauna by limiting habitat loss to only those areas actively required for construction at any given time. This incremental clearing allows wildlife to relocate progressively rather than being suddenly displaced by wholesale site clearance. In cases where phased clearance is not practical and full-site clearing occurs, immediate stabilization measures (such as dust control and temporary vegetation cover) are implemented to reduce habitat degradation and disturbance. These measures are complemented by timing restrictions and specialist oversight to further mitigate impacts on sensitive species, ensuring alignment with the commitment to avoid unnecessary displacement of fauna.
15.4				Page 42 (Loss of Fauna SCC and Fauna Habitat): "If high sensitive areas are to be developed, then off-sets will be required". This is vague and unenforceable. High sensitive areas are required to be avoided, but haven't been, and Offsetting is a	The EMPr has been updated to ensure that highly sensitive areas are avoided.

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				regulated process that is supposed to form part of the EIA process.	
15.5				Page 51 : "Liaise with affected landowners to discuss potential footprint related issues for wind turbines 2, 3, 6, 8, 9, 14, 18, 21 , 25, 26, 27, 28, 30, 33, 34, 38, 40, 43, 118 and 119 and associated access roads etc". This application is for 24 turbines, and does not include turbines numbered up to 119.	The concerns raised regarding the reference to offsets on page 42 are duly acknowledged. It is emphasised that avoidance of high sensitivity areas remains the primary mitigation principle, with offsets considered only as a measure of last resort for residual impacts that cannot be otherwise mitigated. The offsetting process is strictly regulated and forms an integral part of the EIA process. Accordingly, any proposed offsets will be developed in accordance with the relevant legislative frameworks, and detailed, enforceable offsetting measures will be incorporated into the final Environmental Management Programme (EMPr) to ensure compliance and effective implementation. With respect to the mention on page 51 of liaising with landowners for turbines numbered beyond the scope of this application, this has been identified as an inadvertent inclusion likely carried over from earlier documentation or other projects. The current application for the Emvelo Wind Energy Facility specifically comprises 24 turbines. All stakeholder engagement and consultation activities have been appropriately scoped and aligned with this turbine count and the corresponding infrastructure. The relevant sections of the final documentation will be revised to accurately reflect the correct turbine numbers and associated consultation requirements to avoid any ambiguity.
47.				Based on what has been outlined above, at least more than half (ie. 14) of the 24 turbines proposed are located in unsuitable	The new layout design considered specialist input and sought to balance ecological sensitivity with technical and operational feasibility. While it is

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				areas. Implementing a 5km Martial Eagle nest buffer would bring the number of turbines located in unsuitable areas to 18. The implementation of a 6km Martial Eagle buffer translates to 26 of the 29 turbines proposed being in unsuitable locations. In light of this, and in conjunction with the location of associated roads, OHLs and cabling in CBAs and avifauna and fauna high sensitivity areas, DARDLEA cannot support the application in its current format.	acknowledged that a significant proportion of turbines overlap with identified sensitivity zones, the final layout incorporated measures to minimize ecological impacts, including micro-siting adjustments, avoidance of the most critical habitats where feasible, and comprehensive mitigation strategies. Furthermore, site-specific management plans, such as targeted avifaunal monitoring, Shut Down on Demand protocols, and offset considerations, have been developed to address potential impacts on Martial Eagles and other species of conservation concern. The (EMPr) will enforce these measures and include adaptive management based on ongoing monitoring outcomes.
48.				Please provide this Department with an opportunity to review and engage with your response to these comments	Noted.

TABLE 8-22 COMMENTS FROM INITIAL DRAFT EIA DFFE

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
General Comments					
1.	DFFE Ms Bathandwa Ncube	10 April 2025 Per Email	Draft EIAr	The final EIAr must comply with all comments on the draft scoping report signed on 20 September 2024; conditions of the acceptance of the scoping report signed on 19 November 2024; as well as these comments on the draft EIAr, and must address all comments received for the DSR, FSR and draft EIAr.	Acknowledged. The revised Draft EIAr has been revised to incorporate all comments received to date, including those on the DSR, FSR, and initial Draft EIAr. A comprehensive Comments and Responses Report (CRR) is included, documenting how each comment has been addressed.
2.				It is noted that the proposed development site, which has been assessed in the draft EIAr is different to the proposed development site which was identified and approved for assessment in the acceptance of Scoping report letter dated 19 November 2024. The 20% of the proposed Rochdale development site, which has now been included as part of the proposed Emvelo development site, was not part of the screening reports and approved Plan of Study. This results in the process being procedural flawed in terms of legislative requirements under EIA Regulations 2014, as amended. The concerns raised and recommendations in the email sent to you from this Department, dated 17 February 2025 still apply.	The concern regarding changes to the development site post-Scoping Phase is noted. It is important to clarify that the proposed inclusion of portions of the original Rochdale WEF site into the revised Sheepmoor WEF application was necessitated by technical, environmental, and spatial considerations that emerged following the Scoping Phase. These changes were made in accordance with the iterative nature of the EIA process, as recognised in the EIA Regulations, 2014 (as amended), which allows for refinement based on new information and specialist input. While 20% of the area now forming part of the proposed Sheepmoor WEF originates from the former Rochdale WEF, this area had previously undergone screening, scoping, and specialist assessment under that application. These reports were in the public domain, and Interested and Affected Parties (I&APs) were given the opportunity to engage with and comment on them. These I&APs were retained and notified of the changes and the opportunity to

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					participate in the Draft EIAr review process. All previously registered I&APs across Rochdale, Emvelo, and Sheepmoor were consolidated into a single stakeholder list and were duly notified and engaged in accordance with the requirements of the EIA Regulations. Furthermore, the Department was formally consulted on the proposed approach. In an email dated 17 February 2025, Ms. Milicent Solomons of the Department noted that: "In terms of the EIA Regulations, 2014 (as amended), we do not see any prohibition of the proposed process, incorporating the 20% of the Rochdale site into the Emvelo application. The project scope and the relevant assessments will have to comply with all legislative requirements.
Public Participation Process					
1.				Please ensure that comments from all relevant stakeholders are submitted to the Department with the final EIAr, including comments from the relevant sections of this Department.	Acknowledged. All stakeholder comments received during the public participation process, including those from relevant sections of DFFE, are included in the CRR submitted with the revised DEIAr.
2.				All issues raised and comments received during the circulation of the SR and draft EIAr from registered Interested and Affected Parties (I&APs) and organs of state, as listed in your I&APs Database, and others which have jurisdiction in respect of the proposed activity must be adequately addressed and included in the final EIAr.	Confirmed. All issues raised by I&APs and organs of state have been addressed. Responses to these issues are documented in the CRR appended to the revised DEIAr.
3.				Proof of correspondence with the various stakeholders must be included in the final	Acknowledged. Proof of all correspondence with stakeholders, including notification emails, letters,

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				EIAr. This must indicate that this draft EIAr has been subjected to 30 days public participation process, stating the start and end date of the PPP.	and a copy of the advertisement, has been included. The PPP was conducted over a 30-day period, from (10 March 2025) to (10 April 2025), as required.
4.				Evidence that all identified and relevant competent authorities have been given an opportunity to comment on the draft EIAr for the proposed development must be provided with the final EIAr. Should you be unable to obtain comments, proof must be submitted to the Department of the attempts that were made to obtain comments.	This has been addressed. All relevant authorities were provided with an opportunity to comment on the initial Draft EIAr. Copies of correspondence and proof of attempts to solicit input from non-responding authorities are included in the revised DEIAr.
5.				Copies of the original comments received from I&APs and organs of state, which have jurisdiction in respect of the proposed activity, must be submitted with the Final EIAr.	Included. All original comments from I&APs and competent authorities have been appended in full to the revised DEIAr as part of the CRR annexures.
6.				In the final EIAr, the Comments and Response Report (CRR) must include all historical comments and issues raised to date.	Confirmed. The CRR has been consolidated to include all historical and current comments and responses, ensuring continuity and full traceability.
				General Please also ensure that the final EIAr includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 3 of the NEMA EIA Regulations, 2014, as amended. You are further reminded to comply with Regulation 23(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: “The applicant must within 106	The requirements of Appendix 3 of the NEMA EIA Regulations, 2014 (as amended), are duly noted and will be fully incorporated into the Final Environmental Impact Assessment Report (EIAr). The final report will clearly indicate the period for which the Environmental Authorisation (EA) is being sought and the anticipated date of conclusion for the listed activities associated with the proposed Emvelo Wind Energy Facility (WEF). In terms of Regulation 23(1)(a), the initial Draft EIAr (inclusive of specialist reports and the draft

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				days of the acceptance of the scoping report submit to the competent authority - (a) an environmental impact assessment report inclusive of any specialist reports, an EMPr, a closure plan in the case of a closure activity and where the application is a mining application, the plans, report and calculations contemplated in the Financial Provisioning Regulations, which must have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority." Should there be significant changes or new information that has been added to the EIAr or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 23(1)(b) of the NEMA EIA Regulations, 2014, as amended, which states: "The applicant must within 106 days of the acceptance of the scoping report submit to the competent authority – (b) a notification in writing that the documents contemplated in sub-regulation 1(a) will be submitted within 156 days of acceptance of the scoping report by the competent authority or where regulation 21(2) applies, within 156 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the documents, which changes or information was not contained in the original documents consulted on during the	Environmental Management Programme) were submitted within the prescribed timeframe following the acceptance of the Final Scoping Report (FSR) by the competent authority. The Draft EIAr was made available for public review from 10 March to 10 April 2025, ensuring a 30-day public participation period as required. However, as a result of material changes and the inclusion of significant new information particularly additional biodiversity reporting (i.e., the Oribi Management Plan, Biodiversity Offset Report, and revised specialist assessments) the project applicant, Mulilo Emvelo (Pty) Ltd, submitted a formal request to the DFFE in accordance with Regulation 23(1)(b), for an extention to the EIA process,. The DFFE approved this extension and the Final EIAr is due by no later than 25 August 2025. The revised Draft EIAr was subsequently made available for public comment for a further 30-day period, from 14 July to 12 August 2025, in line with the requirements of Regulation 23(1)(b). All revised documentation, including the updated EIAr, EMPr, specialist reports, and comments received during both public participation rounds, will be submitted to the competent authority by the extended deadline of 25 August 2025, as approved. The Final EIAr will include a detailed record of how all public and authority comments have been incorporated.

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				initial public participation process contemplated in sub-regulation (1)(a), and that the revised documents contemplated in sub-regulation 1(a) will be subjected to another public participation process of at least 30 days". Should you fail to meet any of the timeframes stipulated in Regulation 23 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.	

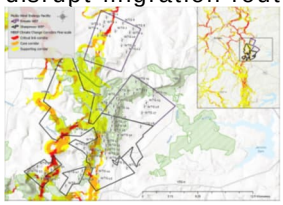
TABLE 8-33 COMMENTS FROM INITIAL DRAFT EIA MTPA

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
7.	MTPA F.N. Krige & Dr. M Lötter	10 April 2025 Per Email	Draft EIAr	INTRODUCTION The Mpumalanga Tourism and Parks Agency (MTPA) has reviewed the application for the proposed Emvelo Wind Energy Facility (WEF) and associated infrastructure (Reference: 14/12/16/3/3/2/2611). Following our review, the MTPA wishes to register significant concerns regarding the project in its current configuration and the proposed turbine layout. These concerns arise from the high environmental sensitivity of the proposed site and the potential for considerable impacts on biodiversity and critical habitats. Key areas of concern include potential effects on critical habitats such as Intact Grassland Patches, Critical Biodiversity Araes, Climate Change Corridors, and National Protected Area Expansion Strategy (NPAES) areas; risks to avifauna, including numerous species of conservation concern; perceived limitations in specialist assessments and proposed mitigation measures, particularly regarding buffer zones; and the cumulative impacts within a region already facing significant development pressure. We also note the recent new placement of several turbines into sensitive areas, including Intact Grassland Patches and zones highlighted as "High Sensitivity – escarpment" in the faunal assessment (described as "the most	The sensitivity of the receiving environment, including the presence of Intact Grassland Patches, Critical Biodiversity Areas (CBAs), Climate Change Corridors, and National Protected Area Expansion Strategy (NPAES) focus areas, was recognised early in the planning process and guided the application of the mitigation hierarchy throughout project development. Multiple layout revisions, informed by input from the biodiversity and avifaunal specialists, to avoid and minimize impacts on sensitive habitats. Where avoidance was not technically feasible due to constraints such as wind resource optimization, topographical limitations, safety buffers, and the recent exclusion zone related to the adjacent airstrip site-specific mitigation measures were developed in line with best practice and applicable guidelines. The relocation of some turbines into more sensitive areas was not undertaken lightly, but rather as part of a broader balancing exercise to avoid other constraints while minimizing biodiversity impacts as far as practically possible. These relocations were reviewed in consultation with the relevant specialists, and the updated layout was subjected to sensitivity overlays and field verification. • The (EMPr) has been updated to reflect refined mitigation and monitoring actions, including: • Habitat-specific mitigation prescriptions for construction and operation in or near sensitive zones;

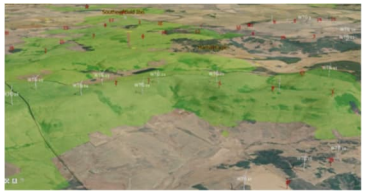
No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				significant faunal habitat"), following relocation to avoid the runway.	• Reinforcement of avifaunal monitoring and Shut Down on Demand (SDOD) protocols; • Rehabilitation and erosion control measures tailored for escarpment and grassland environments; • Clarified post-authorisation responsibilities and enforcement mechanisms. Furthermore, cumulative impacts were assessed within a 35 km radius, consistent with established practice and aligned with the spatial extent used for similar developments in the region. The cumulative analysis included all approved, in-process, and known pre-application wind energy developments to the extent data were available at the time of reporting.
CORE CONCERNS					
2.1				Impacts on Sensitive Habitats The MTPA has reviewed the proposed application and objects to the current proposed layout, and the project as a whole. The reasons for the concern is based on the following: Intact Grassland Patches Intact grassland patches allow for species to thrive and support species that may need to move in response to climate change, enabling the normal functioning of natural ecological processes such as fire regimes or pollination. These patches are larger than 100ha with little or no gaps and edge effects. These large intact patches are expected to be “source areas” in	The ecological importance of Intact Grasslands and their role in supporting biodiversity is fully acknowledged. Through detailed specialist assessments, it has become evident that the environmental impacts associated with current land uses—particularly livestock grazing—within and surrounding the intact grassland areas significantly exceed the anticipated impact of the proposed wind energy facility, which is supported by a robust, multi-tiered mitigation strategy. The proposed development affects only 0.02% of the total Intact Grassland area mapped within Mpumalanga Province. Of this, just 0.2% is expected to be physically disturbed, equating to approximately 0.0003% of the province’s total intact grassland extent. This small footprint, in conjunction with the

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				metapopulation dynamics where birth rates should exceed death rates. No significant impacts should be allowed to affect these areas or change a source area into a sink area (where the death rate usually exceeds the birth rate). There are only 1,039 intact grassland patches that together make up 15% of the province's surface area. These have been prioritised and refined based on their connectivity importance, and these priority areas must be avoided by wind energy facilities. Although the MTPA raised their concern about the occurrence of the intact grassland patches, the specialist reports are silent on the inclusion or consideration of intact grassland patches. For the MTPA and DARDLEA, we are most concerned about the important role these intact grassland patches play as source areas for birds of conservation concern. One would not want to locate wind farms that would displace and kill birds through collisions in "source" areas (metapopulation dynamics). To prevent further loss or extinction risk, we need to avoid these areas. In short, the MTPA utilised a bird point dataset of over 80,000 observations, in combination with 700 intact grassland patches and 700 non-intact grassland patches, to establish that: • Intact grassland patches have a 22% higher likelihood of having any birds of conservation concern present than non-intact grasslands. • Intact grassland patches have on average 49% more bird species of	ability to maintain compatible land uses such as low-intensity grazing, results in a relatively low overall impact. The Biodiversity Offset Report further mitigates this residual loss by proposing the conservation and management of ecologically equivalent or higher-value areas. These offsets aim to maintain long-term ecological functionality, enhance landscape connectivity, support species persistence, and secure key ecosystem services. It is also noted that the Mpumalanga Biodiversity Sector Plan (MBSP) does not explicitly designate Intact Grasslands as "no-go" areas, nor does it prohibit development within them. Instead, the MBSP recognises the need for biodiversity-compatible land uses, which this project strives to achieve. Concerns regarding bird conservation in these habitats are noted. To this end, long-term avifaunal monitoring has been undertaken by a reputable specialist, exceeding standard guideline requirements. In addition, detailed grassland habitat modelling and mapping were conducted by Dr Robyn Colyn and AfriAvian, with a focus on key grassland- and wetland-associated bird species to inform siting, mitigation, and long-term management. The National Protected Areas Expansion Strategy (NPAES) is acknowledged as a valuable strategic tool developed by the Department of Environmental Affairs to guide the expansion of South Africa's protected area network. While it identifies spatial priorities for conservation, the NPAES is non-binding and does not confer formal legal protection on designated areas.

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				conservation concern than non-intact grasslands (bird diversity). • Intact grasslands have over 98% more bird observations than non-intact grasslands (bird abundance). Intact grassland patches make up 23% of the proposed Emvelo WEF footprint. Figures 1 and 2 show the extent of the intact grassland patches. Eight (8) turbines are currently located in intact grassland patches. These are: 13, 19, 20, 21, 22, 23, 24, and 25. They need to be removed. Therefore, the MTPA feels stronger than ever that the establishment of wind farms in intact grassland patches should not be allowed as it may turn a "source" area into a "sink" area. Even Page 4 of the Faunal assessment within the DEIA recognises that "Faunal integrity relies on inter-connected grassland habitats across landscapes." and "…any contiguous areas of intact grassland are considered as high conservation importance." Other Sensitive Spatial Areas: Climate Change Corridors The MBSP's climate change corridor network was designed to enable species and ecosystems to adapt to a changing environment (see Figure 1 below). These features were also incorporated into the MBSP, so there is some overlap. The corridor network considered a single-best (least-cost) corridor connecting up the climate change refugia with the climate change corridors from adjacent provinces.	Portions of the Emvelo WEF site do overlap with NPAES spatial priorities. However, the proposed biodiversity offset together with robust, long-term management interventions is designed to secure and enhance the ecological integrity of these areas. The offset strategy focuses on achieving a net conservation gain by protecting and managing ecologically equivalent or higher-value habitat in perpetuity. This approach directly responds to the current absence of formal protection and the ongoing degradation of these landscapes due to poor land management and unsustainable land uses. In its current condition, the NPAES-priority area within the project footprint is under significant ecological pressure. Without proactive intervention, its conservation value is likely to decline further. The offset therefore not only compensates for the residual impacts of the development but also contributes to the restoration, protection, and long-term improvement of priority areas—supporting national and provincial biodiversity conservation and climate resilience goals.

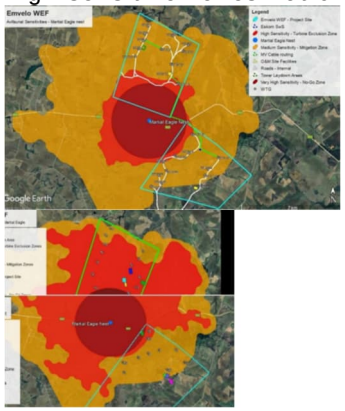
No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				Additional fine-scale corridors were also identified using Circuitscape, finding alternative pathways and identifying pinch points in the corridors and thereby building resilience into the corridor network. As can be seen from Figure 1 below, the north western part of the Emvelo WEF is located over an important climate change corridor that connects up the climate change priorities, thereby potentially compromising the corridor network. The risk from the proposed wind farm on the corridor network is that it will result in both collisions and electrocution, and habitat displacement. Displacement of birds is called functional habitat loss. This disturbance can be detrimental to migratory bird populations if wind farms disrupt migration routes.  Figure 1: MBSP Climate Change Corridor network that links up climate change priorities with refugia and national climate change corridors. Intact grassland patches are indicated in hatched green. National Protected Area Expansion Strategy (NPAES 2018) Just over 70% of the proposed Emvelo WEF is comprised of NPAES spatial priority areas with 25% of the proposed wind turbines	

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				located on NPAES focal areas. These are a priority area for the national and provincial protected area expansion strategy and highlight the national importance of this area. Given and accounting for the recent landcover transformation that has (illegally) occurred, currently 12 turbines are located in NPAES areas. These are: 13, 14, 15, 16, 17, 19, 20, 21, 22, 23, 24, and 25. Under the needs and desirability section of the draft EIA, it states that the PAOI does not intersect any NPAES (page 116), however, on pages 216 and 386 the specialists confirm that it does. According to our calculations, 12 of the 24 turbines are placed in NPAES (2018) areas, which make up 70.5% of the Emvelo WEF. This same text goes on to state that “There are no specific features of very high biodiversity value within the affected polygons and highly sensitive areas have been avoided for development. In addition, the site does not appear to fall on any significant gradients or corridors that are likely to be of high importance for biodiversity processes such as migration and faunal movement.” This is certainly not true. Several sensitive areas are included within the proposed development footprints, and the MBSP Ecological Support Areas and climate change corridors (and vulture flightpaths) clearly show important migration corridors running through the proposed WEF. The DEIA text is incorrect and misleading.	

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				Recent placement of wind turbines in sensitive areas We noted that several wind turbines have been moved into sensitive areas following the need to relocate them due to the runway that had to be avoided. These new turbines are located in intact grassland patches and areas highlighted as high sensitivity – escarpment in the faunal assessment. This was considered to be “the most significant faunal habitat” on page 14 of the faunal specialist assessment. As can be seen from Figure 2 below, the old and the new turbine layout is presented where several new turbines are located in intact grassland patches.  Figure 2: 3D map showing the location of the current turbines (white) as well as the turbines as of the 2024 scoping report (in red). Intact grassland patches are shown in green. It can be seen that in the current layout, there are now significantly more turbines in the intact grassland patches.	
2.2				Avifaunal Risks and Buffer Zones The site's recognised avian biodiversity, including numerous sensitive species, necessitates a highly precautionary approach to impact assessment and mitigation.	Avifaunal Risks and Buffer Zones Noted. From a terrestrial biodiversity perspective, intact grassland vegetation present within the project site and with a CBA 1 (Irreplaceable) classification was modelled and has been avoided by the proposed infrastructure placement. Great effort was employed

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				Important Bird Areas (IBAs) and IUCN Key Biodiversity Araes (KBAs) The proposed WEF falls in an area rich in bird species, particularly birds of conservation concern. Thirty-two priority bird species for wind energy development have been recorded within the WEF and broader area. An additional seventy-six species have been recorded which are powerline sensitive. Of particular concern are the occurrence of African Marsh-Harrier (EN), Black Harrier (EN), Blue Crane (VU), Blue Korhaan (NT), Cape Vulture (EN), Denham's Bustard (VU), Grey Crowned Crane (EN), Lanner Falcon (VU), Martial Eagle (EN), Secretarybird (EN), Southern Bald Ibis (VU), White-bellied Bustard (VU), and Yellow-breasted Pipit (VU). These are all threatened bird species at risk of extinction, over various timeframes. This rich avifaunal biodiversity is recognised regionally and globally through its inclusion within IBAs and KBAs. IBAs make up 49% and KBAs 65% of the Emvelo WEF. At the heart of the MTPA's concerns, resulting in our objection, is the rich avifaunal diversity that is at risk of continual loss of mature individuals through collisions and electrocutions. The avifaunal specialist report acknowledges that collision can be reduced from a high to a medium impact following post-mitigation. However, with 13 threatened bird species occurring on site, reducing the impact to a medium level is still significant, as any loss of large individuals may impact the conservation	to ensure the placement of the majority of proposed turbines in areas of lower biodiversity value. However, the proposed development site's avian biodiversity is recognised with up to 32 priority bird species recorded in the larger project area. Noteworthy is the confirmed presence of 2 of the 3 KBA trigger species (Southern Bald Ibis, Blue Crane and Rudd's Lark). Blue Crane presence has been accommodated by exclusion of suitable habitat from the development footprint and with stringent mitigation to be implemented for all authorised turbines. For Southern Bald Ibis, please refer to our response provided below in the Sheepmoor WEF comments. Note that the Rudd's Lark was not recorded on site. However, the current state of anthropogenic disturbance on the site is concerning and has an existing significant effect on the rich avifaunal diversity of species known to occur in the area. The extent of grazing pressure on the grasslands and continued trampling of wetlands by overstocking of livestock have a significant negative impact on the biodiversity value and continued sustainability of these avian habitats to support healthy populations. It is believed that the development of the proposed WEFs in the area will provide an opportunity for the potential improvement of the habitat conditions through improved grazing regimes, the implementation of onsite conservation measures and the facilitation of potential stewardship agreements in order to manage and reduce anthropogenic impacts. Furthermore, the compulsory implementation of an extensive suite of mitigation measures as recommended by the specialist for all approved turbines are believed to sufficiently reduce the risk to avifauna through potential collision and/or electrocutions posed by the WEF infrastructure.

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				status of these species, particularly in light of cumulative impacts from the 350 approved wind turbines in the province and 129 approved turbines within 40km of Emvelo WEF. Additionally, the avifaunal specialist report assessed the cumulative impact of Emvelo WEF to be moderate to high. Reflecting back on the BirdLife monitoring report of 2025, it states that on average, for every turbine, there are 4.25 bird fatalities per year, and that 10% of these were species of conservation concern. Buffers: Martial Eagle The specialist acknowledges that data limitations (poor temporal span) prevented a detailed flight risk model. Despite this uncertainty, significant confidence is placed in a shaped buffer model that is markedly reduced from previous versions and standard EWT/BLSA recommendations of a 5-6km buffer. Preliminary outputs from the National Martial Eagle Risk Assessment (MERA) tool led by the University of Cape Town, too, support the need to apply a circular buffer of approximately 5km to consider and include the core ranges utilised heavily by resident breeding eagles - rather than applying bespoke buffers based on tracking and observational flight path data. The proponent's own presented model showed 76% of flight time within 3km of the nest, yet a 2.5km no-go buffer is proposed and consistently referenced. This apparent inconsistency requires clarification.	The reference made to the number of approved turbines in the province and surrounding area as well as fatality rates contained in the Birdlife South Africa monitoring report of 2025 is acknowledged; however, one should keep in mind that although a large number of wind farm projects are being proposed / approved, not all projects will be realised as several factors could influence / hinder the development process beyond the EIA phase and decision-making process. Buffers: Martial Eagle Noted. The flight risk model and sensitivity zonation for Martial Eagle were developed using a combination of tracking data, focused field observations, and high-resolution environmental predictor variables. While the model incorporates GPS data from one adult (13 months, 6380 transmitted locations) and one juvenile individual (5 months, ~1450 transmitted locations) at the project site, it also includes tracking data (12 months, ~5850 transmitted locations) from a second adult male Martial Eagle monitored at a comparable highland grassland site. This second dataset extended to approximately 12 months and exhibited a remarkably similar spatial use pattern. Together, these datasets provided a robust basis for assessing spatial flight activity in relation to nest proximity and landscape features. In addition to the tracking data, over 37 hours of direct Martial Eagle flight observations were recorded near the nest site during 60 hours of targeted pre-construction surveys. This effort produced a substantial dataset of localized flight behavior, which was used to train a flight risk model (FRM) using an artificial neural network (ANN). The ANN was developed using a suite of predictor variables representing topography (e.g., slope, ruggedness, TWI), hydrology, and remotely sensed vegetation

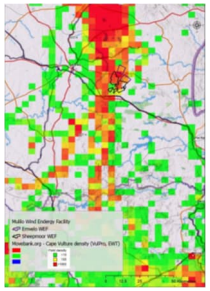
No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				The high sensitivity zone of the Martial Eagle nest sensitivity analysis (Figure 3 below) is now a fraction of its former size. If the specialists reran the shaped buffer model, then why did the medium and very high sensitive zones not change shape?  Figure 3: Comparison of the Martial Eagle nest buffer presented in the scoping report (right) versus the current report (left), besides the specialist acknowledging data gaps. This is half the size EWT and MTPA recommend The new high sensitivity shaped buffer is also now half the size of the general industry standard/EWT recommended 5-6km buffer for Martial Eagles. This is concerning and it leads me back to avifaunal specialists' comments made about insufficient temporal data and flight data for the flight risk assessment, then how come so much confidence is being placed in the limited data to now half the EWT	productivity indices. This enabled a data-driven approach to modelling spatial risk beyond traditional buffer methods. Regarding the delineation of high and medium sensitivity zones: the original high-risk zone (~80 km²) closely mirrors the area of a 5 km circular buffer recommended by BirdLife South Africa and EWT. However, based on the tracking and observation data showing that ~75% of recorded activity occurred within 3 km of the nest, a more precautionary Very High Risk zone (~31 km²) was delineated, within which no wind turbines will be permitted. The Medium Risk zone (~148 km²) now incorporates a more stringent mitigation regime than conventional practice, including both automated Shutdown-on-Demand (SDOD) and dynamic diurnal curtailment during periods of expected eagle activity. Importantly, the risk classification framework was not adjusted to reduce turbine constraints, but rather to reflect biologically informed risk thresholds derived from empirical data. The risk model thresholds themselves remained unchanged; what changed was the delineation of more conservative spatial zones to better reflect the observed space use and mitigate risk more effectively. While we acknowledge the limitations inherent in working with a small sample size — which is a known challenge for this species — the modelling approach integrates multiple lines of evidence and has prioritized precaution in delineating turbine exclusion zones and mitigation areas. The intent is to implement a risk-responsive mitigation hierarchy that reduces potential collisions. We remain open to integrating additional tracking data from future studies to refine the risk model and will update curtailment protocols accordingly as part of the adaptive management strategy.

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				accepted Martial Eagle buffer? We worry that lack of data is putting this species at risk. Furthermore, it is noted that only one year of tracking data has been used to develop recommendations on buffer size and no-go zones, when it is evident that Martial Eagles display significant differences between breeding and non-breeding periods; Martial Eagles typically breed every second year, and thus a minimum of two years of data is vital when considering range use, to capture both the intensive breeding season, and “sabbatical” periods where Martials often utilise larger ranges away from nesting sites. If there is not enough data for a proper flight risk model, then why should we now trust this greatly reduced model that puts the bird at much greater risk? The MTPA is concerned about the transparency around the Martial Eagle tracking data. No map is provided to show any of its tracked flights and major flyways over the study area. Figure 19 is a map of flight lines manually drawn in on a map, not the tracking data. Concern is raised about the accuracy and reliance of flight paths derived from observational vantage points. The MTPA requested a copy of the tracking data in one of the meetings but did not receive it. Given that the occurrence of a nest and flight paths of the Martial Eagle will have a material impact on the turbine layout, we are very concerned about the actual flight paths and the selection and interpretation of certain datasets to support the expansion of the wind turbines.	The national Martial Eagle Risk Assessment (MERA) tool, that has been in development for the past five years using tracking data from over 40 birds, presumably aims to produce a generalized risk framework/model suitable for application across diverse biomes and/or ecoregions. However, the objective of the modelling effort employed by AfriAvian in this instance differs in that our intent is to create a localized site-specific flight risk model that reflects the specific behavioral ecology and landscape use of a resident breeding pair within a defined project area. This includes integrating GPS tracking, direct observational flight data, and spatial environmental predictors to capture actual space use patterns in situ. Using site-specific data allows for the following: Spatial delineation of risk areas based on observed behavior rather than conservative generalization. Habitat-contextualized modelling, accounting for topographic and vegetative (e.g. distribution of perch sites) features that affect flight behavior at this particular site. Empirical validation of proposed mitigation zones (e.g., shaped buffers, curtailment areas) using real exposure data rather than assumed or pooled exposure distributions. This approach provides a more comprehensive and context sensitive model and includes the use of shaped buffers, derived from actual movement patterns, which represents a refined evolution of the circular buffer concept. Collision Risk Modelling Noted. The specialist Collision Risk Modelling (CRM) approach follows the Bayesian framework developed by New et al. (2015), which explicitly incorporates uncertainty by using prior distributions informed by

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				It is well established that adult female Martial Eagles utilise their homeranges differently to males, who spend a significant amount of time hunting and provisioning for their incubating breeding partners and developing nestlings. During core breeding periods, females have a much higher nest site fidelity while males forage extensively over larger ranges. Females typically do not fly as far as the males during the core breeding season, and so the exclusion, and lack of buffers that consider male Martial Eagle range use, is of concern. The conclusions drawn did not factor the flight activity range use, and paths of males. Furthermore, given the reliance of the Martial Eagle on thermals or warm air to travel longer distances, the report does acknowledge that most of the distance flying occurs between 12:00 and 15:00 in the day (this makes up 12% of the day). It is during this 12% of their time where the Martial Eagle female could be spending a significant amount of time over in the turbine rotor swept zone. The fact that only 76% of the time is near the nest means that outside of this, between 12:00 and 15:00, they are very active and could easily collide with a wind turbine. Relying on the 3km buffer zone because of this is very misleading as the impacts can still be very significant. The report is also not clear whether the analysis of time and distance was for the female or the juvenile. The report mentions	the best available biological and empirical data, and updates these with site-specific pre-construction survey data. This model structure is transparent and repeatable, and has been successfully implemented in both international and local contexts. Initially, CRM outputs were generated for five high-priority species: Martial Eagle, Southern Bald Ibis, Cape Vulture, Yellow-breasted Pipit, and Species 23. However, we have expanded the CRM analysis to include all wind priority species. Where robust species-specific data were available (e.g., bird exposure rates, collision probabilities), these were used directly to inform the prior distributions of the model. For species with limited or no local/regional empirical data, ecologically relevant surrogate species were used. Surrogates were selected based on comparable morphology, flight behavior, habitat use, and foraging strategy, in line with best practice guidelines. This ensures that all priority species are accounted for in the CRM, even in data-poor scenarios, while maintaining biological realism and precaution. The core principle of our CRM is to assess predicted fatalities based on three key parameters: (1) bird exposure (flight minutes within turbine space), (2) collision probability (chance of being struck while within the rotor-swept zone), and (3) the hazardous footprint (spatial-temporal turbine risk volume). The Bayesian structure allows for continuous improvement of predictions as additional monitoring data become available, enabling updates to fatality estimates and mitigation strategies within an adaptive management framework. Thus, while initial CRM implementation was focused on data-rich species, the modelling was broadened to all priority taxa, using the most appropriate scientific

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				analysing both but the legend in Figures 22, 22, and 23 refer to an adult. Which makes us think that only the female's data was analysed. Half of her time would have been spent on a nest. The MTPA also reached out to the research team working on the Martial Eagle risk assessment tool, and they confirmed that after analysing the data from over 40 tracked Martial Eagles, they have concluded that they are unable to model the flight paths around nesting areas (like the Vera model) and that we should be using circular 5km buffers around all nest sites. Therefore the MTPA stands strongly by the requirement for insisting on a 5km buffer for all wind turbines. With the 5km circular buffer being the current recommended buffer around Martial Eagle nests, the application of a 5km buffer will result in the removal of turbines 4, 5, 7, 10, 11, 12, 13, 19, 20, 21, 22, 23, 24, and 25. Collision Risk Modelling Collision risk modelling does identify significant risks to four species if unmitigated. Therefore, any approvals must include the compulsory SDoD to ensure risks stay low. There are many more species that were not assessed and impacts unknown and unquantified. Cape Vulture flyways Cape Vultures are globally vulnerable and regionally endangered. The specialist assessment did observe Cape Vultures over the project area for 48 minutes over 756 hours, and within the rotor swept zone.	proxies where necessary to ensure a comprehensive and precautionary assessment. The Avifaunal Specialist Report has been updated to include Potential Biological Removal (PBR) estimates alongside Collision Risk Model (CRM) outputs for all wind priority species recorded on site. This approach enables a scientifically defensible method of establishing species-specific annual fatality thresholds. The PBR framework provides an estimate of the maximum number of individuals that can be removed from a population annually without affecting its viability. By pairing these values with our site-specific CRM fatality predictions—which incorporate the effect of avoidance behavior and mitigation effectiveness—we can assess whether predicted collision mortality falls within acceptable biological limits. The ratio of predicted annual fatalities (CRM) to allowable removals (PBR) is expressed as a percentage threshold, which serves as a practical trigger for additional mitigation. If operational monitoring indicates that annual fatalities are approaching or exceeding PBR-based thresholds, this will trigger an immediate review and escalation of mitigation measures, such as extending curtailment periods, adjusting SDOD protocols, or refining exclusion zones. This framework ensures that mitigation is responsive, data-informed, and conservation-aligned, with threshold exceedance serving as a clear and proactive management trigger. Refer to Section 5.8.8 of the Avifaunal Specialist Report for full details on PBR integration and species-specific thresholds. Cape Vulture flyways The potential risk to Cape Vultures from the proposed wind energy facility was given due consideration, especially given the species' globally Vulnerable and

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				This amounts to 1 vulture visit every 2 weeks. In the recent Birdlife summary report from monitoring operational wind energy facilities (2025), it provides a case study of a wind farm that recorded very low numbers of Cape Vultures during pre-construction monitoring (recorded in less than 1% of total vantage point surveys), yet later in the year, once operational, the wind farm had shutdowns involving 384 Cape Vultures. This highlights the need for impact assessments to incorporate all sources of information. We acknowledge that the Cervantes (2023) report, based on data recorded before that date, did categorise the population utilization distribution as low sensitivity. However, the MTPA queried the following datasets on Movebank.org early in April 2025 – See Figure 4 (Kruger NP Raptors E-obs (n=18); Vulpro (Rehab & Captive bred) (n=123); & EWT SigFox Vultures (n=18)) to create the below map showing Cape Vulture flight paths based on density of observations in movebank.org. This data in Figure 4 clearly shows a north-south flightpath that connects the northern Mpumalanga Escarpment with KwaZulu Natal. And with the specialist reported observation that the vultures fly within the rotor swept zone, then we are very concerned about the risk that the wind farm may pose to vultures as they fly through this corridor. This corridor impacts all the proposed wind turbines.	regionally Endangered conservation status and known collision vulnerability with wind energy infrastructure. The site-based pre-construction monitoring recorded low vulture activity (48 minutes over 756 hours). These results align with the Cape Vulture utilization distribution model published by Cervantes et al. (2023), which classified the area of interest (AOI) as a mosaic of low and medium sensitivity for this species. Nonetheless, the importance of incorporating additional datasets beyond pre-construction surveys is recognized. The recent query of Movebank data by MTPA showing a north–south flight path near the AOI adds a broader regional perspective. However, it is important to note that the density of GPS tracking points (as per Figure 4) does not necessarily imply intensive use of airspace at rotor-swept height or regular passage directly over the proposed turbine positions. Our own focal surveys did record vulture presence, including at risk heights, but these were marginal events—not indicative of regular corridor-like use at the local scale. This distinction highlights a key issue: the Movebank-derived corridor represents a regional pattern recorded over what appears to span more than a decade, whereas our assessment focuses on localized collision risk informed by observed behavior at rotor height. Nonetheless, we acknowledge the precautionary value in layering mitigation across spatial scales. As such, in addition to the site being classified as low/medium sensitivity in Cervantes et al. (2023), we have adopted a stringent, site-wide mitigation strategy. The following compulsory mitigation measures have been incorporated into the EMPr: All turbines, whether in low, medium, or high sensitivity zones, will be subject to Shutdown-on-

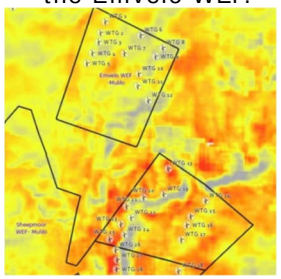
No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
				 Figure 4: Tracking data from Cape Vultures flying over the Emvelo and Mulilo WEFs. Data sourced from Movebank.org in April 2025. Data source VulPro, EWT. Symbology represents density of recorded points. Red = high density.	Demand (SDoD) protocols, with automated radar and camera-based detection systems capable of operating in low-visibility conditions (e.g., mist, dusk). SDoD systems will be operational from the Commercial Operation Date (COD) and monitored continuously throughout the lifespan of the facility. A comprehensive Biodiversity Management Plan (BMP) will be developed prior to COD, specifying turbine-specific curtailment protocols, including diurnal and nocturnal shut-down triggers based on vulture activity and weather conditions. Post-construction monitoring results will be reviewed quarterly to evaluate the effectiveness of mitigation, and the SDoD programme will be adaptively refined based on evidence of elevated flight activity or near-miss events. In conclusion, while the observed risk at site level remains low, we have adopted a precautionary and adaptive approach that implements best-practice curtailment/shut-down technology to prevent collisions. This implemented mitigation measure ensures that if Cape Vulture activity within rotor swept height increases over time, appropriate mitigation measures will be triggered without delay.
2.3				Specialist Assessments While extensive specialist work has been undertaken, MTPA notes areas where further information, methodological alignment, or alternative approaches could strengthen the overall environmental assessment. General Enhanced integration between the aquatic, faunal, bat, terrestrial and avifaunal assessments is recommended to better	Noted. The Guidelines require a minimum of four surveys over a period of a year (12 months) covering four seasons. Pre-construction monitoring data collected at the Emvelo WEF site includes a dataset covering a period of approximately 18 months (February 2022 to August 2023) with additional surveys done adding approximately five more months to the dataset (from October 2023 to February 2024). These additional surveys were done to cover the expanded WEF and EGI development footprints as well as additional targeted Martial Eagle monitoring (with GPS tracking data spanning a period of more

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				understand potential synergistic or cumulative biological impacts. Faunal Specialist Assessment Placement of infrastructure in high/very high sensitivity areas warrants careful justification given specialist recommendations to avoid these areas. Inclusion of previously recommended elements, such as an oribi management plan and distribution map, and potentially broader survey data (e.g., camera traps, reptile/amphibian surveys which appear absent), could enhance the assessment. The assessment's conclusion that the project can be approved based on this theme alone, conditional on mitigation, seems optimistic without considering integrated impacts. Avifaunal Specialist Assessment Further discussion on buffer justifications is needed, especially where they deviate significantly from standard practice or are based on acknowledged limited data. Given the site's sensitivity, the adequacy of one year's monitoring versus a potentially more robust two-year dataset could be considered. Terrestrial Biodiversity Assessment: The MTPA has significant reservations regarding this assessment. Key concerns include: • The terrestrial biodiversity theme is not aligned with SANBI's Species Environmental Assessment Guideline (2022) that the consultant is required to	than 12 months i.e., April 2024 to May 2025) during which time all other bird species were also recorded across the entire project site. In addition, from December 2024 to February 2025 additional targeted wetland surveys were conducted with special focus on Species 23 and again all other bird species were also recorded across the entire project site during this time. Collectively, this totals to a combined 26 months' worth of monitoring data recorded on site. Therefore, the specialist's findings, buffer/exclusion zones, models and recommendations are based on avifaunal data collected over a period of more than two years.

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				comply with in terms of Notice 1150 of Government Gazette 43855 of 2020. • The author only allowed for 4 days to survey both the Emvelo and Sheepmoor WEF sites during the summer months when most summer rainfall plants would be flowering and identifiable. Summer surveys are also a requirement of the SANBI Species Environmental Assessment Guidelines. Four days is certainly not enough to cover an area this size (12,543 ha for both WEFs). • The report also mentions that the Emvelo WEF “falls within a summer & winter rainfall area”. It is well known that Mpumalanga is a summer rainfall region. • No plant species of conservation concern, or endemics, were recorded on site. This is not surprising given the lack of time to survey this large area. ERM also opted to appoint a botanist not familiar with the flora of this area. There are several endemics restricted to this part of Mpumalanga that would be unfamiliar to someone from the Eastern Cape. It just makes it harder to confirm identification, particularly with limited time and coverage in the field. I am confident that several species of conservation would occur on site, they were just not detected. • The failure to apply the SANBI Guidelines not only resulted in inadequate time being allowed to properly assess the terrestrial biodiversity (botany) but also in	

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				determining site ecological importance (SEI). The MTPA does not believe that the approach followed to identify sensitive areas would be able to adequately assess the environmental sensitivity for this area. There were a number of additional variables that could have been applied but were not (site-specific species, CBAs and ESAs, climate change corridors, intact grasslands, rocky ridges, etc.). These could have been applied together with criteria and approach of provided for in the SANBI Species Environmental Assessment Guidelines. • The approach followed resulted in some CBA Irreplaceable areas, that overlapped with intact grasslands and provincial climate change corridors, being designated medium sensitivity (as a maximum value because it did not ultimately fall within the Eastern Highveld Grassland). This is fundamentally wrong as there was no consideration for any species of conservation concern (like roosting areas) or other spatial priorities. Applying the SANBI criteria could allow the montane grassland to be categorised as high, or even very high if species and additional data were considered. • The MTPA has recently modelled the occurrence of all threatened species across the province and our data suggests that the montane ridge has the highest expected threatened species (see side graphic – reddish areas having	

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				highest likelihood of species of conservation concern). We obviously do not expect this data to have been considered, but the mismatch with the results from the terrestrial biodiversity assessment supports our concerns. • In terms of the terrestrial biodiversity assessment, the result is that the montane grassland (not degraded) is of Medium sensitivity, but the degraded Highveld grassland has High sensitivity, and non-degraded Very-high. We have significantly more threatened plant species recorded in the Wakkerstroom Montane Grassland than for the Eastern Highveld Grassland and consider it far more sensitive. • On page 70 of the terrestrial biodiversity specialist report, there is reference to karroid vegetation. This is not the Karoo and I suspect this is a copy and paste error. • The report also records Eucomis bicolor, however it does not occur much north of Wakkerstroom (although it does occur southwards in this vegetation unit); the similar looking Eucomis montana occurs in this area and it has a provincial status of Declining. • The MTPA noticed some of the plant species visible in the photographs provided in the terrestrial assessment were not included in the plant list, which makes us wonder if they could not be identified. • Although the terrestrial assessment report (page 12) also states that there	

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				are no KBA areas on site. It further incorporated Important Bird Areas under the KBA heading and then states that the KBAs are being investigated but not yet finalised. That is not true; they were officially endorsed by the IUCN in June 2024. The avifaunal assessment confirms this and KBAs make of 65% of the Emvelo WEF. 	
2.4				Cumulative Impacts The concentration of renewable energy projects in Mpumalanga (890 turbines approved, in process, or planned), particularly along this sensitive escarpment, necessitates careful consideration of cumulative impacts. Each additional project contributes incrementally to regional habitat fragmentation and potential impacts on species populations, especially avifauna. The avifaunal assessment itself rated cumulative impacts for Emvelo as Moderate to High. Avoiding development in biologically significant 'source' areas like Intact Grassland Patches	Noted. The Avifaunal Impact Assessment has carefully considered the potential cumulative impact of these WEFs resulting in an overall impact significance rating of moderate to high post mitigation. Factors that were taking into account contributing to determining these findings include detailed analysis of avian habitat delineation and flight- and collision risk modelling data for all priority species recorded on site, as well as the avoidance of intact grassland vegetation by turbine infrastructure. Furthermore, an extensive suite of stringent compulsory mitigation measures to be implemented on all authorised turbines on site are recommended as a condition of the EA. In addition, is it worthy to note that suitable habitat for all trigger species characteristic of the Chrissie Pans KBA (i.e., Blue

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				is key to managing these cumulative effects.	Crane and Southern Bald Ibis) has been excluded from the development footprint as it relates to avifaunal sensitivity. Of the 890 turbines mentioned, it is noted that only 350 turbines have been approved in the Mpumalanga Province to date, of which 129 turbines have been authorised within a 40 km radius of the EmveloWEF. Although these figures imply a potentially higher cumulative impact, one should keep in mind that although a large number of wind farm projects are being proposed / approved, not all projects will be realised as several factors could influence / hinder the development process beyond the EIA process and issuing of EA, should such EA be granted.
2.5				Acknowledgement of recent change in landcover and impact on spatial mapping products The delineation of the CBAs and intact grassland patches was based off a landcover map from 2010. Any subsequent loss or transformation is not a fault in the MBSP or intact grassland patches, but as a result of a legal or illegal change in land use. In the MBSP Handbook, the guidelines recommend that a site assessment is required to confirm the current land use. Any loss of which may require additional areas to meet targets (will be dealt with in MBSP v2), but acknowledging that the CBA status may no longer apply to these areas if they have been ploughed or developed (where recovery is not possible within our lifetimes). Therefore, in terms of the Emvelo WEF, any change in land use from natural to cultivation or plantation would result in this particular area no longer being	The concerns raised regarding changes in land cover since the original delineation of Critical Biodiversity Areas (CBAs) and Intact Grassland Patches, and the resulting implications for spatial biodiversity planning tools such as the MBSP are acknowledged. As recommended in the MBSP Handbook, site-level verification was undertaken through the terrestrial biodiversity and avifaunal specialist assessments to confirm current land use and condition. Where areas originally classified as CBAs or intact grassland have undergone transformation (e.g., to cultivation or plantation), these were considered in assessing the actual ecological value and sensitivity of the receiving environment. Turbine placements and infrastructure alignments were revised accordingly through an iterative design process, and specialist input was used to avoid or minimise residual impacts on areas that remain intact or retain high biodiversity value.

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				identified as a CBA or intact grassland patch. The impact of this has been considered when commenting on turbine placement and those that need to be removed.	It is acknowledged that updated spatial products (e.g., MBSP v2) may revise classifications based on observed changes; however, the EIA process applied current best-practice, ground-truthed data and followed the mitigation hierarchy to inform a layout that seeks to balance environmental protection with technical and land access constraints.
3.				Summary of Turbine Locations Requiring Reconsideration Should DFFE proceed towards authorisation, we strongly recommend, at a minimum, the exclusion of the turbines identified in below. • WT 3: CBA Irreplaceable; KBA; NPAES; Terrestrial Biodiversity- Very High sensitivity' Lanner Falcon frequented • WT 13: Intact grassland; IBA, NPAES; Faunal High Sensitivity - escarpment (highest category); Martial - High (edge) • WT 14: CBA Optimal; IBA; NPAES; Avifauna High • WT 15: CBA Optimal; KBA; IBA; NPAES; Terrestrial - Very High sensitivity • WT 17: KBA; IBA; NPAES • WT 19: Intact grassland; IBA; NPAES; Faunal High Sensitivity - escarpment (highest category); Avifauna High • WT 20: intact grassland; IBA; NPAES; Faunal High Sensitivity - escarpment (highest category); Martial - High; Avifauna High • WT 21: Intact grassland; IBA; NPAES; Faunal High Sensitivity - escarpment (highest category); Martial - High; Yellow-breasted Pipit model; Avifauna High	Noted. From an avifaunal perspective, following careful consideration of the comments received, the Developer has revised the proposed WEF layout with the following adjustments as it relates to these turbine locations: WTG 3 – The turbine is located outside of the Avifaunal Turbine Exclusion Zone. WTG 13 – The turbine is located on the edge of the Avifaunal Turbine Exclusion Zone. WTG 14, 15, 17 and 19 – The turbines are located outside of the Avifaunal Turbine Exclusion Zone. WTG 20 – The turbine has been moved and is now located outside of the Avifaunal Turbine Exclusion Zone. WTG 21 – The turbine has been moved and is now located outside of the Very High- and High-Risk Avifaunal Exclusion Zones, as well as outside of the Medium Risk mitigation zones. WTG 22 – The turbine has been moved and is now located outside of the Avifaunal Turbine Exclusion Zone. WTG 23 – The turbine has been moved and is now located on the edge of the Avifaunal Turbine Exclusion Zone. WTG 24 – The turbine has been removed from the revised WEF layout completely.

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				• WT 22: Intact grassland; IBA; NPAES; Faunal High Sensitivity - escarpment (highest category); Avifauna High • WT 23: Intact grassland; IBA; NPAES; Faunal High Sensitivity - escarpment (highest category);Yellow-breasted Pipit model; Avifauna High • WT 24: Intact grassland; CBA Optimal; IBA; NPAES; Faunal High Sensitivity - escarpment (highest category) • WT 25: intact grassland; IBA; NPAES; Faunal High Sensitivity - escarpment (highest category); Bald Ibis nest (1km) In addition, the application of a 5km circular buffer for the Martial Eagle nest site, as recommended by the research team working on the Martial Eagle risk assessment tool, would result in the additional removal of turbines: 4, 5, 7, 10, 11, and 12. Closing In summary, the MTPA highlights substantial environmental sensitivities associated with the proposed Emvelo WEF site. Concerns persist regarding the potential impacts on critical habitats and biodiversity, particularly avifauna, stemming from perceived limitations in the supporting data, assessment methodologies, and proposed mitigation measures. The uncertainty surrounding long-term and cumulative impacts suggests a precautionary approach is warranted, particularly concerning development within ecological 'source areas'.	WTG 25 – The turbine has been moved and is now located outside of the Avifaunal Turbine Exclusion Zone. Note that for WTG 4, 5, 7, 10, 11, 12 and 15 which are specifically located in High-Risk zones, both compulsory SDoD and diurnal proactive curtailment will be fully implemented on all authorized WTGs throughout the lifespan of the proposed WEF. In addition, for all turbines located in the Medium Risk zones, compulsory SDoD will be fully implemented on all authorized WTGs across the entire project site throughout the lifespan of the proposed WEF. The Guidelines require a minimum of four surveys over a period of a year (12 months) covering four seasons. Pre-construction monitoring data collected at the Emvelo WEF site includes a dataset covering a period of approximately 18 months (February 2022 to August 2023) with additional surveys done adding approximately five more months to the dataset (from October 2023 to February 2024). These additional surveys were done to cover the expanded WEF and EGI development footprints as well as additional targeted Martial Eagle monitoring (with GPS tracking data spanning a period of more than 12 months i.e., April 2024 to May 2025) during which time all other bird species were also recorded across the entire project site. In addition, from December 2024 to February 2025 additional targeted wetland surveys were conducted with special focus on Species 23 and again all other bird species were also recorded across the entire project site during this time. Collectively, this totals to a combined 26 months' worth of monitoring data recorded on site. Therefore, the specialist's findings, buffer/exclusion zones, models

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				The proposed Emvelo WEF is expected to have a significant cumulative impact on the avifauna, bats, and other terrestrial biodiversity. The environmental sensitivity ensures the probability of serious risk to the avifaunal biodiversity. We were disappointed with the quality of the terrestrial biodiversity assessment report that was not aligned with the SANBI Guidelines for species assessments and the resulting sensitivity layer should not be used as it was based on limited data and skewed towards transformation percentage for the entire vegetation units. It should have followed the established site sensitivity assessment approach presented in the guidelines. Most of the other specialist assessments were aligned with this methodology. The sensitivity of the proposed WEF is so high, with so many bird species of conservation concern present, that two years of detailed avifaunal monitoring should have been conducted. There are still significant gaps in the knowledge and confidence in the data presented that we cannot trust the models and information presented. The Emvelo WEF occurs along a north-south running escarpment where uplift and intact grasslands result in an unusually high number of birds of conservation concern. Even the globally threatened Cape Vultures have a flight path over the proposed WEF. We are not comfortable with the confidence and robustness of the data presented around the avifauna, terrestrial biodiversity, and	and recommendations are based on avifaunal data collected over a period of more than two years. The comment regarding the Cape Vultures' flight path across the proposed development site is noted; however, the risk to vultures on site was confirmed to be low based on the results of the pre-construction monitoring data and the findings of the Avifaunal Impact Assessment. We are confident that the onsite monitoring dataset is sufficiently robust and is considered adequate given the avifaunal sensitivity on site. Also, the recommended mitigation measures i.e., compulsory Automated SDoD to be implemented on all approved turbines across the development site is considered sufficient to reduce the potential risk of collision to vultures passing through the area (see response regarding Cape Vulture flyways above). Furthermore, given the sensitivity of the site and the potential risk to avifauna by the WEF and its associated infrastructure, it is important to note that the habitat on the site is currently subjected to extensive degradation and transformation related to anthropogenic activities such as trampling, over grazing, erosion and alien infestation. Therefore, we have recommended an extensive suite of mitigation measures that have been proven successful at other operational wind farms globally and elsewhere in South Africa. We have also recommended that the implementation of these required mitigation strategies and management actions be included in the EMPr as well as conditions to the EA, should such EA be granted by the Competent Authority. It is thus our specialist opinion that this proposed WEF development can proceed on the condition that all recommended and required

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				fauna, that we object to this application. Should DFFE wish to authorise this application, then we recommend specific wind turbines that should not be authorised. The high sensitivity of the site, combined with the potential for collisions, displacement, and cumulative impacts, suggests that the project could still have severe and potentially irreversible impacts on regional bird populations. The mitigation measures proposed may not be sufficient to address these risks, making the current proposed turbine layout fatally flawed from an avifaunal perspective. Please do not hesitate to contact this office if there are any enquiries.	mitigation measures and management actions be successfully implemented.

TABLE 8-44 COMMENTS FROM INITIAL DRAFT EIA BIRDLIFE SOUTH AFRICA

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1	Birdlife South Africa Sammantha Ralston-Paton	10 April as per Email	Draft EIAr	The proposed developments overlaps with critical habitats, including Intact Grassland Patches, Critical Biodiversity Areas (CBAs), Climate Change Corridors, National Protected Area Expansion Strategy (NPAES) areas, and Key Biodiversity Areas (KBAs), wetlands and the escarpment (the latter is used by birds for altitudinal and north-south migrations). The area supports numerous species of conservation concern, including bird that are at risk of direct fatalities (e.g., collisions and electrocutions), habitat loss, and disturbance. We are therefore concerned that this site is not suitable for wind turbine and associated infrastructure.	Noted. The sensitivity of the site and area in general is noted and recognised in terms of the number of sensitive avifaunal species. The degradation of the landscape as a result of current unsustainable farming practises of overgrazing the grasslands and wetlands, as well as the alien tree infestation should be highlighted. The developer commits to implementing numerous mitigation measures and to embark on extensive land management issues to minimise anthropogenic impacts. The applicant acknowledges the environmental sensitivity and biodiversity value of the Project Area and Mpumalanga Province. Early development screening and specialist assessment were undertaken across approximately 25,000 hectares. Guided by specialist input, the project layout avoided the most sensitive features, including avifaunal habitats and flight corridors, and was refined to focus on areas where environmental impacts are lower while maintaining a viable wind resource. The final project area now spans approximately 10,700 hectares, with a disturbance footprint of only 115 hectares. On-site specialist verification confirmed that much of the area is already heavily degraded, particularly from sustained grazing pressures, which contrasts with the sensitivity suggested in outdated desktop mapping based on 2010 land cover data. Avifaunal specialists further assessed potential risks, ensuring that turbine placement avoided critical flight paths and high-sensitivity habitats, and confirmed that the current cumulative pressures of overgrazing and land degradation pose a greater risk to

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					biodiversity than the managed introduction of a wind farm. Multi-layered, species- and habitat-specific mitigation measures have been developed and integrated into the EMPr, ensuring that impacts on birds, grasslands, and broader ecosystems remain at acceptable levels. Notably, only 0.07% of Mpumalanga's mapped intact grasslands overlap with the project area, of which only 0.1% will be disturbed, equating to 0.0004% of provincial intact grasslands. Through the implementation of the Biodiversity Offset Report, the project provides an opportunity to actively restore and secure ecological functionality while demonstrating how responsible private-sector investment can deliver renewable energy in a manner that enhances long-term land stewardship. This integrated approach directly contributes to South Africa's Just Energy Transition while ensuring that biodiversity, including sensitive avifaunal populations, is safeguarded.
2				The duration and scope of data collection for the avifaunal assessments appear inadequate given the sensitivity of the habitats and the spices they support. BirdLife South Africa and the Endangered Wildlife Trust (EWT)'s Best Practice Guidelines and our Cape Vulture guidelines recommend increased survey effort in areas of high avifaunal sensitivity. The sites have been confirmed as such by the avifaunal specialist.	Noted. The Guidelines require a minimum of four surveys over a period of a year (12 months) covering four seasons. Pre-construction monitoring data collected at both the Emvelo and Sheepmoor WEF sites include a dataset covering a period of approximately 18 months (February 2022 to August 2023) with additional surveys done adding approximately five more months to the dataset (from October 2023 to February 2024). These additional surveys were done to cover the expanded WEF and EGI development footprints as well as additional targeted Martial Eagle monitoring during which time all other bird species were also recorded across the entire project site. In addition, from December 2024 to February 2025 additional targeted wetland

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					surveys were conducted with special focus on Species 23 and again all other bird species were also recorded across the entire project site during this time. Furthermore, the risk to vultures were confirmed to be low; therefore, the claim made in terms of the Cape Vulture Guidelines regarding increased survey effort is considered unsubstantiated. We are therefore of the opinion that the onsite monitoring dataset is sufficiently robust and considered adequate given the avifaunal sensitivity on site. The applicant acknowledges the importance of thorough avifaunal assessment, particularly in areas of heightened sensitivity. While we note the reference to BirdLife South Africa and EWT best practice guidelines, it is important to highlight that our approach extended well beyond standard requirements. In addition to the baseline monitoring, additional focal assessments were undertaken over extended periods of time, specifically for priority species such as the Southern Bald Ibis and Martial Eagle identified during the baseline monitoring. A 5 km buffer around the project boundary was systematically surveyed to locate Martial Eagle nests, two individuals were successfully captured and tagged to track their movements in relation to the site to inform mitigation . Furthermore, microphones and cameras were deployed within wetland habitats to detect the presence and activity of cryptic species of concern (Species 23), and habitat modelling was conducted for grassland specialists and owl species to inform avoidance measures. These efforts ensured that siting decisions were directly informed by proactive on-the-ground specialist evidence, rather than relying solely on desktop mapping. As a result, turbines and infrastructure

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					were deliberately avoided in areas of high avifaunal use, and tailored mitigation measures have been incorporated into the EMPr. The cumulative dataset generated through this multi-pronged methodology provides a robust and precautionary foundation for impact prediction and ongoing adaptive management.
3				While the location of vantage points is provided, there is no indication of view-sheds, and it is unclear what proportion of turbines were covered by vantage point surveys.	Noted. For the Emvelo WEF, only 4 out of 24 proposed WTG locations fell outside the 2 km radii of the vantage point surveys, whereas for the Sheepmoor WEF, also only 4 out of 29 proposed WTG locations were located outside the 2 km radii of the vantage point surveys. Therefore, the total site area surveyed during pre-construction bird monitoring covered about 105 km2 out of the approximately 143 km2, translating to about 73% reporting coverage of the entire Amsterdam WEFs project site. Some factors influenced the reporting coverage through vantage point surveys such as i) the development footprint for each WEF kept changing during the pre-construction monitoring period, and ii) additional land was added to the project area mid-way through the pre-construction monitoring period. As a result, additional effort was made to include additional surveys in the area in general beyond the first year of pre-construction monitoring as well as the recording of additional flight data of all incidental observations supports the slightly below average reporting coverage via vantage point surveys.
4				Limiting cumulative assessment to a 35 km radius is inappropriate for wide-ranging species - i.e. most birds. A more ecologically relevant approach is needed	Noted. The specialist was required to assess all cumulative impacts within a 30 km radius of the proposed Amsterdam WEF cluster as provided by the EAP. From a specialist perspective, a radius of at least 50 km would have been considered a

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					more ecologically relevant approach, hence why the Avifaunal Impact Assessment considered all cumulative impacts within a slightly increased radius of up to 35 km based on available information provided to the specialist at the time of assessment.
5				We are concerned about potential degradation of wetlands associated with the developments, including habitat for Critically Endangered Species 23. We are particularly concerned where MV cabling is proposed to traverse a wetland (marked as a no-go area). It is unclear whether the cable will be buried or above ground; neither option is supported due to collision risk (above ground) and habitat degradation (below ground).	Noted. This MV cable has been removed from the revised WEF layout completely and no longer traverses Species 23 habitat. Also, project related infrastructure avoids all wetlands as well as the identified Species 23 habitat. Wetland functioning is set to improve through proper grazing regimes and onsite remediation. It is important to note that many wetlands in the area are already significantly impacted by agricultural activities, including overgrazing during dry periods, fertiliser runoff, sedimentation, and invasive alien plant species that reduce water availability. Where impacts on wetlands are expected, the EMPr includes strict site-specific mitigation measures to minimise disturbance, including careful micro-siting, erosion control, and rehabilitation. The Biodiversity Offset Report (BOR) further supports long-term ecological recovery through targeted restoration and alien clearing, ensuring residual impacts are appropriately offset. The comment submitted by BLSA refers to the species as being Critically Endangered. The applicant understands that the species was recently downlisted from being Critically Endangered to Endangered, as communicated by Bird Life South Africa on the 3rd of July on their official Social Media platforms. The applicant recognises the ecological importance of wetlands, particularly as potential habitat for Species 23. It is important to note that many of the wetlands

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					within the project area are already heavily impacted by existing land uses, and their current ecological condition is not as intact as indicated in desktop mapping. Where MV cabling is required in proximity to these features, all cabling will be placed underground where technically possible to remove collision risk, and rehabilitation measures will be implemented to prevent habitat degradation. The final alignment and construction methods will be confirmed on a case-by-case basis in consultation with the appointed wetland and avifaunal specialist, ensuring that site-specific risks are managed appropriately and that wetland integrity is safeguarded.
6				We acknowledge the thought and analysis that went into developing the proposed mitigation strategy for Species 23 but are concerned that the proposed avoidance and mitigation measures are not sufficiently precautionary.	Noted. The mitigation strategy proposed for Species 23 is designed to be both precautionary and adaptive, leveraging high-resolution, near real-time data sources to inform turbine curtailment decisions during the species' active season. The use of dynamic habitat modelling based on updated satellite imagery, rainfall patterns, and soil moisture conditions provides a proactive mechanism to anticipate wetland activation and potential habitat use. This approach offers temporal resolution beyond static or pre-season assessments, ensuring that turbines in the medium-risk mitigation zone are curtailed specifically when habitat conditions become suitable for Species 23. In addition, the integration of drone-based structural assessments and vegetation productivity monitoring allows for localized ground-truthing and improves predictive accuracy of habitat suitability. Night-time curtailment is automatically triggered during periods of confirmed habitat favourability between October and March, aligning with the species' life history

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					requirements. Further precaution is embedded in the detailed engineering design phase (or proposed pre-operational research phase) prior to construction, which includes tracking movement and flight height of Species 23. These data will be used to refine model thresholds and potentially extend or adjust curtailment periods as needed. Should ongoing monitoring indicate a higher-than-expected risk, curtailment protocols can be intensified or spatially expanded. This strategy ensures that mitigation is not static, but instead responds to actual habitat conditions and species activity, thereby balancing ecological protection with operational feasibility in a scientifically defensible manner. The EMPr includes adaptive management measures that allow for refinement should Species 23 be encountered during pre-construction walkdowns or monitoring. In addition, the Biodiversity Offset Report (BOR) supports broader habitat conservation and species persistence through targeted offset actions, ensuring that precautionary principles are upheld across both site-level and landscape-scale interventions. The DEIAr layout has been updated to further avoid Species 23 sensitive areas by removing an identified MV cable and reducing the blade length by 20m. The mitigation strategy for Species 23 was developed through targeted field studies, habitat modelling, and specialist-led site verification. The avoidance measures go beyond standard practice, including design adjustments to exclude suitable habitats and additional monitoring commitments, ensuring that the approach is both precautionary and scientifically robust.

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7				In light of the to the limited data on the species of its movement patterns and collision risk, we do not support the location of turbines in any of the medium sensitivity areas identified for the species in the avifaunal assessment.	Noted. The rigorous mitigation strategy includes a systematic approach, where wetland condition monitoring and observation of catchment level rainfall events offer sufficient warning for night-time proactive turbine curtailment. The system's precision will be improved through further research on the movement patterns and flight height of Species 23 prior to the WEFs becoming operational, to which the developer has already committed to undertake. Furthermore, WTG7 has been removed from the Species 23 Very High Sensitivity No-Go area based on the revised WEF layout. It is the specialist's opinion that the mitigation strategy proposed for Species 23 is considered sufficient. The avifaunal assessment specifically accounted for the limited data on Species 23 by implementing targeted field surveys, habitat modelling, and specialist verification to identify areas of actual use with the use of camera and microphone technology. Turbine placement has been adjusted to avoid known and likely high-sensitivity zones, while medium-sensitivity areas were further assessed and mitigated through curtailment, layout refinement and ongoing monitoring. This site-specific approach ensures precautionary management that is more effective than broad, exclusionary measures based solely on generalized sensitivity categories.
Additional comments on the proposed curtailment strategy are detailed below.					
9				The avifaunal assessment uses various data sources to predict how Martial Eagles use the area, but the basis for the final buffer recommendations is unclear. For example, a 2.5 km no-development buffer is recommended,	Specialist: Noted. Additional Vantage Point monitoring was conducted near the identified Martial Eagle nest to gain a better understanding of flight behaviour. Five additional targeted surveys were conducted, in addition to the seven

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				despite the report's own vantage point surveys suggesting 3 km may be more appropriate.	surveys completed as part of the pre-construction monitoring recorded during February 2022 to August 2023. The five additional targeted surveys were conducted during the following time envelopes: 17–22 October 2023 15–23 November 2023 30 November–05 December 2023 17–22 January 2024 14–20 February 2024 A total of 60 hours of Vantage Point watches were completed to record flight patterns of Martial Eagles as well as other priority species. Observations were primarily concentrated in the vicinity of the Martial Eagle nest, but where feasible, the eagles were followed to collect as much flight data in the landscape around the nest as possible. The flight risk model developed is based on the extensive flight data (60+ hours) collected on-site. The model output has been refined using tracking data, which indicated that the majority of tracked flight activity (up to about 75% of recorded Martial Eagle flight time) was concentrated within an approximately 3 km buffer zone surrounding the nest.
10				Tracking data from a single adult and one juvenile was used to model habitat use and define high and medium sensitivity zones (turbine collision). However, as far as we can ascertain, the model was based on less than a year's worth of data and does not account for interannual variation, seasonal use, alternative nest sites, or sex-based behavioural differences. Furthermore, the criteria used to define high, medium, and low/no sensitivity	Noted. The flight risk model and sensitivity zonation for Martial Eagle were developed using a combination of tracking data, focused field observations, and high-resolution environmental predictor variables. While the model incorporates GPS data from one adult (13 months, 6380 transmitted locations) and one juvenile individual (5 months, ~1450 transmitted locations) at the project site, it also includes tracking data (12 months, ~5850 transmitted locations) from a

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				areas are not transparent. It is also unclear whether other relevant data (e.g., territory size and tracking data from other studies) were considered and how this influenced the recommendation.	second adult male Martial Eagle monitored at a comparable highland grassland site. This second dataset extended to approximately 12 months and exhibited a remarkably similar spatial use pattern, which is included in the figures reporting on space use. Together, these datasets provided a robust basis for assessing spatial flight activity in relation to nest proximity and landscape features. In addition to the tracking data, over 37 hours of direct Martial Eagle flight observations were recorded near the nest site during 60 hours of targeted pre-construction surveys. This effort produced a substantial dataset of localized flight behavior, which was used to train a flight risk model (FRM) using an artificial neural network (ANN). The ANN was developed using a suite of predictor variables representing topography and focal site characteristics (distance from nest, perch sites, etc.). This enabled a data-driven approach to modelling spatial risk beyond traditional buffer methods. Regarding the delineation of high and medium sensitivity zones: the original high-risk zone (~80 km²) closely mirrors the area of a 5 km circular buffer recommended by BirdLife South Africa and EWT. However, based on the tracking and observation data showing that ~75% of recorded activity occurred within 3 km of the nest, a more precautionary Very High Risk zone (~31 km²) was delineated, within which no wind turbines will be permitted. The Medium Risk zone (~148 km²) now incorporates a more stringent mitigation regime than conventional practice, including both automated Shutdown-on-Demand (SDOD) and dynamic diurnal curtailment during periods of expected eagle activity. Importantly, the risk classification framework was not adjusted to reduce turbine constraints, but
11				While we support refining circular buffers with more robust, site-specific data, we are concerned that the proposed buffer is significantly smaller than the 5–6 km buffer recommended by BirdLife South Africa and EWT. Although available studies in this regard are limited, this buffer is based on the best available data on territory size.	

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					rather to reflect biologically informed risk thresholds derived from empirical data. The risk model thresholds themselves remained unchanged; what changed was the delineation of more conservative spatial zones to better reflect the observed space use and mitigate risk more effectively. While we acknowledge the limitations inherent in working with a small sample size — which is a known challenge for this species — the modelling approach integrates multiple lines of evidence and has prioritized precaution in delineating turbine exclusion zones and mitigation areas. The intent is to implement a risk-responsive mitigation hierarchy that reduces potential collisions. Refer to Section 5.8.7.1 of the updated Avifaunal Specialist Report for additional information on Martial Eagle tracking data considered in this study. It is further acknowledged that the basis for the 5–6 km buffer recommended by BirdLife South Africa and EWT and supports the precautionary intent behind it. However, it is noted that the species in question is known to range well beyond this distance, often exceeding 100 km from the nest, which means that a static radial buffer is not going to prevent collisions. The approach adopted for this project is grounded in site-specific data collection, including detailed behavioural observations and habitat-use assessments, which provide a more accurate understanding of how the species interacts with the landscape. This data not only informs a more meaningful buffer around known nest sites, but also feeds directly into a curtailment model and other active mitigation measures designed to reduce collision risk and ensure that wind turbines within the broader landscape are managed in a way that prioritises the protection of the species.

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					We acknowledge and respect the intention behind the BirdLife and EWT circular buffers for Martial Eagle nests, which are precautionary tools to be used in the absence of site-specific data. However, in this case, we now have robust, site-specific empirical data that supersedes these buffers and allows for a more targeted and effective mitigation strategy. Upon discovery of the Martial Eagle nest, we initially considered applying the standard BirdLife and EWT buffers. However, we then took the proactive step of GPS-tagging the three eagles to better understand their behaviour. The tracking data has shown that the eagles regularly ranges 40, 50, and even more than 60 km from the nest, far beyond the buffer distances traditionally applied. This makes it clear that a fixed buffer offers a false sense of security. It may prevent turbines from being placed near the nest but does nothing to protect the bird in the broader landscape where it actually flies. Crucially, the fixed 5–6 km buffer and the GPS-informed mitigation strategy are mutually exclusive. One is static, the other dynamic. The buffer model leaves high-use areas unprotected, while our data-driven approach applies facility wide mitigation where the eagle actually flies. Our proposed mitigation approach is based on real-time behavioural data and enables protection that is predictive, flexible, and adaptive to actual risks faced by the eagles, unlike fixed-radius buffers based on assumed behaviour. We strongly recommend proceeding with this site-specific, data-driven strategy as it offers the best outcome for the Martial Eagle and all other sensitive species present on site.

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12				A shaped turbine exclusion zone was delineated in the avifaunal reports, based on modelled flight activity for Southern Bald Ibis. Again, we request clarity on how the thresholds for the sensitivity zones (i.e. between high, medium, and low/no sensitivity) were defined.	Noted. The delineation of the turbine exclusion (sensitivity) zones for Southern Bald Ibis (SBI) was based on a continuous flight risk surface derived from flight data and spatial modeling of flight behavior around known roost and colony sites. To define the risk categories (High and Medium), we applied an empirical thresholding approach informed by observed flight density patterns. Specifically, the High Risk zone was delineated to encompass the core 70% of modeled flight activity, with a target of including at least 70% of all recorded SBI flight points surrounding known roosts and colonies. The final High-Risk Zone achieved coverage of approximately 75% of all observed flights, slightly exceeding the target to ensure conservative spatial buffering around high-use areas. The Medium Risk zone was extended outward to capture a broader range of movements, aiming to encompass over 80% of recorded SBI flights. The final modelled zone covered approximately 79% of all flight data, offering a precautionary yet data-driven buffer beyond the core area. This tiered thresholding strategy attempted to reflect biologically meaningful space use given available recorded data. These zones were not arbitrarily defined, but rather derived directly from spatial correspondence between observed flight patterns and modelled risk predictions.
13.				Cape Vulture (Endangered): We are concerned that the impact assessments underestimates the risk of Cape Vulture fatalities. Our recent review of operational monitoring reports (BirdLife South Africa 2025) shows that vulture collisions occurred even at sites where the species was rarely or never recorded during	Specialist: Noted. The implementation of SDoD can be an effective mitigation measure to prevent the risk of Cape Vulture fatalities. SDoD will be fully implemented on all authorized WTGs throughout the lifespan of the proposed WEF. The Avifaunal Specialist Report has been updated to include the following compulsory mitigation

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				monitoring surveys. We are therefore of the opinion that the recorded observation of one vulture a week is sufficient to warrant the implementation of shutdown-on-demand (SDoD) for all proposed turbines.	measures as recommended for inclusion in the EMPr: All wind turbine generators (WTGs) – located in both 'high risk zones' and 'medium risk zones' - must be subjected to SDoD, which must include Automated SDoD (camera and radar) to accommodate misty conditions and night flying species, as well as proactive curtailment based on environmental and weather conditions. SDoD and radar technology must be in operation at the onset of commercial operation date (COD). SDoD success must be monitored throughout the lifetime of the facility, where monitoring data during operation will continuously inform the SDoD needs for each turbine. The requirement of a comprehensive diurnal and nocturnal Shut Down on Demand (SDoD) programme must be included in the EMPr, post–EA (should such EA be granted) during the detailed design phase prior to construction. Specific details of the SDoD programme will be included in a comprehensive Biodiversity Management Plan (BMP) which will be developed and implemented prior to the commercial operational date of the facility. The applicant acknowledges the sensitivity of the site and the importance of proactive avifaunal mitigation. Shutdown-on-demand (SDoD) will be implemented on all turbines, not only to address vulture concerns, but to provide broad protection for multiple species including Martial Eagle, Southern Bald Ibis, Secretarybirds, and cranes. This approach ensures meaningful mitigation across the site and demonstrates a precautionary, science-informed commitment to responsible stewardship in a highly sensitive region. The

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					design of access roads were done in alignment with the bird specialist. Areas often used by farmers, or areas that are already anthropogenically impacted on, were prioritised where access could not be rerouted. This was done on a case-by-case basis with the avifaunal specialist.
14.				Yellow-breasted Pipit (Vulnerable): Turbines and roads have been proposed within Yellow-breasted Pipit habitat, contrary to the avifaunal specialist's recommendations. We do not support this.	Noted. All WTGs were removed from Yellow-breasted Pipit habitat with the exception of WTG 23 that still appears to be fringing on a high-risk area as identified for the Yellow-breasted Pipit. It is recommended that this turbine position be reconsidered following the avifaunal walkthrough, post-EA (should such EA be granted) prior to construction. Also, according to the revised WEF layout, a few proposed access roads still transect Yellow-breasted Pipit habitat where these roads follow existing gravel roads occurring on site. Where impacts are expected, existing disturbed tracks already used by landowners have been prioritised for access routing, in line with specialist guidance to utilise the most impacted areas and minimise new disturbance. The routings have been carefully selected based on site verification and input from the avifaunal and terrestrial specialist team. Furthermore, residual impacts on Yellow-breasted Pipit habitat are addressed through the BOR, which outlines targeted conservation measures to support species persistence at a landscape scale. The design of access roads were done in alignment with the bird specialist. Areas often used by farmers, or areas that are already anthropogenically impacted on, were prioritised where access could not be rerouted. This was

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					done on a case-by-case basis with the avifaunal specialist.
15.				We also suggest that there should be greater commitment to avoid and conserve the remaining habitat of this species.	Noted. All WTGs were removed from Yellow-breasted Pipit habitat with the exception of WTG 23 that still appears to be fringing on a high-risk area as identified for the Yellow-breasted Pipit. It is recommended that this turbine position be reconsidered following the avifaunal walkthrough, post-EA (should such EA be granted) prior to construction. To promote conservation of the remaining, Yellow-breasted Pipit habitat, alien clearing and rehabilitation of natural grasslands will benefit all grassland bird species within the development footprint as well as in the larger area. An extensive conservation stewardship and habitat restoration and management programme is being developed that will form part of the operational management of the WEF. The implementation of extensive and stringent mitigation measures will ensure that avifaunal species potentially attracted to these habitats receive adequate protection. The applicant is committed to the conservation of remaining habitat for the Yellow-breasted Pipit. This will be achieved through active management measures, including controlling grazing pressure, rehabilitating degraded areas, removing alien invasive species, and implementing the Biodiversity Offset. Collectively, these efforts will hopefully restore and protect habitat quality, providing meaningful, long-term benefits for the species.
16.				Other Species at Risk: The ecological importance of intact grassland patches for birds	Noted. The current conservation status of Secretary birds is locally Vulnerable. The grassland habitat in the area is of importance for

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				(e.g. Endangered Secretary bird) is not sufficiently acknowledged in the assessment.	numerous of the priority species and species of conservation concern that occur in the area. The site ecological importance in terms of grassland has been rated as medium. Grassland areas of importance have been avoided from both an avifaunal as well as a terrestrial biodiversity perspective. Multi-layered, species- and habitat-specific mitigation measures have been developed and integrated into the EMPr, ensuring that impacts on birds, grasslands, and broader ecosystems remain at acceptable levels. Notably, only 0.07% of Mpumalanga's mapped intact grasslands overlap with the project area, of which only 0.1% will be disturbed, equating to 0.0004% of provincial intact grasslands.
17.				At least 32 priority bird species were recorded in the project area of influence, and more within the powerline corridor. However, sensitivity maps were only produced for a few of these species. It appears that the assumption is that the overlap in mitigation/avoidance zones for the handful of key species will cover the others. However, this is not made explicit and may give the false impression that only the mapped species are at risk.	Noted. The sensitivity of the site is duly recognised. Several species do share specific sensitive habitat types e.g. grasslands and wetlands and will indeed benefit from avoidance areas delineated for specific species. Although sensitivity maps were only generated for specific species it must be noted that all species of conservation concern and priority species will be SDoD trigger species. Low detection probability species and nocturnal or smaller species will be offered protection through selective proactive curtailment and other innovative mitigation strategies.
18.				Similarly, collision risk modelling was only conducted for a few species, likely due to limited data (see above regarding concerns about data limitations).	Noted. Our Collision Risk Modelling (CRM) approach follows the Bayesian framework developed by New et al. (2015), which explicitly incorporates uncertainty by using prior distributions informed by the best available biological and empirical data, and updates these

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					with site-specific pre-construction survey data. This model structure is transparent and repeatable and has been successfully implemented in both international and local contexts. Initially, CRM outputs were generated for five high-priority species: Martial Eagle, Southern Bald Ibis, Cape Vulture, Yellow-breasted Pipit, and Species 23. However, we have expanded the CRM analysis to include all wind priority bird species. Where robust species-specific data were available (e.g., bird exposure rates, collision probabilities), these were used directly to inform the prior distributions of the model. For species with limited or no local/regional empirical data, ecologically relevant surrogate species were used. Surrogates were selected based on comparable morphology, flight behavior, habitat use, and foraging strategy, in line with best practice guidelines. This ensures that all priority species are accounted for in the CRM, even in data-poor scenarios, while maintaining biological realism and precaution. The core principle of our CRM is to assess predicted fatalities based on three key parameters: (1) bird exposure (flight minutes within turbine space), (2) collision probability (chance of being struck while within the rotor-swept zone), and (3) the hazardous footprint (spatial-temporal turbine risk volume). The Bayesian structure allows for continuous improvement of predictions as additional monitoring data become available, enabling updates to fatality estimates and mitigation strategies within an adaptive management framework. The applicant acknowledges that

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					collision risk modelling was focused on key species. Despite data limitations, data collection and modelling were conducted for Southern Bald Ibis, Martial Eagle, Species 23, Yellow-breasted Pipit, select lark species, and relevant owls, in line with specialist advice and sensitivity ratings within the project area. The project has invested extensively to collect robust, site-specific data for those species identified as requiring detailed assessment, ensuring that mitigation measures are targeted and effective.
19.				Avoidance and Layout Alternatives: Although avifaunal and faunal specialists made explicit recommendations for avoiding sensitive areas, these do not appear to have influenced the "preferred" development layouts. These recommendations are reflected in the EIA reports and EMPrs and they seem to influence the “post mitigation” significance ratings presented in the reports. This creates ambiguous and potentially misleading assessments – it is unclear what exactly is being proposed and what has been assessed.	The layout refinement process followed an iterative, multi-disciplinary approach in which inputs from all specialists particularly faunal and avifaunal were considered alongside technical, landowner, engineering, and constructability constraints. While not all avoidance recommendations could be implemented in full due to competing land use considerations (e.g., landowner consent, wind resource availability, constructability, and exclusion zones), numerous turbine positions were amended or removed throughout the EIA process to improve alignment with environmental sensitivities. The preferred layout represents a compromise that reflects the best balance achievable between environmental constraints and project feasibility. The selection of the preferred layout was made by the applicant, based on a combination of ERM’s environmental findings, specialist inputs (including sensitivity maps and avoidance recommendations), and technical requirements. The significance ratings presented in the EIA reflect the post-mitigation residual impacts based on this final layout and assume full implementation of the mitigation hierarchy—
20.				It is also unclear on what basis the “preferred” layouts were been selected. Is it the applicant’s opinion, or ERM’s?	

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					including avoidance where possible, minimisation, and operational-phase mitigation (e.g., Shut Down on Demand, monitoring, and adaptive management). To clarify these aspects, the final layout and rationale were further elaborated in the revised DEIA Report, and the EMPr has been updated to ensure consistency between recommended mitigation and actual layout implementation. The applicant confirms that all specialist recommendations for avoiding sensitive areas have been carefully considered in the development of the layouts. Where sensitive features could not be fully avoided, these areas were addressed through targeted mitigation measures and are supported by the Biodiversity Offset, which ensures rehabilitation, habitat protection, and enhancement. Post-mitigation significance ratings reflect the combined effect of layout design and these measures, providing an accurate and transparent assessment of residual impacts. Turbines that remain in certain sensitive areas are necessary to maintain project viability and enable the export of clean energy, while the integrated mitigation approach ensures that environmental stewardship is upheld. The “preferred” layouts reflect a combination of technical, environmental, and economic considerations. They were developed by the applicant in close consultation with appointed specialists, including ERM, to balance optimal wind resource, financial viability, and environmental sensitivity. Specialist input directly informed the avoidance of high-sensitivity areas, mitigation measures, and the residual impact

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					assessment, ensuring that the layouts are both scientifically defensible and operationally feasible.
21.				Table 5-1 of the EIR contains misleading claims with regards to the site and overlap with sensitive areas. For example, it states: “There are no specific features of very high biodiversity value within the affected polygons and highly sensitive areas have been avoided for development. In addition, the site does not appear to fall on any significant gradients or corridors that are likely to be of high importance for biodiversity processes such as migration and faunal movement”. This contradicts the avifaunal assessment.	Noted. To address this concern, the revised DEIA Report has been updated to more accurately reflect the findings of the avifaunal assessment and to avoid generalizations that could be perceived as misleading. The revised narrative now acknowledges the presence of sensitive features within the broader site and clarifies that avoidance was applied to the extent practicable, with further mitigation proposed through the EMPr and operational-phase measures such as monitoring and adaptive management.
22.				We strongly recommend that layout alternatives (e.g. the applicant’s preferred alternative and one that implements the biodiversity specialists’ recommendations for avoidance) are more transparently assessed.	Recommendation noted. The revised DEIA Report was updated to more clearly compare the preferred layout with alternatives that incorporate biodiversity specialists’ avoidance measures, ensuring greater transparency in the assessment of options. The applicant notes the comment and confirms that all layout alternatives, including specialist-informed options, have been transparently assessed in the EIA documentation.
23.				If turbine relocations are not implemented in a layout, this should not influence the assessment of impact significance.	Noted. The revised DEIAr reflects that impact significance ratings reflect the actual assessed layout. Where turbine relocations were not adopted, the associated impacts were rated accordingly to maintain assessment integrity and transparency. WTG’s that were noted to fall within avifaunal no-go areas during the Draft EIAr first subjected to PP were all shifted out to fall outside of the designated no-go areas, including the blade overhang. Additionally, the rotor diameter was reduced by 38 meters.

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24.				SDoD is recommended for medium sensitivity areas, yet the (applicants') "preferred" alternative includes turbines within high sensitivity zones. If such turbines are approved (which we do not support), SDoD should be extended to those areas as well.	Noted. Diurnal and nocturnal SDoD will be fully implemented on all authorized WTGs throughout the lifespan of the proposed WEF. The Avifaunal Specialist Report has been updated to include the following compulsory mitigation measures as recommended for inclusion in the EMPr: All wind turbine generators (WTGs) – located in both 'high risk zones' and 'medium risk zones' - must be subjected to SDoD, which must include Automated SDoD (camera and radar) to accommodate misty conditions and night flying species, as well as proactive curtailment based on environmental and weather conditions. SDoD and radar technology must be in operation at the onset of commercial operation date (COD). SDoD success must be monitored throughout the lifetime of the facility, where monitoring data during operation will continuously inform the SDoD needs for each turbine. The Shut Down on Demand (SDoD) programme must be developed and included in the EMPr, post–EA (should such EA be granted) during the detailed design phase prior to construction. Specific details of the SDoD programme will be included in a comprehensive Biodiversity Management Plan (BMP) which will be developed and implemented prior to the commercial operational date of the facility. In addition, note that the SDoD implementation will entail systems capable of curtailing turbines during daylight hours based on species level identification. Also, all turbines will be subjected to several tiers of mitigation that include seasonal night time proactive curtailment for Species 23 (from dusk to dawn), daylight proactive curtailment at high-risk periods for specific turbines in relation to known high risk periods for

No.	Name and Organization	Date and Method	Phase of PPP	Comment	Response
					Martial Eagle flight activity, and night time radar SDoD for nocturnal species such as flamingos. Blade patterning will also be fully implemented on all WTGs. The applicant acknowledges the concern and confirms that SDoD will be applied proactively across all turbines in sensitive areas, to ensure effective protection of all relevant bird species.
25.				Several species recorded on site were not mapped for sensitivity but are likely to be at risk of collisions (e.g. Secretarybird and Cape Vulture). SDoD should therefore be applied to all turbines.	Noted. SDoD will be fully implemented on all authorized WTGs throughout the lifespan of the proposed WEF. The Avifaunal Specialist Report has been updated to include the following compulsory mitigation measures as recommended for inclusion in the EMPr: All wind turbine generators (WTGs) – located in both ‘high risk zones’ and 'medium risk zones' - must be subjected to SDoD, which must include Automated SDoD (camera and radar) to accommodate misty conditions and night flying species, as well as proactive curtailment based on environmental and weather conditions. SDoD and radar technology must be in operation at the onset of commercial operation date (COD). SDoD success must be monitored throughout the lifetime of the facility, where monitoring data during operation will continuously inform the SDoD needs for each turbine. 4The Shut Down on Demand (SDoD) programme must be developed and included in the EMPr, post-EA (should such EA be granted) during the detailed design phase prior to construction. Specific details of the SDoD programme will be included in a comprehensive Biodiversity Management Plan (BMP) which will be developed and implemented prior to the commercial operational date of the facility.

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					Note that blade patterning will be applied to all authorised WTGs and diurnal proactive curtailment for Martial Eagles will also be fully implemented within high-risk zones. The applicant confirms that SDoD will be applied to all turbines, providing precautionary protection for Secretary birds, Cape Vultures, and other species of concern.
26.				The EIA and EMPrs suggest either observer-led or automated (radar or camera) SDoD should be implemented - implying that just one of these approaches will be adequate. However, a combination of approaches, tailored to the behaviour of all priority species at risk may be required. For example, radar would benefit large night-flying species (e.g., flamingos, owls) and those that fly in misty conditions, while camera-assisted SDOD is more suited for large soaring birds (e.g., eagles) that move during the day. Observer-led SDOD would benefit species that spend time on the ground (e.g., Secretarybird and Southern Bald Ibis), that, when they do fly, may not be detected by technology in time to shut turbines down.	Noted. Compulsory diurnal and nocturnal SDoD, both observer-led and/or automated (radar and/or camera) will be fully implemented on all authorised WTGs throughout the lifespan of the proposed WEF. The applicant agrees with this recommendation and confirms that a combination of SDoD approaches (observer-led, radar, and camera-assisted) will be considered for implementation. This approach reflects input from I&APs and our avifaunal specialist.
27.				In light of the above, we suggest that more detail is needed with regards to required approach to SDOD, including the spatial and temporal coverage, trigger species, and operational protocols for implementation.	Noted. Automated SDoD will be implemented on all turbines at both WEF facilities. The SDoD implementation will entail systems capable of curtailing turbines during daylight hours based on species level identification. Also, all turbines will be subjected to several tiers of mitigation that include seasonal night time proactive curtailment for Species 23, daylight proactive curtailment for Martial Eagles at high-risk periods for specific

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					turbines, and night time radar SDoD for nocturnal species such as flamingos. The applicant is in the process of developing detailed SDoD protocols and will implement them in accordance with the recently published BirdLife South Africa guidelines (June 2025). Temporal coverage will be informed by data obtained through the Martial Eagle GPS tracking program at the site, aligned with met mast measurements (measure environmental conditions) to determine the probability of flight activity. This approach will allow turbines to be actively shut down when birds are most likely to be in flight, ensuring effective mitigation for priority species. Triggers species and the SDOD program will be developed prior to operation,
28.				With regards to reducing collision risk for Species 23 (which is too small to benefit from SDoD), the proposal to curtail operations at night based on habitat suitability monitoring does not offer adequate protection.	Noted. Rallids (and Species 23) are predominantly confined to wetland habitats with dense cover during daylight hours, reinforcing our confidence that the 350m wetland buffer will provide effective protection for these birds. When flushed, their daytime flights are brief—covering only a few meters—and remain low to the ground, never exceeding a few meters in height. During night time, when longer distance flight activity becomes a possibility, a comprehensive proactive turbine curtailment strategy will be implemented for the entire duration of the summer season. Every turbine within the mitigation zone will be shut down during the night while the birds are present, significantly reducing (if not entirely eliminating) the likelihood of collisions and ensuring their safety. We believe that curtailing the turbines at night, as per the rigorous mitigation strategy proposed, will provide Species 23 with adequate protection against collision risk. Furthermore, it is

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					commonly known that rallids and other waterbirds such as Species 23 that are known to migrate (local, seasonal, or palearctic) do so primarily at night to conserve energy, avoid predators and to use the stars for navigation. Given our knowledge and understanding of Species 23's ecology, it is strongly believed that this species would exhibit similar behaviour and hence the proposed mitigation strategy would provide adequate protection. With regard to Species 23, while night-time curtailment based on habitat suitability is included, it is not the sole mitigation measure. The project applies the full mitigation hierarchy, including avoidance of high-sensitivity areas, habitat management, and targeted monitoring. Specialist advice guides turbine placement to minimise potential impacts. Additional proactive measures, such as habitat modelling and on-site surveys, inform adaptive management. These combined efforts ensure robust protection for Species 23 beyond operational curtailment alone.
29.				Movements likely occur between wetlands as conditions change—often faster than the proposed 7–14-day monitoring interval, and while it is commonly assumed that the species only moves at night, there is no data to verify this assumption yet.	Note that the satellite imagery is updated weekly, therefore the frequency of checking these datasets cannot be increased; however, the proposed mitigation strategy prescribes the onsite implementing of hydrometric equipment that would measure the ambient conditions (such as soil moisture, temperature, etc.) on an hourly basis. Therefore, changes in the local weather parameters will be detected much more frequently than at a 7-14 day interval. Wetland monitoring at the onset of spring / summer will be conducted more frequently, and regional rainfall patterns will also be monitored in order to determine when conditions become or

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					are likely to become suitable for the species. At such time, the facilities will be required to curtail all turbines located within the identified medium risk Species 23 habitat connectivity corridors at night i.e., from dawn to dusk. The following turbines at each facility are affected: Emvelo WEF: WTGs 5, 13, 15, 19, 20, 23, 25 Sheepmoor WEF: WTGs 26, 27, 28, 29, 44, 45 Refer to Table 11 in section 6.3.2 as well as Appendix 7 (EMPr inputs) of the updated Avifaunal Specialist Reports. More frequent monitoring intervals can be considered in areas of concern.
30.				We are further concerned that much simpler operational phase mitigation measures have failed at wind farms elsewhere in South Africa. The complexities and expertise required for this “smart” curtailment presents a risk of poor implementation and an inability of officials to ensure and, if necessary, enforce compliance.	Noted. The Developer themselves will construct and operate the proposed two WEFs and is therefore committed to implementing the specialist’s recommended mitigation measures and management actions as underpinned by the conditions of the Environmental Authorisation (EA) (should such EA be granted), and as such the proposed mitigation strategy is therefore enforceable. furthermore, the concerns around the effectiveness of operational-phase mitigation at other wind farms, and agrees that smart curtailment requires both technical expertise and strong implementation oversight are acknowledged. However, this project is being developed under a more current regulatory and ecological understanding, and with a fundamentally different level of commitment. The applicant is committed to setting a new standard, smart curtailment and other mitigation measures will not only be incorporated into the EMPr, but also embedded in contractor obligations, financing agreements, and Financial Close (FC) conditions. Furthermore, a robust reporting framework has

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					been included to ensure transparency and allow authorities and stakeholders to monitor compliance in real time. The applicant acknowledges that operational mitigation measures have not always been successfully implemented at other wind farms. However, this project represents a deliberate step forward. With robust protocols, specialist oversight, and alignment with IFC, ESG, and Equator Principles, we are applying a higher standard of environmental management.
31.				Given our limited understanding of this species' movement patterns and risk of collisions we do not support turbines in any medium sensitivity areas identified for this species. Alternatively, we suggest that a risk averse, precautionary approach would be full seasonal curtailment of turbines in medium risk areas during summer.	Noted. All turbines avoid very high and high sensitivity areas identified for Species 23. For WTGs 5, 13, 15, 19, 20, 23, 25, 26, 27, 28, 29, 44 and 45 that are located within medium sensitivity areas i.e., habitat connectivity corridors identified for Species 23 will be subjected to a rigorous nocturnal proactive curtailment strategy during summer (i.e., from dusk to dawn) to reduce and mitigate any potential risk those turbine positions could possibly pose on Species 23. While we acknowledge the limited understanding of this species' movements, the mitigation hierarchy is being followed: first avoiding sensitive areas wherever possible (this was strengthened early in the project through targeted field assessments, habitat mapping, and specialist guidance) then implementing targeted mitigation where avoidance is not feasible, and finally offsetting any residual impacts through our Biodiversity Offset program.
32.				The EIAs and EMPr mention adaptive management strategies should be implemented	Noted. The avifaunal specialist report has been updated to include Potential Biological Removal

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				if fatality thresholds are exceeded. However, no such thresholds are defined.	(PBR) and Collision Risk Model (CRM) results calculated for all priority species recorded on site. CRM values that take the effectiveness of avoidance and mitigation measures into account have been used to calculate the PBR as a percentage value for each priority species. This value is then considered to serve as the annual fatality threshold value per species as it relates to turbine collisions per site. If these annual fatality thresholds are potentially exceeded during operations the prescribed mitigation strategy will be improved and refined. Refer to Section 5.8.8 of the updated Avifaunal Specialist Report.
33.				In the absence of robust figures, we recommend a zero-fatality target for threatened and demographically sensitive species. Exceeding this should trigger further mitigation if available data suggests that further fatalities of the affected species are likely over the lifespan of the facility.	
34.				We are exceptionally concerned that there are currently no proven, additional mitigation options beyond curtailment, or stopping turbines entirely. This would have significant cost implications for the operator. This open-ended recommendation introduces a significant degree of risk and uncertainty for the applicant, as well as biodiversity. There should be clear parameters defined and budget set aside accordingly.	Noted. If the calculated annual fatality thresholds for these WEFs are potentially exceeded during operations, the prescribed mitigation strategy will be improved and refined. For example, the automated SDoD species level identification algorithm might need to be improved or retrained for the specific species or more camera systems with better viewsheds might be required. The applicant is fully committed to the proper implementation of all mitigation measures. The EMPr is designed to be adaptive and can be updated during operations to enhance impact reduction as needed. Ongoing monitoring will provide accountability and inform any future interventions required to further protect biodiversity.
35.				While we support recommendations for proactive conservation contained in the EIA (e.g., stewardship, alien clearing and offsets),	Noted. The Avifaunal Specialist Report has been updated to include more species-specific detail regarding both monitoring to assess impacts and

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				we are concerned about feasibility of this if the applicant is not the landowner. We suggest that these recommendations and landowner agreements should carefully considered to ensure recommendations and commitments in this regard are implementable.	the implementation of stringent Post Construction Fatality Monitoring at the facility. The applicant confirms that all proposed measures, including stewardship, alien clearing, and offsets, are fully implementable. Affected landowners are engaged and committed to working collaboratively to ensure these measures are effectively carried out, supporting long-term biodiversity outcomes.
36.				As a condition of approval (should this be granted), the applicant must secure landowner agreements for all required mitigation and monitoring (e.g., carcass searches, SDoD) before construction begins.	This comment is noted and DFFE should consider to include as condition for approval if practical, feasible and appropriate.
37.				Given the site's sensitivity and risk to birds species of conservation concern, monitoring requirements should be more detailed and species-specific. For example: a. Carcass surveys should be tailored to detect fatalities for Species 23 and other small species (e.g., Yellow-breasted Pipit) in addition to large birds, b. Surveys should be designed to detect displacement, disturbance, and habitat alteration for priority species. c. Carcass surveys must continue for the facility's lifespan to evaluate SDoD and curtailment effectiveness.	Acknowledged. The Avifaunal Specialist Report has been updated to include more species-specific detail regarding both monitoring to assess impacts and the implementation of stringent Post Construction Fatality Monitoring at the facility. Thank you. We will ensure monitoring is tailored to address both small and large priority species, including displacement and habitat impacts, and that carcass surveys and SDoD evaluations continue throughout the operational lifespan to support effective impact management.
38.				As discussed above, the construction phase EMPr is not aligned with the preferred layout (i.e. it recommends avoidance of areas where roads, turbines and cables have been proposed). Clarification is needed on how this will be resolved.	This discrepancy is acknowledged. The EMPr has been updated to align with the final preferred layout and associated mitigation hierarchy.

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39.				The operational EMPr should be revised to include specific, time-bound, and measurable impact management outcomes, clearly defined triggers for additional action and response timeframes.	The EMPr has been updated to incorporate clear and enforceable timeframes for the implementation, monitoring, and reporting of all mitigation and management measures. Each mitigation measure is now linked to specific deadlines and reporting intervals to ensure accountability and effective tracking of progress. These revisions are detailed in the EMPr implementation schedule which also clearly outlines the responsibilities of the Environmental Control Officer (ECO), relevant specialists, and the project proponent.
40.				Fatality thresholds must be clearly defined to avoid ambiguity.	Noted. The Avifaunal Specialist Report has been updated to include Potential Biological Removal (PBR) and Collision Risk Model (CRM) results calculated for all priority species recorded on site. CRM values that take the effectiveness of avoidance and mitigation measures into account have been used to calculate the PBR as a percentage value for each priority species. This value is then considered to serve as the annual fatality threshold value per species as it relates to turbine collisions per site. If these annual fatality thresholds are potentially exceeded during operations the prescribed mitigation strategy will be improved and refined. Refer to Section 5.8.8 of the updated Avifaunal Specialist Report.
41.				We suggest that the operational EMPr, specifically the mitigation actions included in the avifaunal management plan should be reviewed at least every five years. Stakeholders should be provided an opportunity to provide input into any changes.	Noted. Appendix 7 and 8 of the Avifaunal Specialist Report has been updated accordingly to include this recommendation as a condition in the EMPr.

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42.				Operational phase EMPr compliance, including avifaunal management plan, should be audited annually.	Noted. Appendix 7 and 8 of the Avifaunal Specialist Report has been updated accordingly to include this recommendation as a condition in the EMPr.
43.				All avifaunal monitoring and audit reports should be made publicly available and shared with BirdLife South Africa.	Noted. Appendix 7 and 8 of the Avifaunal Specialist Report has been updated accordingly to include this recommendation as a condition in the EMPr.
44.				We are concerned that the proposed conditions of authorization relating to impacts on bird are weak, particularly with regard to monitoring and mitigating operational phase impacts. While the EMPrs play an important role, many requirements can be lost in the detail of these vast documents. Critical recommendations should be highlighted in the EA, and detailed in the EMPr.	Noted. Section 8.3 of the Avifaunal Specialist Reports have been updated to include specific conditions relating to the implementation of recommended and required mitigation measures and management actions as it relates to potential Avifaunal impacts. We will carefully review the EA and EMPr to ensure that critical recommendations are clearly highlighted and appropriately addressed.
45.				Conclusion and Next Steps BirdLife South Africa does not support the proposed developments in their current formant. We have significant concerns about that suitability of the area of wind farm development, and suggest that the impact assessment, layout and mitigation strategies need to be substantially strengthened and updated before the development could be considered for approval (if at all). Due to time constraints, BirdLife South Africa has not reviewed the EIA report in as much detail as we would prefer. We may have missed some issues and reserve the right to raise further concerns and questions. We also recommend that the EIAs be subjected to an independent peer review as part of the revision process.	Noted. The revised DEIA Report has been revised to strengthen the impact assessment, refine the layout in line with specialist recommendations, and enhance the mitigation hierarchy, particularly for biodiversity and avifauna. The recommendations of BirdLife South Africa were reviewed and considered in this process. While independent peer review is not a statutory requirement under the EIA Regulations, the assessments were subject to rigorous internal review and multiple specialist inputs. All legally required processes have been followed. BirdLife South Africa's right to raise further issues is acknowledged, and any additional submissions will be considered if received within the applicable regulatory timeframes.

TABLE 8-55 COMMENTS AND RESPONSE TABLE FOR IAPS ON DRAFT EIA PHASE (10 APRIL 2025)

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	*Response*
				General Comments	
	Riaan Meintjies	22 April 2025	Draft EIAr	From: Riaan Meintjes <riaan@themis.co.za> Sent: Tuesday, April 22, 2025 1:10 PM To: ERM Arcus Amsterdam <erm.arcusamsterdam@erm.com>; eiaapplications@dffe.gov.za Subject: Mulilo Amsterdam Wind Energy Facility Cluster Importance: High Dear Sir/Madam Kindly refer to our attached letter and kindly acknowledge receipt. Regards Riaan Meintjes Director Attachment: Letter to ERM Arcus Amsterdam 22.04.25.pdf Letter Contents: Dear Sirs SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER 1 We address this correspondence to you on the instructions of our clients, the Trustees for the time being of the Peter Celliers Trust ("the Trust").	PER EMAIL THE TRUSTEES FOR TIME BEING OF THE PETER CELLIERS TRUST C/O HAYES INCORPORATED Attention: Riaan Meintjes Email: riaan@themis.co.za Dear Mr Meintjes RE: SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER 1 We refer to: 1.1 the Draft Environmental Impact Assessment Reports circulated for public participation on 16 July 2025 in respect of the Sheepmoor and Emvelo Wind Energy Facilities, situated in the Mpumalanga Province ("Proposed Project") in respect of the environmental authorisation application ("EA Application") submitted by Environmental Resources Management Southern Africa (Pty) Ltd ("ERM" or "us") on behalf of the Applicants; 1.2 your letter to us, dated 22 April 2025 ("22 April Letter"); and 1.3 your emails to us, dated 7 August 2025 and 14 August 2025. 2 Thank you for your comments submitted in respect of the Proposed Project on behalf of the Trustees for the time being of the Peter Celliers Trust ("Peter Celliers Trust"), we note the content thereof. 3 The Applicant will apply for approval of aeronautical assessment of aviation obstacles to the Air Traffic and Navigation Services ("ATNS") ("ATNS Approval Application") under the Civil Aviation Regulations, 2011 (GN 425 of 1 June 2012) ("Civil Aviation Regulations") and the Aeronautical Information Circular dated 18 April 2024 (AIC 001-2024) in due course.

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				2 The Trust is the owner of Portions 8, 19 and 28 of the Roodewal Farm (Farm number 270), Registration Division IT, Mpumalanga. It is an interested and affected party with regard to the proposed development of the Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province. 3 The Trust conducts an aerodrome and a helipad from Portion 28 of its farm. The aerodrome has been used for aircraft of the Learjet and KingAir categories and has, at all times material hereto, remained in regular use. The landing strip of the aerodrome is used in both directions. 4 The operation and safety requirements of aerodromes and helipads are governed by the provisions of the Civil Aviation Act, 13 of 2009, the Civil Aviation Regulations, 2011 (as amended) ("the Regulations") and Annex 14 to the Convention on International Civil Aviation, 7th Edition, July 2016. 5 The safety requirements for aerodromes and heliports are contained in Part 139 of the Regulations and Regulation 139.01.30 deals with obstacle limitation and marking outside aerodromes and heliports. Regulation 139.01.30(1) imposes an obligation on the	4 Please note that the Civil Aviation Regulations indicate that the ATNS Approval Application may be submitted at any time prior to the construction of the Proposed Project. 5 We note from the 22 April Letter that you reference part 1.14 of the SA-CATS 139.01.30 technical standard which prohibited the development of a wind farm within 35 km of an aerodrome. Please be advised that this prohibition has since been removed from SA-CATS 139.01.30 in the Amendment SA-CATS 2 of 2023 document and is no longer in effect. 6 Regarding the concerns raised in paragraph 7 of the 22 April Letter we confirm that landscape-level impacts associated with the proposed wind farm have been assessed by the relevant specialists, including the visual, faunal, and avifaunal specialists. Appropriate mitigation measures will be implemented to manage potential impacts. In particular, specific mitigation measures relating to large terrestrial bird species, such as the Secretary bird, have been outlined in detail within the avifaunal specialist. 7 Finally, we wish to confirm that your comments, including the 22 April Letter, and our responses thereto will be included in the public participation report for the EA Application. The Applicant also confirms that it will keep the Peter Celliers Trust updated regarding the outcome of the ATNS Approval Application. It should be noted that the 22 April Letter was originally submitted outside of the prescribed Public Participation Process (PPP) period and was therefore not included in the original publication report. However, as this letter has since been resubmitted during the current PPP period, within the prescribed timeframes, both the letter and our responses will be incorporated into the Final Comments and Responses Report (CRR). 8 Please do not hesitate to contact the writer of this letter should you have any queries in this regard. Yours faithfully

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				holder of an aerodrome licence to monitor the surroundings of the aerodrome to assess permanent or temporary obstacle limitation and penetration surfaces, to establish if any obstacle has an impact on the safety of aircraft operations at such aerodrome. Sub-regulation (7) goes on to provide that the holder of an aerodrome licence shall not allow to be erected, without the prior approval of the Director, an object higher than 45 meters above the mean level of a landing area or within 8 kilometres measured from the nearest point on a boundary of an aerodrome. Regulation 139.01.30 further incorporates the provisions of Document SACATS 139. 6 Document SA-CATS 139.01.30 elaborates upon the requirements for obstacle limitations and markings outside aerodromes or heliports. Paragraph 1.14 deals extensively with the requirements pertaining to wind turbine generators (wind farms) and paragraph 1.14(2), dealing with wind farm placement, states as follows: “Due to the potential of wind turbine generators to interfere on (sic) radio navigation equipment, no Windfarm should be built closer than 35 km from an aerodrome. In addition, much care should be taken to consider visual flight rules routes, proximity of known recreational flight activity such as hang-gliders, en	

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				route navigational facilities etc." (our underlining) 7 In addition to the aerodrome, there is a registered nature conservancy named Nu-Scotland on the Trust's farm. The conservancy regularly hosts guests and bi-annually hosts cricket groups of between 80 to 100 people. The visual impact assessments of the proposed wind farms will need to take the use of the Trust's farm as a nature conservancy into account. The conservancy is home to a wide range of antelope, zebra and birds, including Secretary Birds, which have been classified as endangered, largely due to habitat degradation. Appropriate mitigation measures will need to be put in place to address the threats that the wind farms will pose to the fauna on the Trust's farm and surrounds. 8 The Trust is accordingly opposed to the erection of any wind turbines closer than 35 kilometres from the boundary of the Trust's aerodrome. Yours faithfully RIAAN MEINTJES HAYES INCORPORATED	
	Josua Meyer	15 April 2025	Initial Draft EIAr	From: Josua Meyer <meyerjosua55@gmail.com> Sent: Tuesday, April 15, 2025 10:11 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>	Applicant: The avifaunal specialist was commissioned to conduct independent, systematic surveys following accepted professional protocols over multiple seasons, ensuring comprehensive coverage of the study area. All field data, including eagle tracking

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				Subject: Re: Request for proprietary information and data Re : Draft EIA report for EMVELO and SHEEPMOOR proposed WEF Dear Mr Barbeau The request for the data recovered from the two tagged martial eagles remains outstanding.That deprives my right as IAP to submit constructive comments on the draft EIA report. An email was received on 14/04/2025 from Mr Johans van Wyk of the applicant in this regard. Due to your silence I like to take the opportunity to react to that. Although time for comments depart already but this is a friendly request to include this response in the comments due to ERM non-response. The oldest trick in the book is to get your opposition on board. EWT is a NGO organization surviving on donations which might also play a part in the partnership. The moment EWT entered in a non-disclosure partnership with the applicant it destroyed their impartiality and credibility. Their name should read now ENDANGER for WILDLIFE TRUST. It is extremely arrogant and offencive from the applicant to assume there is only one accredited avifaunal specialist. The applicant is correct that a second specialist might not	information, were collected and analysed independently by the specialist, with the applicant having no influence over findings or conclusions. Non-disclosure agreements are standard practice to protect sensitive ecological data and do not compromise the specialist's scientific independence. Concerns regarding seasonal coverage and missed nests are addressed through adaptive management, targeted monitoring, and ongoing consultation with authorities to ensure all priority species are adequately considered. The Martial Eagle nest was identified through targeted surveys commissioned by the applicant, with the avifaunal specialist conducting systematic searches across a 5 km radius as recommended by their own methodology. The finding aligns with standard professional practice, demonstrating that the assessment was thorough and independent.

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				come to a similar conclusion but is likely to arrive at a more meaningful conclusion due to his independence. The combination of information/data/insights the applicant mentioned is already incorporated by the eagle in its tagged flight data. The value of that flight data is that it is undistorted and can not be adapted to fit the applicants application. A few concerns regarding the applicant's experience project avifaunal specialist - the martial eagle nest was disclosed by a local farmer and not by the specialist field monitoring team during their seven site visits. This was revealed by Mr Lloyd Barnes of the applicant during a meeting at Mr Jan Robberts house in the presence of witnesses. - site field monitoring was only executed during 8 months of the year with no monitoring during four crucial summer months (21/10/2022 to 21/02/2023) Therefore the specialist failed to identify important priority bird species breeding sites including both crane species. - when an active Mahem breeding nest was reported to Mulilo's specialist in January 2025 no attempt was made to visit or even to record the location. The same response	Mr Lloyd Barnes notes that he was informed by Mr Meyer of the presence of a Mahems nest. Mr Lloyd Barnes specifically

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				was experienced from Mr Lloyd Barnes from the applicant. - a 60 year plus old breeding site of the Southern Bald Ibis was shamefully not identified - the specialist signed a non disclosure agreement with the applicant and with that sacrificed his independence. The applicant had taken a long shot trying to classify the tracking data under NEMBA and is advised rather to pay attention to its permit conditions. The applicant is already in breach of item 1.9 and 1.10 of his permit and runs the danger that it might be cancelled.	requested the location of the nest, to be assessed, but Mr Meyer did not provide this information.
	Mnr Labuschagne and Josua Meyer	11 April 2025	Initial Draft EIAr	From: Mnr Labuschagne <jbwl@vsli.co.za> Sent: Friday, April 11, 2025 3:10 PM To: ERM Arcus Amsterdam <erm.arcusamsterdam@erm.com> Cc: Josua Meyer <meyerjosua55@gmail.com> Subject: SHEEPMOOR/EMVELO WEF Good day Find attached letter for your attention. Regards JOSUA MEYER Attachment:	

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	Celine Oates Richards Summers INC	11 April 2025	Initial Draft EIAr	From: Celine Oates <celine@summersinc.co.za> Sent: Friday, April 11, 2025 11:09 AM To: ERM Arcus Amsterdam <erm.arcusamsterdam@erm.com>; Stephanie Gopaul <stephanie.gopaul@erm.com> Cc: Richard Summers <Richard@summersinc.co.za>; Reception – Richard Summers Inc. <Reception@summersinc.co.za>; Clarice Arendse <clarice@summersinc.co.za>; Matodzi Albert Silidi <Matodzi@summersinc.co.za>; Lauren le Grange <lauren@summersinc.co.za> Subject: RE: RE: COMMENTS ON THE ENVIRONMENTAL IMPACT ASSESSMENT PROCESS FOR THE PROPOSED EMVELO WIND ENERGY FACILITY AND SHEEPMOOR WIND ENERGY FACILITY [DFFE REFERENCE NUMBERS: 14/12/16/3/3/2/2611 & 14/12/16/3/3/2/2613] Dear Sir/ Madam After auditing the WeTransfer link, we came across a further annexure that had not uploaded. In this regard kindly see attached hereto Annexure F4. As such, kindly confirm receipt of the following: 1. Combined comments on the EIA Process for the Proposed Emvelo and Sheepmoor Wind Energy Facilities;	Good day, All documentation has been downloaded. Thanks Regards

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				2. Annexure A; 3. Annexure B; 4. Annexure C1; 5. Annexure C2; 6. Annexure D; 7. Annexure E; 8. Annexure F1; 9. Annexure F2; 10. Annexure F3; and 11. Annexure F4. We look forward to your confirmation of receipt. Kind regards, Celine Oates RICHARD SUMMERS INC. Candidate Attorney	
	Khululwa Matshoba (Ntc)	11 April 2025	Initial Draft EIAr	From: Khululwa Matshoba <StuurmKV@ntcsa.co.za> Sent: Friday, April 11, 2025 10:53 AM To: Mpho Malema <mpho.malema@erm.com> Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: FW: Reminder: Draft EIA Reports Available for Comment – Sheepmoor and Emvelo Wind Energy Facilities Dear Mpho Kindly note that the project is affecting our proposed Camden B site's. See attached.	Good day Khululwa, I hope this email finds you well. Thank you for your comment and for identifying the interaction between the proposed Amsterdam Wind Energy Facility and the existing Camden–Edwaleni 1 transmission line. We confirm that we will follow the required Eskom processes to apply for and, where appropriate, request relaxations of relevant clearance and servitude standards. We remain committed to engaging with Eskom's technical team following the approval of the Environmental Authorisation to ensure that any infrastructure interfaces are addressed in line with your requirements. The site selection process for the project has considered a large assessment area and evaluated various technical and environmental constraints, which provides flexibility for potential

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				May you please rectify and update us. Thank you. Warm regards Khululwa	adjustments if required. We have also considered alternative configurations during the planning phase, which will assist in working collaboratively to achieve a mutually acceptable solution. We look forward to continued engagement with Eskom to address this matter in a coordinated manner.
	Josua Meyer	10 April 2025	Initial Draft EIAr	From: Josua Meyer <meyerjosua55@gmail.com> Sent: Thursday, April 10, 2025 10:40 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: Re: Re : Draft EIA report for EMVELO and SHEEPMOOR proposed wind farms Dear Sir 1. Let us try to explain it ....With reference to one of ERM own drawings you sent via email to me, Preferred Site Development Plan, Figure 3 attached for your convenience. It shows tree areas bordered with a different colour namely BLUE, GREEN and YELLOW.. At the top of the title bloc at the right hand side of Figure 3, just bellow Turbine Locations you find three rectangular figures, top rectangular figure bordered BLUE with description Sheepmoor WEF 1 next to it,middle rectangular figure bordered GREEN with description Sheepmoor WEF 2 next to it and then underneath that a rectangular figure bordered YELLOW with description Sheepmoor WEF 3 next to it. Do I really need to go further?	

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				It will be appreciated if you can tell us now what situation with Sheepmoor WEF 3 will be after the cancellation of Sheepmoor WEF 2. The impact of the changes from the original application is highly debatable. 2. ".... consider landowners willingness ....." That is a U turn, thanks. 3. Copies of my request and applicant answer attached (unfortunately it is in Afrikaans) Another U turn! I was always open for discussion but the applicant closed the channel as per letter. That unfortunate situation forced me to appoint a lawyer to assist me in this regard. Lately the applicant through mr. Johans van Wyk tried to communicate outside the official channels he forced me into, probably to avoid public exposure.The Social specialist recommended to the applicant to engage with me about my concerns but was blatantly ignored. Thanks for your invitasion and I will discuss it with my lawyer. NOTE : Can not include attachments due to technical error and will send it tomorrow as part of this email	

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	R Summers	10 April 2025		From: Celine Oates <celine@summersinc.co.za> Sent: Thursday, April 10, 2025 10:32 PM To: ERM Arcus Amsterdam <erm.arcusamsterdam@erm.com>; Stephanie Gopaul <stephanie.gopaul@erm.com> Cc: Richard Summers <Richard@summersinc.co.za>; Reception – Richard Summers Inc. <Reception@summersinc.co.za>; Clarice Arendse <clarice@summersinc.co.za>; Matodzi Albert Silidi <Matodzi@summersinc.co.za>; Lauren le Grange <lauren@summersinc.co.za> Subject: RE: COMMENTS ON THE ENVIRONMENTAL IMPACT ASSESSMENT PROCESS FOR THE PROPOSED EMVELO WIND ENERGY FACILITY AND SHEEPMOOR WIND ENERGY FACILITY [DFFE REFERENCE Dear Sir/Madam We refer to the above matter. We act on behalf of Mr. Josua Meyer, a registered interested and affected party. Kindly find attached hereto the Combined Comments in response to the proposed Emvelo and Sheepmoor Wind Energy Facilities. Kindly find Annexures A-F in support of our comments in the following WeTransfer link: https://we.tl/t-Z2fOZ4MEbM .	

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				Kindly acknowledge receipt of our comments and associated annexures. Should you have any difficulty accessing the documentation, kindly let us know so that we may provide you with same. Kind regards, Celine Oates RICHARD SUMMERS INC. Attachment: Annexure F4.pdf • Combined Comment on the Sheepmoor and Emvelo WEF DEIRs_10.04.25.pdf Contents of the letter answered in Error! Reference source not found.~~Table 8-6~~ below.	

TABLE 8-67 COMMENTS AND RESPONSES FROM INITIAL DRAFT EIA REPORT CONTINUED

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	Elize Roberts	10 April 2025	Initial Draft EIAr	From: Elize Robberts <elize.robberts1@gmail.com> Sent: Thursday, April 10, 2025 9:54 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: Draft EIA Reports Available For Comment-Sheepmoor and Emvelo Wind Energy Facilities Good day, To whom it may concern Our comments and concerns to be included in the submission of the final EIA Report are as follows: 1) Impact of wind farm projects and wind turbines on bee diversity on pollination.We request a full and formal in pact study by an accredited institute. To be done incorporating both Sheepmoor and Emvelo wind energy facilities 2)Impact of wind turbines on fire bombers aviation and flight restriction on pilots and bomber planes to extinguish fires around and over wind turbines.Water bombing is a critical requirement over the watershed mountain and veins in the above mentioned area especially on the eastern escarpment. NB: In our spread insurance cover fire bomber assistance is included and covered.If there is aviation limits this cover becomes null and void Your sincerely J.H.Robberts	1. At present, there is limited empirical evidence indicating significant impacts of wind energy infrastructure on bee diversity or pollination services. The EIA process has included specialist biodiversity assessments which did not identify pollinators as a key impact theme. However, should new evidence or regulatory guidance emerge indicating a need for further assessment, the Applicant will consider commissioning a targeted study in consultation with relevant authorities and stakeholders. 2. The EIA process has considered aviation safety, including consultation with the Civil Aviation Authority (CAA) and relevant aviation stakeholders. Should any aviation restrictions be identified that may affect fire bomber operations, these will be addressed through coordination with the relevant authorities to ensure that emergency response capabilities are not compromised.

	Mashudu Mudau DFFE	10 April 2025	Initial Draft EIAr	From: Mashudu Mudau <MaMudau@dffe.gov.za> Sent: Thursday, April 10, 2025 4:06 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Thivhulawi Nethononda <TNETHONONDA@dffe.gov.za>; Nompumelelo EN. Mtshali <NMtshali@dffe.gov.za> Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province EXTERNAL MESSAGE Dear Stephanie The Directorate: Protected Areas Planning and Management Effectiveness would like to thank you for the opportunity to review the Draft Environmental Impact Assessment reports for the proposed development of Sheepmoor and Emvelo Wind Energy Facilities, Transmission line and associated infrastructure, Mpumalanga Province. Sheepmore WEF will be located on farms: • Farm Onverwacht 273 IT • Farm Schiedam 274 IT • Farm Waaihoek 286 IT • Farm Klipfontein 283 IT • Farm Windhoek 291 IT While Emvelo WEF will be located on farms: • Schimmelhoek 272 IT • Schiedam 274 IT • Steenkoolspruit No: 275 IT After conducting the review of the submitted documents, we have noted that parts of	

				proposed developments will take place within a protected area in terms of Section 9 of the National Environmental Management: Protected Areas Act (NEMPAA), Act No. 57 of 2003. However, the northern site of the Emvelo WEF is located with buffer zone(2.3km) of the Chrissiesmeer Protected Environment, while the southern site is located within 2.1km of the Jericho Dam Nature Reserve as identified in terms of NEMPAA. The directorate has the following comments: • The Chrissiesmeer Protected Environment was declared due to it being a sensitive habitat for various birds (including birds of conservation concern) found within the area. The sole existence of the PE is to provide safety for such birds. It is the directorates opinion that although the proposed wind energy developments are located 2km away from the PE, the development will affect birds that might consider using other habitats outside the PE. • Furthermore, the Sheepmoor WEF takes up 12% of Key Biodiversity Areas, 55% of Important Bird Area and 60% of Protected Area Expansion Strategic Areas. It is a concern that areas that have been declared for conservation of birds is being considered for developments that puts them in danger, birds of conservation concern have been recorded in this IBA. Although not formally protected, it is important to note that these are priority areas for conservation by the department. It is recommended that the EAP consult with the province on any conservation plans for the area.	

				• There are birds' nest (i.e. Grey Crowned Crane, Martial Eagle, Wattled Crane, and the Southern Bald Ibis) confirmed for birds that are sensitive to wind turbines, it is a concern that more than 80% of the turbines are located within the buffer area of these species nest. It is recommended that Birdlife SA and EWT must be consultant for proper determination of the buffer area for each species. The presence of the Martial Eagle was also confirmed during the site visit conducted on the 02nd of April 2025. • According to the Mpumalanga Biodiversity Sector Plan, both facilities are located within the Freshwater Ecological Support Area: Important sub-catchments area. Although (as stated in the reports) all watercourses and drainage line have been avoided, Freshwater ecosystems area are important areas that are supposed to be conserved. Additionally, the facilities are located within the Strategic Water Resource Area, these are the department's important areas for conservation. • We have further noted that most turbines are located within Critical Biodiversity Areas and intact/natural vegetation, these are important areas for conservation. It is recommended that turbines and/or any other infrastructures are moved from confirmed CBA and intact vegetation. • The directorate is concern on the assessment of the cumulative impact, Sheepmore and Emvelo are both being proposed by the same applicant and their PPP is running simultaneously. However, the cumulative assessment on each report did not consider the other facility while the information of each facility is readily	

				available to the EAP. The EAP has only considered the Camden WEF within the 30km radius for cumulative impact, while there are other projects within the vicinity such as ABO Ujekamanzi WEF (located within 27.3km). Conclusively, the directorate has noted the recommended conservation efforts of replacing/offsetting 1ha of impacted area with rehabilitating 3ha of land, while this will have a positive impact on ground, unfortunately the impacts on fatality of birds cannot be overlooked. Recommendations made by Birdlife SA and EWT must strictly be adhered to.	
	Braam Moodie	09 April 2025 as per email	Initial Draft EIAr	From: Braam Moodie <b.moodie@vodamail.co.za> Sent: Wednesday, April 9, 2025 6:35 PM To: ERM Arcus Amsterdam <erm.arcusamsterdam@erm.com> Cc: Ilona Deveugele <ilona@commettre.co.za> Subject: Objection against Sheepmoor Windfarm Project [You don't often get email from b.moodie@vodamail.co.za. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification] EXTERNAL MESSAGE Good day. As a landowner on the farms Rietvallei 299 Por 3 ; Windhoek 291 Por 3&5 and leaser of the Windhoek 291 Por 4&10 we were never	Good day Mr. Moodie, Kindly note that the potential issues have been assessed as part of the scoping and EIA and the documents are available on our website. Located on: https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/ Additionally, you have been added as an I&AP to the project database and will be informed of the final submission and appeal processes. Kind Regards,

				contacted neither informed as neighbouring land owners of the project. This project is likely centered around environmental and social concerns.Here are some potential issues: * Environmental Impact * Visual Impact * Noise Pollution * Agricultural and Land Use Concerns * Social and Community Impact * Grid Connection and Infrastructure We therefore want to register as I & AP (Concerned and affected parties) neighbours next to the proposed project. We strongly object against this project. Kind Regards Braam Moodie	
	Josua Meyer	07 April 2025	Draft EIA phase	From: Josua Meyer <meyerjosua55@gmail.com> Sent: Monday, April 7, 2025 10:30 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: Re: Re : Draft EIA report for EMVELO and SHEEPMOOR proposed wind farms Hi Sir, With all due respect Sir, you did not answer my questions. - does Sheepmoor WEF 2 fall away as confirmed in writing by Mulilo? - what is the influence on Sheepmoor WEF 3 with Sheepmoor WEF 2 also not part of project as confirm in writing by Mulilo (previous email should read WEF 3 and not WEF 1)	Good day Josua and Matodzi, Please may you clarify what you mean by “Sheepmoor WEF 2”. The only projects proposed are the Emvelo Wind Energy Facility and the Sheepmoor Wind Energy Facility. The previously proposed Rochdale Wind Energy Facility application has been withdrawn. Nor is a Sheepmoor WEF 3 proposed. The refinement and micro siting of wind turbines and associated infrastructure, for each facility, will not impact the process of the associated applications. As discussed, in order to apply for environmental authorisation for linear infrastructure, the current EIA regulations do not require the applicant to obtain Landowner consent. That being said, the applicant will consider landowner willingness to be a part of the project when compiling the final layout. Overhead line infrastructure is regarded as Linear Infrastructure. The applicant is not aware of the meeting request you reference. Please be sure to direct requests for engagements, in relation to

				Regarding comment on liniere infra structure, by implication you said that private landowners got no right on their own property and that this current layout drawings is not the paper worth that it is written on? Does your comment on liniere infra structure also refer to the transmission line that crosses my private property that no permission is required to do so? Facts about meeting on 4/02/25 at Mr Jan Robberts house - Mulilo did not invite me as IAP. I was present on Mr Jan Robberts request because he did not trust the integraty of Mulilo's representatives and needed me as witness. - Meeting requested with Mr Johans van Wyk of Mulilo and specialist on 19/02/25 was denied the same day. No use in meeting after comments deadline.	this application, from the EAP, or keep the EAP in CC. The applications are still within the Public Participation Phase and the applicant has informed the EAP that they are available for a meeting at the I&APs earliest convenience. If you are unfortunately not available during the Public Participation phase, the applicant will endeavour to accommodate your availability and include your comments in the Public Participation record.
	Megan Govender	04 April 2025	Initial Draft EIA	From: Megan Govender <megan.govender@enertrag.com> Sent: Friday, April 4, 2025 10:45 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; EIA Applications <EIAApplications@dffe.gov.za> Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Good Day Please find attached comments for the Sheepmoor and Emvelo Wind Energy Facilities. Kind Regards, Megan Kim Govender	

				Senior Project Developer Attachment: ZA CD ESA Comment on Emvelo WEF_ Final 20250403.docx	
				ENERTRAG South Africa (Pty) Ltd ("ENERTRAG") hereby notes the contents of the Draft Environmental Impact Assessment Report for the Emvelo WEF dated 10 March 2025 (the Draft "EIAR"), which includes application for a 132kV Overhead Powerline (the "OHPL") connecting the on-site substation to the Eskom grid via the Camden B Main Transmission Substation.	
				Kindly note that ENERTRAG has secured the following Environmental Authorisations for the development of the following renewable energy facilities near Ermelo Mpumalanga: Camden I Wind Energy Facility (WEF) and associated infrastructure Reference: 14/12/16/3/3/2/2137; 3.2 Camden II WEF and associated infrastructure Reference: 14/12/16/3/3/2/2135; 3.3 Camden I Solar Energy Facility (SEF) and associated infrastructure, Reference: 14/12/16/3/3/2/2136 ("Camden I SEF"); 3.4 Camden up to 400kV grid connection, common collector substation and associated infrastructure Reference: 14/12/16/3/3/2/2134; 3.5 Camden I WEF grid connection up to 132kV and associated infrastructure Reference: 14/12/16/3/3/1/2769; 3.6 Camden II WEF grid connection up to 132kV and associated infrastructure Reference: 14/12/16/3/3/1/2887, and	

				Amendment Reference: 14/12/16/3/3/1/2887/AM1; and 3.7 Camden I SEF grid connection up to 132kV and associated infrastructure DFFE EA Reference: 14/12/16/3/3/1/2768 (Camden I SEF Grid). (collectively the "Camden Renewable Energy Cluster").	
				4. The Camden Renewable Energy Cluster is located south-west of the proposed Emvelo WEF. In terms of the Draft EIAR the OHPL for the Emvelo WEF will be approximately 30 km and will traverse thirty five land parcels. The Draft EIAR specifies one preferred OHPL route and outlines three proposed alternative OHPL routes.	
				5. The third proposed OHPL route, Alternative 3 OHPL, traverses the layout for the authorised Camden I SEF as well as the authorised Camden I SEF Grid on Portion 1 of the Farm Welgelegen 322. ENERTRAG accordingly does not support the proposed Alternative 3 OHPL route.	
				6. In the event that the Alternative 3 OHPL route becomes the approved route, we remain open to engaging with the applicant in respect of the proposed Emvelo WEF pursuant to reaching a mutually beneficial outcome.	
2	Restrov Boerdery (NWJ Vorster Trust)	04 April 2025	Draft Scoping Phase	From: Retsrov Boerdery <vorsterboerdery@lantic.net> Sent: Friday, April 4, 2025 10:30 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: 0684401 Mulilo WEF-cluster Goodday,	Good day, Thank you for your email. We hereby acknowledge receipt of your request to register NWJ Vorster Trust (NWJ Vorster & AE Vorster) as an Interested and Affected Party (I&AP) for the project. Kindly note that your contact details will be added to the I&AP database.

				NWJ Vorster Trust (NWJ Vorster & AE Vorster) do hereby wish to register as I&AP. Any documentation can be delivered to this email address. Adelma Vorster – Director at Retsrov Boerdery - Pikkie Vorster Sel: 083 291 4843 Sel: 0739557710 Email: vorsterboerdery@lantic.net Email: vorsterboerdery@lantic.net	Please find attached the formal notice, which includes a link to download all relevant project documentation for your review and records.
3	Mpilo Masondo	04 April 2025	Draft Scoping Phase	From: Mpilo Masondo <MasondMM@ntcsa.co.za> Sent: Friday, April 4, 2025 5:32 PM To: Mpho Malema <mpho.malema@erm.com> Subject: RE: Reminder: Draft EIA Reports Available for Comment – Sheepmoor and Emvelo Wind Energy Facilities Good day Mpho, Please could you send the kmz shapefile(s) of the proposed projects so that we can see whether they affect any of our current or future projects. Regards, Mpilo	Hi Mpilo, I hope you are well. Kindly receive the attached kmz files as per your request. Please do not hesitate to contact us should you need any further information or clarity.
4	Bathandwa Ncube	03 April 2025	Draft Scoping Phase	From: Bathandwa Ncube <BNcube@dffe.gov.za> Sent: Thursday, April 3, 2025 11:12 AM To: Stephen Burton <Stephen.Burton@erm.com>; GCowden <GCowden@mpg.gov.za>; ERM Arcus Amsterdam	Good day Bathandwa, Many thanks for attached attendance register. Best Regards,

				<ERM.ArcusAmsterdam@erm.com>; Andrew Pearson <andrew@mulilo.com>; Lloyd Barnes <lloyd@mulilo.com>; Masina Morudu <memorudu@dffe.gov.za>; Portia Makitla <PMakitla@dffe.gov.za>; Mashudu Mudau <MaMudau@dffe.gov.za>; Nompumelelo Lekalakala <NLekalakala@dffe.gov.za>; SB. Mbuyane <MbuyaneSB@mpg.gov.za>; R Luyt <rluyt@mpg.gov.za>; Albert Froneman <Albert@afriavian.com>; reth@mulilo.com; joth@mulilo.com; oqfakude@mpg.gov.za Subject: RE: RE: Site visit request: 14/12/16/3/3/2/2611; 2612;2613: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP Goodmorning Thank you for attending the site visit yesterday. Please find attached, attendance register. Kind regards Ms Bathandwa Ncube	
5	Khululwa Matshoba	04 April 2025	Draft EIA phase	From: Khululwa Matshoba <StuurmKV@ntcsa.co.za> Sent: Friday, April 4, 2025 5:07 PM To: Mpho Malema <mpho.malema@erm.com> Subject: RE: Reminder: Draft EIA Reports Available for Comment – Sheepmoor and Emvelo Wind Energy Facilities Dear Mpho Please share the kmz files so that we may check if our files are impacted. Thank you.	Dear Khululwa Matshoba, I hope this email finds you well. Kindly receive the attached kmz files as per your request. Please do not hesitate to contact us should you need any further information or clarity. Kind regards

				Warm regards Khush	
6	Eleanor Richardson	31 March 2025	Draft EIA Phase	From: Eleanor Richardson <richardsonpeplow@gmail.com> Sent: Monday, March 31, 2025 3:22 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: Complete bat specialist reports needed Good afternoon ERM, Please could I have the complete bat specialist reports for both proposed Emvelo and Sheepmoor WEFs (Amsterdam cluster)? The reports on the website https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/ are missing all the figures and appendices. Many thanks, Kate Richardson	Good morning, I hope this email finds you well. Kindly receive the attached as requested. Please let me know if you need any further information or clarification. Kind regards Attachments in PDF: 1. Appendix 1 Figures 2. Appendix 1 Figures_ 3. Appendix 2 Specialist CV 4. Appendix 3 eia.specialistdeclaration2023aug(003)_Emvelo 5. Appendix 3 eia.specialistdeclaration2023aug(003)_sheepmoor 6. Appendix 4 Aronson_ SACNASP 7. Appendix 2 Specialist CV
7	Matodzi Albert Silidi	31 March 2025	Draft EIA Phase	From: Matodzi Albert Silidi <Matodzi@summersinc.co.za> Sent: Monday, March 31, 2025 11:15 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Mpho Malema <mpho.malema@erm.com> Cc: Stephen Burton <Stephen.Burton@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>;	Dear Matodzi, I hope this email finds you well. As per our telephone conversation, please note that your request for the documents has been duly noted. As mentioned, the EAP is currently on-site and will provide the documents as soon as they return to the office. Apologies for the delay, and thank you for your patience.

				Reception – Richard Summers Inc. <Reception@summersinc.co.za>; Richard Summers <Richard@summersinc.co.za>; Clarice Arendse <clarice@summersinc.co.za> Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province EXTERNAL MESSAGE Dear Mpho Please refer to my email of 28 March 2025 We have specifically requested the Bat specialist report with the Appendices referred to in the report, and these are Appendix 1: Figures Appendix 2: Specialist V Appendix 3: Specialist Declaration Appendix 4: SACNASP Certificate	From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Sent: Monday, April 7, 2025 10:36 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Matodzi Albert Silidi <Matodzi@summersinc.co.za> Cc: Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com> Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Good day, Please see attached documents as requested. Kind regards Attachment: Bat Specialits Appendices.zip
8	Josua Meyer	29 March 2025	Draft EIA Phase	From: Josua Meyer <meyerjosua55@gmail.com> Sent: Saturday, March 29, 2025 11:44 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: Re : Draft EIA report for EMVELO and SHEEPMOOR proposed wind farms - URGENT - Email of 11/3/2025 refers Still waiting for the data recovered from the two tagged MARTIAL EAGLES	Dear Mr Meyer, RE: Please see below formal communications from Mulilo pertaining the Amsterdam Wind Energy Project. Thank you for your inquiry and for your evident dedication to the conservation and understanding of Martial Eagles. We appreciate your interest in this species and acknowledge the depth of care you have expressed in your request. As this is a protected species, the tracking data related to Martial Eagle flights, nesting locations, and movements is sensitive information that must be managed responsibly. Mulilo Renewable Project Developments, in partnership with the Endangered Wildlife Trust (EWT) is the custodian of the Data, and access to it is subject to strict regulatory and ethical considerations. We also

				This delay to provide required data by ERM will affect the submission date for comments on the above project. We need at least 15 working days to verify and analyze the data before we can submit our comments. We appreciate your urgent attention	note that your request to use this data in assessing the proposed buffer distances would not provide your specialist with the necessary insights. The buffer proposed by the project's avifaunal specialist in the draft environmental Impact Assessment was not solely based on tracking data, but included a combination of the following information/data/insights: • Proprietary commercial Data from our met mast; • Findings, data and in-depth site experiences gained by the specialist from the long-term bird monitoring program conducted before tracking began, following South African bird monitoring guidelines; and • An additional focal point survey of the nest itself, over a number of months including substantial observed and documented flight paths; and Detailed site specific vegetation and habitat mapping and modelling. Given this, the specific tracking data you have requested would not contribute meaningfully to further understanding or reassessment of the proposed buffer zones. A second specialist, without the above mentioned information and experience, is unlikely to arrive at a similar or meaningful conclusion of the recommended buffer size and shape. Furthermore, it must be noted that the project specialist, as required by the NEMA EIA regulations, is independent of the applicant, is SACNASP registered, and has complied with all guideline requirements to obtain an informed buffer and set of recommendations for the project. Additionally, under the National Environmental Management: Biodiversity Act (NEMBA), this tracking program is classified as bioprospecting. Accessing or conducting research on such data requires a permit, which neither you nor your specialist have provided. Without the necessary permit, we are unable to share this information.
9	Matodzi Albert Silidi	28 March 2025	Draft EIA Phase	From: Matodzi Albert Silidi <Matodzi@summersinc.co.za> Sent: Friday, March 28, 2025 9:28 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>;	EAP accepted phone call from Matodzi, providing requested documents on Monday the 31st March 2025. Dear Matodzi,

				Stephanie Gopaul <Stephanie.Gopaul@erm.com> Cc: Stephen Burton <Stephen.Burton@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>; Reception – Richard Summers Inc. <Reception@summersinc.co.za>; Richard Summers <Richard@summersinc.co.za>; Clarice Arendse <clarice@summersinc.co.za>; Mpho Malema <mpho.malema@erm.com> Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Hi Lucien/ Stephanie Thank you for providing the copies of the comments. Could you kindly send us the complete Bat Specialist Report, including the figures, as the version in your package excluded them Kind regards,	I hope this email finds you well. As per our telephone conversation, please find attached the appendices related to the bat specialist reports that were previously sent. Please let me know if you need any further information. Kind regards From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Sent: Monday, April 7, 2025 10:36 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Matodzi Albert Silidi <Matodzi@summersinc.co.za> Cc: Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com> Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Good day, Please see attached documents as requested. Kind regards Attachment: Bat Specialits Appendices.zip
10	Bathandwa Ncube	28 March 2025	Draft EIA Phase	From: Bathandwa Ncube <BNcube@dffe.gov.za> Sent: Friday, March 28, 2025 12:42 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Andrew Pearson <andrew@mulilo.com>; Lloyd Barnes <lloyd@mulilo.com> Cc: Albert@afriavian.com; Mashudu Mudau	This comment has been duly noted.

				<MaMudau@dffe.gov.za>; Masina Morudu <memorudu@dffe.gov.za>; Nompumelelo Lekalakala <NLekalakala@dffe.gov.za>; Portia Makitla <PMakitla@dffe.gov.za>; Thivhulawi Nethononda <TNETHONONDA@dffe.gov.za>; mervyn.lotter@gmail.com; GCowden <GCowden@mpg.gov.za>; R Luyt <rluyt@mpg.gov.za>; SB. Mbuyane <MbuyaneSB@mpg.gov.za> Subject: RE: RE: RE: Site visit request: 14/12/16/3/3/2/2611; 2612;2613: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP Goodday Stephen Thank you for the itinerary. We will see how the day goes, but as stated by Robyn, we may have to end the site visit earlier, as we also have to travel back to Pretoria. Kind regards Bathandwa	
11	Matodzi Albert Silidi	28 March 2025	Draft EIA Phase	From: Matodzi Albert Silidi <Matodzi@summersinc.co.za> Sent: Friday, 28 March 2025 09:28 To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com> Cc: Stephen Burton <Stephen.Burton@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>; Reception – Richard Summers Inc. <Reception@summersinc.co.za>; Richard Summers <Richard@summersinc.co.za>; Clarice Arendse	Good day, Please see attached documents as requested. Kind regards Attachments to email as PDF: 1. Appendix 1 Figures_ 2. Appendix 1 Figures

				<clarice@summersinc.co.za>; Mpho Malema <mpho.malema@erm.com> Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Hi Lucien/ Stephanie Thank you for providing the copies of the comments. Could you kindly send us the complete Bat Specialist Report, including the figures, as the version in your package excluded them Kind regards,	
12	Robyn Luyt	27 March 2025	Draft EIA Phase	From: Robyn Luyt <rluyt@mpg.gov.za> Sent: Thursday, March 27, 2025 2:56 PM To: BNcube@dffe.gov.za; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Gavin Cowden <GCowden@mpg.gov.za>; Andrew Pearson <andrew@mulilo.com>; Lloyd Barnes <lloyd@mulilo.com> Cc: Albert@afriavian.com; MaMudau@dffe.gov.za; memorudu@dffe.gov.za; NLekalakala@dffe.gov.za; PMakitla@dffe.gov.za; TNETHONONDA@dffe.gov.za; mervyn.lotter@gmail.com; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; complaints@msukaligwa.gov.za; celia@mtpa.co.za; celia.dewaal@mtpa.co.za; frans.krige@mtpa.co.za;	Noted. Itinerary was adjusted accordingly.

				johan@mtpa.co.za; khumbelo.malele@mtpa.co.za; mervyn@mtpa.co.za Subject: Re: RE: RE: Site visit request: 14/12/16/3/3/2/2611; 2612;2613: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP Dear Stephen, Gavin and I will be traveling together from Nelspruit. The trip to Ermelo for us will be just under 3hrs. Because of poor night vision I'm averse to driving in the dark, but will try to get to Holbank by 08h30. I'm more concerned about our trip back to Nst. I have a Subaru Crosstrek (all wheel drive but not the clearance of an SUV / bakkie); I would not want to leave Ermelo after 14h00, so it may be best for us to leave to get back to Nelspruit from Holbank at the proposed 12h00 slot. Kind Regards Robyn	
13	Gavin Cowden	27 March 2025	Draft EIA Phase	From: Gavin Cowden <GCowden@mpg.gov.za> Sent: Thursday, March 27, 2025 7:21 AM To: BNcube@dffe.gov.za; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Andrew Pearson <andrew@mulilo.com>; Lloyd Barnes <lloyd@mulilo.com> Cc: MaMudau@dffe.gov.za; memorudu@dffe.gov.za;	Dear All, For those that have confirmed their attendance at the site visit next Wednesday (02nd April 2025) please see attached a high level itinerary, as well as a number of kmz's that the client has kindly provided to guide you to the meeting start point and the various features of the site. Please could we ask that you try to make the site visit start time or let us know if you are running late for some reason. @Gavin Cowden, would you be able to make it to Holbank River Lodge, or do you still need a pickup?

				NLekalakala@dffe.gov.za; PMakitla@dffe.gov.za; TNETHONONDA@dffe.gov.za; mervyn.lotter@gmail.com; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; Robyn Luyt <RLuyt@mpg.gov.za>; complaints@msukaligwa.gov.za; celia@mtpa.co.za; celia.dewaal@mtpa.co.za; frans.krige@mtpa.co.za; johan@mtpa.co.za; khumbelo.malele@mtpa.co.za; mervyn@mtpa.co.za Subject: Re: RE: Site visit request: 14/12/16/3/3/2/2611; 2612;2613: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP EXTERNAL MESSAGE Morning Stephen, Re the site visit next week - please advise where we are meeting and what time ? Also - I am not sure of the conditions of the roads in that area after the rains but is it maybe possible to get a lift to site (from Ermelo ?) with someone that has a 4x4 ? Many thanks Kind regards Gavin	Please let us know if you have any queries.
14	Bathandwa Ncube	25 March 2025	Draft EIA Phase	From: Bathandwa Ncube <BNcube@dffe.gov.za> Sent: Tuesday, March 25, 2025 9:24 AM To: Stephen Burton <Stephen.Burton@erm.com>; ERM Arcus	This comment has been duly noted.

				Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Masina Morudu <memorudu@dffe.gov.za>; Mashudu Mudau <MaMudau@dffe.gov.za>; Nompumelelo Lekalakala <NLekalakala@dffe.gov.za>; Portia Makitla <PMakitla@dffe.gov.za>; Thivhulawi Nethononda <TNETHONONDA@dffe.gov.za>; SB. Mbuyane <MbuyaneSB@mpg.gov.za>; R Luyt <rluyt@mpg.gov.za>; GCowden <GCowden@mpg.gov.za>; Andrew Pearson <andrew@mulilo.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com> Subject: Site visit request: 14/12/16/3/3/2/2611; 2612;2613: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP Goodday Stephen Thank you for your response. 1. The withdrawal request for Rochdale WEF (14/12/16/3/3/2/2612) was received and EIA admin will confirm with you in due time. 2. Communication from MTPA regarding their unavailability for the site visit is noted. 3. The site visit is confirmed, and we have finalised our bookings. We will arrive in Ermelo on Tuesday, 01 April 2025, for the site visit on the 02 April 2025. Please note my cellphone number below. Kind regards	

15	BC Admin DFFE	25 March 2025	Draft EIA Phase	From: BC Admin <bcadmin@dffe.gov.za> Sent: Tuesday, March 25, 2025 3:21 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Portia Makitla <PMakitla@dffe.gov.za>; Nompumelelo Lekalakala <NLekalakala@dffe.gov.za>; Lindiwe Victoria Dlamini <LVDlamini@dffe.gov.za> Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Dear Sir/Madam DFFE Directorate: Biodiversity Conservation hereby acknowledge receipt of the invitation on the 10 March 2025 to review and comment on the project mentioned on the subject line. Kindly note that the project has been allocated to Mrs P Makitla and Ms Nompumelelo Lekalakala (Copied on this email). In addition, kindly share the shapefiles of the development footprints/application site with the Case Officers. Please note: All Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries must be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@dffe.gov.za for attention of Mr Seoka Lekota	Good day, Please see attached Shapefiles as requested. Kind regards
16	Josua Meyer	25 March 2025	Draft EIA Phase	From: Josua Meyer <meyerjosua55@gmail.com> Sent: Saturday, March 29, 2025 12:26 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>	Good day Mr Josua Meyer,

				Subject: Re : Draft EIA report for EMVELO and SHEEPMOOR proposed wind farms It came to my attention that Mr Jan Robberts and Mr Pikkie Vorster are not part of the Sheepmoor WEF anymore as confirmed in writing by Mlilo. Does that mean that the layout is going to change again - WTG39 falls away? - Sheepmoor WEF 2 also falls away? - What is the influence on Sheepmoor WEF 1? According to the owner of Windhoek farm, Mr Braam Moodie, Mlilo hasn't got any permission for the MW cable routing between Sheepmoor 1 & 2 that crosses his property and will not be given. Alternative route? There is also no permission for the internal roads between WTG 39 and WTG 31 and between WTG 40 and WTG 41 which crosses my properties. Alternative route? Also the preferred transmission line crosses my property Waaihoek 4/286, 12/286 and 3/286 without permission. Permission will never be grand and an alternative route needs to be investigated and resubmitted for comments. Mlilo refuses meeting requests with the parties. Did Mlilo base this application on assumptions? Urgent clarification required for comments.	Thank you for your comment. We would like to address the concerns you raised. In terms of the layout, there will indeed be changes, and WTG39 will likely be removed. However, the Sheepmoor WEF will continue without WTG39, and the proposed Sheepmoor WEF will not be dropped. The project will still move forward with the revised layout. Regarding the linear infrastructure, including the MW cable and internal roads, the current regulations does not require the applicant to obtain landowner consent for these elements. That being said, the applicant will explore alternative routes where needed and will consider all options when finalizing the layout. We also want to clarify that the applicant has not refused meeting requests. In fact, Applicant representatives met with yourself and other IAP Landowners on-site on the 4th of February 2025 to discuss the project. If you or any other concerned parties would like a meeting, please let us know, and we will be happy to arrange one. Kind Regards,

17	Matodzi Albert Silidi	24 March 2025		From: Matodzi Albert Silidi <Matodzi@summersinc.co.za> Sent: Monday, March 24, 2025 2:08 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Mpho Malema <mpho.malema@erm.com> Cc: Stephen Burton <Stephen.Burton@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com> Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Hi Lucien Would you kindly send the copies of the comments. I have read those extracts on the report already but needed the whole copy. I might have confused when I responded by saying "on the scoping report" and was of the idea that you will attach the copies Kind regards, Matodzi A. Silidi	Good day Matodzi, Please see copies of comments as requested. Kind Regards Below list of PDFs Attached to mail: 1. Mulilo Amsterdam WEFS DSR Comments 2. Comments SR Emvelo WEF 5G-30 3. Comments SR Sheepmoor WEF 5G-30 4. Comments SR Rochdale WEF 5G-30 5. LUA24-3966 obj. Emvelo

						WEF infrastructure Draft SR ERM 6. LUA 24-2967 MPTA objection DSR Sheepmor WEF ERM 7. LUA24-6965 Rochdale Wind Energy (Draft Comments)
18	Mervyn Lotter	24 March 2025	Draft EIA Phase	From: Mervyn Lotter <mervyn.lotter@gmail.com> Sent: Monday, March 24, 2025 6:33 PM To: Stephen Burton <Stephen.Burton@erm.com> Cc: Bathandwa Ncube <BNcube@dffe.gov.za>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>; Andrew Pearson <andrew@mulilo.com>; Lloyd Barnes <lloyd@mulilo.com>; Masina	This comment has been Duly noted.	

				Morudu <memorudu@dffe.gov.za>; Mashudu Mudau <MaMudau@dffe.gov.za>; complaints@msukaligwa.gov.za; Nompumelelo Lekalakala <NLekalakala@dffe.gov.za>; Portia Makitla <PMakitla@dffe.gov.za>; Thivhulawi Nethononda <TNETHONONDA@dffe.gov.za>; SB. Mbuyane <MbuyaneSB@mpg.gov.za>; R Luyt <rluyt@mpg.gov.za>; celia@mtpa.co.za; GCowden <GCowden@mpg.gov.za>; celia.dewaal@mtpa.co.za; mervyn@mtpa.co.za; frans.krige@mtpa.co.za; khumbelo.malele@mtpa.co.za; johan@mtpa.co.za Subject: Re: Site visit request: 14/12/16/3/3/2/2611; 2612;2613: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP Dear Stephen Please note that the MTPA would be unable to participate in the upcoming site visit due to cost curtailment measures. However, we will review the documentation and specialist reports and comment accordingly. Kind regards Mervyn	
19	Matodzi Albert Silidi	24 March 2024	Draft EIA Phase	From: Matodzi Albert Silidi <Matodzi@summersinc.co.za> Sent: Monday, March 24, 2025 11:06 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; EIA Applications <EIAApplications@dffe.gov.za>;	Good day Matodzi, Please see the following locations within Public Participation Reports Volume III for requested comments: Emvelo

				Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Mpho Malema <mpho.malema@erm.com> Cc: Clarice Arendse <clarice@summersinc.co.za>; Richard Summers <Richard@summersinc.co.za>; Reception – Richard Summers Inc. <Reception@summersinc.co.za> Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Dear Stephanie Please send us the comments from DFFE Biodiversity section, Department of Agriculture, Rural Development, Land and Environmental Affairs (DARDLEA) and Mpumalanga Tourism and Parks Agency (MTPA) Kind regards, Matodzi A. Silidi	TABLE 7-4 COMMENTS AND RESPONSE TABLE ON NEW APPLICATION FOR DRAFT SCOPING PHASE RECEIVED FROM DARDLEA (20 SEPTEMBER 2024) TABLE 7-3 COMMENTS AND RESPONSE TABLE ON NEW APPLICATION FOR DRAFT SCOPING PHASE RECEIVED FROM MTPA (20 SEPTEMBER 2024) TABLE 7-4 COMMENTS AND RESPONSE TABLE ON NEW APPLICATION FOR DRAFT SCOPING PHASE RECEIVED FROM BIODIVERSITY CONSERVATION (13 AUGUST 2024) Sheepmoor TABLE 7-2 COMMENTS AND RESPONSE TABLE ON NEW APPLICATION FOR DRAFT SCOPING PHASE RECEIVED FROM MPUMALANGA TOURISM AND PARKS AGENCY (18 SEPTEMBER 2024) TABLE 7-3 COMMENTS AND RESPONSE TABLE ON NEW APPLICATION FOR DRAFT SCOPING PHASE RECEIVED FROM DARDLEA (17 SEPTEMBER 2024) TABLE 7-4 COMMENTS AND RESPONSE TABLE ON NEW APPLICATION FOR DRAFT SCOPING PHASE RECEIVED FROM BIODIVERSITY CONSERVATION (13 AUGUST 2024) Thank you,
20	Matodzi Albert Silidi (Summersinc)	20 March 2025	Draft EIA Phase	From: Matodzi Albert Silidi <Matodzi@summersinc.co.za> Sent: Thursday, March 20, 2025 7:01 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; EIA Applications <EIAApplications@dffe.gov.za>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>	Dear Matodzi, We acknowledge receipt of your correspondence dated 20 March 2025 regarding your request for an extension of the commenting period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities.

				Cc: Clarice Arendse <clarice@summersinc.co.za>; Richard Summers <Richard@summersinc.co.za>; Reception – Richard Summers Inc. <Reception@summersinc.co.za> Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Dear Stephanie See attached letter for your urgent attention. Kind regards, Matodzi A. Silidi Dear Sir/Madam, RE: NOTIFICATION OF SUBMISSION OF DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORTS FOR PUBLIC REVIEW AND COMMENT FOR THE PROPOSED SHEEPMOOR AND EMVELO WIND ENERGY FACILITIES, MPUMALANGA PROVINCE [DFFE Reference Numbers: 14/12/16/3/3/2/2611 and 14/12/16/3/3/2/2613] 1. We represent Mr. Josua Meyer, who is a registered I&AP in connection with the above applications. 2. On 10 March 2025 we received the notification sent to interested and affected parties ('I&APs') regarding the current 30-day period for I&APs to review and comment on the abovementioned Draft Environmental Impact Assessment Reports and specialist reports for the above	We recognize the concerns raised regarding the volume and technical complexity of the documentation. However, we regret to inform you that we are bound by the statutory timeframes prescribed in the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended). As per Regulation 3(8) of the EIA Regulations, a minimum of 30 days is required for public participation during the review and comment period. While the Regulations allow for an extension in specific circumstances, the overall project timeline and legislated approval process do not permit an extension beyond the prescribed 30-day timeframe in this instance. Regulatory Framework Governing Public Participation The public participation process (PPP) for this project has been conducted in full compliance with the National Environmental Management Act (NEMA), 1998 (Act No. 107 of 1998) and the EIA Regulations, 2014. The notification of the commenting period was issued in accordance with legal requirements to ensure that Interested and Affected Parties (I&APs) were duly informed and provided with an opportunity to participate. The timing of the process was determined in alignment with the overall project schedule, which must adhere to strict regulatory deadlines. Clarification on the 30-Day Commenting Period When the EIA Regulations specify a minimum of 30 days for public comment, it means: • Legally Required Baseline: The Environmental Assessment Practitioner (EAP) must allow at least 30 days for I&APs to review and submit comments on the Draft EIA Report. This is the shortest legally permissible timeframe. We understand that appointment of legal or other representatives by I&APs are done at the discretion, cost and in the timeframe of the IAP needing representation and this does should ideally be done earlier on in the EIA process- however this is something that is outside of the control of the EAP and in this case, there isn't an opportunity to extend the commenting timeframe on the draft EIA as it cannot be accommodated by the overall process.

				mentioned project comprising of two (2) separate WEF projects. According to your notice the commenting period would run until 10 April 2025. 3. We hereby request additional time for the commenting period and associated public participation process for the reasons set out below: 3.1. The documentation provided to I&APs is voluminous, viz, Emvelo is in excess of 2600 pages whilst Sheepmoor is on excess of 2800 pages, all of which will need to be reviewed in order for I&APs to meaningfully comment on the abovementioned reports and to enable engagement in the scoping and environmental impact assessment processes in a manner that is fair, meaningful and promotes the right to administrative justice enshrined in section 33 of the Constitution of the Republic of South Africa, 1996. 3.2. Restricting I&APs timeframes for comment to 30 days – as the bare minimum statutory period - in these circumstances undermines the ability of I&APs ability to interrogate the various specialist reports to ensure that I&APs provide meaningful inputs into the EIA process. Regulation 3(8) of the EIA Regulations provides for a 30-day period as bareminimum period for which public participation may be conducted. This does not mean that a 30-day period is appropriate in all circumstances. 3.3. Limiting the commenting period to 30 days not only flies in the face of	• Extension is Possible but Not Guaranteed: While the Regulations provide for longer periods in certain circumstances (e.g., highly technical reports, public holidays, or large-scale projects), an extension is not automatic and depends on project timelines, regulatory constraints, and is granted at the discretion of the competent authority (DFFE). • Fixed Project Timelines: Any extension must align with the broader regulatory approval process. If an extension would jeopardize key project milestones, including submission deadlines to the competent authority, it cannot be accommodated. We acknowledge your concerns that public holidays may affect availability; however, given the constraints of the statutory process, we are unable to extend the commenting period beyond the legislatively mandated timeframe. We encourage I&APs to submit their comments within the stipulated timeframe and remain available to assist with any clarifications or additional information required to facilitate meaningful participation. Should you have any further queries, please do not hesitate to contact us. Kind Regards

				procedural fairness but also offends our client's right to administrative justice, is inappropriate, unreasonable and unjust. 4. In light of the above, it is not reasonable to expect I&APs to digest that level of detailed (and highly technical) information and to be able to comment within the stipulated timeframe of 30 days. Our client obviously would wish to consult with its own specialists, some of whom are not really available at such short notice. 5. We therefore request an additional 30 days over and above the comment period advertised (i.e. a total of a 60-day commenting period) which would expire on 15 May 2025 in order to facilitate meaningful public engagement. By way of equivalent example we are advising clients in connection with several pending NEMA applications in which the public comment period is running over the April slash Easter holiday time frame and for that reason the EAP in connection with that project has extended the public comment period into mid-May 2025 to account for the potential prejudice. 6. Our client finds it deeply concerning that the EAP has elected to release public comment notification for these two projects during the period marked by Human Rights Day, the Easter holidays, Freedom Day as well as Worker's Day. The net result of your approach in this regard is that you are effectively depriving I&APs of a reasonable opportunity for a thorough review and response to the voluminous information. This practice places an undue burden on I&APs and significantly limits	

				their ability participate fairly in the application process. 7. Our client considers this approach to be unreasonable and in bad faith, as it undermines the principle of fair and inclusive stakeholder engagement. 8. We look forward to hearing from you. Yours faithfully, RICHARD SUMMERS INC.	
21	Matodzi Richard Synners INC	19 March 2025 Per email	Draft Scoping Phase	From: Richard Summers <Richard@summersinc.co.za> Sent: Wednesday, March 19, 2025 1:09 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; EIA Applications <EIAApplications@dffe.gov.za> Cc: Stephanie Gopaul <stephanie.gopaul@erm.com>; Clarice Arendse <clarice@summersinc.co.za>; Reception – Richard Summers Inc. <Reception@summersinc.co.za> Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Importance: High Dear Stephanie Please send us the kmz files for all the turbines in respect of both Projects. Kind regards Richard Summers	Good morning Richard, I hope this email finds you well. Kindly find the attached KMZ files as per your request. Should you require any further information or clarification, please do not hesitate to contact me.

22	Josua Meyer	19 March 2025	Draft EIA Phase	From: Josua Meyer <meyerjosua55@gmail.com> Sent: Wednesday, March 19, 2025 5:36 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province EXTERNAL MESSAGE Good day The following figures refer to in the bat specialist reports for Emvelo and Sheepmoor WEF outstanding FIGURE 1, FIGURE 3 and FIGURE 5 Appreciate if it can be submit ASAP. Thanks	Good morning Joshua, I hope this email finds you well. Kindly find the attached bat specialist figures as requested. Please let me know if you need any further information or clarification. Kind regards
23	Bathandwa Ncube	19 March 2025 Draft EIA phase	Draft EIA Phase	From: Bathandwa Ncube <BNcube@dffe.gov.za> Sent: Wednesday, March 19, 2025 2:36 PM To: Stephanie Gopaul <stephanie.gopaul@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>; Andrew Pearson <andrew@mulilo.com> Cc: Masina Morudu <memorudu@dffe.gov.za>; Mashudu Mudau <MaMudau@dffe.gov.za>; complaints@msukaligwa.gov.za; Nompumelelo Lekalakala <NLekalakala@dffe.gov.za>; Portia Makitla <PMakitla@dffe.gov.za>; Thivhulawi Nethononda	Dear Bathandwa, Thank you for your email regarding the proposed site visit on the 2nd of April 2025. With regards to your specific queries, please note the responses below: 1.We have submitted a withdrawal request for Rochdale WEF (14/12/16/3/3/2/2612) and are awaiting the confirmation of the withdrawal status from the EIA Applications desk. 2.Your invitation to the other officials is noted, thank you. 3. Mulilo is in the process of compiling a high-level itinerary for the site visit (with specific emphasis on key environmental features and an estimated start and end time), but we can note

				<TNETHONONDA@dffe.gov.za>; mervyn.lotter@gmail.com; SB. Mbuyane <MbuyaneSB@mpg.gov.za>; R Luyt <rluyt@mpg.gov.za>; celia@mtpa.co.za; GCowden <GCowden@mpg.gov.za>; celia.dewaal@mtpa.co.za; mervyn@mtpa.co.za; frans.krige@mtpa.co.za; khumbelo.malele@mtpa.co.za; johan@mtpa.co.za Subject: Site visit request: 14/12/16/3/3/2/2611; 2612;2613: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP EXTERNAL MESSAGE Dear EAP and Applicant 14/12/16/3/3/2/2611: THE PROPOSED DEVELOPMENT OF THE EMVELO WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE 14/12/16/3/3/2/2612: THE PROPOSED DEVELOPMENT OF THE ROCHDALE WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, INCLUDING A GRID CONNECTION, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE 14/12/16/3/3/2/2613: THE PROPOSED DEVELOPMENT OF THE SHEEPMOOR WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE	that ablutions will be an issue while on site, as the nearest public facilities are in Ermelo itself. 4. We also note that the site requires 4x4 vehicles if possible, but a high-clearance vehicle as a minimum. Please can you confirm via return email that the 2nd of April is now booked from your end for the site visit, as we wish to organise all logistics accordingly. Please let me know if you have any queries regarding the above.

				As per my earlier communication with Mr Lucien Barbeau, the Department requests a site visit for the above-mentioned applications, as per the details below: Date : Wednesday, 02 April 2025 Proposed time : To be confirmed Meeting place : Near Ermelo (exact location to be confirmed) Please note the following: 1.It is noted that the DEIAr for the proposed development of the Rochdale WEF (14/12/16/3/3/2/2612) has not been submitted to the Department. 2.An invitation to the site visit has been extended to officials from: a. DFFE: Integrated Environmental Authorisations; Biodiversity Conservation and Protected Areas sections. b. Mpumalanga DARDLEA c. MTPA 3. You are requested to propose a high-level itinerary for the site visit (meeting location; meeting time; brief introduction and signing of the attendance register; proposal of site to be inspected first and last; key environmental features to be observed on each site; estimated end time; access to ablutions etc). Officials who want to observe specific areas on site will communicate this. 4. Please indicate the accessibility of the sites- vehicle requirements (any vehicle/ high-clearance/ 4x4 etc.)	

				For any further queries, please contact me on the details below. Looking forward to hearing from you. Kind regards	
25	Chrisna Calitz	11 March 2025	Draft EIA Phase	From: Calitz, Chrisna Judith <Ccalitz@MSUKALIGWA.GOV.ZA> Sent: Tuesday, March 11, 2025 7:11 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Good day I see that you put the address for the Ermelo Public Library as Wedgewood avenue. THIS IS WRONG The Physical address for the Ermelo PL is: Msukaligwa Municipality Civic Centre, Ermelo Entrance on c/o Church and Smuts street.	Good day Sindy, Thank you for your query. The report content of the versions you have has not changed with the resubmission, other than the amendment of the dates of public participation (PP), and thus the versions you have can be used to confirm receipt if you are happy to do so. Additional copies of the reports (including the amended dates for PP) have been couriered to you and should be with you soon. Please let me know if you have any queries regarding the above. Kind regards,

26	Celia de waal	11 March 2025	Draft Scoping Phase	From: Celia de Waal <celia.dewaal@mtpa.co.za> Sent: Tuesday, March 11, 2025 8:08 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Frans Krige <frans@mtpa.co.za>; Khumbelo Malele <Khumbelo.Malele@mtpa.co.za>; Mervyn Lotter <Mervyn.Lotter@mtpa.co.za> Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Good day Kindly send us, the MTPA a hard copy of the Draft EIA Report for Sheepmoor and Emvelo Wind Energy Facilities, for our scientists to comment on, to the following physical address in Lydenburg From: Celia de Waal <celia.dewaal@mtpa.co.za> Sent: Wednesday, March 12, 2025 11:55 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Frans Krige <frans@mtpa.co.za>; Khumbelo Malele <Khumbelo.Malele@mtpa.co.za>; Mervyn Lotter <Mervyn.Lotter@mtpa.co.za> Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Good day Your USB memory stick was just delivered.	Good afternoon Celia, I hope this email finds you well. As per our conversation on Friday, I wanted to inform you that the report is on its way to you via USB. Please let me know if you need anything else or if you have any questions. Kind regards

				Kind regards Celia	

	Josua Meyer	12 March 2025	Draft scoping phase	From: Josua Meyer <meyerjosua55@gmail.com> Sent: Wednesday, March 12, 2025 3:43 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Sorry Sir, still no property boundaries show except for the power lines figures. Can you please make sure and resend it. List of figures where property boundaries are missing : Figures 1 / 3 / 5 / 6 / 7,1 / 7,2 (2 off) Thanks	Good morning, Joshua, I hope this email finds you well. Please find the attached document containing the refined figures you requested. If you need any further information or clarification, feel free to reach out. Kind regards Attachments Sheepmoor WEF site layout plan Sheepmoor WEF Critical Biodiversity Sheepmoor WEF site sensitivity map Sheepmoor WEF renewable energy projects within 35 km radius Sheepmoor WEF preliminary developmental geographical coordinates Sheepmoor WEF site locality map The same figure names for Emvelo were attached

27	Josua Meyer	11 March 2025	Draft Scoping Phase	From: Josua Meyer <meyerjosua55@gmail.com> Sent: Tuesday, March 11, 2025 11:59 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Re: DRAFT EIA REPORT : EMVELO and SHEEPMOOR proposed wind farms CAN YOU PLEASE CLEARLY SHOW ALL THE PROPERTY BOUNDARIES AS WELL AS DISTRICT ROADS ON ALL THE FIGURES FOR BOTH PROPOSED WIND FARMS IT IS IMPOSSIBLE TO COMMENT WITHOUT THAT INFORMATION GPS COORDINATES NOT PRACTICAL AT THIS STAGE THIS WAS ALREADY REQUESTED DURING SCOPING FACE BUT BLINDLY IGNORE	Dear Joshua, I hope this email finds you well. Thank you for your email. As requested, please find the attached figures showing the property boundaries and roads. Should you need any further details or clarification, please don't hesitate to reach out. Attachments Emvelo WEF site locality map Emvelo WEF land use Sheepmoor WEF site locallity map Sheepmoor WEF lan use
28	Megan Govender	11 March 2025	Draft Scoping Phase	From: Megan Govender <megan.govender@enertrag.com> Sent: Tuesday, March 11, 2025 1:51 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Good Day Stephanie	Good afternoon Mpilo, I hope this email finds you well. As requested, please find attached the KMZ files for both Sheepmoor and Emvelo for your attention. Should you require any further information, please don't hesitate to contact me. Kind regards

				Please can you share a kmz of the updated project boundaries for Sheepmoor (WEF 1, 2 and 3) and Emvelo (WEF 1 and WEF 2). Thanks so much!	
29	Josua Meyer	11 March 2025	Draft Scoping Phase	From: Josua Meyer <meyerjosua55@gmail.com> Sent: Tuesday, March 11, 2025 8:59 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province <u>Re: Draft EIA report for ENVELO and SHEEPMOOR proposed wind farms</u> The avifaunal report made use of data recovered from two tagged MARTIAL EAGLES apparently tagged by EWT. ONE believes to be shot already. Can it be arranged that the data make available to us for independant analising. We need it urgently for our comments. Thanks	Dear Mr Meyer, RE: Please see below formal communications from Mulilo pertaining the Amsterdam Wind Energy Project. Thank you for your inquiry and for your evident dedication to the conservation and understanding of Martial Eagles. We appreciate your interest in this species and acknowledge the depth of care you have expressed in your request. As this is a protected species, the tracking data related to Martial Eagle flights, nesting locations, and movements is sensitive information that must be managed responsibly. Mulilo Renewable Project Developments, in partnership with the Endangered Wildlife Trust (EWT) is the custodian of the Data, and access to it is subject to strict regulatory and ethical considerations. We also note that your request to use this data in assessing the proposed buffer distances would not provide your specialist with the necessary insights. The buffer proposed by the project's avifaunal specialist in the draft environmental Impact Assessment was not solely based on tracking data, but included a combination of the following information/data/insights: • Proprietary commercial Data from our met mast; • Findings, data and in-depth site experiences gained by the specialist from the long-term bird monitoring program conducted before tracking began, following South African bird monitoring guidelines; and • An additional focal point survey of the nest itself, over a number of months including substantial observed and documented flight paths; and • Detailed site specific vegetation and habitat mapping and modelling.

					Given this, the specific tracking data you have requested would not contribute meaningfully to further understanding or reassessment of the proposed buffer zones. A second specialist, without the above-mentioned information and experience, is unlikely to arrive at a similar or meaningful conclusion of the recommended buffer size and shape. Furthermore, it must be noted that the project specialist, as required by the NEMA EIA regulations, is independent of the applicant, is SACNASP registered, and has complied with all guideline requirements to obtain an informed buffer and set of recommendations for the project. Additionally, under the National Environmental Management: Biodiversity Act (NEMBA), this tracking program is classified as bioprospecting. Accessing or conducting research on such data requires a permit, which neither you nor your specialist have provided. Without the necessary permit, we are unable to share this information.
30	Mpilo Masondo	10 March 2025 Per email	Draft Scoping Phase	From: Mpilo Masondo <MasondMM@ntcsa.co.za> Sent: Monday, March 10, 2025 5:47 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province Good day, Please could you provide the kmz file(s) of the development so that we can see if any of our current of future projects are affected. Regards, Mpilo	Good afternoon Mpilo, I hope this email finds you well. As requested, please find attached the KMZ files for both Sheepmoor and Emvelo for your attention. Should you require any further information, please don’t hesitate to contact me. Kind regards

TABLE 8-7~~8~~ COMMENTS AND RESPONSES FOR FINAL SCOPING PHASE RECEIVED FROM DFFE (19 NOVEMBER 2024)

Ref	Name of Organisation	Date and Method	Phase of PP	Comment	Response
			General Comments		
1.	DFFE Ms Masina Morudu	19 November 2024 Per email	Final Scoping Phase	The meeting minutes in Appendix 6 of the Public Participation Report refers. The discussions during the meeting with the Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs (DARDLEA) and the Mpumalanga Tourism & Parks Agency (MTPA) on 11 September 2024 are noted.	Comment has been acknowledged.
2.				The table of coordinates on page x of the SR is noted. The EIAr must include: a. The corner coordinates for the Battery Energy Storage System. b. Bend point coordinates for the 132kV powerline alternatives; and the main access roads.	Coordinates of the bend points for the 132kV alternatives and main access roads have been included in the Draft EIA Report.
3.				The EIAr must include the approximate length of each grid connection alternative route, and these grid connection routes must be discussed in the "Alternatives" section of the EIAr.	The EIAr includes the approximate length of each grid connection alternative route and discussed in the alternative section accordingly
4.				You are requested to provide the estimated operational lifespan of the proposed Emvelo WEF and details of future plans for the site and infrastructure after decommissioning, as well as the possibility of upgrading the proposed infrastructure to more advanced technologies.	Lifespan of the proposed WEF is 25 – 30 years. There are several sustainable plans and strategies that can be implemented for decommissioning, repowering, or transitioning to new uses such as decommissioning and recycling, repowering and upgrading technology, Land restoration/biodiversity enhancements.

5.				The EIAr must confirm the availability of services identified on pages 124 to 126 of the final SR.	Water and waste services will be requested form the local municipality, or where services are not available, they will be outsourced to private contractors.
6.				If the EIAr contains listed activities and/or other information that differs from the application form, the application form must be amended accordingly and submitted to the Department with the EIAr.	The listed activities in Table 3.1 of the EIAr Report correspond with the listed activities in the application form.

Battery Energy Storage System (BESS)

No.				Comment from DFFE	EAP Response
7.				Applicable BESS technologies must be included under the Technology Alternatives section of the EIAr.	Not Applicable as BESS has been removed from final layout.
8.				A risk assessment study is not required for the Battery Energy Storage System (BESS), however, impacts associated with the risks must be identified, considered, and assessed as part of the EIAr.	BESS is no longer included in the final layout.

Public Participation

No.				Comment from DFFE	EAP Response
9.				Comments on the draft EIAR must be obtained from this Department's Biodiversity Conservation Directorate at BCAdmin@dffe.gov.za and Protected Areas section (regarding the NPAES) at Tnethononda@dffe.gov.za. Further to that, these comments must be addressed and incorporated in the final EIAr.	When the EIA phase commences, the Draft EIA report and all appendices, including the public participation documentation will be submitted to the Directorate Biodiversity Conservation at Email; BCAdmin@dffe.gov.za and Protected Areas section (regarding the NPAES) at Tnethononda@dffe.gov.za
10.				Proof of correspondence with the various stakeholders must be included in the EIAr. This must indicate that this draft EIAr has been subjected to 30 days public participation process, stating the start and end date of the PPP.	Please refer to Volume III – PP Report, which includes written notice for the availability of the draft EIAr for comment

11.				Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAr.	Original copies of comments from stakeholders have been included as an appendix to Volume III – PP Report
12.				Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. Please provide proof of written notice for the availability of the draft EIAr for comment.	Please refer to Volume III – PP Report, which includes written notice for the availability of the draft EIAr for comment
13.				All issues raised and comments received must be incorporated into the Comments and Response Report (CRR).	All comments and issues raised are addressed in this CRR.
14.				Comments from I&APs must not be split and arranged into categories. Comments from each submission must be responded to individually.	Comments from each submission has been responded to individually
15.				Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as “noted” is not regarded as an adequate response to an I&AP’s comments.	Comments have been captured verbatim and not summarised. All comments have been responded to clearly and ‘noted’ has been avoided in all responses.
16.				The CRR addresses comments on the draft SR, which have been received from organs of state, however, copies of these comments are not included in the report. Copies of original comments received from I&APs and organs of state, which have jurisdiction in respect of the proposed activity must be submitted to the Department with the EIAr.	Original copies of comments from I&APs and organs of state have been included as an appendix to Volume III – PP Report
17.				If applicable, the attendance registers and minutes of any meetings held by the Environmental Assessment Practitioner (EAP) with Interested and Affected Parties (I&APs) and other role players must be included in the EIAr.	Attendance registers and minutes of any meetings held by the Environmental Assessment Practitioner (EAP) with Interested and Affected Parties (I&APs) and other role players been included as an appendix to Volume III – PP Report

18.				The newspaper advert proof in Appendix C of the Public Participation Report refers. Please submit a full page of the newspaper(s) containing the advertisement, ensuring that the name of the newspaper and date are visible.	This has been included as an Appendix in Volume III.

Specialist Assessments

No.				Comment from DFFE	EAP Response
19.				Interim and final comments from the South African Heritage Resources Agency (SAHRA) must be addressed and incorporated in the EIAr.	Please note comments from SAHRA was not provided during scoping phase. Comments received from SAHRA during EIA phase will be incorporated in the EIAr
20.				Specialist assessments must be conducted in accordance with the Government Notice No. 320 of 20 March 2020 (i.e. “the Protocols”), and Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species).	Specialist assessments have been conducted in accordance with the Government Notice No. 320 of 20 March 2020 (i.e. “the Protocols”), and Government Notice No. 1150 of 30 October 2020.
21.				The following specialist studies will form part of the EIAr as indicated in Section 12.6 of the FSR: a. Soil and Agriculture Potential Impact Assessment; b. Freshwater and Wetlands (Aquatics) Impact Assessment; c. Terrestrial Biodiversity (Flora and Fauna) Impact Assessment; d. Avifauna Impact Assessment; e. Bat Impact Assessment; f. Visual / Landscape and Flicker Impact Assessment; g. Heritage, Archaeology and Palaeontology Impact Assessment; h. Noise Impact Assessment; i. Socio-economic Impact Assessment; and j. Traffic and Transportation Impact Assessment.	The EIAr report encompasses all studies outlined
22.				Please note that the Department considers a ‘no-go’ area, as an area where no development of any infrastructure is allowed; therefore, no development	The term "no-go" is often applied to various types of infrastructure by different specialists, however, its

				of associated infrastructure including access roads is allowed in the 'no-go' areas.	application can vary based on the specific environmental concerns being addressed. In the context of avifauna, certain areas may be designated as "no turbine areas" to protect sensitive bird species, while still permitting the development of other types of infrastructure.
23.				Should the specialist definition of 'no-go' area differ from the Departments definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable.	The EAP acknowledges that the departments definition of a 'no-go' area is for any infrastructure, including the associated infrastructure such as access roads. Applicable buffer zones are shown on the sensitivity figures.
24.				Should the specialist studies provide more detail regarding any of the project activity thresholds, please ensure that the project activity descriptions are amended accordingly in the application form and EIAr.	Project activity descriptions was amended in the application form and EIAr according to the specialist studies.
25.				All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA.	Specialist studies are final, with no further studies recommended.
26.				Should a specialist recommend specific mitigation measures, these must be clearly indicated.	Specific mitigation measures as recommended by specialists are clearly indicated the EIAr and EMPr.
27.				Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defendable reasons; and were necessary, include further expertise advice.	No contradicting recommendations were provided by specialists. Specialists' recommendations have been considered and included Section 13 of the EIAr to be included in EA and / or in the EMPr for implementation.

28.				Where applicable, each specialist study must provide a preferred grid connection alternative.	Three grid connection alternatives have been considered.
				Layout & Sensitivity Maps	
No.				Comment from DFFE	EAP Response
29.				Please provide a layout map which indicates the following: a. Wind turbine positions (numbered) and its associated infrastructure; b. Permanent laydown area footprint; c. Internal roads indicating width (construction period width and operation period width) and with numbered sections between the other site elements which they serve (to make commenting on sections possible); d. Wetlands, drainage lines, rivers, stream and water crossing of roads and cables indicating the type of bridging structures that will be used; e. The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure; f. Substation(s) and/or transformer(s) sites including their entire footprint; g. All existing infrastructure on the site, especially roads; h. Buildings proposed within the substation footprint; i. Buffer areas; and j. All “no-go” areas.	A layout map detailing the proposed layout of the facility, adhering to specialist recommendations have been included in Volume I of the EIAr.
				Cumulative Assessments	
30.				Regarding the identified similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must indicate the following: a. Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land.	A preliminary assessment of cumulative impacts was made in the Scoping Phase and has been assessed further in the EIA Phase where a detailed process flow and methodology has been defined as recommended.

				b. Identified cumulative impacts associated with the proposed development must be rated with the significance rating methodology used in the process. c. Detailed process flow and proof must be provided, 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. d. The cumulative impacts significance rating must also inform the need and desirability of the proposed development. e. A cumulative impact environmental statement on whether the proposed development must proceed.	
WEF Environmental Management Programme (EMPr)					
31.				A construction and operational phase EMPr for the WEF, which includes mitigation and monitoring measures must be submitted with the EIAr.	A construction and operational phase EMPr for the WEF, which includes mitigation and monitoring measures has been drafted and will be submitted with the EIAR.
32.				The EMPr must be developed in terms of Appendix 4 of the EIA Regulations, 2014 as amended and must include (but not limited to) the following plans and measures: a. A Re-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; b. A Weed and invader plant 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 content of the EMPr produced for the proposed development is in compliance in terms of Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended, and includes, where relevant the plans and measures recommended by the Department.

				the continuous monitoring and removal of alien species is undertaken; c. 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 and be implemented prior to commencement of the construction phase; d. An Open space management plan, to be implemented during the construction and operation of the facility; e. A Traffic management plan for the site access 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 e.g. limiting construction vehicles travelling on public roadways during the morning and late afternoon commute time and avoid using roads through densely populated built-up areas so as not to disturb existing retail and commercial operations; f. A Transportation plan for the transport of components, main assembly cranes and other large pieces of equipment; g. A Stormwater 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; h. A Fire management plan to be implemented during the construction and operation of the facility; i. 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; j. 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; k. Measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments, and other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants; l. Dust management measures; m. Waste management measures; n. Emergency response; and, o. All recommendations and mitigation measures recorded in the EIAr and the specialist studies conducted. This includes the management and monitoring plans and procedures appended in the specialist studies.	
33.				The decommissioning chapter of the EMPr for the facility must contain information relating to the handling, repurposing or disposal of dysfunctional, severely damaged batteries, module and containers.	The decommissioning phase section of the EMPr for the facility contains information relating to the handling, repurposing or disposal of dysfunctional, severely damaged batteries, module and containers
34.				The EMPr must distinguish between impact management actions and impact management outcomes.	The EMPr ensures a structured approach, distinguishing between impact management actions and impact management outcomes.
35.				The EMPr must not contain any ambiguity. Where applicable, statements containing the word “should” or “may” are to be amended to “must”.	Where applicable, statements containing the words ‘should’ or ‘may’ have been removed.
Generic Environmental Management Programme (EMPr)					
36.				The proposed development triggers Activity 11 of Listing Notice 1 (as amended). The relevant generic	Applicable Generic EMPr(s) have been included in Volume I.

				EMPr(s) must be included in the EIAr, over and above the EMPr for the WEF.	
37.				Part B: Section 2 of the generic EMPr(s) must be completed, and a copy of the signed EMPr(s) must be submitted with the EIAr. Please note that Point 7.1.1 in Part B: Section 2 needs to match the details of the applicant as contained in the application form. The generic EMPr(s) must be signed by the applicant and submitted with the EIAr. An unsigned Generic EMPr is regarded as incomplete.	Signed Generic EMPr(s) have been included in Volume I.
38.				If any specific environmental sensitivities/attributes are present on the site which require more specific impact management outcomes and impact management actions, not included in the pre-approved generic EMPr template, to manage impacts, those impact management outcomes and actions must be included in Part C of the generic EMPr.	Specific impact management outcomes and impact management actions have been included in Part C of the Generic EMPr(s).

TABLE 8-89 COMMENTS AND RESPONSE TABLE FOR IAPS ON DRAFT SCOPING PHASE 22 AUGUST 2024 (RESUBMISSION)

Ref	Name and Organisation	Date and Method	Phase of PPP	Comment	Response
8.	Nrateng Mashiloane Aviation Environmental Compliance Department	22 August 2024 Per email	Draft Scoping Phase	From: Aviation Environmental Compliance <environment@caa.co.za> Sent: Thursday, August 22, 2024 2:16 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Pamela Madondo <MadondoP@caa.co.za>; Evelyn Shogole <ShogoleE@caa.co.za> Subject: RE: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga Good day, I hope this email finds you well. Kindly note that the SACAA has transferred all obstacle assessments and applications responsibilities to Air Traffic and Navigation Services (ATNS) as published on the SACAA website: www.caa.co.za/industryinformation/obstacles/ . A formal application must be lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted. The list and contact details of the approved obstacles assessment services providers can be obtained from the CAA website: www.caa.co.za. Kind regards,	The EAP acknowledges that the SACAA has transferred all application responsibilities to Air Traffic and Navigation Services (ATNS). The applicant confirms that a formal application has been lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted.
9.	Sindy Mbuyane DARDLEA	23 August 2024 Per email	Draft Scoping Phase	From: Sindy Mbuyane <mbuyanesb@mpg.gov.za> Sent: Friday, August 23, 2024 12:58 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>	Good day Sindy, Thank you for your query. The report content of the versions you have has not changed with the resubmission, other than the amendment of the dates of public participation

				Cc: Gavin Cowden <GCowden@mpg.gov.za>; Robyn Luyt <RLuyt@mpg.gov.za>; 'Mervyn Lotter' <Mervyn.Lotter@mtpa.co.za> Subject: Re: Notification of Submission: Draft scoping Report Amsterdam WEFs, near Ermelo, Mpumalanga Good day Stephanie, Thank you for the resubmission notification. Are the reports submitted to our Office the updated versions or we need to await submission of the updates before considering receipt of such reports? I recall an email by Lloyd that there will be updates on the reports. Kind Regards, SIndi	(PP), and thus the versions you have can be used to confirm receipt if you are happy to do so. Additional copies of the reports (including the amended dates for PP) have been couriered to you and should be with you soon. Please let me know if you have any queries regarding the above. Kind regards,
10.	Pamela Madondo Environment Compliance Specialist	26 August 2024 Per email	Draft Scoping Phase	From: Aviation Environmental Compliance <environment@caa.co.za> Sent: Monday, August 26, 2024 9:11 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Nrateng Mashiloane <MashiloaneN@caa.co.za> Subject: RE: Notification of Submission: Draft scoping Report Amsterdam WEFs, near Ermelo, Mpumalanga Good day, I hope this email finds you well. Kindly note that the SACAA has transferred all obstacle assessments and applications responsibilities to Air Traffic and Navigation Services (ATNS) as published on the SACAA website: www.caa.co.za/industryinformation/obstacles/ . A formal application must be lodged with Air	The EAP acknowledges that the SACAA has transferred all application responsibilities to Air Traffic and Navigation Services (ATNS). The applicant confirms that a formal application has been lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted.

				Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted. The list and contact details of the approved obstacles assessment services providers can be obtained from the CAA website: www.caa.co.za. Kind regards, Pamela Madondo	
11.	Tebego Kgaphola Branch: Biodiversity and Conservation	26 August 2024 Per email	Draft Scoping Phase	From: BC Admin <bcadmin@dffe.gov.za> Sent: Monday, August 26, 2024 10:18 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: RE: Notification of Submission: Draft scoping Report Amsterdam WEFs, near Ermelo, Mpumalanga Good morning Kindly note that our comments still stands.	The EAP acknowledges that Biodiversity and Conservations comment still stands.
12.	Salome Mambane Department of Forestry, Fisheries and the Environment (DFFE) Integrated Environmental Authorisations	26 August 2024 Per email	Draft Scoping Phase	From: Salome Mambane <SMAMBANE@dffe.gov.za> Sent: Monday, August 26, 2024 11:49 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com> Cc: EIAadmin <EIAadmin@dffe.gov.za>; Andrew Pearson <andrew@mulilo.com>; goxaba@mpg.gov.za; complaints@msukaligwa.gov.za; Bathandwa Ncube <BNcube@dffe.gov.za> Subject: 14/12/16/3/3/2/2611 Dear Sir/Madam ACKNOWLEDGEMENT OF RECEIPT OF THE NEW APPLICATION FORM AND DRAFT SCOPING REPORT FOR THE PROPOSED PROPOSED	EAP acknowledges receipt of the comment from the Department on the Draft Scoping Report for the Emvelo WEF.

				DEVELOPMENT OF THE EMVELO WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, AND GERT SIBANDE DISTRICT MUNICIPALITY, MPUMALANGA PROVINCE. The Department confirms having received the Application Form and Draft Scoping Report for Environmental Authorisation for the abovementioned project on 22 August 2024. You have submitted these documents to comply with the Environmental Impact Assessment (EIA) Regulations, 2014, as amended. Kindly note that your application for Environmental Authorisation falls within the ambit of an application applied for in terms of Part 3 of Chapter 4 of the EIA Regulations, 2014, as amended. You are therefore referred to Regulation 21 of the EIA Regulations, 2014 as amended. Please take note of Regulation 40(3) of the EIA Regulations, 2014, as amended, which states that potential Interested & Affected Parties, including the Competent Authority, may be provided with an opportunity to comment on reports and plans contemplated in Regulation 40(1) of the EIA Regulations, 2014, as amended, prior to the submission of an application but must be provided an opportunity to comment on such reports once an application has been submitted to the Competent Authority. Note that in terms of Regulation 45 of the EIA Regulations, 2014, as amended, this application will lapse if the applicant fails to meet any of the time-frames prescribed in terms of these Regulations, unless an extension has been granted by the Department in terms of	

				Regulation 3(7) of the EIA Regulations, 2014, as amended. You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.	
13.	Mpilo Masondo NTCSA	2 September 2024 Per email	Draft Scoping Phase	From: Mpilo Masondo <MasondMM@ntcsa.co.za> Sent: Monday, September 2, 2024 9:58 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Amsterdam WEFs, near Ermelo, Mpumalanga Good day, Please could you send the kmz files of the proposed projects to see whether any of our current or future projects will be affected. Regards, Mpilo	Good day, Please see attached KMZ files as requested. Kind Regards
14.	Josua Meyer Interest and Affected Party	10 September 2024 Per email	Draft Scoping Phase	From: Josua Meyer <meyerjosua55@gmail.com> Sent: Tuesday, September 10, 2024 8:22 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: Re: VOORGESTELDE ERMELO WINDPLASE Dankie vir uit maar EIENDOM GRENSE word nie getoon nie. Uitleg dus nutteloos aangesien grense noodsaaklik is om enige kommentaar te lewer voor periode daarvoor verstryk (20/9/24)	Good day Josua, I have attached a copy of the form for your perusal, please do complete and send back to me so that I am able to capture your data. Attached are the shapefiles of the land parcels of affected Land Owners. I confirm that you are a registered I&AP. The development is within its comment period and any comments made by you in this period will be captured accordingly. You will also receive further communication regarding the development as it moves through its different phases.

				VERSOEK DUS DRINGEND UITLEG WAT EIENDOM GRENSE EN PAAIE DUIDELIK TOON Vertrou op u spoedige reaksie By voorbaat dank	Kind Regards
15.	Josua Meyer Interest and Affected Party			From: Josua Meyer <meyerjosua55@gmail.com> Sent: Tuesday, September 10, 2024 8:29 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: Re: SHEEPMOOR, EMVELO WIND ENERGIE PROJEKTE Het ongelukkig nie toegang tot Aida nie Kan u vorm asb aanstuur Wys u egter daarop dat as aangrensende eienaar aan u beoogde ontwikkeling registrasie outomaties deur u ontwikkelaar gedoen moet word. Graag verneem ek of sodanige registrasie wel gedoen is aangesien nog geen korrespondensie in die verband ontvang is nie Vertrou op spoedige en gunstige reaksie op bogemelde	Good day Josua, I have attached a copy of the form for your perusal, please do complete and send back to me so that I am able to capture your data. Attached are the shapefiles of the land parcels of affected Land Owners. I confirm that you are a registered I&AP. The development is within its comment period and any comments made by you in this period will be captured accordingly. You will also receive further communication regarding the development as it moves through its different phases. Kind Regards
16.	Robyn Luyt DARDLEA	11 September 2024 Per email	Draft Scoping Phase	From: Robyn Luyt <rluyt@mpg.gov.za> Sent: Wednesday, September 11, 2024 2:52 PM To: Gavin Cowden <GCowden@mpg.gov.za>; frans.krige@mtpa.co.za; Andrew Pearson <Andrew@mulilo.com>; khma@mulilo.com; Lloyd Barnes <Lloyd@mulilo.com> Cc: ERM Arcus Amsterdam <Erm.arcusamsterdam@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; albert.froneman@gmail.com; Clifford Kubheka <KubhekaCZ@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; Okwethu Fakude <oqfakude@mpg.gov.za>; Florah.Lekaka@mtpa.co.za; mervyn@mtpa.co.za;	The EAP acknowledges receipt of the attendance register for the engagement meeting. The register is attached to the PPP report as annexure A.

				Mixo.hlatshwayo@mtpa.co.za; rockey.nkosi@mtpa.co.za Subject: Attendance Register | Mulilo Renewable Energies engagement Good afternoon everyone, Herewith the attendance register of physical attendees at today's meeting for your records. Kind Regards Robyn	
17.	Ryan David-Andersen Interested and Affected Party	13 September 2024 Per email	Draft Scoping Phase	From: Ryan David-Andersen <ryan@amdadevelopments.co.za> Sent: Friday, September 13, 2024 8:24 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: Registration as I&AP for Mpumalanga Projects Dear ERM Please may you register my details in signature below for any Mpumalanga projects - including Amsterdam - we are developing a wind farm near Ermelo named Zephyr. Thanks very much Ryan David-Andersen	Good day Ryan, Thank you for reaching out, your details will be captured. Kind regards,
18.	Robyn Luyt DARDLEA	17 September 2024 Per email	Draft Scoping Phase	From: Robyn Luyt <rluyt@mpg.gov.za> Sent: Tuesday, September 17, 2024 2:42 PM To: ERM Arcus Amsterdam <Erm.arcusamsterdam@erm.com> Cc: energy@birdlife.org.za; cagenbach@dffe.gov.za; MEMorudu@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za;	The EAP acknowledges receipt of DARDLEAs comment on Emvelo WEF.

				Tebogom@gsibande.gov.za; Gavin Cowden <GCowden@mpg.gov.za>; Clifford Kubheka <KubhekaCZ@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; frans.krige@mtpa.co.za; mervyn@mtpa.co.za; Lloyd Barnes <Lloyd@mulilo.com> Subject: SR Comments | Emvelo WEF Amsterdam Cluster Importance: High Dear Stephanie, Please find herewith DARDLEAs comments on the draft Scoping Report for the Emvelo WEF and Grid Connection. Comments for Sheepmoor and Rochdale to follow. Kind Regards Robyn	
19.	Celia De Waal MTPA	18 September 2024	Draft Scoping Phase	From: Celia de Waal <celia@mtpa.co.za> Sent: Wednesday, September 18, 2024 2:36 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Tommie Steyn <Tommie@mtpa.co.za>; jjexteen@gmail.com; Johan Eksteen <johan@mtpa.co.za>; Frans Krige <frans@mtpa.co.za>; Khumbelo Malele <Khumbelo.Malele@mtpa.co.za>; Thabile Mnisi <Thabile.Mnisi@mtpa.co.za>; Phumla Nkosi <Phumla.Nkosi@mtpa.co.za>; Fortunate Watkins <Fortunate.Watkins@mtpa.co.za>; Mervyn Lotter <Mervyn.Lotter@mtpa.co.za> Subject: MTPA's comments LUA 24/3967 - Draft EIA Scoping Report for the proposed development of the Sheepmoor Wind Energy facility. Dear Ms. Gopaul	Hi Celia, Thank you for providing comment on the Emvelo WEF facility. Are you able to please indicate when we can expect comment on the remaining 2 facilities, namely Rochdale and Emvelo. Kind regards Lucien

				Kindly receive the attached comments from the MTPA regarding a Draft EIA Report for the proposed development of the Sheepmoore Wind Energy facility (WEF) with 23 wind turbines and Auxiliary infrastructure. Your reference number: Project 0684401 (DFFE: 14/12/16/3/3/2/2593) Our EIA registration/reference number is LUA 24/3967 (kindly use this number in any further correspondence to us regarding this project) Kind regards Celia de Waal	
20.	Celia De Waal MTPA	19 September 2024	Draft Scoping Phase	From: Celia de Waal <celia@mtpa.co.za> Sent: Thursday, September 19, 2024 11:07 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Tommie Steyn <Tommie@mtpa.co.za>; Frans Krige <frans@mtpa.co.za>; Tommie Steyn <tommiesteyn63@gmail.com> Subject: RE: MTPA's comments LUA 24/3967 - Draft EIA Scoping Report for the proposed development of the Sheepmoor Wind Energy facility. Good morning Regarding your enquiry below, the following: • The comments for the Emvelo project (our ref: LUA 24/3966) is currently at the Acting Manager: Scientific Service for review). The signed copy might be released today, which will be send to you as soon as I receive it.	Hi Celia, Thank you for the update, Regards

				• The commenting scientist is currently still busy commenting on the Rochdale project (LUA 24/3965). Kind regards Celia	
21.	Josua Meyer Interested and Affected Party	19 September 2024	Draft Scoping Phase	From: Postnet Ermelo <ermelo.postnet@gmail.com> Sent: Thursday, September 19, 2024 1:21 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: meyerjosua55@gmail.com Subject: [ATTACHMENT SKM_C250i24091906550] APPENDIX A COMMENTS ON ROCKDALE, EMVELO AND SHEEPMOOR WIND FARMS The following problems are foreseen with development of above-mentioned wind farms 1. DISTURBANCE OF CLIMATE AND Rainfalls The escarpment has a unique rainfall pattern where the east wind introduces moisture into layers and condenses as rain and/or precipitates as fog and dew once it moves in over the plateau. The fog and dew that comes in along with the east wind is critically important and prevents pollination problems especially during mid-summer droughts. Turbulence of rotary turbine rotors increases vertical mixing of heat and water vapor which adversely affects meteorological conditions downwind, including rainfall. Wind turbines further cause significant desiccation of soil by pulling the warmer upper	Hi Josua, Thank you for sharing your concerns about the proposed WEF cluster. We appreciate your input. Your comments will be considered during the Environmental Impact Assessment (EIA) phase. As part of the process, we will assess potential changes to the wind turbine layout and work to avoid sensitive areas to minimize any negative impacts. Your feedback appreciated and we will keep you updated as the EIA progresses. Kind regards,

				air down to the ground in order to increase soil temperatures. Turbines therefore change local wind patterns that have negative impacts on rainfall, soil moisture and even micro climate with long-term effects on fertility and productivity of agricultural soils and grasslands. THE PLACEMENT OF THE WIND TURBINES AT THE BOTTOM OF THE ESCARPMENT WILL THEREFORE BE FATAL TO THE ENVIRONMENT'S CLIMATE AND VEGETATION WHICH WILL ALSO ADVERSELY AFFECT MV FARMING PROSPECTS IN THE LONG TERM. 2. Bird LIFE IS THREATENED Area consists of unique grassland that provides ideal habitat for several rare and endangered bird species. It also hosts large diverse small grassland species that are not even mentioned here. Number of several threatened and/or protected species found here include : Breekop arende (eagles). Breeding pair successfully hatched chick this year. - Sekretaris Voels. Several old as well as active nests enter the area. As recently as May '24, a pair with a chick were spotted at Waaihoek. Mahem is found widely spread throughout area which is also actively breeding. A chick is often spotted with adults. Blou Kraanvoels are on the rise with at least one chick observed annually. - Fish eagles also regularly visit the ponds in the area. - Veldpou occurs but is currently becoming rare. Nests in the field were also spotted already. Kalkoen Ibus is common with several active breeding colonies.	

				There are positive signs that Aasvoels are also moving back. Breeding colonies are active at Smithfield, not far from the area. Various owl species that may not be extinct but are extremely necessary to ensure ecological balance are also present in large numbers AI the bird species, as well as bats and insects, are essential to maintain balance in the ecology and are in danger of either being killed or relocated to other areas due to this. Fatal collision with turbine blade Habitat disturbances by increased soil temperatures. Air pressure changes voar turbines as well as the vertebrae behind turbines. Very sensitive to low frequency electromagnetic pressure causing waves by wind turbines that act adversely on hui Eradicating nests and even killing them to eliminate approval barriers as has already been proven with the shooting of a break-headed eagle. 3. ANIMAL LIFE IS THREATENED The following rare and protected nursing animals are found here Oorbietjie Bruinhiena Mieshoop Tier Aardwolf The animals are in danger of moving away by habitat destruction, vibration and noise caused by turbines. Dirty electricity produced by wind power can pass through cables and into the ground. The soil stream has a detrimental effect on the productivity and reproduction of mammals. 4. NOISE AND VIRTUAL POLLUTION Wind turbines produce sound waves (pressure waves) by the rotating blades and are heard as rumbling and/or detectable as infra-sounds as	

				well as electromagnetic waves generated upon conversion of wind energy into electricity. The conversion produces poor quality power (dirty electricity and ground current) which is detrimental to human and animal health. The shade flickering of turbines is also contributing factor to health problems. There is a definite link between the 'ground current' produced by turbines and cancer. It has been documented that childhood leukemia has increased by 300% due to it. However, the above can activate several other clinical health conditions in humans. In animals and insects that perceive low frequency sounds and vibrations better than humans, there is great danger of moving out of territory and thus disappearing altogether. IN LIGHT OF THE FACTS, A TURBINE AND CABLE Free BUFFER ZONE OF AT LEAST 1.5 KM FROM My PROPERTY'S BOUNDARY WIRES MUST BE REHABILITATED. The number of how turbines contributes to virtual pollution of nature. 5. INFRASTRUCTURE The improved infrastructure will lead to increases in movement and inflow of undesirable elements which will drastically increase crime. Stock theft at my farm has stopped since I stopped scraping district road to Sheepmoor because it has become difficult to pass. During the construction phase, labour unrest can be expected due to expectations created in local populations. The fact that no turbines are allowed on my property will not indemnify my property from the negative side effects of the 3 wind farms. THOROUGH FURTHER INVESTIGATIONS ARE THEREFORE REQUESTED BEFORE APPROVAL IS GRANTED TO PROJECT BY THE AUTHORITY	

				- LONG-TERM INFLUENCE OF PLANNED WIND FARMS ON AGRICULTURE, CLIMATE AND RAIN FALL. - IDENTIFICATION AND MOVEMENTS OF ENDANGERED AND PROTECTED Bird SPECIES AS WELL AS WHERE NESTS OCCUR, ACTIVE AND OLD NESTS. - IDENTIFICATION OF THE RARE MAMMALS AS WELL AS THEIR MOVEMENTS IN THE AREA. Foresees adverse long-term prospects for agriculture and environment and therefore cannot UNRESERVEDLY support development of wind farms. Sincerely, On behalf of JOSHUA MEYER TRUST	
22.	Kirsten Jones Interested and Affected Party	19 September 2024	Draft Scoping Phase	From: kirsten@red-cap.co.za <kirsten@red-cap.co.za> Sent: Thursday, September 19, 2024 4:17 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: 'Francois le Roex' <francois@red-cap.co.za> Subject: Sheepmoor, Rochdale and Emvelo WEFs - Registration as I&AP Hi there, Please could you register myself and colleague Francois le Roex (copied) as I&APs on these projects, Kind regards	Good day, Thank you for your email, you will now be added as an I&AP to the proposed Sheepmoor, Rochdale and Emvelo WEFs. Kind Regards
23.	Kirsten Jones Interested and Affected Party	20 September 2024	Draft Scoping Phase	From: kirsten@red-cap.co.za <kirsten@red-cap.co.za> Sent: Friday, September 20, 2024 9:56 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>	Hi Kristen, That is correct. Kind Regards

				Cc: 'Francois le Roex' <francois@red-cap.co.za> Subject: RE: Sheepmoor, Rochdale and Emvelo WEFs - Registration as I&AP Thanks Lucien, Will you be uploading the FSR onto the website (and notifying I&APs) once it has been submitted to DFFE? Kind regards Kirsten	
24.	Josua Meyer Interested and Affected Party	20 September 2024 Aida Form	Draft Scoping Phase	From: Postnet Ermelo <ermelo.postnet@gmail.com> Sent: Friday, September 20, 2024 11:17 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: meyerjosua55@gmail.com Subject: What's your name? Josua Last Name Meyer Who do you represent? Organisation – Josua Meyer Trust Designation - Trustee Your Email – meyerjosua55@gmail.com Your Phone Number – 081 019 2213 Alternative Phone Number – n/a Your Address Street Address – Plaas Ondwerwacht Street Address Line 2 – Plaas Waaihoek City - Ermelo State/Province - Mpumalanga Zip Code – n/a Country - RSA What is your interest in the projects? – Plaas Eienaar	The EAP acknowledges receipt of IAPs Aida response form as well as attached file.

				Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website? Please copy and paste the link onto a browser (https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/) No What are your comments regarding the Rochdale, Emvelo and Sheepmoor WEF Cluster? Verwys na bylaag A aangeheg Protection of Personal Information (POPI) Act, Act 4 of 2013 Do you consent to your information being published in the public domain, and being used as part of the Public Participation Process? Yes	
25.	Moya Odendaal Interested and Affected Party	21 September 2024 Aida Form	Draft Scoping Phase	Dear AidaForm user, Your form "Stakeholder Engagement Form" has a new response. ========== 1. What's your name? Moya Odendaal 2. Who do you represent? Heya Lidri Pty Ltd Odendaal 3. Your Email hfgerber@vodamail.co.za 4. Your Phone Number +0824572021 5. Alternative Phone Number +0810165617	Good day, Thank you for your comment. Your comments will be taken into consideration during the EIA phase of the proposed WEF Cluster. Kind Regards

				6. Your Address Stuart Street 90, Amsterdam, Amsterdam, Mpumalanga, 2375, South Africa 7. What is your interest in the projects? Environment 8. Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website? Yes 9. What are your comments regarding the Rochdale, Emvelo and Sheepmoor WEF Cluster? It will change the environment forever 10. Protection of Personal Information (POPI) Act, Act 4 of 2013 No (0)	
26.	Rone Odendaal Interested and Affected Party	21 September 2024 Aida Form	Draft Scoping Phase	Dear AidaForm user, Your form "Stakeholder Engagement Form" has a new response. ========== 1. What's your name? Rone Odendaal 2. Who do you represent? Individual Affected party 3. Your Email petronellaodendaal@gmail.com 4. Your Phone Number +27726972040 5. Alternative Phone Number +27825744185	Good day, Thank you for your comment. Your comments will be taken into consideration during the EIA phase of the proposed WEF Cluster. Kind Regards

				6. Your Address Athole farm, Amsterdam, Mpumalanga, 2375, South Africa 7. What is your interest in the projects? Strongly oppose 8. Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website? No 9. What are your comments regarding the Rochdale, Emvelo and Sheepmoor WEF Cluster? Negative impact on the environment and bird life. 10. Protection of Personal Information (POPI) Act, Act 4 of 2013 No (0)	
27.	Bathandwa Ncube DFFE	24 September 2024 Per email	Draft Scoping Phase	From: Bathandwa Ncube <BNcube@dffe.gov.za> Sent: Tuesday, September 24, 2024 6:06 PM To: Stephanie Gopaul <stephanie.gopaul@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Andrew Pearson <andrew@mulilo.com>; goxaba@mpg.gov.za; R Luyt <rluyt@mpg.gov.za>; SB. Mbuyane <MbuyaneSB@mpg.gov.za>; mervyn.lotter@gmail.com; complaints@msukaligwa.gov.za; EIAadmin <EIAadmin@dffe.gov.za>; Lydia Kutu <LKutu@dffe.gov.za>; Ephron Maradwa <EMaradwa@dffe.gov.za>; Salome Mambane <SMAMBANE@dffe.gov.za> Subject: 14/12/16/3/3/2/2611; 14/12/16/3/3/2/2612; 14/12/16/3/3/2/2613 Goodday	The EAP acknowledges receipt of DFFEs comment on Mulilo WEF Cluster.

				Please find attached, DSR comments for the proposed Emvelo, Rochdale and Sheepmoor WEF developments. Kind regards Ms Bathandwa Ncube (EAPASA)	
28.	Celia De Waal MTPA	01 October 2024 Per Email	Draft Scoping Report	From: Celia de Waal <celia@mtpa.co.za> Sent: Tuesday, October 1, 2024 10:35 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Frans Krige <frans@mtpa.co.za>; Johan Eksteen <johan@mtpa.co.za> Subject: FW: MTPA's comments LUA 24/3966 - Draft Scoping for 45 wind turbines (Emvelo Wind Energy) Good day Kindly receive two of the letters as requested I will follow up with Frans Krige on LUA 24/3965, Rochdale, as soon as he is done with his meeting. Regards	
29.	Celia De Waal MTPA	01 October 2024 Per Email	Draft Scoping Report	From: Celia de Waal <celia@mtpa.co.za> Sent: Tuesday, October 1, 2024 11:15 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Frans Krige <frans@mtpa.co.za> Subject: DRaft Comments LUA 24-3965 Rochdale Wind Energy Facility Good day Kindly receive the draft comments from Mr. Krige of LUA 24-3965. As soon as we have a signed copy, I will forward it to you.	Thanks Celia!

				Kind regards	
30.	Celia De Waal MTPA	02 October 2024 Per Email	Draft Scoping Report	From: Celia de Waal <celia@mtpa.co.za> Sent: Wednesday, October 2, 2024 11:14 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Frans Krige <frans@mtpa.co.za>; Mixo Hlatshwayo <mixo@mtpa.co.za>; Khumbelo Malele <Khumbelo.Malele@mtpa.co.za>; Johan Eksteen <johan@mtpa.co.za>; Thabile Mnisi <Thabile.Mnisi@mtpa.co.za>; Phumla Nkosi <Phumla.Nkosi@mtpa.co.za> Subject: MTPA's comments: LUA 24/3965 - Draft Scoping report for the Rochdale Wind Energy Facility near Ermelo Good day Kindly receive the attached comments from the MTPA regarding a Draft Scoping Report for the 240 MW Rochdale Wind Energy Facility near Ermelo. Your reference number is: 0684401 Our EIA registration/reference number is: LUA 24/3965 Kind regards Celia de Waal	Hi Celia Signed copy well received Kind Regards

TABLE 8-9~~10~~ COMMENTS AND RESPONSES ON NEW APPLICATION FOR DRAFT SCOPING PHASE RECEIVED FROM DFFE (24 SEPTEMBER 2024)

	Application Form

No.	Comment from DFFE	EAP Response	Section in Report
1.	Please confirm that the postal code for the EAP's address is correct.	Application form has been updated. EAP's address has been updated.	Please refer to Application form.
2.	The screening tool report attached as Appendix 14 of the application form must be signed by the compiler.	Signature has been added to Appendix 14.	Please refer to Application form.
3.	Please ensure that all relevant listed activities are applied for, are specific and that it can be linked to the development activity or infrastructure as described in the project description. The onus is on the applicant and the environmental assessment practitioner (EAP) to ensure that all the applicable listed activities are included in the application form. Failure to do so may result in unnecessary delays in the processing of the application.	Listed activities in the application form corresponds to those listed in the Final Scoping Report.	Please refer to Application form and Table 3.1 in this Final Scoping Report.
4.	If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted with the final SR.	Listed activities in the application form mirror those listed in this Final Scoping Report.	Please refer to Application form.
5.	Please take note of GNR 4143, which was gazetted on the 04 December 2023, which requires a letter of consent from Eskom Holdings SOC Ltd if the proposed development is within a specific radius of a main electricity transmission or distribution	The proposed development is not near to an Eskom Main Transmission Substation (MTS) and therefore does not trigger the need for consent from Eskom in terms of GN 4143. However, the applicant confirms that it will engage Eskom further during the EIA phases and during the confirmation of the final layout to ensure all relevant set back requirements are met	Not Applicable.

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

8.	You are requested to submit copies of signed Specialist Declaration of Interest forms (witnessed and signed by a Commissioner of Oaths) for all specialist studies conducted. The forms are available on Department's website (please use the Department template).	Specialist Declarations have been included in Volume II.	Please refer to Volume II – Specialist Studies.
9.	Please note that in terms of Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), it is a requirement for specialists to be registered with the South African Council for Natural Scientific Professions (SACNASP) in their respective fields.	SACNASP certifications has been included in Volume II.	Please refer to Volume II – Specialist Studies.
10.	The Heritage Survey, which has been included as part of this SR, must be submitted to the South African Heritage Resources Agency (SAHRA) for comments, via the South African Heritage Resources Information System (SAHRIS).	All requested documentation will be uploaded to the South African Heritage Resources Agency (SAHRA) for comments, via the South African Heritage Resources Information System (SAHRIS). Should comment be received following submission of the FSR, the comment will be sent to the Department for consideration.	Not Applicable.
	Public participation process		
No.	Comment from DFFE	EAP Response	Section in Report

11.	The Public Participation Process must be conducted in terms of Regulation 39, 40 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.	The public participation process for the Emvelo WEF has been conducted in terms of Regulation 39, 40 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.	Refer to Section 9 of the FSR and Volume III – Public Participation Report.
12.	The proposed development site is within a Critical Biodiversity Area (CBA) and National Protected Areas Expansion Strategy (NPAES). Comments must be obtained from this Department's Biodiversity Conservation Section. The contact details are as follows: i. Biodiversity Conservation Directorate Attention: Mr. Seoka Lekota Email: BCAdmin@dffe.gov.za ii. Protected Areas Planning and Management Effectiveness Directorate Attention: Mr. Thivhulawi Nethononda Email: TNethononda@dffe.gov.za	All issues raised and comments received during the availability of the DSR have been addressed in the Public Participation Report (Volume III) and in the FSR, as required. Comments have been provided from BCAdmin and comments from Protected Areas Planning and Management Effectiveness will be obtained during the EIA phase.	Refer to the PP Report – Volume III.
13.	Please ensure that all issues raised and comments received during the circulation of the draft SR from registered Interested and Affected Parties (I&APs) and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed and included in the final SR.	All issues raised and comments received during the availability of the DSR has been addressed in the Public Participation Report (Volume III) and in the FSR, as required. The Project Details of the FSR - Volume I, reflects the changes made from DSR to FSR.	Refer to the PP Report – Volume III.
14.	Copies of original comments received from I&APs and organs of state, which have jurisdiction in respect of	Original comments received from I&APs and organs of state have been included in Volume III – Public Participation Report.	Refer to the PP Report – Volume III.

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

19.	Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as “noted” is not regarded as an adequate response to an I&AP’s comments.	Comments received have been adequately addressed and have not been summarised in the C&R report.	Refer to the PP Report – Volume III.
20.	The attendance register and minutes of any meetings held by the Environmental Assessment Practitioner (EAP) with Interested and Affected Parties (I&APs) and other role players must be included in the final SR.	This has been included as an Appendix in Volume III.	Please refer Volume III – Public Participation Report.
21.	Provide photo evidence of on-site notices, including the names of landmarks and/or GPS coordinates (in degrees, minutes, and seconds) of their placements.	This has been included as an Appendix in Volume III.	Please refer Volume III – Public Participation Report.
22.	Please submit a full page of the newspaper(s) containing the advertisement, ensuring that the information in the advert is legible and that the name of the newspaper and date are visible.	This has been included as an Appendix in Volume III.	Please refer Volume III – Public Participation Report.
	General		
No.	Comment from DFFE	EAP Response	Section in Report
	You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that:		

	"If S&EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a scoping report which has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority" You are are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of Scoping reports in accordance with Appendix 2 and Regulation 21(1) of the EIA Regulations 2014, as amended. Further note that in terms of Regulation 45 of the EIA Regulations 2014, as amended, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).		

TABLE 8-10~~11~~ COMMENTS AND RESPONSE TABLE ON NEW APPLICATION FOR DRAFT SCOPING PHASE RECEIVED FROM DARDLEA (20 SEPTEMBER 2024)

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

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

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

8	The plan of study for EIA must include and address the following: 8.1 Terrestrial Biodiversity: ▪ Intact Grassland Patches and Key Biodiversity Areas must be identified and considered in the analysis of impacts on terrestrial biodiversity. ▪ Where Infrastructure is to be developed In CBAs and Intact Grassland Patches, the impact of the loss of CBAs and intact grassland habitat In terms of metapopulation dynamics (i.e. how the loss of source areas Will impact areas of low quality habitat that cannot support a population of species on Its own) must be assessed. ▪ The Site Ecological Importance methodology, as per the requirements of the Species ▪ Environmental Assessment Guidelines, must be demonstrated to have been applied. ▪ The Impact of the potential loss of ecological drivers on ecological processes must be analyzed I.e. fire, which is an important driver for the maintenance of grassland biodiversity.	The Terrestrial Impact assessment will consider the listed requirements.
8.2	Avifauna: DARDLEA supports the avifaunal specialists' recommendations to remove turbines from the "exclusion zones" identified during pre-construction monitoring. However, in the proposed re-assessment of the layout, the Avifaunal Assessment must consider and include the following:	This comment has been duly noted
	▪ The Birds and Wind-Energy Best-Practice Guidelines state that the duration of pre-construction monitoring should be extended (beyond 12 months) where there is a high risk of significant Impacts on priority species. Sufficient evidence of high risk of significant impact on avifauna on site and within the Project Area of influence exists to extend minimum pre-construction monitoring requirements to adequately assess impacts and determine appropriate mitigation measures. Where the layout of the proposed wind farm does not avoid all sensitive features, corridors and buffers (e.g. CBAs, intact grasslands patches, KBAs, pans and all waterbodies, and provide shaped buffers for such features), additional monitoring must be undertaken to confirm the full	The monitoring protocol implemented was guided by the following: • Procedures for the Assessment and Minimum criteria for reporting on identified environmental themes in terms of sections 24(5)(a) and (h) and 44 of NEMA when applying for Environmental Authorisation (Gazetted October 2020) • Protocol for the specialist assessment and minimum report content requirements for environmental impacts on avifaunal species by onshore wind energy generation facilities where the electricity output is

	spectrum of prevailing environmental conditions to ensure avoidance of significant Impacts,	20MW or more (Government Gazette No. 43110 – 20 March 2020). • Jenkins, A.R., Van Rooyen, C.S., Smallie, J.J., Anderson, M.D., & A.H. Smit. 2015. Best practice guidelines for avian monitoring and impact mitigation at proposed wind energy development sites in southern Africa. Produced by the Wildlife & Energy Programme of the Endangered Wildlife Trust & BirdLife South Africa. Hereafter referred to as the wind guidelines. Monitoring at the WEF sites and a Control Site were conducted by a team of experienced avifaunal field specialists during the following time envelopes: • 21 February–03 March 2022 • 21–27 April 2022 • 01–16 June 2022 • 06–21 October 2022 • 14–17 January 2023 • 05–09 May 2023 • 28–30 June 2023 • 22–26 August 2023 Additional Vantage Point and Transect Count monitoring was conducted near the identified Martial Eagle nest to gain a better understanding of their flight behaviour. Five surveys were conducted, in addition to the seven surveys completed as part of the pre-construction monitoring. The five additional surveys were conducted during the following time envelopes: • 17–22 October 2023

		• 15–23 November 2023 • 30 November–05 December 2023 • 17–22 January 2024 • 14–20 February 2024
	▪ Intact grassland patches are important habitat for foraging and facilitate avifauna breeding and movement. Intact grassland patches must be considered and incorporated in the analysis of Impact zones applicable to avifauna.	MTPA intact grassland patches would have to be avoided both from a terrestrial and avifaunal perspective.
	▪ Buffers for waterbodies aquatic features - confirm the rationale in their determination and how their sizes (210m around drainage lines, and 110m around wetland no-go zones) were determined to be sufficient to account for movement of birds through the site, and protection of roosting areas and flight behaviors (approaching and leaving roost sites foraging sites etc).	The additional 110m (i.e. 210m in total) is to account for the rotor-swept area of the turbines. During the EIA Phase fine scale habitat modelling and identification of wetland corridors for cryptic / low detection probability wetland species will be conducted. Two forms of risk zones will be delineated, namely core breeding habitat, and associated connectivity habitat. Connectivity habitat will include wetland habitats not used for breeding but for movement, as well as wetland/grassland margins. These features will need to be buffered to account for the sensitivity of the respective species involved.
	▪ DARDLEA is especially concerned that the site comprises habitat suitable for species with low detection probability, including the Globally Vulnerable Yellow-breasted Pipit, and Endangered Rudd's Lark, and the Critically Endangered Species 23. The precautionary principle must be applied in the undertaking of comprehensive habitat- based assessments in order to robustly delineate flyways and movement corridors for these species.	During the EIA phase fine scale habitat modelling and identification of wetland and grassland corridors for cryptic / low detection probability wetland species will be conducted. Two forms of risk zones will be delineated, namely core breeding habitat, and associated connectivity habitat. Connectivity habitat will include wetland and grassland habitats not used for breeding but for movement, as well as wetland/grassland margins. These features will need to be buffered to account for the sensitivity of the respective species involved. No dedicated site surveys were conducted for Sensitive Species 23 as yet – these will be conducted during the EIA phase.

	▪ Confirmation of compliance with vantage point requirements. Based on our viewshed analysis appears that only 45-50% of the site is covered vs the required 75%, and that some turbines have been located outside of vantage point visibility.	Vantage points were selected based on their accessibility and the ability to observe the maximum area of the site. The proposed turbine locations covered by vantage points at the Emvelo site is in fact at least 73% and not 45-50% as stated. The locations of these vantage points were also chosen to cover the three WEF sites collectively, achieving a combined coverage of 76%, which meets the minimum requirement stipulated by the BLSA guidelines. Additionally, the vantage point observations were supplemented by five further surveys (total of 60 hours) conducted at various on-site locations to record detailed information on the flight activity of Martial Eagles. During these surveys, the flight behavior of all species of conservation concern was noted and recorded, thereby enhancing the overall coverage and observations from the vantage points on site.
	▪ DARDLEAs position is that blade painting will be a non-negotiable, compulsory requirement for all authorized wind farms in the province, and Shut Down on Demand (SDoD) would be a compulsory adaptive management requirement. However, since neither of these measures are effective for night flying birds, which have been confirmed on and adjacent to the site, a separate operational impact analysis must be undertaken for "Mortality of priority night flying species due to collisions with the wind turbines",	Blade patterning (painting) as well as sdod will be a compulsory requirement during the operational phase. Additionally adaptive management for the implementation of additional mitigation measures will also be a requirement during the operational phase. Nighttime vs. Daytime impact ratings will be done separately during the EIA phase. Radar SDoD mitigation to be considered for nighttime mitigation to reduce flamingo and other night flying bird collisions. Nocturnal surveys were not undertaken, however Grass Owl habitat will be modelled as part of the wetland sensitive areas to avoid during the EIA phase.
	▪ The night-flying greater flamingo was confirmed on site, and there is currently no known technology to mitigate for the collision of night flying birds.	Flamingo presence and mitigation will be revisited in more detail in the EIA phase. Radar SDoD mitigation to be considered for nighttime mitigation to reduce flamingo and other night flying bird collisions.

	▪ Due to the sensitivity of avifauna using the area, and the presence of pans and wetlands on and adjacent to the site, as well as the presence of night-flying birds, tracking data should be acquired to augment the 2D models used.	Extensive tracking studies are typically not within the scope of an EIA process. The Martial Eagle female is however being satellite tracked to better understand spatial and temporal use of the landscape with the aim of further refining the buffer zones and mitigation measures.
	▪ Surveys and tracking should be undertaken to determine the collision risks for nocturnal species,	Extensive tracking studies are typically not within the scope of an EIA process. But all available data sources will be investigated and integrated in the EIA phase of the project.
	▪ A site-specific list of priority avifaunal species for wind farms for this particular region must be developed, which must include all wetland species (noting that the priority species list published by BirdLife South Africa in 2012 does not include most wetland species, and did not Include Mpumalanga).	Priority species definitions and considerations for the EIA phase will be revisited and where possible all wetland species will be taken into account with a particular focus on species of conservation concern.
	▪ Appropriate fatality thresholds (turbine collision, as well as power line collision and electrocution) need to be defined and agreed on within and as part of the EIA process, which must then be incorporated into the Impact analysis.	Collision Risk Modelling to be conducted during EIA phase.
	▪ It Is acknowledged that the Martial Eagle nest turbine no-go buffer Is currently being investigated further with detailed modelling and additional survey work, to inform the final no-go area during the EIA phase. Latest available information from literature, specialists and BirdLife must be consulted during this exercise. This must Include BirdLife's and EWT's recommendations of 5-6km buffer for Martial Eagle nests, noting however that Martial Eagles are known to have large breeding territories, and any buffer must be supported by the birds' actual use of an area.	A detailed flight risk model has been developed to define a high-risk turbine exclusion buffer around the nest. The flight risk model will be further refined during the EIA phase. Tracking data currently collected by the Endangered Wildlife Trust will be used to better inform the spatial and temporal use of the eagles in the area around the nest to better inform the buffer and further refine the implementation of mitigation measures.
8.3	Bat Assessment ▪ Appropriate fatality thresholds need to be defined and agreed oh within the EIA process and Incorporated in the impact analysis. ▪ Separate mitigation measures need to be considered in more detail for high-flying bat species (i.e. Egyptian Free-TaUed bat) ,1nd lower-level bat species (e.g. Cape Serotine) In the EIA, i.e. different turbine design, blade I rotor sweep size and height,	The feedback regarding the Bat specialist report is noted and these concerns will be addressed in the Final Bat EIA Report.

	should be investigated for the specific wind turbines located adjacent to areas where these different bat species occur.	
8.4	Microclimate Impact Assessment ▪ Research has demonstrated that turbines can affect the conditions required for mist formation, and that wind farms warm the land surface, especially at night. Altered microclimates will affect the conditions that support the highveld grasslands. Biodiversity and agricultural potential will potentially be affected. A Microclimate Impact Assessment must be undertaken, which must inform the terrestrial biodiversity study as well as the Agricultural Assessment. The impact of this WEF on the micro- climate, in particular the potential impact on precipitation, soil moisture, soil temperature, etc. therefore also needs to be assessed as part of the EIA.	We are unaware of any local studies on Microclimate that have shown the same impacts in the South African context. Should you be aware of any local study that has identified land surface warming as an impact of wind energy facilities, please direct us to the appropriate published document.
9	All relevant stakeholders, including but not limited to, Birdlife SA, Mpumalanga Tourism and Parks Agency (MTPA), Gert Sibande District Municipality (GSDM), Department of Agriculture, Land Reform and Rural Development (DALRRD), Department of Public Works, Roads and Transport (DPWRT), and Msukaligwa Local Municipality must be must be consulted and provided with an opportunity of.at least 30 days to submit comments.	All issues raised and comments received during the availability of the DSR have been addressed in the Public Participation Report (Volume III) and in the FSR, as required. Additionally, all the I&APs listed are, or have been added to the I&AP database.
10	The public participation process must be demonstrated to have been conducted In accordance with Regulations 39-44 of the EIA Regulations, 2014 (as amended).	The public participation process for the Emvelo WEF has been conducted in terms of Regulation 39, 40 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.
11	Please provide this Department with an opportunity to review and engage with your response to these comments prior to the submission the final scoping report.	Due to the tight time constraints associated with the EIA regulations, we will not be able to afford DARDLEA an opportunity to re-comment prior to Final Scoping Report Submission. Any additional comments on our responses can be submitted directly to DFFE should they deem them appropriate.
12	We are concerned that the proposed development site is not suitable for the development of wind energy infrastructure, and do not support the layout in its current form.	We appreciate the departments inputs as to the potential risks and impacts associated with the current layout. As noted above, and in our meeting on the 11th of September 2024, the sensitivities identified by the various specialists are being

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

TABLE 8-3 COMMENTS AND RESPONSE TABLE ON NEW APPLICATION FOR DRAFT SCOPING PHASE RECEIVED FROM MTPA (20 SEPTEMBER 2024)

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

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

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

9	The MTPA would like to recommend the following: Key biodiversity areas should be avoided, and Wind turbines removed from such. • A 100m buffer around wetlands and other waterbodies must be implemented and adhered to throughout the lifecycle of the proposed development. • 5km radius Martial Eagle Buffer (as recommended by BirdlifeSA} must be implemented and avoided throughout the lifecycle of the proposed development. • A Thorough Terrestrial Biodiversity assessment which also includes Intact grasslands patches. • A thorough Avifaunal study must be done with all the best practices to avoid the bird collision risks. • Proper mitigation strategies of the wind turbines to avoid collisions and mortalities must be included in the EIAr. • The roads, temporary site camps and all the other associated infrastructure must be included on the site layout of the Emvelo WEF in the EIAr. • The Applicant must find a more suitable alternative site for this development with less risk to biodiversity. • The clearance or removal of vegetation must be restricted to the project footprint. • Moderately modified- old lands and heavily modified areas (Degraded} are the most preferred sites for the Emvelo WEF, other natural areas are also preferred but under certain conditions. • The applicant must apply duty of care to ensure that there is no significant pollution or degradation of the environment.	Recommendations provided will included in the Impact Assessment, accordingly. 5km radius Martial Eagle Buffer (as recommended by BirdlifeSA} must be implemented and avoided throughout the lifecycle of the proposed development. Response: • Due to the discovery of a Martial Eagle nest within the proposed WEF project footprints, extensive additional monitoring was performed to collect flight data of the adult eagles and the juvenile in the area. 37 hours, 34 minutes and 11 seconds of Martial Eagle flight time was recorded during an additional 60 hours of observation time conducted in the area. The extensive dataset of Martial Eagle flight data was used to develop a flight risk model. High-quality grassland areas were also identified to prevent displacement of sensitive grassland birds due to disturbance and habitat destruction. A thorough Avifaunal study must be done with all the best practices to avoid the bird collision risks. Response: • Noted – a comprehensive avifaunal impact assessment study is underway. Proper mitigation strategies of the wind turbines to avoid collisions and mortalities must be included in the EIAr. Response: • An Avifaunal EMPR has been included as Appendix 7 & 8
10	The MTPA does not support the Environmental Authorisation of the proposed Emvelo Wind Energy Facility (Ply} Ltd for proposed Wind Energy Facility and Auxiliary infrastructure operation within the application area with up to 45 proposed wind turbines. The sensitive areas cover most of the proposed Emvelo WEF project area, Important Birds Area (IBA} covers 43% of the project area; Key Biodiversity Areas (KBA} Covers 21.4% of the project area; Critical Biodiversity Areas (CBA} covers 1,302.2 ha of the project area; and 2,272.5 ha of intact grassland patches within the project area.	The layout will be revised during the EIA phase

TABLE 8-4 COMMENTS AND RESPONSE TABLE ON NEW APPLICATION FOR DRAFT SCOPING PHASE RECEIVED FROM BIODIVERSITY CONSERVATION (13 AUGUST 2024)

Ref	Comment	Response
1	COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED MULILO AMSTERDAM WEFS CLUSTER, NEAR ERMELO, MPUMALANGA PROVINCE The Directorate: Biodiversity Conservation has reviewed and evaluated the reports and does not have any objection to the draft Scoping Reports and the Plan of Study for EIA. Kindly note that the EIA report must comply with the procedures for the assessment and minimum criteria for reporting on identified environmental themes in terms of sections 24(5) (A) and (H) and 44 of the National Environmental Management Act, 1998. The Environmental Impact Assessment report must comply with all the requirements as outlined in the Environmental Impact Assessment (EIA) guideline for renewable energy projects and the Best Practice Guideline for Birds & Wind Energy for assessing and monitoring the impact of wind energy facilities on birds in Southern Africa. In conclusion, all Public Participation Process documents related to Biodiversity EIA for review and queries should be submitted to the Directorate: Biodiversity Conservation at Email; BCAdmin@environment.gov.za for the attention of Mr. Seoka Lekota.	The EAP acknowledges the comment from the Department and notes their response in terms of compliance with EIA regulations and Best Practice Guideline for Birds & Wind Energy for assessing and monitoring the impact of wind energy facilities on birds in Southern Africa.

TABLE 8-1112 COMMENTS AND RESPONSE TABLE (PREVIOUSLY WITHDRAWN APPLICATION)

Ref	Name and Organisation	Date and Method	Phase of PPP	Comment	Response
1	Nrateng Mashiloane Aviation Environmental	23 July 2024 Per email	Draft Scoping Phase	From: Nrateng Mashiloane <MashiloaneN@caa.co.za> Sent: Tuesday, July 23, 2024 9:25 AM To: ERM Arcus Amsterdam	

	Compliance Department			<ERM.ArcusAmsterdam@erm.com> Cc: Pamela Madondo <MadondoP@caa.co.za>; Evelyn Shogole <ShogoleE@caa.co.za> Subject: RE: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga Good day, I hope this email finds you well. Kindly note that the SACAA has transferred all obstacle assessments and applications responsibilities to Air Traffic and Navigation Services (ATNS) as published on the SACAA website: www.caa.co.za/industryinformation/obstacles/ . A formal application must be lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted. The list and contact details of the approved obstacles assessment services providers can be obtained from the CAA website: www.caa.co.za. Kind regards,	
2	John Geeringh National Transmission Company South Africa SOC Ltd (NTCSA)	23 July 2024 Per email	Draft Scoping Phase	From: John Geeringh <GeerinJH@ntcsa.co.za> Sent: Tuesday, July 23, 2024 11:50 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga Please send me KMZ files of the proposed developments and grid connection. Please find attached Eskom requirements for work at or near Eskom infrastructure and servitudes, as well as a setbacks guideline for RE Developments. Kind regards	From: ERM Arcus Amsterdam Sent: Monday, July 29, 2024 5:56 PM To: John Geeringh <GeerinJH@ntcsa.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga Dear John, Thank you for your e-mail. Please find attached a KMZ file of each WEF. Thank You Kind Regards

3	Lydia Kutu Department of Forestry, Fisheries and the Environment (DFFE) Integrated Environmental Authorisations	24 July 2024 Per email	Draft Scoping Phase	From: Lydia Kutu <LKutu@dffe.gov.za> Sent: Wednesday, July 24, 2024 7:34 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Bathandwa Ncube <BNcube@dffe.gov.za>; EIAadmin <EIAadmin@dffe.gov.za>; Salome Mambane <SMAMBANE@dffe.gov.za>; Stephen Burton <Stephen.Burton@erm.com>; Sadiya Salie <Sadiya.Salie@erm.com>; Anathi Manyakanyaka <Anathi.Manyakanyaka@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com> Subject: 14/12/16/3/3/2/2591 Dear Sir/Madam ACKNOWLEDGEMENT OF RECEIPT OF THE NEW APPLICATION FORM AND DRAFT SCOPING REPORT FOR THE PROPOSED CARLETONVILLE SOLAR PHOTOVOLTAIC PLANT AND ASSOCIATED INFRASTRUCTURE ON REMAINDER OF FARM TWYFELVLAKTE NO. 105, MERAFONG CITY LOCAL MUNICIPALITY, WEST RAND DISTRICT MUNICIPALITY, GAUTENG PROVINCE. The Department confirms having received the Application Form and Draft Scoping Report for Environmental Authorisation for the abovementioned project on 22 July 2024. You have submitted these documents to comply with the Environmental Impact Assessment (EIA) Regulations, 2014, as amended. Kindly note that your application for Environmental Authorisation falls within the ambit of an application applied for in terms of Part 3 of Chapter 4 of the EIA Regulations, 2014, as amended. You are therefore referred to Regulation 21 of the EIA Regulations, 2014 as amended. Please take note of Regulation 40(3) of the EIA Regulations, 2014, as amended, which states	EAP acknowledge that this was an unintended error of acknowledgement. DFFE had subsequently attempted to redact this message.

				that potential Interested & Affected Parties, including the Competent Authority, may be provided with an opportunity to comment on reports and plans contemplated in Regulation 40(1) of the EIA Regulations, 2014, as amended, prior to the submission of an application but must be provided an opportunity to comment on such reports once an application has been submitted to the Competent Authority. Note that in terms of Regulation 45 of the EIA Regulations, 2014, as amended, this application will lapse if the applicant fails to meet any of the time-frames prescribed in terms of these Regulations, unless an extension has been granted by the Department in terms of Regulation 3(7) of the EIA Regulations, 2014, as amended. You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department. Kind Regards,	
4	Lydia Kutu Department of Forestry, Fisheries and the Environment (DFFE) Integrated Environmental Authorisations	24 July 2024 Per email	Draft Scoping Phase	From: Lydia Kutu <LKutu@dffe.gov.za> Sent: Wednesday, July 24, 2024 7:37 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Bathandwa Ncube <BNcube@dffe.gov.za>; EIAadmin <EIAadmin@dffe.gov.za>; Salome Mambane <SMAMBANE@dffe.gov.za>; Stephen Burton <Stephen.Burton@erm.com>; Sadiya Salie <Sadiya.Salie@erm.com>; Anathi Manyakanyaka <Anathi.Manyakanyaka@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com> Subject: 14/12/16/3/3/2/2592 Dear Sir/Madam	The EAP acknowledges the receipt of the Draft Scoping report to the department

				ACKNOWLEDGEMENT OF RECEIPT OF THE NEW APPLICATION FORM AND DRAFT SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF THE ROCHDALE WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, INCLUDING A GRID CONNECTION, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, AND GERT SIBANDE DISTRICT MUNICIPALITY, MPUMALANGA PROVINCE. The Department confirms having received the Application Form and Draft Scoping Report for Environmental Authorisation for the abovementioned project on 22 July 2024. You have submitted these documents to comply with the Environmental Impact Assessment (EIA) Regulations, 2014, as amended. Kindly note that your application for Environmental Authorisation falls within the ambit of an application applied for in terms of Part 3 of Chapter 4 of the EIA Regulations, 2014, as amended. You are therefore referred to Regulation 21 of the EIA Regulations, 2014 as amended. Please take note of Regulation 40(3) of the EIA Regulations, 2014, as amended, which states that potential Interested & Affected Parties, including the Competent Authority, may be provided with an opportunity to comment on reports and plans contemplated in Regulation 40(1) of the EIA Regulations, 2014, as amended, prior to the submission of an application but must be provided an opportunity to comment on such reports once an application has been submitted to the Competent Authority. Note that in terms of Regulation 45 of the EIA Regulations, 2014, as amended, this application will lapse if the applicant fails to meet any of	

				the time-frames prescribed in terms of these Regulations, unless an extension has been granted by the Department in terms of Regulation 3(7) of the EIA Regulations, 2014, as amended. You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department. Kind Regards,	
5	Lydia Kutu Department of Forestry, Fisheries and the Environment (DFFE) Integrated Environmental Authorisations	24 July 2024 Per email	Draft Scoping Phase	From: Lydia Kutu <LKutu@dffe.gov.za> Sent: Wednesday, July 24, 2024 7:38 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Bathandwa Ncube <BNcube@dffe.gov.za>; EIAadmin <EIAadmin@dffe.gov.za>; Salome Mambane <SMAMBANE@dffe.gov.za>; Stephen Burton <Stephen.Burton@erm.com>; Sadiya Salie <Sadiya.Salie@erm.com>; Anathi Manyakanyaka <Anathi.Manyakanyaka@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com> Subject: 14/12/16/3/3/2/2591 Dear Sir/Madam ACKNOWLEDGEMENT OF RECEIPT OF THE NEW APPLICATION FORM AND DRAFT SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF THE EMVELO WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, AND GERT SIBANDE DISTRICT MUNICIPALITY, MPUMALANGA PROVINCE. The Department confirms having received the Application Form and Draft Scoping Report for	

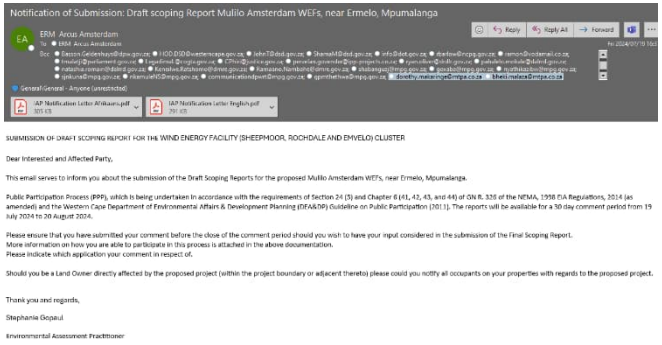
				Environmental Authorisation for the abovementioned project on 22 July 2024. You have submitted these documents to comply with the Environmental Impact Assessment (EIA) Regulations, 2014, as amended. Kindly note that your application for Environmental Authorisation falls within the ambit of an application applied for in terms of Part 3 of Chapter 4 of the EIA Regulations, 2014, as amended. You are therefore referred to Regulation 21 of the EIA Regulations, 2014 as amended. Please take note of Regulation 40(3) of the EIA Regulations, 2014, as amended, which states that potential Interested & Affected Parties, including the Competent Authority, may be provided with an opportunity to comment on reports and plans contemplated in Regulation 40(1) of the EIA Regulations, 2014, as amended, prior to the submission of an application but must be provided an opportunity to comment on such reports once an application has been submitted to the Competent Authority. Note that in terms of Regulation 45 of the EIA Regulations, 2014, as amended, this application will lapse if the applicant fails to meet any of the time-frames prescribed in terms of these Regulations, unless an extension has been granted by the Department in terms of Regulation 3(7) of the EIA Regulations, 2014, as amended. You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.	

				Kind Regards,	
6	Lydia Kutu Department of Forestry, Fisheries and the Environment (DFFE) Integrated Environmental Authorisations	24 July 2024 Per email	Draft Scoping Phase	From: Lydia Kutu <LKutu@dffe.gov.za> Sent: Wednesday, July 24, 2024 7:40 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Bathandwa Ncube <BNcube@dffe.gov.za>; EIAadmin <EIAadmin@dffe.gov.za>; Salome Mambane <SMAMBANE@dffe.gov.za>; Stephen Burton <Stephen.Burton@erm.com>; Sadiya Salie <Sadiya.Salie@erm.com>; Anathi Manyakanyaka <Anathi.Manyakanyaka@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com> Subject: 14/12/16/3/3/2/2593 Dear Sir/Madam ACKNOWLEDGEMENT OF RECEIPT OF THE NEW APPLICATION FORM AND DRAFT SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF THE SHEEPMOOR WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, AND GERT SIBANDE DISTRICT MUNICIPALITY, MPUMALANGA PROVINCE. The Department confirms having received the Application Form and Draft Scoping Report for Environmental Authorisation for the abovementioned project on 22 July 2024. You have submitted these documents to comply with the Environmental Impact Assessment (EIA) Regulations, 2014, as amended. Kindly note that your application for Environmental Authorisation falls within the ambit of an application applied for in terms of Part 3 of Chapter 4 of the EIA Regulations, 2014, as amended. You are therefore referred	The EAP acknowledges the receipt of the Draft Scoping report to the department

				to Regulation 21 of the EIA Regulations, 2014 as amended. Please take note of Regulation 40(3) of the EIA Regulations, 2014, as amended, which states that potential Interested & Affected Parties, including the Competent Authority, may be provided with an opportunity to comment on reports and plans contemplated in Regulation 40(1) of the EIA Regulations, 2014, as amended, prior to the submission of an application but must be provided an opportunity to comment on such reports once an application has been submitted to the Competent Authority. Note that in terms of Regulation 45 of the EIA Regulations, 2014, as amended, this application will lapse if the applicant fails to meet any of the time-frames prescribed in terms of these Regulations, unless an extension has been granted by the Department in terms of Regulation 3(7) of the EIA Regulations, 2014, as amended. You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department. Kind Regards	
7	Tebego Kgaphola Department of Forestry, Fisheries & the Environment	29 July 2024 Per email	Draft Scoping Phase	From: BC Admin <bcadmin@dffe.gov.za> Sent: Monday, July 29, 2024 9:22 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Portia Makitla <PMakitla@dffe.gov.za>; Tebego Kgaphola <tkgaphola1@dffe.gov.za>; Lindiwe Victoria Dlamini <LVDlamini@dffe.gov.za> Subject: RE: Notification of Submission: Draft	

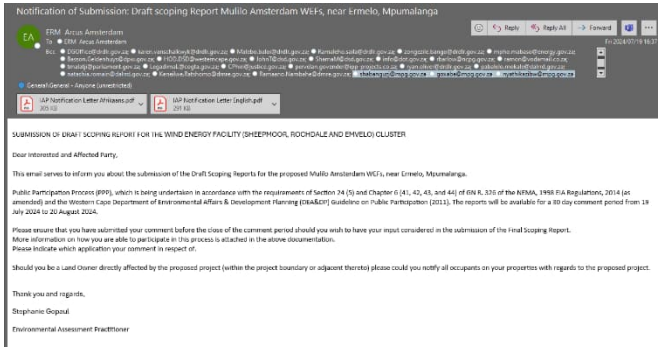
				scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga Dear Sir/Madam DFFE Directorate: Biodiversity Conservation hereby acknowledge receipt of the invitation to review and comment on the project mentioned on the subject line. Kindly note that the project has been allocated to Mrs P Makitla and Ms Tebego Kgaphola (Copied on this email). In addition, kindly share the shapefiles of the development footprints/application site with the Case Officers. Please note: All Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries must be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@dffe.gov.za for attention of Mr Seoka Lekota	
8	Josua Meyer Aida Form entry	30 July 2024 Per email	Draft Scoping Report	From: Josua Meyer <meyerjosua55@gmail.com> Sent: Tuesday, July 30, 2024 11:00 AM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: Fwd: SHEEPMOOR, EMVELO WIND ENERGIE PROJEKTE VERSOEK VORM OM TE REGISTREER AS BELANGHEBBENDE PARTY OP BOGEMELDE PROJEKTE sodat kommentaar gelewer kan word. Het nie rekening op aida om aanlyn te registreer nie en die foon nommer 011-798 5400 is foutief. Waardeer	From: ERM Arcus Amsterdam Sent: Tuesday, August 6, 2024 12:10 PM To: Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: RE: SHEEPMOOR, EMVELO WIND ENERGIE PROJEKTE Good day, Thank you for your comment, you will now be added to the I&AP database. Below is a link to the Aida form, there will be no need to register in order to fill out the form: https://mulilowef.aidaform.com/public-participation-form Thank you,

9	John Geeringh National Transmission Company South Africa SOC Ltd (NTCSA)	31 July 2024 Per email	Draft Scoping Report	From: John Geeringh <GeerinJH@ntcsa.co.za> Sent: Wednesday, July 31, 2024 3:45 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga Thanks, they will have to relook at their turbine layouts with regards to the setbacks requirements of 3 x tip height from TX lines and 1 x tip height from Dx lines. Lines connecting to power stations are extremely sensitive and chance are we may no grant setbacks relaxation. Regards	From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Sent: Wednesday, August 7, 2024 9:24 AM To: John Geeringh <GeerinJH@ntcsa.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga Hi John, Thank you for your email. The layout will be revised, taking into account the WTG's that are within the proximity of the existing transmission lines. We will ensure that these turbines are 3x the Tip height from existing Electrical infrastructure. Kind Regards,
10	Josua Meyer Interested and Affected Party	31 July 2024 Per email	Draft Scoping Report	From: Josua Meyer <meyerjosua55@gmail.com> Sent: Thursday, August 1, 2024 9:06 PM To: ERM Arcus Amsterdam <erm.arcusamsterdam@erm.com> Subject: VOORGESTELDE ERMELO WINDPLASE Plasing, groottes van turbines onduidelik Versoek duidelike kaart waar turbines geplaas gaan word. Eiendom grense en distrikspaaie moet duidelik getoon word.	From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Sent: Tuesday, August 6, 2024 9:45 AM To: Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: RE: VOORGESTELDE ERMELO WINDPLASE Good day, Kindly see attached Layout of Proposed WEF's. Additional information on the project can be found in the link below: https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/ Kind Regards,

11	Robyn Luyt Director: Environmental Impact Management (EIM) DARDLEA	03 August 2024 Per email	Draft Scoping Report	From: Robyn Luyt <rluyt@mpg.gov.za> Sent: Saturday, August 3, 2024 3:09 PM To: ERM Arcus Amsterdam <Erm.arcusamsterdam@erm.com> Cc: cagenbach@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za; whector@dffe.gov.za; Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; Celia.dewaal@mtpa.co.za; frans.krige@mtpa.co.za; mervyn@mtpa.co.za Subject: Consultation | Mlulio Wind Farms Mpumalanga Importance: High Good day Ms Gopaul, It has come to our attention, and not via any official notification from ERM, that draft Scoping Reports for the following wind farms proposed in the Gert Sibande District in Mpumalanga Province are out for public comment from 19 July 2024 to 20 August 2024 (as per ERM website), where ERM is the EAP: 1. Shepmoore WEF 2. Emvelo WEF 3. Rochdale WEF Neither DARDLEA nor MTPA have been consulted to date, nor have we received copies of any of the draft Scoping Reports. Aside from the requirements of the EIA Regulations, DARDLEA and MTPA have through internal arrangements with DFFE requested to be included in all pre-application consultations for Renewable Energy projects in Mpumalanga, particularly wind energy facilities. DARDLEA and MTPA must be included during all pre-application meetings and in all in-process consultations.	From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Sent: Tuesday, August 6, 2024 1:43 PM To: Robyn Luyt <rluyt@mpg.gov.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: cagenbach@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za; whector@dffe.gov.za; Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; Celia.dewaal@mtpa.co.za; frans.krige@mtpa.co.za; mervyn@mtpa.co.za Subject: RE: Consultation | Mlulio Wind Farms Mpumalanga Good day Robyn, Please note that DARDLEA and MTPA were notified regarding the PP for the Draft scoping Phase on the 19th July 2024. Kindly see proof of notification below:  Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga SUBMISSION OF DRAFT SCOPING REPORT FOR THE WIND ENERGY FACILITY (SHEEPMOOR, ROCHDALE AND EMVELO) CLUSTER Dear Interested and Affected Party, This email serves to inform you about the submission of the Draft Scoping Reports for the proposed Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga. Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2013). The reports will be available for a 30 day comment period from 19 July 2024 to 20 August 2024. Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final Scoping Report. More information on how you are able to participate in this process is attached in the above documentation. Please indicate which application your comment in respect of. Should you be a Land Owner directly affected by the proposed project (within the project boundary or adjacent thereto) please could you notify all occupants on your properties with regards to the proposed project. Thank you and regards, Stephanie Gopaul Environmental Assessment Practitioner

For the purpose of commenting on draft reports during the regulatory periods, we request that hard copies of all reports are submitted to Ms Sindi Mbuyane in our Ermelo office (where projects are located in the Gert Sibande District), and sent electronically to me via WeTransfer. Please also ensure that MTPA receives the reports in the manner requested by them. For your records I include the contact details of all relevant officials to be consulted in DARDLEA (when an application is in the Gert Sibande District) and MTPA:

DARDLEA	DESIGNATION	EMAIL	PHONE
Robyn Luyt	Director: Environmental Impact Management (EIM)	rluyt@mpg.gov.za	082 672 7868
Sindisiwe Mbuyane	Deputy Director: EIM Gert Sibande District	mbuyanesb@mpg.gov.za	076 870 5543
Gavin Cowden	Deputy Director: Environmental Policy, Planning and Coordination	gcowden@mpg.gov.za	
MTPA	**DESIGNATION**	**EMAIL**	**PHONE**
Mervyn Lotter	Manager: Biodiversity Planning	Mervyn@mtpa.co.za	083 299 7618


Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

ERM Arcus Amsterdam

IAP Notification Letter Afrikaans.pdf

IAP Notification Letter English.pdf

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

Dear Interested and Affected Party,

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

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2013). The reports will be available for a 30 day comment period from 19 July 2024 to 20 August 2024.

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

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

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

				<table><tr><td>Frans Krige</td><td>Land Use Advisor</td><td>Frans.Krige@mtpa.co.za</td><td></td></tr><tr><td>Khumbelo Malele</td><td>Land Use Advisor</td><td>Khumbelo.Malele@mtpa.co.za khumbelomalele@gmail.com</td><td>013 235 2395</td></tr><tr><td>Celia de Waal</td><td>EIA Data Capturer LUA</td><td>celia.dewaal@mtpa.co.za</td><td>082 841 7163</td></tr></table> Please note that time frames for commenting on draft reports can only commence on the date that hard copies of the reports are received, and we request that our 30 day time frame aligns with DFFE's. Kind Regards Robyn	
12	Celia de Waal Mpumalanga Tourism and Parks	06 August 2024 Per email	Draft Scoping Report	From: Celia de Waal <celia@mtpa.co.za> Sent: Tuesday, August 6, 2024 9:35 AM To: ERM Arcus Amsterdam <erm.arcusamsterdam@erm.com> Cc: Mervyn Lotter <Mervyn.Lotter@mtpa.co.za>; Johan Eksteen <johan@mtpa.co.za>; Frans Krige <frans@mtpa.co.za>; Khumbelo Malele <Khumbelo.Malele@mtpa.co.za> Subject: FW: Register for the Zephyr WEF Meeting and site visit Good morning Kindly send us, the MTPA, hard copies of the 3 Wind Farm reports, for our Scientists to comment on, to the following physical address: To: Cecilia de Waal (EIA Data Capturer) MTPA Office Building (Lydenburg)	From: ERM Arcus Amsterdam Sent: Tuesday, August 6, 2024 3:27 PM To: Celia de Waal <Celia.dewaal@mtpa.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Johan Eksteen <johan@mtpa.co.za>; Frans Krige <frans@mtpa.co.za>; Khumbelo Malele <Khumbelo.Malele@mtpa.co.za>; Mervyn Lotter <Mervyn.Lotter@mtpa.co.za> Subject: RE: Consultation | Mlulio Wind Farms Mpumalanga Good day Cecilia, Thank you for your email. The reports are on their way to the below address as we speak. Kind Regards,

				End of Morgan street Lydenburg 1120 My contact details are: 013 065 0062 or 082 841 7163 Kind regards Celia de Waal From: Mervyn Lotter <mervyn@mtpa.co.za> Sent: Saturday, August 3, 2024 9:00 AM To: Frans Krige <frans@mtpa.co.za>; Celia de Waal <celia@mtpa.co.za>; Robyn Luyt (rluyt@mpg.gov.za) <rluyt@mpg.gov.za>; Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za> Subject: FW: Register for the Zephyr WEF Meeting and site visit Hi there Christophe sent me the attached KML file and the below links. I see these are links to scoping reports dated 19 July 2024. They seem to have started with the application process while not yet consulting us. Celia, could you please write to ERM to request copies of the three wind farm documents for comment. Robyn/Sindy, you may want to do the same. I have updated our webmap with these latest boundaries from the KML file. Best wishes Mervyn	

				From: Christophe Pajonk <Christophe.Pajonk@edf-re.co.za> Sent: Friday, August 2, 2024 12:19 PM To: Mervyn Lotter <mervyn@mtpa.co.za> Subject: RE: Register for the Zephyr WEF Meeting and site visit Hi Mervyn, Many thanks for reaching out. Please find attached the kmz of the Mullilo WEF projects in Mpumalanga. Please also find below the publicly available documents for their respective projects https://www.sustainability.com/globalassets/documents/proposed-amsterdam/0684401_sheepmoor-wef-dsr.pdf https://www.sustainability.com/globalassets/documents/proposed-amsterdam/0684401_emvelo-wef-dsr.pdf https://www.sustainability.com/globalassets/documents/proposed-amsterdam/0684401_rochdale-wef-dsr.pdf I hope this helps. Kind regards,	

				Christophe From: Mervyn Lotter <mervyn@mtpa.co.za> Sent: Thursday, August 1, 2024 8:25 PM To: Christophe Pajonk <Christophe.Pajonk@edf-re.co.za> Subject: RE: Register for the Zephyr WEF Meeting and site visit EXTERNAL MAIL Hi Christophe Thank you for writing. Would you please send me an image or shapefile for the Mulilo WEF boundaries when you get a chance? Best wishes Mervyn From: Christophe Pajonk <Christophe.Pajonk@edf-re.co.za> Sent: Thursday, August 1, 2024 4:50 PM To: Sindy Mbuyane <mbuyanesb@mpg.gov.za>; Gavin Cowden <GCowden@mpg.gov.za>; Robyn Luyt <RLuyt@mpg.gov.za>; Frans Krige <frans@mtpa.co.za>; hlatshwayo.mixo@mtpa.co.za; Mervyn Lotter <mervyn@mtpa.co.za>; Rockey Nkosi <rockey.nkosi@mtpa.co.za> Cc: Ryan David-Andersen <ryan@amdadevelopments.co.za> Subject: RE: Register for the Zephyr WEF Meeting and site visit Good afternoon everyone, Thank you so much for your time and very valuable feedback and recommendations.	

				Ryan and I are now back in Cape Town and addressing your comments. We have liaised back with our EAP and will provide you with further information shortly. Thanks again for taking the time to meet with us and for the transparency, we highly appreciate it. I will be sending a couple of emails in the next few days in line with our engagement. Kind regards, Christophe From: Sindy Mbuyane <mbuyanesb@mpg.gov.za> Sent: Wednesday, July 31, 2024 11:23 AM To: Ryan David-Andersen <ryan@amdadevelopments.co.za>; Christophe Pajonk <Christophe.Pajonk@edf-re.co.za>; Gavin Cowden <GCowden@mpg.gov.za>; Robyn Luyt <RLuyt@mpg.gov.za>; Frans Krige <frans@mtpa.co.za>; hlatshwayo.mixo@mtpa.co.za; mervyn@mtpa.co.za; rockey.nkosi@mtpa.co.za Subject: Register for the Zephyr WEF Meeting and site visit EXTERNAL MAIL Good day All, Find attached for your attention. Kind Regards, Sindisiwe Mbuyane EAPASA Reg: 2021/3509, IAIAsa 2040304	

				Environmental Officer Control Grade B Gert Sibande District (13 De Jager Street, Ermelo 2350) 013 004 0766 076 870 5543	
13	Celia de Waal Mpumalanga Tourism and Parks	06 August 2024 Per email	Draft Scoping Report	From: Celia de Waal <Celia.dewaal@mtpa.co.za> Sent: Tuesday, August 6, 2024 3:37 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: RE: Consultation | Mlulio Wind Farms Mpumalanga Thank you	
14	Robyn Luyt Director: Environmental Impact Management (EIM) DARDLEA	10 August 2024 Per email	Draft Scoping Report	From: Robyn Luyt <rluyt@mpg.gov.za> Sent: Sunday, August 11, 2024 4:19 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za> Subject: Re: RE: Consultation | Mlulio Wind Farms Mpumalanga Good afternoon, Please confirm whether you received the below email - I have deleted all graphics from the email thread to ensure this reaches you. Regards Robyn >>> Robyn Luyt 08/11/24 9:51 AM >>> Good day Stephanie, As of 8 August 2024, neither DARDLEA nor MTPA have received draft Scoping Reports to review and comment on, nor have we received a response to the email below.	From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Sent: Sunday, August 11, 2024 4:23 PM To: Robyn Luyt <rluyt@mpg.gov.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za> Subject: RE: RE: Consultation | Mlulio Wind Farms Mpumalanga Good day Robyn, Emails have been received and responded to. Please see attached response. Kind Regards *NOTE:* *Post concerns expressed from DARDLEA/MTPA. The previous draft applications were withdrawn and the*

				Kind Regards Robyn *Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc.,* *Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)* *Director: Environmental Impact Management* *Department of Agriculture, Rural Development,* *Land & Environmental Affairs* *Mpumalanga Provincial Government* *Riverside Office Park, Aqua Street (Cycad* *Building - Block 4)* *Nelspruit, 1200* *Tel: 013 759 4000* *Email: rluyt@mpg.gov.za* >>> Robyn Luyt 08/07/24 9:41 AM >>> Good day Stephanie, Be advised that the names of the officials at MTPA that you have highlighted in your below notification are not the relevant officials that are required to be notified or the relevant officials that must review and comment on draft Scoping or EIA reports, or any reports related to an EIA process. There are also no officials in the list of officials in your screenshots that are in the Environmental Affairs Chief Directorate in MDARDLEA - as far as I am aware they are in the section that deals with Agriculture, which is an entirely different mandate. It would not be acceptable to not provide the commenting authority the mandatory 30 days to review and comment on draft reports, especially in light of the fact that there has been no prior notification. The Directorate Environmental Impact Management within DARDLEA represents the MEC as Competent Authority in Mpumalanga, and the commenting	*entire process restarted to afford all IAPs 30 days commenting period.*

				authority in respect projects administered by DFFE. MTPA has the mandate for biodiversity matters on behalf of DARDLEA. As per my email to you below (3 August), hard copies of all reports must be submitted to Ms Mbuyane (Environmental Impact Management) at our Ermelo office, and the documents must be made available to me (and in this instance to Mr Cowden and Mr Lotter) electronically at the same time. You will need to contact Ms De Waal and Mr Krige at MTPA to confirm how documents must be submitted to MTPA. Please provide shape files of the 3 proposed WEFs as well. Regards Robyn	
15	Robyn Luyt Director: Environmental Impact Management (EIM) DARDLEA	10 August 2024 Per email	Draft Scoping Report	From: Robyn Luyt <rluyt@mpg.gov.za> Sent: Sunday, August 11, 2024 4:56 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za> Subject: Re: RE: RE: Consultation | Mlulio Wind Farms Mpumalanga Importance: High Good day, Please see my email response to you on 7 August as per below email thread. I have not had a response and we still await the draft reports for commenting. Please urgently advise how this is being addressed. I have just had an email from MTPA stating that you are busy sending them the draft reports. Please confirm when I will receive a link to the reports, and when our Ms Mbuyane will receive the hard copies. Please also confirm that we (both	

				DARDLEA and MTPA) will be provided with the mandatory 30 days to comment. Should you wish to discuss this further please call me on 0826727868. Regards Robyn	
16	Tebego Kgaphola Directorate: Biodiversity Mainstreaming and EIA	12 August 2024 Per email	Draft Scoping Phase	From: BC Admin <bcadmin@dffe.gov.za> Sent: Monday, August 12, 2024 1:07 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: RE: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga Good day Kindly share the link for the below project.	From: ERM Arcus Amsterdam Sent: Monday, August 12, 2024 2:07 PM To: BC Admin <bcadmin@dffe.gov.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Subject: RE: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga Good day Tebego, Please see below link to the proposed project: https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/ Kindly navigate to the bottom of the page to download all reports and additional documentation related to the project. Kind Regards
17	Robyn Luyt Director: Environmental Impact Management (EIM) DARDLEA	12 August 2024 Per email	Draft Scoping Report	From: Robyn Luyt <rluyt@mpg.gov.za> Sent: Monday, August 12, 2024 2:09 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: bncube@dffe.gov.za; OLetlalo@dffe.gov.za; Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za> Subject: Re: RE: RE: Consultation | Mlulio Wind	From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Sent: Monday, August 12, 2024 4:06 PM To: Robyn Luyt <rluyt@mpg.gov.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: bncube@dffe.gov.za; OLetlalo@dffe.gov.za; Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>

				Farms Mpumalanga Importance: High Dear Lucien, Our telephone discussion this morning refers. I just wanted to confirm what we discussed in writing, ie. that MTPA and DARDLEA are different entities, and that MTPA and DARDLEA must each get reports for commenting. You confirmed that you dispatched documents to Ms Celia de Waal in Lydenburg last week (to arrive this week). Note that as per the table below, Ms de Waal will receive the documents for MTPA. DARDLEA must therefore still be provided with the documents. Hard copies to Ms Mbuyane at our Ermelo office, and a link to be sent to me. Please also send me the shapefiles. I have understood that you will be discussing this with your client and with Ms Gopaul, and that ERM would revert to me. Please see page 2 of our application form attached where you will find the physical address of our Ermelo office (Gert Sibande District). Kind Regards Robyn	Subject: RE: RE: RE: Consultation | Mlulio Wind Farms Mpumalanga Hi Robyn, Thank you for your call earlier. I wanted to inform you that we sent out the notification to all IAPs on July 19th, 2024. We are currently in the process of couriering the Draft Scoping Reports to Sindiswe Mbuyane in Ermelo. We would greatly appreciate it if you could review the reports within the current PPP period. Additionally, we have added you to the IAP database for the Full Scoping and EIA Phase to afford you an opportunity to comment. We are keen to have you onboard and to ensure that you are up to speed with the proposed project, we would be happy to set up a call at your convenience. We understand that you may not have received the reports yet, but if you could review them at your earliest convenience, it would be greatly appreciated. Below is a link to the electronic copies of the reports and attached the shapefiles of the development for your review. https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/ Please let me know if you would like to discuss this further or if you have any questions.
18	Bathandwa Ncube DFFE	12 August 2024 Per email	Draft Scoping Report	From: Bathandwa Ncube <BNcube@dffe.gov.za> Sent: Monday, August 12, 2024 4:14 PM To: Stephanie Gopaul <stephanie.gopaul@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>	

				Cc: Masina Morudu <memorudu@dffe.gov.za>; mervyn.lotter@gmail.com; GCowden <GCowden@mpg.gov.za>; SB. Mbuyane <MbuyaneSB@mpg.gov.za>; celia@mtpa.co.za; R Luyt <rluyt@mpg.gov.za> Subject: 14/12/16/3/3/2/2591; 2592; 2593: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP Goodday Lucien 14/12/16/3/3/2/2591: THE PROPOSED DEVELOPMENT OF THE EMVELO WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE 14/12/16/3/3/2/2592: THE PROPOSED DEVELOPMENT OF THE ROCHDALE WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, INCLUDING A GRID CONNECTION, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE 14/12/16/3/3/2/2593: THE PROPOSED DEVELOPMENT OF THE SHEEPMOOR WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE The application and draft Scoping Report (SR) for Environmental Authorisation received by the Department on 22 July 2024 refers. Following our telephone conversation earlier today regarding the public participation process, please be informed that comments on the draft Scoping Report (SR) are due to you on 22 August 2024. It is noted that there are organs of state who have jurisdiction in respect	

				of the proposed activity, which requires that they be added to the I&AP Database and given an opportunity to comment on the draft SR. The applicant is requested to submit the final SR to the Department on or before the due date (05 September 2024) and may submit comments from MTPA and DARDLEA as addendums, subsequent to the submission of the final SR to the Department. MTPA and Mpumalanga DARDLEA are requested to cc this Department when submitting comments to the EAP. Kind regards	
19	ERM Arcus Amsterdam Mailbox	12 August 2024 Per Email	Draft Scoping Phase		From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Sent: Monday, August 12, 2024 4:58 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: nyathikazibheki@gmail.com; shabanguzj@mpg.gov.za Subject: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga Hi Bheki, Our telephonic discussion earlier refers. Understandably, you mentioned IT related issues in terms of receiving e-mails and forwarding them, hence I have copied your gmail address as requested. Please see below notification that was sent on the 19th of July 2024.

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

Dear Interested and Affected Party,

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

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

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

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

Thank you and regards,
Stephanie Gopaul
Environmental Assessment Practitioner

20	Celia de Waal Mpumalanga Tourism and Parks	13 August 2024 Per email	Draft Scoping Phase	From: Celia de Waal <celia@mtpa.co.za> Sent: Tuesday, August 13, 2024 8:16 AM To: Stephanie Gopaul <stephanie.gopaul@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Masina Morudu <memorudu@dffe.gov.za>; mervyn.lotter@gmail.com; GCowden <GCowden@mpg.gov.za>; SB. Mbuyane <MbuyaneSB@mpg.gov.za>; Bathandwa Ncube <BNcube@dffe.gov.za>; R Luyt <rluyt@mpg.gov.za>; Frans Krige <frans@mtpa.co.za>; Johan Eksteen <johan@mtpa.co.za> Subject: MTPA Acknowledgement of receipt RE: 14/12/16/3/3/2/2591; 2592; 2593: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP Good day Stephanie The MTPA acknowledge the receipt of the following 3 documents. It was delivered yesterday 12 August 2024. 14/12/16/3/3/2/2591: THE PROPOSED DEVELOPMENT OF THE EMVELO WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE 14/12/16/3/3/2/2592: THE PROPOSED DEVELOPMENT OF THE ROCHDALE WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, INCLUDING A GRID CONNECTION, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE 14/12/16/3/3/2/2593: THE PROPOSED DEVELOPMENT OF THE SHEEPMOOR WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, NEAR ERMELO, WITHIN THE	The EAP acknowledges the receipt of the DSRs to the department

				MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE The commenting scientist is Mr. Frans Krige who is copied in this e-mail.	
21	Robyn Luyt Director: Environmental Impact Management (EIM) DARDLEA	13 August 2024 Per email	Draft Scoping Report	From: Robyn Luyt <rluyt@mpg.gov.za> Sent: Tuesday, August 13, 2024 8:50 AM To: BNcube@dffe.gov.za; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <stephanie.gopaul@erm.com> Cc: cagenbach@dffe.gov.za; memorudu@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za; mervyn.lotter@gmail.com; Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; celia@mtpa.co.za Subject: Re: 14/12/16/3/3/2/2591; 2592; 2593: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP Importance: High Good Morning all, I am extremely concerned with the agreement reached between ERM and DFFE. DARDLEA, as the Provincial Department responsible for environmental affairs in Mpumalanga Province, has to date not yet received any of the draft documents for review and comment. In accordance with the requirements of Regulation 40(1)(b), the scoping report is required to be subjected to all I&APs for a period of at least 30 days for comment. Further to this, Regulation 40(2)(b) states that the public participation process must provide access to all information ...and must include consultation with every State department that administers a law relating to a matter affecting the environment	From: Stephanie Gopaul <stephanie.gopaul@erm.com> Sent: Tuesday, August 13, 2024 3:56 PM To: Robyn Luyt <rluyt@mpg.gov.za>; BNcube@dffe.gov.za Cc: cagenbach@dffe.gov.za; memorudu@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za; mervyn.lotter@gmail.com; Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; celia@mtpa.co.za; Lloyd Barnes <lloyd@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com> Subject: RE: 14/12/16/3/3/2/2591; 2592; 2593: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP Dear Robyn Thank you for your email in response to that of Bathandwa's in the email trail. Apologies that the draft documents did not reach your desk, however these were submitted and made accessible to DARDLEA on 19th July (see email attached). Following your email on 3rd August 2024, we responded to you on 6th August (as per the email attached) and advised you that DARDLEA were in fact notified of the availability. Your email on 8th August refers: Good day Stephanie, "Be advised that the names of the officials at MTPA that you have highlighted in your below notification arenot the relevant officials that are required to be

				relevant to an application for an environmental authorisation. Regulation 21(1) is very clear in the requirement that a final Scoping Report must, within 44 days of submitting an application to the CA, be submitted to the CA (ie. DFFE), which report has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received. The arrangement below is not in line with this requirement, which amounts to an administrative flaw, and I fail to see how DFFE would be in a position to consider a final Scoping report that does not include the input from DARDLEA. The arrangement would also preclude the requirement for the applicant to incorporate the comments received from DARDLEA into the final Scoping report. As stated above, DARDLEA still awaits the documents for comment. Kind Regards Robyn	notified or the relevant officials that must review and comment on draft Scoping or EIA reports, or any reports related to an EIA process. There are also no officials in the list of officials in your screenshots that are in the Environmental Affairs Chief Directorate in MDARDLEA - as far as I am aware they are in the section that deals with Agriculture, which is an entirely different mandate. It would notbe acceptable to not provide the commenting authority the mandatory 30 days to review and comment on draft reports, especially in light of the fact that there has been no prior notification. The Directorate Environmental Impact Management within DARDLEA represents the MEC as Competent Authority in Mpumalanga, and the commenting authority in respect projects administered by DFFE. MTPA has the mandate for biodiversity matters on behalf of DARDLEA. As per my email to you below (3 August), hard copies of all reports must be submitted to Ms Mbuyane (Environmental Impact Management) at our Ermelo office, and the documents must be made available to me (and in this instance to Mr Cowden and Mr Lotter) electronically at the same time. You will need to contact Ms De Waal and Mr Krige at MTPA to confirm how documents must be submitted to MTPA. Please provide shape files of the 3 proposed WEFs as well." We then responded to you with the links to access the documents electronically and couriered hard copies to Ms Sindi Mbuyane as per your request on 3rd August - we will follow up with the courier if these haven't been received by her as yet. MTPA received their hard copies yesterday (refer to email attached from Celia de Waa for proof of receipt). Importantly, in your email of 3rd August, you state that "DARDLEA and MTPA have through internal arrangements with DFFE requested to be included in all pre-application consultations for Renewable

					Energy projects in Mpumalanga, particularly wind energy facilities." You also state in your email of 8th August (referenced in the para above) that "especially in light of the fact that there has been no prior notification". I would like to point out that Ms Sindi Mbuyane was in fact involved in the pre-app meeting – please see attached the pre-app meeting minutes that Ms Sindi signed. Prior consultation therefore did happen and we kindly request that in light of this, you consider completing your review of the DSR to meet the public participation deadline of 22 August 2024. Should you be unable to provide your comments by this date, we would agree to the way forward stipulated in the email by Ms Bathandwa Ncube on 12 august 2024- ie. this would mean that the FSR would progress and get submitted without DARDLEA and MTPA comments if these are not available at the time, and for comments from these departments to be submitted as an addendum to the FSR. We thank you for your engagement to date and look forward to your response.
22	Tebego Kgaphola Directorate: Biodiversity Mainstreaming and EIA	13 August 2024 Per email	Draft Scoping Phase	From: Tebego Kgaphola <tkgaphola1@dffe.gov.za> Sent: Tuesday, August 13, 2024 12:47 PM To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> Cc: Portia Makitla <PMakitla@dffe.gov.za> Subject: COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED MULILO AMSTERDAM WEFS CLUSTER, NEAR ERMELO, MPUMALANGA PROVINCE Good day	*NOTE:* *Post concerns expressed from DARDLEA/MTPA. The previous draft applications were withdrawn and the entire process restarted to afford all IAPs 30 days commenting period.*

				Kindly find the attached comments for the aforementioned project	
23	Mervyn Lotter	13 August 2024 Per email	Draft Scoping Phase	From: Mervyn Lotter <mervyn.lotter@gmail.com> Sent: Tuesday, August 13, 2024 8:34 PM To: Stephanie Gopaul <stephanie.gopaul@erm.com> Cc: Robyn Luyt <rluyt@mpg.gov.za>; BNcube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za; Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; celia@mtpa.co.za; Lloyd Barnes <lloyd@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>; Frans Krige <frans.krige@mtpa.co.za> Subject: Re: 14/12/16/3/3/2/2591; 2592; 2593: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP DDear Stephanie, I am writing to clarify several points regarding the recent applications: The appropriate MTPA staff members responsible for reviewing these three applications only received the links on August 6th and hard copies on August 12th. The two MTPA staff members you contacted in July are involved in permitting processes (such as issuing permits for collecting protected species) and are not responsible for reviewing development applications. As they were blind copied, they would have been unaware if the correct staff had been included in the correspondence.	

				According to the minutes you provided, Ms. Mbuyane informed you on May 31, 2024, that "the MTPA is the main custodian of biodiversity in Mpumalanga and their guidelines would provide guidance on avoiding biodiversity sensitive areas." However, it appears this guidance was not sought. Upon reviewing my email records, I found communications from Andrew Pearson, Annitta Attieh, and Verushka Snyders (all from Mulilo) regarding CBAs for other projects, indicating that Mulilo is aware that I am the appropriate contact for biodiversity planning related matters. I also have several emails to both Frans Krige and myself from ERM staff, such as Kate Hamilton from around 2016 and more recently. ERM should know who the correct staff would be to send the EIA documents to for comment. We are currently managing several other development applications with similar deadlines. Given the short notice, it would be challenging to thoroughly review and apply our minds to the three applications before August 22nd. It is regrettable that we were not consulted earlier, despite the prior recommendation to do so. This has now placed undue pressure on our team to meet your deadline. Comments from authorities need to be considered and incorporated into the final EIA document. Including them as an appendix defeats the purpose of the legislated timeframes and the need to consider these inputs in the first place. This is a risk to your project.	

				We can only try and do our best. Regards, Mervyn	
24	Masina Morudu DFFE	14 August 2024 Per email	Draft Scoping Phase	From: Masina Morudu <memorudu@dffe.gov.za> Sent: Tuesday, August 13, 2024 12:00 PM To: Stephanie Gopaul <stephanie.gopaul@erm.com> Cc: Coenrad Agenbach <CAGENBACH@dffe.gov.za>; Olivia Letlalo <OLetlalo@dffe.gov.za>; Sindiswa Dlomo <SDLOMO@dffe.gov.za>; mervyn.lotter@gmail.com; GCowden <GCowden@mpg.gov.za>; SB. Mbuyane <MbuyaneSB@mpg.gov.za>; celia@mtpa.co.za; R Luyt <rluyt@mpg.gov.za>; Bathandwa Ncube <BNcube@dffe.gov.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Andrew Pearson <andrew@mulilo.com> Subject: RE: 14/12/16/3/3/2/2591; 2592; 2593: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP Dear Stephanie, Following the discussion between the Provincial Department (DARDLEA) and the EAP earlier this morning, it was confirmed that the EAP did notify the province about the proposed wind energy developments but unfortunately the notification was sent to the Agriculture section within the department and the environmental section did not get the notification/draft reports. The Provincial Department was made aware of the public review of the draft scoping reports of the proposed developments by other interested and affected parties and Ms Luyt contacted ERM and requested the draft reports for comment on 03 August 2024 (see attached	From: Stephanie Gopaul <stephanie.gopaul@erm.com> Sent: Wednesday, August 14, 2024 8:06 PM To: Masina Morudu <memorudu@dffe.gov.za> Cc: Coenrad Agenbach <CAGENBACH@dffe.gov.za>; Olivia Letlalo <OLetlalo@dffe.gov.za>; Sindiswa Dlomo <SDLOMO@dffe.gov.za>; mervyn.lotter@gmail.com; GCowden <GCowden@mpg.gov.za>; SB. Mbuyane <MbuyaneSB@mpg.gov.za>; celia@mtpa.co.za; R Luyt <rluyt@mpg.gov.za>; Bathandwa Ncube <BNcube@dffe.gov.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Andrew Pearson <andrew@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>; Lloyd Barnes <lloyd@mulilo.com> Subject: RE: 14/12/16/3/3/2/2591; 2592; 2593: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP Dear Masina Thank you for your emails. We will discuss with the proponent and get back to you.

				email). The EAP/Applicant failed to submit the requested reports until this week. The Provincial Department and MTPA must be afforded 30 days to comment as per EIA Regulations 2014 as amended otherwise the process will be viewed as being procedural flawed. Considering the above, it is noted that the EAP will not be able to meet the regulated time frames for the submission of the final Scoping Reports (05 September 2024), and thus, the applications are going to regrettably lapse. Therefore the Department advices that the EAP withdraws the current applications and reapply. Please note that , reapplying constitutes the EIA process from the beginning. Regards, MASINA MORUDU	

APPENDIX 1 I&AP DATABASE

AFFILIATION TO PROJECT	FARM / DEPARTMENT / ORGANISATION NAME	FARM PORTION	NAME	SURNAME	OTHER	EMAIL ADDRESS	TELEPHONE	OTHER PHONE	ADDRESS	POSTAL ADD.	CITY	CODE	COMMENT	RETURNED EMAIL ADDRESSES	SG CODE
1. Directly Affected Landowner															
Gridline	265	12													
Gridline	265	21													
	266	4													
Gridline	266	6													
Gridline	266	8													
Gridline	267	35													
Gridline	267	40													
Gridline	267	RE/34													
Gridline	267	RE/22													
Gridline	267	27													
Gridline	267	26													
Gridline	267	2													
Gridline	267	8													
Gridline	267	36													
Gridline	267	29													
Gridline	267	30													
Gridline	267	7													
Gridline	269	1													
Gridline	269	4													
Gridline	269	2													
Gridline	270	2													
Gridline	270	5				[redacted]	[redacted]								
Gridline	270	6				[redacted]	[redacted]								
Gridline	270	7													
Gridline	270	8													
Gridline	270	9				[redacted]	[redacted]								
Gridline	270	10				[redacted]	[redacted]								
Gridline	270	11				[redacted]	[redacted]								
Gridline	270	13													
Gridline	270	16													
Gridline	270	17													
Gridline	270	18													
Gridline	270	19													
Gridline	270	23				[redacted]	[redacted]								
Rochdale facility / Gridline	272	1				[redacted]	[redacted]								
Rochdale facility / Gridline	272	2													
Rochdale facility	272	5													
Gridline	273	1													
Sheepmoor facility/ Gridline	273	2				[redacted]	[redacted]								
Sheepmoor facility/ Gridline	273	3													
Sheepmoor facility/ Gridline	273	4				[redacted]	[redacted]								
Gridline	273	5													
Sheepmoor facility/ Gridline	273	6				[redacted]	[redacted]								
Sheepmoor facility/ Gridline	273	7				[redacted]	[redacted]								
Sheepmoor facility/ Gridline	273	8				[redacted]	[redacted]								
Sheepmoor facility/ Gridline	273	9				[redacted]	[redacted]								
Sheepmoor facility	273	10				[redacted]	[redacted]								
Sheepmoor facility/ Gridline	273	12				[redacted]	[redacted]								
Sheepmoor facility/ Gridline	273	13													
Gridline	273	RE													
Emvelo facility	274	1				[redacted]	[redacted]								
Emvelo facility/ Gridline	274	2				[redacted]	[redacted]								
Emvelo facility	274	5				[redacted]	[redacted]								
Emvelo facility	274	6				[redacted]	[redacted]								
Emvelo facility/ Gridline	274	RE				[redacted]	[redacted]								

Emvelo facility	283	RE				[redacted]	[redacted]									
Emvelo facility	285	RE/1				[redacted]	[redacted]									
Emvelo facility	285	5				[redacted]	[redacted]									
Emvelo facility	286	2				[redacted]	[redacted]									
Emvelo facility	286	3														
Sheepmoor facility/ Gridline	286	4														
Emvelo facility	286	5														
Emvelo facility	286	6				[redacted]	[redacted]									
Emvelo facility	286	7														
Emvelo facility	286	9				[redacted]	[redacted]									
Emvelo facility	286	10														
Emvelo facility	286	12														
Emvelo facility	286	13				[redacted]	[redacted]									
Emvelo facility	286	14														
Gridline	287	RE														
Sheepmoor facility/ Gridline	287	3				[redacted]	[redacted]									
Sheepmoor facility/ Gridline	287	4														
Sheepmoor facility/ Gridline	287	5														
Sheepmoor facility/ Gridline	287	6														
Gridline	287	7														
Gridline	287	17														
Gridline	288	1/RE														
Gridline	288	2/RE														
Gridline	288	5														
Gridline	288	6														
Gridline	288	9														
Gridline	288	10														
Gridline	289	1/RE														
Gridline	289	2														
Gridline	289	3														
Gridline	289	4														
Gridline	289	5														
Gridline	289	6/RE														
Gridline	289	9														
Gridline	289	10														
Gridline	289	11														
Gridline	289	16														
Gridline	290	RE														
Gridline	290	1/RE														
Gridline	290	2/RE														
Gridline	290	7														
Gridline	290	8														
Gridline	290	9/RE														
Gridline	290	10/RE														
Gridline	290	11/RE														
Gridline	290	14/RE														
Sheepmoor facility/ Gridline	291	1				[redacted]	[redacted]									
Emvelo facility	291	7														
Sheepmoor facility/ Gridline	291	8/RE				[redacted]	[redacted]									
Gridline	291	9														
Gridline	322	1														
Gridline	329	RE														
Sheepmoor Facilty	Onverwacht					[redacted]	[redacted]									
2. Surrounding Landowners																
Surrounding Landowner	Farm 288	1														
Surrounding Landowner	Farm 288															
Surrounding Landowner	Farm 288	11														

Surrounding Landowner	Farm 289	9														
Surrounding Landowner	Farm 289	6														
Surrounding Landowner	Farm 289	11														
Surrounding Landowner	Farm 289	RE														
Surrounding Landowner	Farm 266	9														
Surrounding Landowner	Farm 266	RE														
Surrounding Landowner	Farm 529															
Surrounding Landowner	Farm 290	4														
Surrounding Landowner	Farm 290	RE														
	Farm 267	2														
Surrounding Landowner	Farm 267	6														
Surrounding Landowner	Farm 267	4														
Surrounding Landowner	Farm 267	14														
Surrounding Landowner	Farm 267	24														
Surrounding Landowner	Farm 267	23														
Surrounding Landowner	Farm 267	20														
Surrounding Landowner	Farm 267	32														
Surrounding Landowner	Farm 267	30														
Surrounding Landowner	Farm 267	9														
Surrounding Landowner	Farm 267	18														
Surrounding Landowner	Farm 267	12														
Surrounding Landowner	Farm 267	29														
Surrounding Landowner	Farm 267															
Surrounding Landowner	Farm 267	27														
Surrounding Landowner	Farm 267	26														
Surrounding Landowner	Farm 267	8														
Surrounding Landowner	Farm 267	25														
Surrounding Landowner	Farm 289	RE 3														
Surrounding Landowner	Farm 289	2														
Surrounding Landowner	Farm 269	3														
Surrounding Landowner	Farm 269	2														
Surrounding Landowner	Farm 269	1														
Surrounding Landowner	Farm 269	4														
Surrounding Landowner	Farm 290	RE/3														
Surrounding Landowner	Farm 290	RE 2														
Surrounding Landowner	Farm 290	RE 1														
Surrounding Landowner	Farm 290	7														
	Farm 290	RE 11														
	Farm 290	RE 10														
Surrounding Landowner	Farm 290	RE 9														
Surrounding Landowner	Farm 290	RE 14														
Surrounding Landowner	Farm 292	2														
Surrounding Landowner	Farm 292	19														
Surrounding Landowner	Farm 129	18														
Surrounding Landowner																
Surrounding Landowner																
Surrounding Landowner																
Surrounding Landowner																
Surrounding Landowner																
3. National / Provincial / Local Government Departments																
National Government	National Department of Forestry, Fisheries and the Environment (DFFE)		Muhammod	Essop		[redacted]										
National Government	National Department of Forestry, Fisheries and the Environment (DFFE)		Milicent	Solomons		[redacted]										
National Government	National Department of Forestry, Fisheries and the Environment (DFFE)				Deputy Director: Intergrated Environmental Authorisations											
National Government	National Department of Forestry, Fisheries and the Environment (DFFE)				Environmental Case Officer											
National Government	National Department of Forestry, Fisheries and the Environment (DFFE)		Ms Ernest	Mokganedi	Chief Directorate: Protected Areas Expansion Unit	[redacted]			[redacted]		Pretoria	0001				
National Government	National Department of Forestry, Fisheries and the Environment (DFFE)		Portia	Maketla	BDC Department	[redacted]	[redacted]		[redacted]		Pretoria	0083				
National Government	National Department of Forestry, Fisheries and the Environment (DFFE)		Seoka	Lekota	BDC Department	[redacted]	[redacted]		[redacted]		Pretoria	0083				
National Government	National Department of Forestry, Fisheries and the Environment (DFFE)		Stanley	Tshitwamulomoni	Chief Directorate: Biodiversity Section	[redacted]			[redacted]		Pretoria	0001				

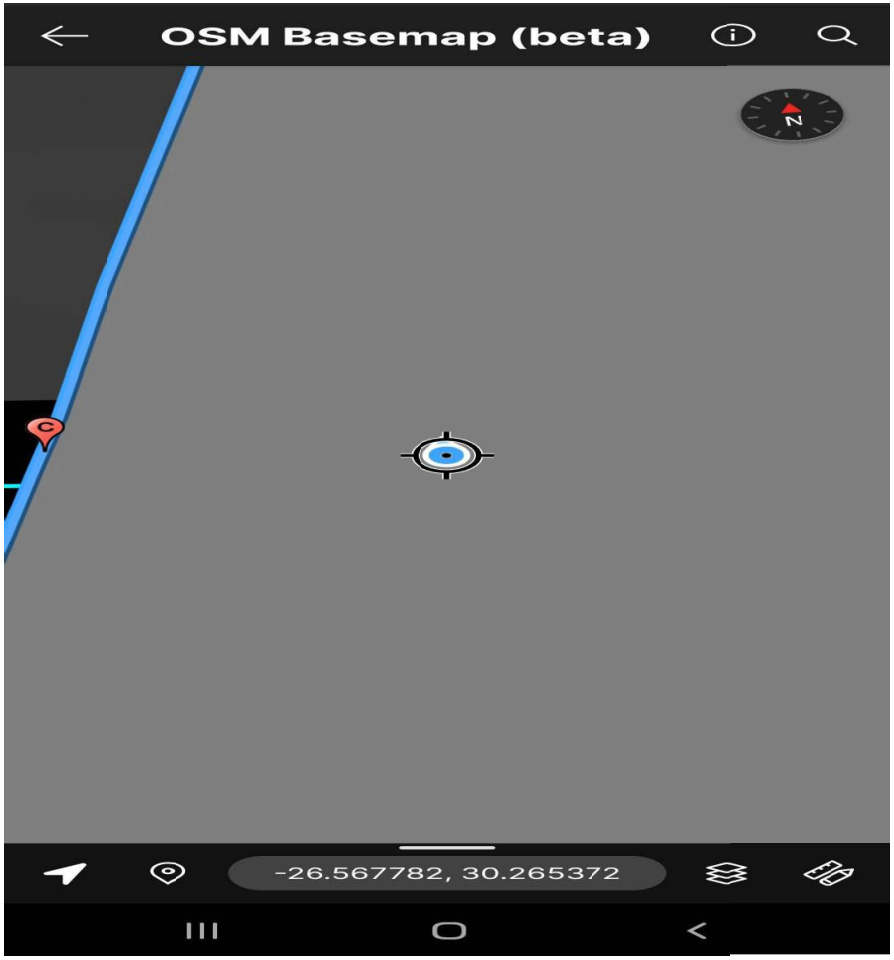
National Government	Department of Agriculture, Forestry and Fisheries (DAFF)		Mashudu	Marubini	National Government	MashuduMa@daff.gov.za	[redacted]		Office 270, Delphen Building, cnr Annie Botha and Union Street	Private Bag x120	Pretoria	0001			
National Government	Department of Agriculture, Forestry and Fisheries (DAFF)		Andile	Hawes		CPO@daff.gov.za									
National Government	Department of Agriculture, Forestry and Fisheries (DAFF)		Anneliza	Collet		annelizac@nda.agric.za									
National Government	National Department of Human Settlements, Water and Sanitation (DHSWS)		Nelisa	Ndobeni	Environmental Control Officer	NdobeniN2@dws.gov.za			Private Bag X644, PRETORIA,	Private Bag X644, PRETORIA, 0001	Pretoria	0001			
National Government	National Department of Human Settlements, Water and Sanitation (DHSWS)		Phila	Mayisela	Acting Head of Department	Phila.Mayisela@westerncape.gov.za	[redacted]	[redacted]	27 Wale Street,	Private Bag X9083, Cape Town, 8000	Cape Town	8001			
National Government	National Department of Human Settlements, Water and Sanitation (DHSWS)		Nelly	Letsholonyane	National Government Cooperate Services	nelly.letsholonyane@dhs.gov.za	[redacted]		Govan Mbeki House, 240 Justice Mahomed Street, Sunnyside	Private Bag X644, PRETORIA, 0001	Pretoria	0001			
National Government	National Department of Mineral Resources and Energy (DMRE)		Pieter	Swart	Provincial Government	Pieter.swart@dmr.gov.za									
National Government	National Department of Mineral Resources and Energy (DMRE)		Busisiwe	Magazi	Provincial Government	busisiwe.magazi@dmr.gov.za, Duduzile.Kunene@dmr.gov.za	[redacted]		Atterbury House, 9th Floor, c/o Lower Burg & Riebeeck Street, CAPE TOWN, 8012						
National Government	National Department of Mineral Resources and Energy (DMRE)		Nwabisa	Qwanyashe	National Government	nwabisa.qwanyashe@dmr.gov.za	[redacted]			Private Bag X59	Pretoria	0007			
National Government	National Department of Mineral Resources and Energy (DMRE)		Thabo	Mokoena	Director General	thabo.mokoena@dmr.gov.za, mamabefu.modipa@dmr.gov.za	[redacted]		192 cnr Visagie and Paul Kruger Streets,	Private Bag X96, PRETORIA, 0001	Pretoria	0001			
National Government	National Department of Mineral Resources and Energy (DMRE)		Ethel	Sinthumule	National Government	ethel.sinthumule@dmr.gov.za	[redacted]								
National Government	National Department of Mineral Resources and Energy (DMRE)		Molefe	Morokane	National Government	Molefe.Morokane@dmr.gov.za.	[redacted]	[redacted]							
National Government	National Department of Communications and Digital Technologies		Nozipho N	Mndaweni	National Government	nozipho@doc.gov.za	[redacted]			Private Bag X745	Pretoria	0001			
National Government	National Department of Agriculture, Land Reform and Rural Development (DALRRD)		Katshaba	Goafhiwe	National Government	katshaba.goafhiwe@drdlr.gov.za	[redacted]								
National Government	National Department of Agriculture, Land Reform and Rural Development (DALRRD)		Mduduzi	Shabane	National Government	mduduzi.shabane@drdlr.gov.za; DGOffice@drdlr.gov.za	[redacted]	[redacted]		Private Bag X833	Pretoria	0001			
National Government	National Department of Agriculture, Land Reform and Rural Development (DALRRD)		Dr N	Makgalemele	National Government	karen.vanschalkwyk@drdlr.gov.za	[redacted]	[redacted]	Room 246, Old Building, 184 Jacob Mare (Jeff Masemola) Street		Pretoria	0001			
National Government	National Department of Agriculture, Land Reform and Rural Development (DALRRD)		Malebo	Baloi	National Government	Malebo.baloi@drdlr.gov.za	[redacted]	[redacted]							
National Government	National Department of Agriculture, Land Reform and Rural Development (DALRRD)		Pule	Saila	National Government	Ramaleho.saila@drdlr.gov.za	[redacted]								
National Government	National Department of Agriculture, Land Reform and Rural Development (DALRRD)		Zongezile	Bongo	National Government	zongezile.bango@drdlr.gov.za	[redacted]	[redacted]	[redacted]		Pretoria	0001			
National Government	National Department of Energy (DoE)		Mpho	Mabaso	Director: Renewable Energies	mpho.mabaso@energy.gov.za	[redacted]		34 The Terraces Building C/o , Riebeeck & Bree Street , Cape Town CBD, 8001/ Department of Energy, Private						
National Government	National Department of Public Works		Basson	Geldenhuys	National Government	Basson.Geldenhuys@dpw.gov.za									
National Government	National Department of Social Development		Robert	Macdonald	Provincial Government, Head of department	HOD.DSD@westerncape.gov.za	[redacted]		Union House, 14 Queen Victoria Street	Private Bag X9112, Cape Town, 8000	Cape Town	8001			
National Government	National Department of Social Development		Office	Office	National Government	JohnT@dsd.gov.za; ShamaM@dsd.gov.za	[redacted]		North Wing, HSRC Building, 134 Pretorius Street, Pretoria, Gauteng, 0002	National Department of Social Development, Private Bag X901,	Pretoria	1			
National Government	National Department of Transport		Pule Godfrey	Selepe	National Government	info@dot.gov.za	[redacted]	[redacted]		Private Bag X193	Pretoria	0001			
National Government	National Department of Transport		R.C	Barlow	National Government	rbarlow@ncpg.gov.za; ramon@vodamail.co.za	[redacted]	[redacted]		45 Schmidtsdrift Road	Kimberley	8300			
National Government	National Department of Cooperative Governance and Traditional Affairs		Collen	Malatji	National Government	tmalatji@parliament.gov.za	[redacted]	[redacted]	Suite 21, Lesedi Shopping Centre, Vosloorus			1475			
National Government	National Department of Cooperative Governance and Traditional Affairs		Legadima	Leso	National Government	LegadimaL@cogta.gov.za	[redacted]	[redacted]							
National Government	National Department of Government Communication and Information System		Chrispin	Phiri	National Government	CPhiri@justice.gov.za	[redacted]	[redacted]	Tshedimosetso House, 1035 cnr Frances Baard and Festival streets, Hatfield	Private Bag X745	Pretoria	0001	Initial Notification Email Returned Undelivered		Initial Notification Email Returned Undelivered
National Government	National Department of Energy IPP		Pervelan	Govender	National Government	pervelan.govender@ipp-projects.co.za, info@ipp-projects.co.za									
National Government	National Commision on Restitution of Land Rights		Ryan	Oliver	National Government	ryan.oliver@drdlr.gov.za; pabalelo.mokale@dalrrd.gov.za; natashia.romain@dalrrd.gov.za							For all enquiries please call the office at 053 ****** or email to Mr. Mokale p*****@dalrrd.gov.za or Ms. Romain		For all enquiries please call the office at 053 ****** or email to Mr. Mokale p*****@dalrrd.gov.za
National Government	Department of Mineral Resources and Energy		Keneilwe	Ratshomo	Energy Economics and Statistics	Keneilwe.Ratshomo@dmre.gov.za									
National Government	Department of Mineral Resources and Energy		Ramaano	Nembahe	Energy Economics and Statistics	Ramaano.Nambahe@dmre.gov.za, Ramaano.Nembahe@[redacted]									
Provincial Government	Mpumalanga Province Agriculture, rural development, land and environmental affairs		Ms Z.J.	Shabangu	Director: Communication Services	shabanguzj@mpg.gov.za	[redacted]								
Provincial Government	Mpumalanga Province Agriculture, rural development, land and environmental affairs		Mr G.O	Xaba	Director : Gert Sibande District	goxaba@mpg.gov.za	[redacted]			PO Box 1748, Ermelo, 2350					
Provincial Government	Mpumalanga Province Agriculture, rural development, land and environmental affairs		Bheki	Nyathikazi	Director: Communication Services	nyathikazibw@mpg.gov.za; nyathikazibheki@gmail.com	[redacted]								
Provincial Government	Mpumalanga Province community safety, security and liaison		Mr SJM	Nkuna	General Manger: Traffic Management	sjnkuna@mpg.gov.za	[redacted]								
Provincial Government	Mpumalanga Province community safety, security and liaison		Mr NS	Nkambule	Senior Manager: Gert Sibande	nkamuleNS@mpg.gov.za	[redacted]								
Provincial Government	Mpmalanga Province Public Works, Roads and Transport		Mr MC	Morolo	Head: public works, roads and transport	communicationdpwrt@mpg.gov.za	[redacted]								
[redacted]	[redacted]				[redacted]		[redacted]								
[redacted]	[redacted]		[redacted]	[redacted]	[redacted]		[redacted]								
[redacted]	Mpumalanga Premier Office		George	Mthethwa	Chief Director: Communication	gpmthethwa@mpg.gov.za	[redacted]								
[redacted] Government	Mpumalanga Tourism and Parks Agency		Dorothy	Makaringe	Permitting Applications	dorothy.makaringe@mtpa.co.za	[redacted]	[redacted]							
Provincial Government	Mpumalanga Tourism and Parks Agency		Bheki	Malaza	Permitting Applications	bheki.malaza@mtpa.co.za	[redacted]	[redacted]							
Provincial Government	Gert Sibande District Municipality		Clr MG	Chirwa	Executive Mayor		[redacted]								
Provincial Government	Gert Sibande District Municipality		Mr CA	Habile	Municipal Manager	marinda.booth@gsibande.gov.za	[redacted]								
Provincial Government	Gert Sibande District Municipality		Ms Bongi	Dube	Head of Communications	bongi@gsibande.gov.za, records@gsibande.gov.za	[redacted]	[redacted]							
Provincial Government	Economic Development and Tourism		Mr V	Dlamini	Head of Department	jimarakala@mpg.gov.za	[redacted]	[redacted]							
Provincial Government	Economic Development and Tourism		Mr P	Khumalo	District Director: Gert Sibande	Pkhumalo@mpg.gov.za	[redacted]	[redacted]							
Provincial Government	Economic Development and Tourism		Mr S	Hlatshwayo	Environmental Impact Management Acting director	SHlatswayo@mpg.gov.za	[redacted]	[redacted]							
Provincial Government	Economic Development and Tourism		Mr M	Mahlalela	Pollution & Waste Management Service Acting Director	Mahlalelamm@mpg.gov.za	[redacted]	[redacted]							
[redacted]	[redacted]		[redacted]	Msibi	Gert Sibande District Manager	spmsibi@mpg.gov.za	[redacted]	[redacted]							
[redacted]	[redacted]		[redacted]	Henning	Emerlo EC	taniahenning@mtnloaded.co.za	[redacted]	[redacted]							
Provincial Government	Economic Development and Tourism		Mr S	Makhabane	Amsterdam EC	makhabaneps@vodamail.co.za, makhabane@gmail.com	[redacted]	[redacted]		Private Bag X1012 De Aar 7000					
Local Government	Msukaligwa Local Municipality		Ben	Nkosi	Ward 18 councillor					Private Bag X1012 De Aar 7002					
Local Government	Msukaligwa Local Municipality		Sibusiso	Khalishwayo	Ward 11 councillor										
Local Government	Msukaligwa Local Municipality		Mapulane	Nkosi	Executive Mayor	complaints@msukaligwa.gov.za	[redacted]	[redacted]		Private Bag X329, VICTORIA WEST, 7070					
Local Government	Msukaligwa Local Municipality									Private Bag X329, VICTORIA WEST, 7070					

4. Key Stakeholders, Organs of State and Non-Govermental Organisations (NGOs)															
Key Stakeholder	National Energy Regulator of South Africa (NERSA)		Andile	Gxasheka	National Government	Andile.Gxasheka@nersa.org.za	[redacted]	[redacted]		PO Box 40343	Arcadia	0007			
Key Stakeholder	National Energy Regulator of South Africa (NERSA)		Office	Office	National Government	info@nersa.org.za	[redacted]	[redacted]	Kulawula House 526 Madiba (former Vermeulen) Street	PO Box 40343	Arcadia	0007			
Key Stakeholder	WESSA		Morgan	Griffiths		morgan.griffiths@wessa.co.za	[redacted]								
[redacted] Stakeholder	South African Civil Aviation Authority (CAA)		Lizelle	Stroh	Obstacle Specialist	strohl@caa.co.za	[redacted]	[redacted]		Private Bag X73	Halfway House	1685			
Key Stakeholder	South African Civil Aviation Authority (CAA)		Evelyn	Shogole	Environmental Specialist	ShogoleE@caa.co.za	[redacted]			Private Bag X 73 Halfway House; 1685					
Key Stakeholder	South African Civil Aviation Authority (CAA)		Gawie	Bestbier		BestbierG@caa.co.za									
Key Stakeholder	South African Civil Aviation Authority (CAA)		Chinga	Mashetese		MashetesеC@caa.co.za									
Key Stakeholder	Air Traffic and Navigation Services SOC Limited (ATNS)		Mabitsi	Legodi	Senior Projects Manager	mabitsile@atns.co.za	[redacted]								
Key Stakeholder	Independent Communications Authority of South Africa (ICASA)		Anastasia			aseabi@icasa.org.za	[redacted]								
Key Stakeholder	Eskom SOC Ltd (ESKOM)		John	Geeringh	Senior Environmental Advisor Eskom GC - Land Development	john.geeringh@eskom.co.za	[redacted]	[redacted]	Megwatt Park D1Y38	PO Box 1091	Johannesburg	2000			
Key Stakeholder	Eskom SOC Ltd (ESKOM)		Krishna	Naidoo	Eskom Transmission	naidook@eskom.co.za									
Key Stakeholder	ESKOM: Renewable Energy		Mpilo	Masondo		MasondMM@eskom.co.za	[redacted]								
Key Stakeholder	ESKOM: Renewable Energy		Pumza	Jizana		JizanaP@eskom.co.za	[redacted]								
Key Stakeholder	ESKOM: Renewable Energy		Martina	Phiri		PhiriM@eskom.co.za	[redacted]								
Key Stakeholder	ESKOM: Renewable Energy		Khululwa	Gaongalelwe	National Government	StuurmKV@eskom.co.za									
Key Stakeholder	Transnet SOC ltd		Thandeka	Nohoyeka	Chief Property Technician, Transet Property	Thandeka.nohoyeka@transnet.net	[redacted]								
Key Stakeholder	Transnet SOC ltd		Ezekiel	Monyamane	Transnet Freight Rail, the Senior Manager : Environmental Sustainability,	Ezekiel.monyamane@transnet.net	[redacted]								
Key Stakeholder	Transnet SOC ltd		Herman	Coetzee	Transnet: Radio Communication Department	herman.coetzee2@transnet.net									
Key Stakeholder	South African Bat Assessment Advisory Panel (SABAAP)		Kate	Richardson	Chairperson	chair@sabaa.org.za; info@sabaa.org.za									
Key Stakeholder	BirdLife SA		Samantha	Ralston	Birds and Renewable Energy Manager	energy@birdlife.org.za	[redacted]	[redacted]		Private Bag X5000	Parklands	2121			
Key Stakeholder	Endangered Wildlife Trust		Yolan	Friedman	CEO	ewt@ewt.org.za	[redacted]	[redacted]		Private Bag X11	Modderfontein	1645			
Key Stakeholder	Endangered Wildlife Trust		Lourens	Leeuwner	Wildlife and Energy Prgramme	lourensl@ewt.org.za	[redacted]	[redacted]		Private Bag X11	Modderfontein	1645			
Key Stakeholder	Endangered Wildlife Trust		Constant	Hoogstad	Wildlife and Energy Prgramme	eia@ewt.org.za		[redacted]		Private Bag X12	Modderfontein	1646			
Key Stakeholder	South African National Biodiversity Institute (SANBI)				NPAES	info@sanbi.org.za, sanbi@behonest.co.za	[redacted]	[redacted]	Private Bag X101						
Key Stakeholder	Southern African Alternative Energy Association (SAAEA)		Alwyn	Smith	Administrator	alwyn@saaea.org	[redacted]			PO Box 866	Welobie	1714			
Key Stakeholder	Sustainable Energy Society of Southern Africa (SESSA)		Adriana	Chickesh	Knowledge Management Information Officer	office@sessa.org.za	[redacted]	[redacted]	53 Dudley Road		Parkwood	2193			
Key Stakeholder	World Wildlife Fund (WWF) South Africa		Morne	Du Plessis		mduplessis@wwf.org.za									
Key Stakeholder	Agri SA		Thea	Liebenberg	Media Liaison Officer	thea@agrisa.co.za	[redacted]	[redacted]		Private Bag X180	Centurion	0046			
Key Stakeholder	Agri SA		Janse	Rabie	Head of AgriSA Natrual Resources	janse@agrisa.co.za	[redacted]	[redacted]		Private Bag X180	Centurion	0046			
Key Stakeholder	Agricultural Research Council		Shadrack	Moephuli	CEO	enquiry@arc.agric.za	[redacted]	[redacted]		PO Box 8783	Pretoria	0001			
Key Stakeholder	Cell C Tele Communications		Vivien	Kiewitz		VKiewitz@cellc.co.za	[redacted]	[redacted]							
Key Stakeholder	Cell C Tele Communications		Brian	Joubert		bjoubert@cellc.co.za		[redacted]							
Key Stakeholder	MTN Tele Communications		Charles	van Reenen	Innovation Centre Engineering	vanree_c@mtn.co.za									
Key Stakeholder	MTN Tele Communications		Renier	Nel		renier.nel@mtn.co.za									
Key Stakeholder	Telkom SA Limited		Leonard	Shaw	Wireless Planning Development & Support, Telkom HQ	ShawL S@telkom.co.za	[redacted]	[redacted]		Private Bag X74	Pretoria	0001			
Key Stakeholder	Vodacom South Africa Tele Communications		Craig	Barnes		barnesc@vodacom.co.za									
Key Stakeholder	Vodacom South Africa Tele Communications		Nico	Fourie		nico.fourie@vodacom.co.za									
Key Stakeholder	Ermelo Public Library		Chrisna	Calitz		ccalitz@mpukallawa.gov.za	[redacted]								
5. General Stakeholders and I&Aps															
I&AP	Sivest		Luvanya	Naidoo		LuvanyaN@sivest.com	[redacted]								
I&AP	Sivest		Siphiwokuhle	Buthelezi		SiphiwokuhleB@sivest.com	[redacted]								
I&AP	Landowner		Braam	Moodie		b.moodie@vodamail.co.za	[redacted]								
I&AP	Landowner		Mr	Meyer		meyerjosua55@gmail.com	[redacted]								
I&AP	Director: Environmental Impact Management (EIM)		Robyn	Luyt		rluyt@mpg.gov.za	[redacted]								
I&AP	Deputy Director: EIM Gert Sibande District		Sindisiwe	Mbuyane		mbuyanesb@mpg.gov.za	[redacted]								
I&AP	Deputy Director: Environmental Policy, Planning and Coordination		Gavin	Cowden		gcowden@mpg.gov.za									
I&AP	Manager: Biodiversity Planning		Mervyn	Lotter		Mervyn@mtpa.co.za	[redacted]								
I&AP	Land Use Advisor		Frans	Krige		Frans.Krige@mtpa.co.za									
I&AP	Land Use Advisor		Khumbelo	Malele		Khumbelo.Malele@mtpa.co.za; khumbelomalele@gmail.com	[redacted]								
I&AP	EIA Data Capturer LUA		Celia	de Waal		celia.dewaal@mtpa.co.za	[redacted]								
I&AP			Ryan	David-Andersen	AMDA Developments	ryan@amdadevelopments.co.za	[redacted]								
I&AP			Kirsten Jones		Redcap	kirsten@red-cap.co.za									
I&AP			Francois le Roex		Redcap	francois@red-cap.co.zakirsten@red-cap.co.za									
I&AP			Moya	Odendaal	Heya Lidri Pty Ltd Odendaal	hfgerber@vodamail.co.za									
I&AP			Rone	Odendaal	Individual Affected party	petronellaodendaal@gmail.com									
I&AP			Mr. Thivhulawi Nethononda		Protected Areas Planning and Management Effectiveness Directorate	TNethononda@dffe.gov.za									
I&AP	Abo Energy		Du Toit	Malherbe	Abo Energy	dutoit.malherbe@aboenergy.com									

I&AP	Enertrag		Megan Govender		Senior Project Developer	Megan.Govender@enertrag.com									
I&AP	Enertrag		Nkhensani Masondo		Senior Environmental Advisor	Nkhensani.Masondo@enertrag.com									
I&AP	Enertrag		Kyle Swartz		Project Development Team Lead	kyle.swartz@enertrag.com									
I&AP	Sirius Power		David Nunez		Director	david.nunez@siriuspower.co.za									
I&AP			Grant Celliers			grantcelliers@gmail.com									
I&AP	Seriti green Developer		Mukondeleli "Kondi" Makoya			mukondeleli.makoya@seritigreen.com	[redacted]		15 Chaplin, Cnr Oxford and Chaplin Roads, Illovo, 2196, Johannesburg, Gauteng , 2194, South Africa						
I&AP			Riaan Meirdies			riaan@themis.co.za									
I&AP	Seriti Green		Seriti Green		Seriti Green	mukondeleli.makoya@seritigreen.com									
I&AP	Red Cap Energy Assistant PM				Francois le Roex	francois@red-cap.co.za	[redacted]		Unit28, Mainstream Shopping Centre, Cape Town, Western Cape, 7806, South Africa						
I&AP	MTPA				Celia De Waal	celia01@yahoo.com			MTPA Office Building (Lydenburg) End of Morgan street Lydenburg 1120				Alternative to defective Work emails		
I&AP	MTPA				Franz Krige	skrige@gmail.com							Alternative to defective Work emails		
I&AP	MTPA				Mervyn Lotter	mervyn.lotter@gmail.com							Alternative to defective Work emails		
I&AP	Richard Summers Inc Attorneys		Matodzi Silidi		Matodzi Silidi	matodzi@summersinc.co.za									
I&AP	Richard Summers Inc Attorneys		Crystal du Toit		Crystal du Toit	reception@summersinc.co.za									
I&AP	Richard Summers Inc Attorneys		Clarice Arendse		Clarice Arendse	clarice@summersinc.co.za									
I&AP	Richard Summers Inc Attorneys		Richard Summers		Richard Summers	richard@summersinc.co.za	[redacted]		Unit 126, Victoria Junction 57 Prestwich Street De Waterkant, 8001 Cape Town						
I&AP	Webber Wentzel		Huneiza	Goolam		Huneiza.Goolam@webberwentzel.com									
I&AP						igno.gouws@webberwentzel.com									
I&AP	Rhino Resources Ltd		Travis	Smithard		tsmithard@rhinoresourcesltd.com									
I&AP						myantonder@rhinopresourcesltd.com									
I&AP						gpantanacce@rhinopresourcesltd.com									
I&AP						CPT_Board@rhinorsc.onmicrosoft.com									
I&AP	SLR consulting		Theo Wicks/GP Kriel			RhinoER379@slrconsulting.com	[redacted]								
I&AP	Volant Environmental		Low	De Vries		low@volantenvironmental.com	[redacted]								
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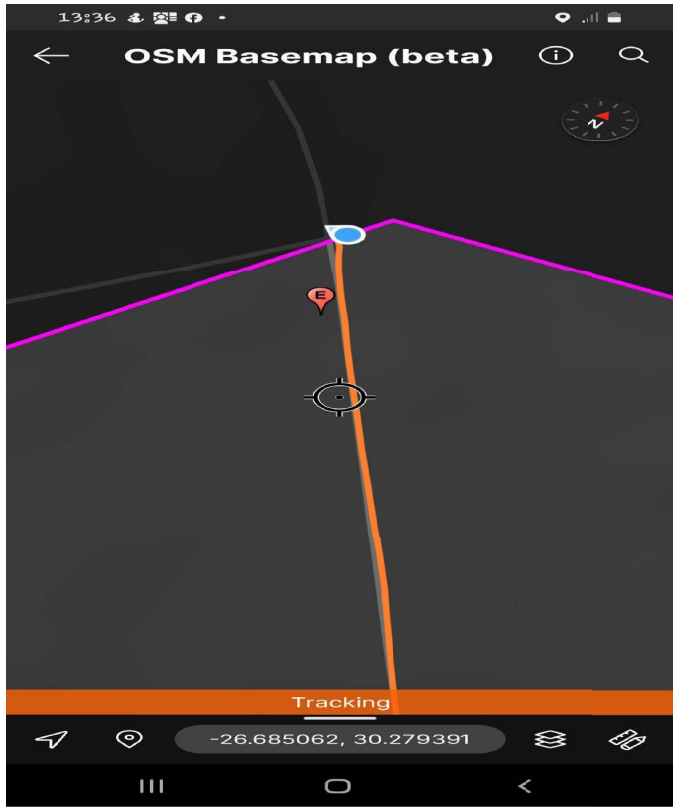
APPENDIX 2 SITE NOTICES AND POSTER PLACEMENT PROOF

Amsterdam Sheepmoor WEF (Point C) Site Notices



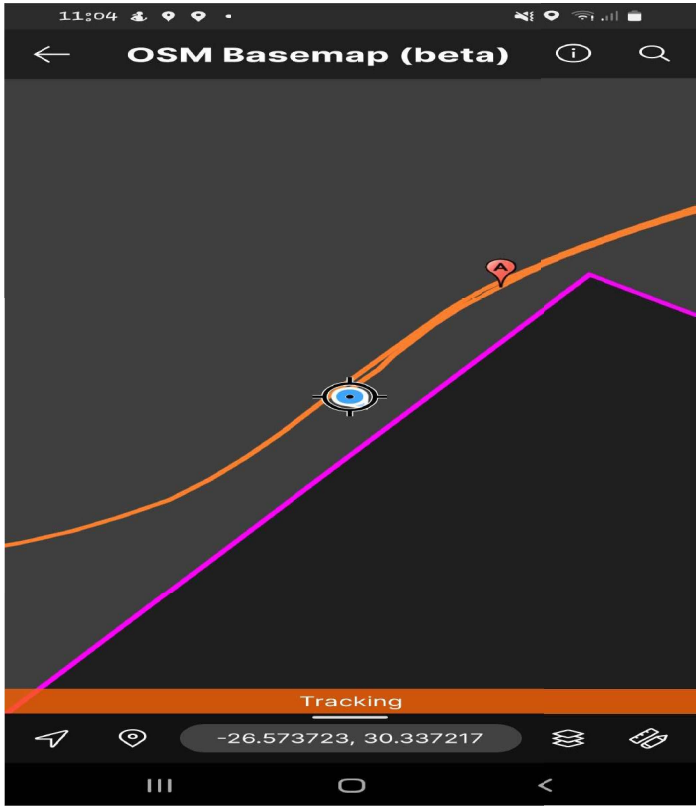


Amsterdam Emvelo WEF (Point E) Site Notices



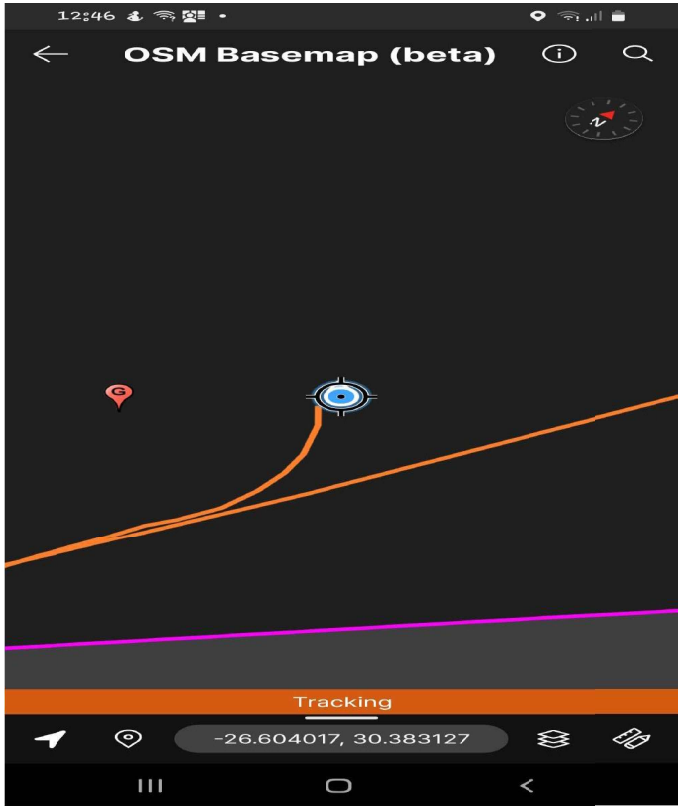


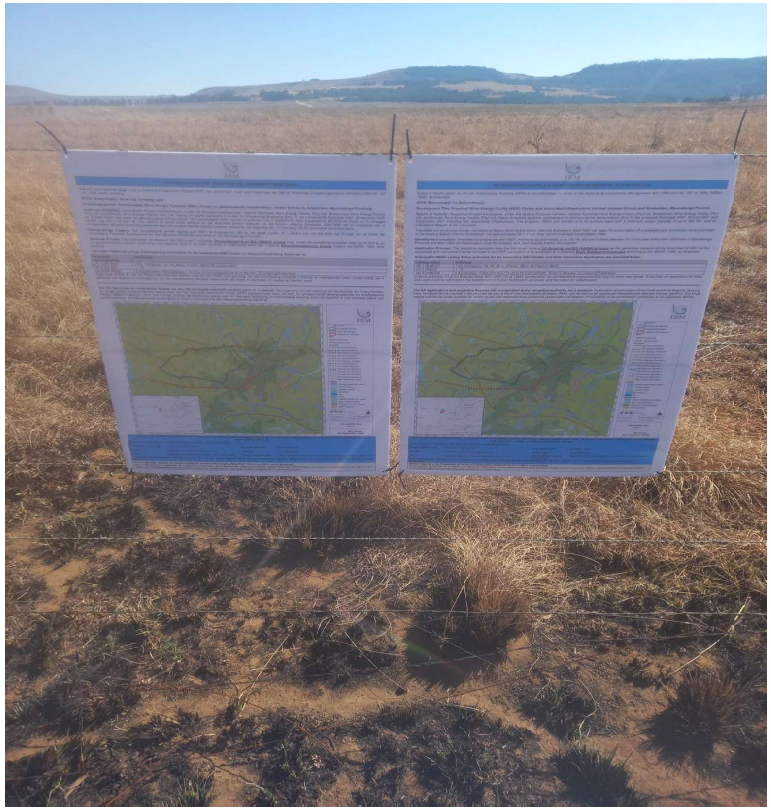
Amsterdam Sheepmoor WEF (Point A) Site Notices



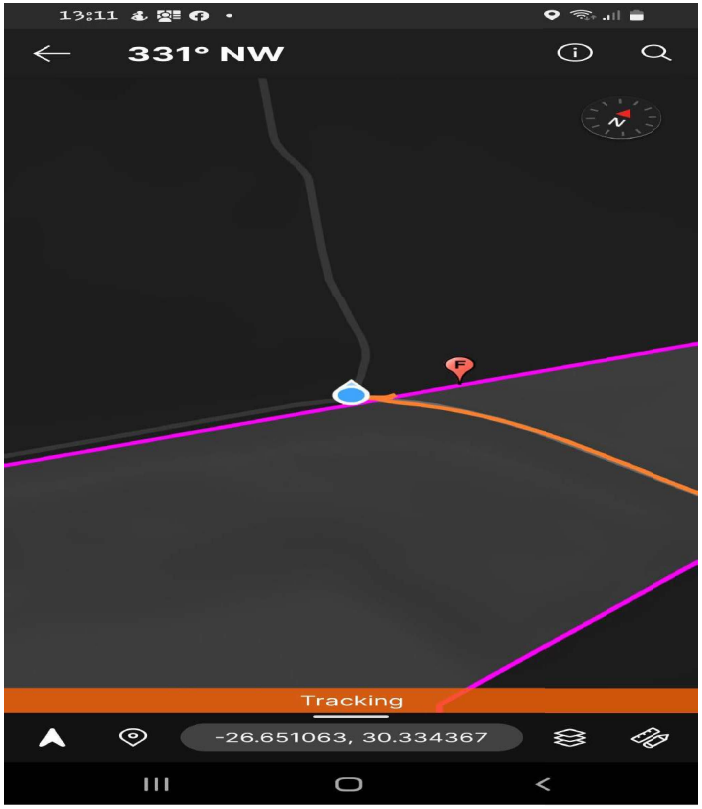


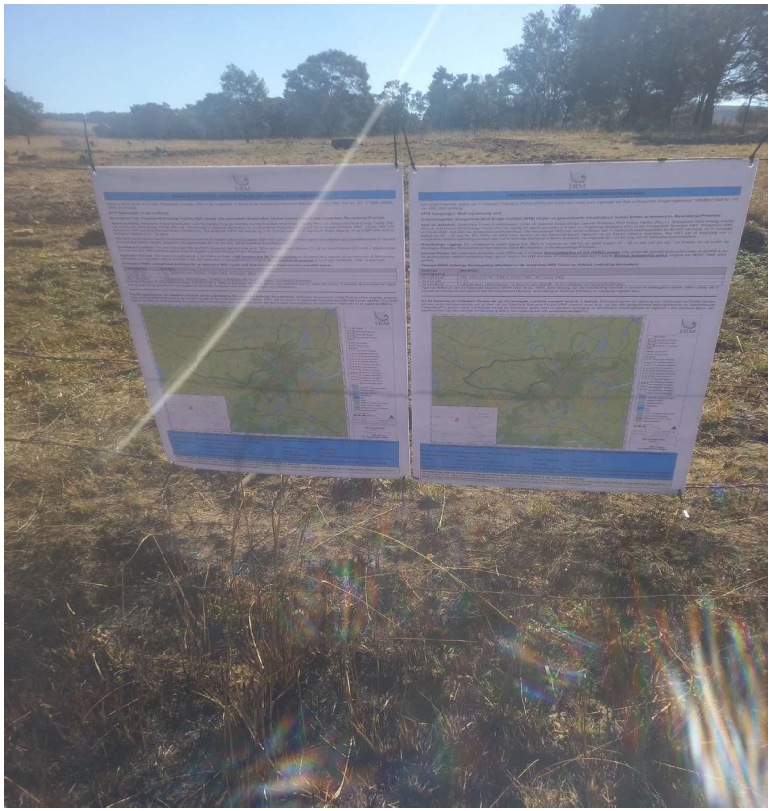
Amsterdam Sheepmoor WEF (Point G) Site Notices





Amsterdam Sheepmoor WEF (Point F) Site Notices





Amsterdam WEF (1-3) Posters

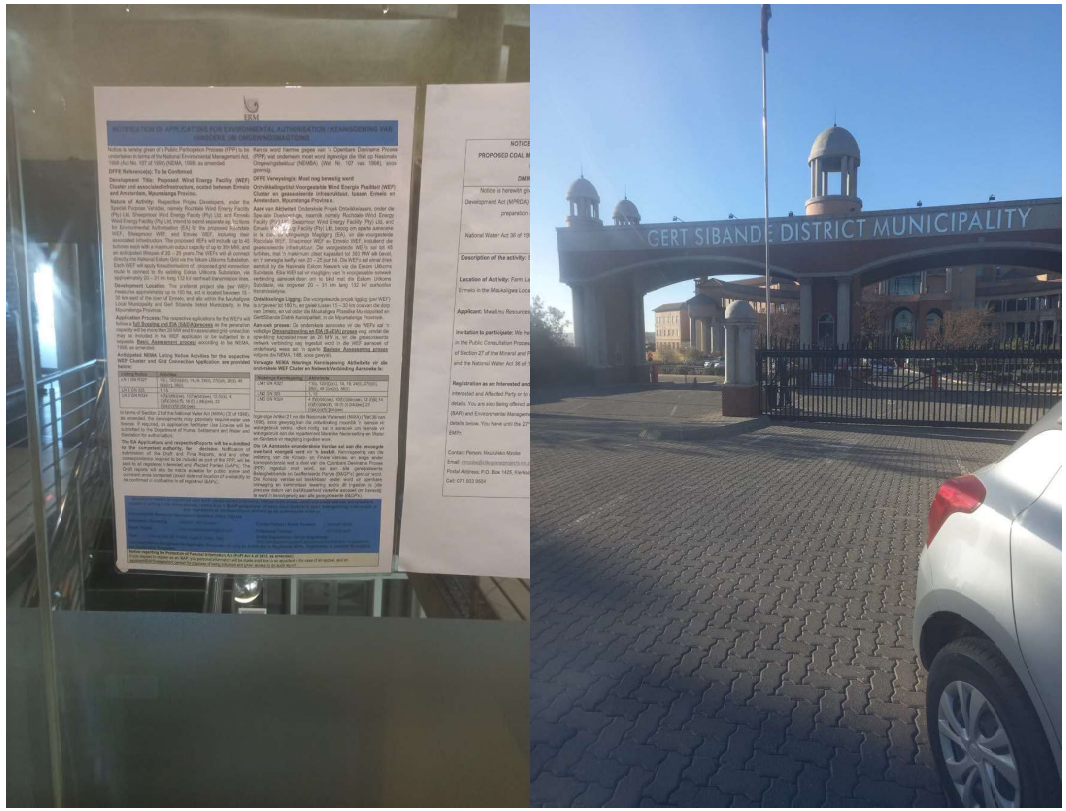
Ermelo, Amsterdam and Sheepmoor

Locations in Town(s)
Gert Sibande District Municipality Complex
Ermelo Game
SAPS Ermelo Police Station
Msukaligwa Local Municipality
Ermelo Public Library
Trident Medical Centre
Devland Cash and Carry – Ermelo
Pick n Pay Family - Ermelo
Superspar Ermelo
SAPS Amsterdam Police Station
Amsterdam Clinic
Global Amsterdam – Gas Station
Sheepmoor Clinic

Amsterdam WEF (1-3) Posters

Amsterdam Poster Proofs

Gert Sibande District Municipality



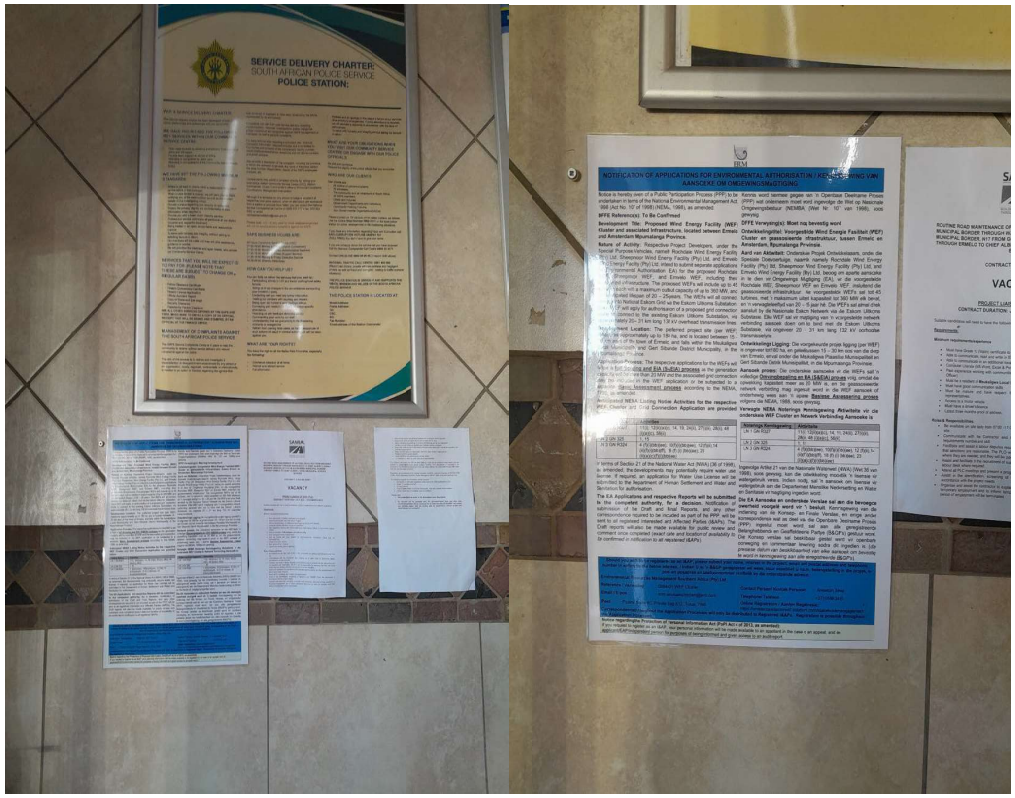
Game Ermelo



Amsterdam WEF (1-3) Posters

Amsterdam Poster Proofs

SAPS Ermelo Police Station



Msukaligwa Local Municipality



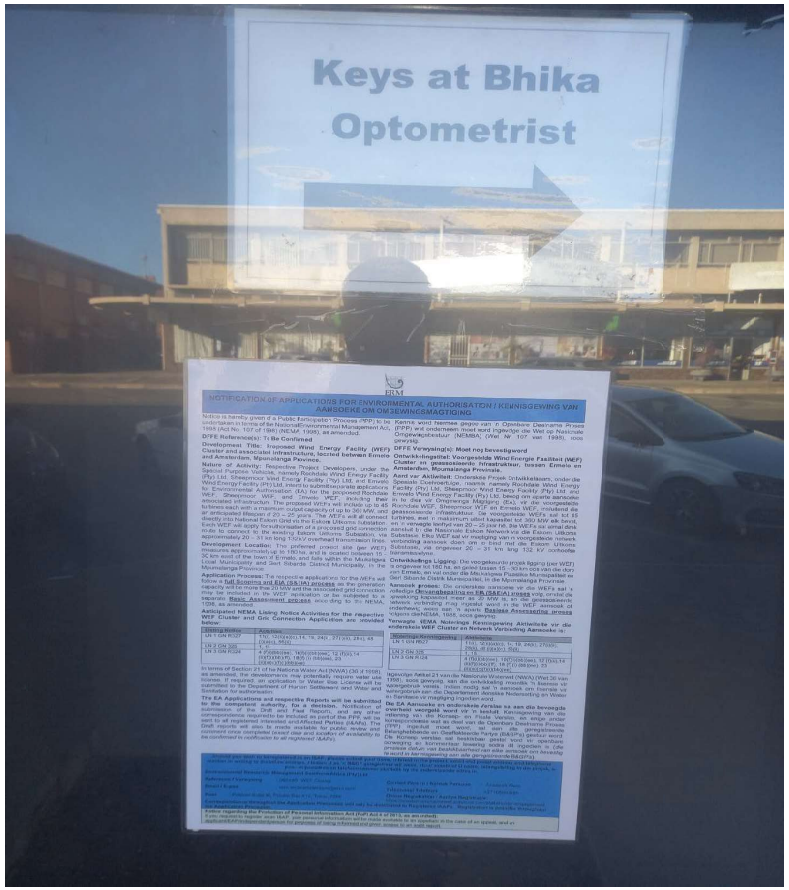
Amsterdam WEF (1-3) Posters

Amsterdam Poster Proofs

Ermelo Library



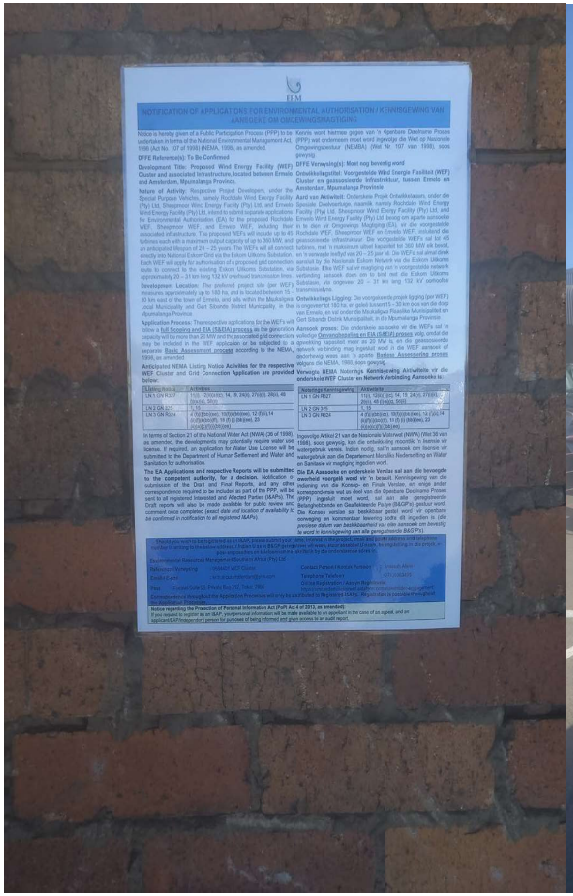
Trident Medical Centre

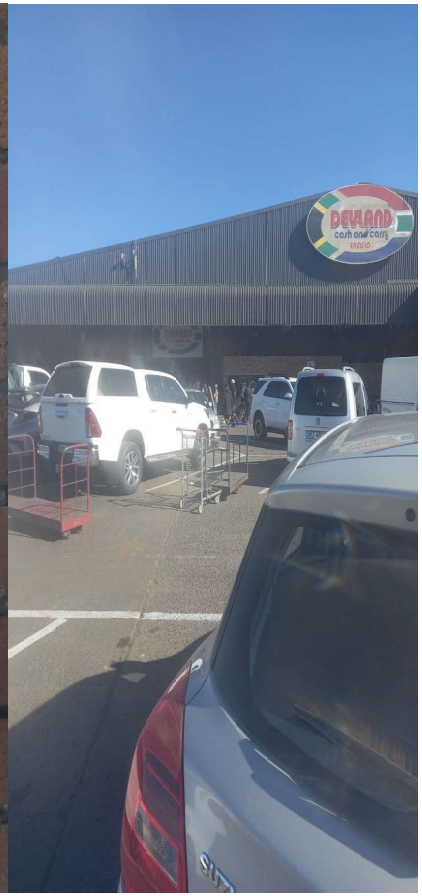


Amsterdam WEF (1-3) Posters

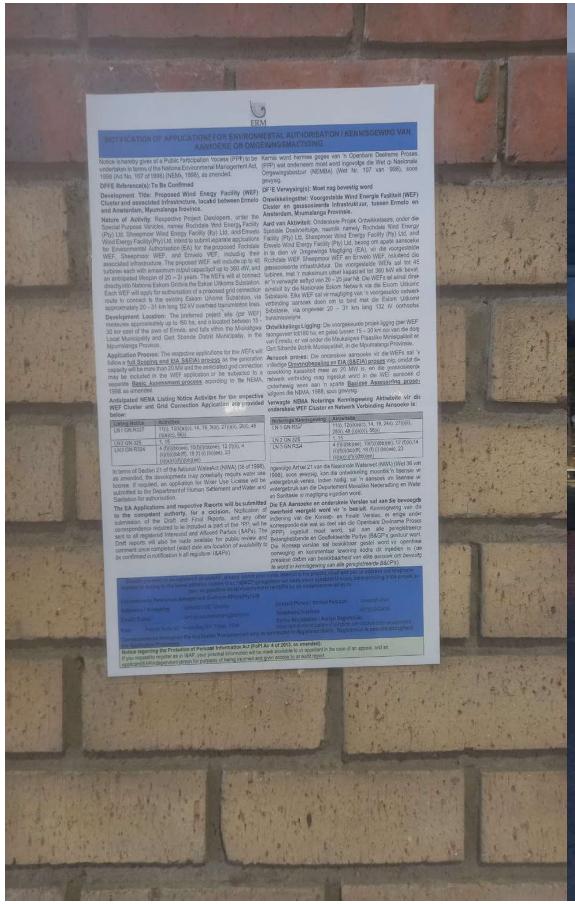
Amsterdam Poster Proofs

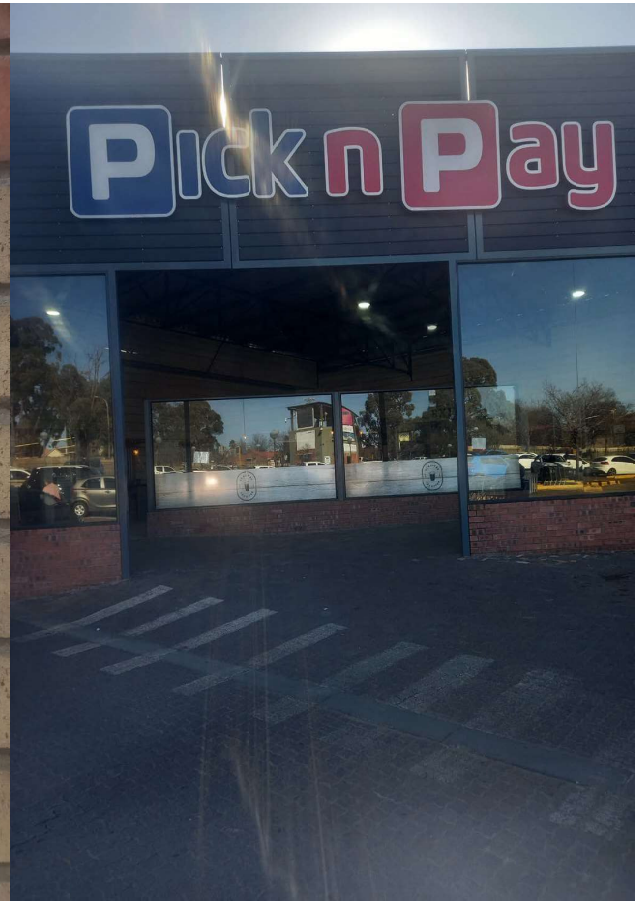
Devland Cash and Carry





Pick n Pay Ermelo





Amsterdam WEF (1-3) Posters

Amsterdam Poster Proofs

Superspar Ermelo



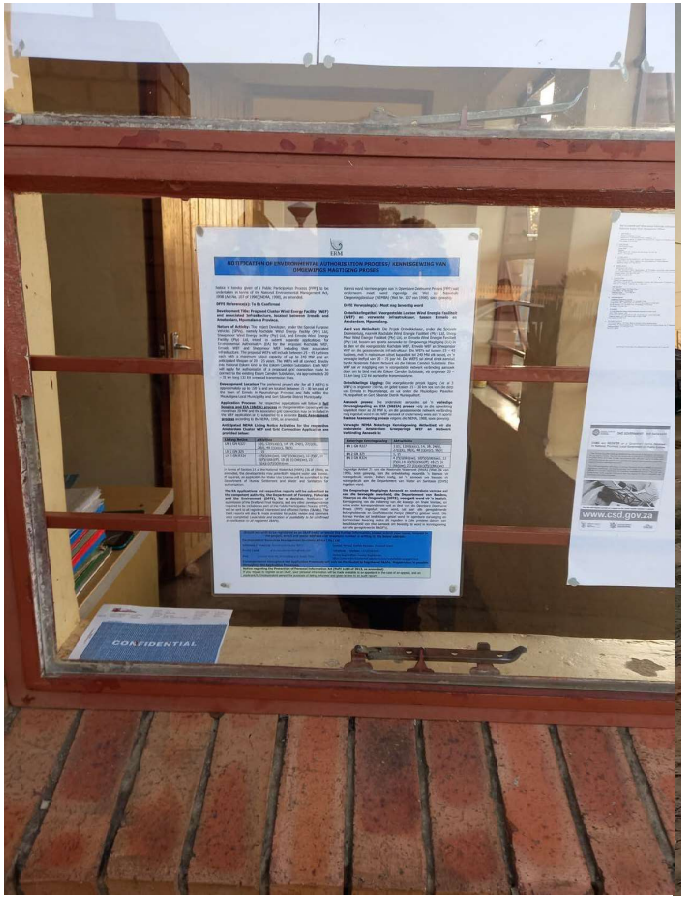
SAPS Police Station Amsterdam

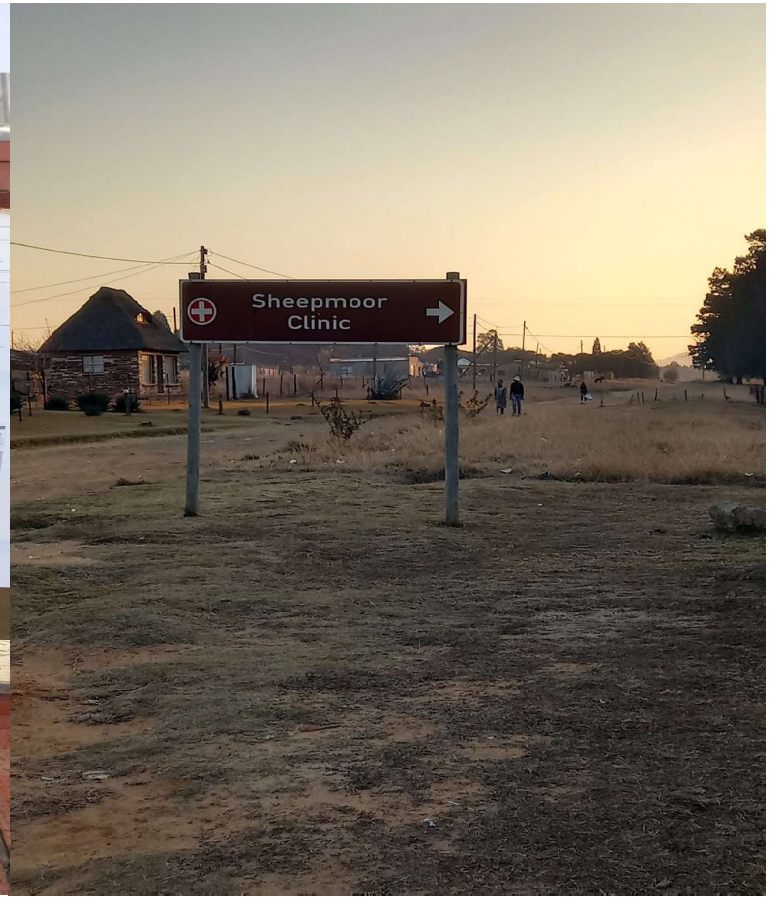


Amsterdam WEF (1-3) Posters

Amsterdam Poster Proofs

Sheepmoor Clinic





Amsterdam WEF (1-3) Posters

Amsterdam Poster Proofs

Amsterdam Clinic



Global Amsterdam



APPENDIX 3 NEWSPAPER ADVERTISMENT PROOF

PRINT

ARCUSCONSULTING27NM

ERM

NOTIFICATION OF ENVIRONMENTAL AUTHORISATION PROCESS

Notice is hereby given of a Public Participation Process (PPP) to be undertaken in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA, 1998), as amended.

DFFE Reference(s): To Be Confirmed

Development Title: Proposed Cluster Wind Energy Facility (WEF) and associated infrastructure, between Ermelo and Amsterdam, Mpumalanga Province.

Nature of Activity: The Project Developer, under the Special Purpose Vehicles, namely Rochdale Wind Energy Facility (Pty) Ltd, Sheepmoor Wind Energy Facility (Pty) Ltd, and Emvelo Wind Energy Facility (Pty) Ltd, intend to submit separate applications for Environmental Authorisation (EA) for the proposed Rochdale WEF, Emvelo WEF and Sheepmoor WEF including their associated infrastructure. The proposed WEFs will include between 25 – 45 turbines each with a maximum output capacity of up to 240 MW and an anticipated lifespan of 20 – 25 years. The WEFs will all connect directly into National Eskom Grid via the Eskom Camden Substation. Each WEF will apply for authorisation of a proposed grid connection route to connect to the existing Eskom Camden Substation, via approximately 20 – 31 km long 132 kV overhead transmission lines.

Development Location: The preferred project site (for all 3 WEFs) is approximately up to 150 ha, and is located between 15 - 30 km east of the town of Ermelo in Mpumalanga Province and falls within the Msukaligwa Local Municipality and Gert Sibande District Municipality.

Application Process: The respective applications will follow a full Scoping and EIA (S&EIA) process as the generation capacity will be more than 20 MW and the associated grid connection may be included in the WEF application or be subjected to a separate Basic Assessment process according to the NEMA, 1998, as amended.

Anticipated NEMA Listing Notice Activities for the respective Amsterdam Cluster WEF and Grid Connection Application are:

Listing Notice	Activities
LN 1 GN R327	11(i), 12(ii)(a)(c), 14, 19, 24(ii), 27(i)(ii), 28(ii), 48 (i)(a)(c), 56(ii)
LN 2 GN 325	1, 15
LN 3 GN R324	4 (f)(i)(bb)(ee), 10(f)(i)(bb)(ee), 12 (f)(ii),14 (ii)(f)(i)(bb) (ff), 18 (f) (i) (bb)(ee), 23 (ii)(a)(c)(f)(i)(bb)(ee)

In terms of Section 21 of the National Water Act (NWA) (36 of 1998), as amended, the developments may potentially require water use license. If required, an application for Water Use License will be submitted to the Department of Human Settlement and Water and Sanitation for authorisation.

The EA Applications and respective Reports will be submitted to the competent authority, the Department of Forestry, Fisheries and the Environment (DFFE), for a decision. Notification of submission of the Draft and Final Reports, and any other correspondence required to be included as part of the PPP, will be sent to all registered Interested and Affected Parties (I&APs). The Draft reports will also be made available for public review and comment once completed (exact date and location of availability to be confirmed in notification to all registered I&APs). Should you wish to be registered as an I&AP, please submit your name, interest in the project, email and postal address and telephone number in writing to the below address.

Environmental Resource Management Southern Africa (Pty) Ltd
Reference/Verwysing: Amsterdam Cluster WEFs
E-mail/E-pos: erm.arcusamsterdam@erm.com
Post/Pos: Postnet Suite 90, Private Bag X12, Tokai, 7966

Contact Person / Kontak Persoon: Aneesah Alwie
Telephone / Telefoon: (+27)10 596 3495

Online Registration / Aanlyn Registrasie: https://amsterdamclusterwef.aidaform.com/stakeholder-engagement

Correspondence throughout the Application Processes will only be distributed to Registered I&APs. Registration is possible throughout the Application Processes.

Notice regarding the Protection of Personal Information Act (PoPI Act 4 of 2013, as amended)

If you request to register as an I&AP, your personal information will be made available to the Competent Authority and an appellant in the case of an appeal, and an applicant/EAP/independent person for purposes of being informed and given access to an audit report.

KENNISGEWING VAN OMGEWINGSMAGTIGING-PROSES EN WATERGEBRUIK-LISENSIE AANSOEKPROSESSE

Kennis word hiermee gegee van 'n Openbare Deelname Proses (PPP) wat onderneem moet word ingevolge die Wet op Nasionale Omgewingsbestuur (NEMBA) (Wet Nr. 107 van 1998), soos gewysig.

DFFE Verwysing(s): Moet nog bevestig word

Ontwikkelingstitel: Voorgestelde Loxton Wind Energie Fasiliteit (WEF) en verwante infrastruktuur, tussen Ermelo en Amsterdam, Mpumalanga.

Aard van Aktiwiteit: Die Projek Ontwikkelaaar, onder die Spesiale Doelvoertuig, naamlik Rochdale Wind Energie Fasiliteit (Pty) Ltd, Sheep Moor Wind Energie Fasiliteit (Pty) Ltd, en Emvelo Wind Energie Fasiliteit (Pty) Ltd, beaam om aparte aansoeke ter Omgewingsmagtigirg (EA) in te dien vir die voorgestelde Rochdale WEF, Emvelo WEF en Sheepmoor WEF en die geassosieerde infrastruktuur. Die WEFs sal tussen 25 – 45 turbines, met 'n maksimum uitset kapasiteit tot 240 MW elk, en 'n verwagte leeftyd van 20 – 25 jaar hê. Die WEFS sal almal direk aansluit by die Nasionale Eskom Netwerk via die Eskom Camden Substasie. Elke WEF sal vir magtiging van 'n voorgestelce netwerkverbinding aansoek doen om to bind met die Eskom Camden Substasie, via ongeveer 20 – 31 km lang 132 kV oorhoofse transmissielyne.

Ontwikkelingsligging: Die voorgekeurde projeklgging (vir al 3 WEFs) is ongeveer 150 ha, en geleë tussen 15 – 30 km oos van die dorp Ermelo in Mpumalanga, en val onder die Msukaligwa Plaaslike Munisipaliteit en Gert Sibande Distrik Munisipaliteit.

Aansoekproses: Die onderskeie aansoeke sal 'n volledige Omvangbepaling en EIA (S&EIA) proses volg as die opwekkingkapasiteit meer as 20 MW is, en die geassosieerde netwerkverbinding mag ingesluit word in die WEF aansoek of onderhewig wees aan 'n aparte Basiese Assesseringsproses volgens die NEMA, 1988, soos gewysig.

Verwagte NEMA Noteringskennisgewing Aktiwitieit vir die onderskeie Amsterdam Groeperings WEF en Netwerkverbinding Aansoek is:

Noterings-kennisgewing	Aktiwiteite
LN 1 GN R327	11(i), 12(ii)(a)(c), 14, 19, 24(ii), 27(i)(ii), 28(ii), 48 (i)(a) (c), 56(ii)
LN 2 GN 325	1, 15
LN 3 GN R324	4 (f)(i)(bb)(ee), 10(f)(i)(bb)(ee), 12 (f)(ii),14 (ii)(f)(i)(bb) (ff), 18 (f) (i) (bb)(ee), 23 (ii)(a)(c)(f)(i)(bb)(ee)

Ingevolge Artikel 21 van die Nasionale Waterwet (NWA) (Wet 36 van 1998), soos gewysig, kan die ontwikkeling moontlik 'n lisensie vir watergebruik vereis. Indien nodig, sal 'n aansoek om lisensie vir watergebruik aan die Departement van Water en Sanitasie (DWS) ingedien word.

Die Omgewingsmagtigings Aansoek en onderskeie verslae sal aan die bevoegde owerheid, die Departement van Bosbou, Visserye en die Omgewing (DFFE), voorgelê word vir 'n besluit. Kennisgewing van die indiening van die konsep- en finale Verslae, en enige ander korrespondense wat as deel van die Openbare Deelname Proses (PPP) ingesluit moet word, sal aan alle geregistreerde Belanghebbende en Geaffekteerde Partye (B&GP's) gestuur word. Die Konsep Verslae sal beskikbaar gestel word vir openbare oorweging en kommentaarlewering sodra dit ingedien is (die presiese datum van beskikbaarheid van elke aansoek om bevestig te word in kennisgewing aan alle geregistreerde B&GP's).

Online Registrasie / Aanlyn Registrasie: https://amsterdamclusterwef.aidaform.com/stakeholder-engagement

Korrespondensie deurgaans die Aansoekprosesse sal slegs verspreid word aan Geregistreerde I&APs. Registrasie is moontlik deurgaans die Aansoekprosesse.

Kennisgewing rakende die Beskerming van Persoonlike Inligting Wet (PoPI Wet 4 van 2013, soos gewysig)

Indien u versoek om as 'n I&AP te registreer, sal u persoonlike inligting beskikbaar gestel word aan die Bevoegde Gesag en enige appellant in die geval van 'n appèl, en aan 'n applikant/OIB/onafhanklike persoon vir doeleindes om ingelig en toegang te verleen tot 'n ouditverslag.

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NOTIFICATION OF APPLICATIONS FOR ENVIRONMENTAL AUTHORISATION / KENNISGEWING VAN AANSOEKE OM OMGEWINGSMAGTIGING

Notice is hereby given of a Public Participation Process (PPP) undertaken in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA, 1998), as amended.

DFFE Reference(s): Emvelo WEF - 14/12/16/3/3/2/2611
: Sheepmoor WEF - 14/12'16/3/3/2/2613

Development Title: Proposed Wind Energy Facility (WEF) Cluster and associated infrastructure, located between Ermelo and Amsterdam, Mpumalanga Province.

Nature of Activity: Respective Project Developers, under the Special Purpose Vehicles, namely Sheepmoor Wind Energy Facility (Pty) Ltd, anc Emvelo Wind Energy facility (Pty) Ltd, intend to submit separate amended applications for Environmental Authorisation (EA) for the proposed Sheepmoor WEF and Emvelo WEF, including their associated infrastructure. The proposed WEFs will include up to 40 turbines each with a maximum output capacity of up to 260 MW, and an anticipated lifespan of 25 - 30 years. The WEFs will all connect directly into National Eskom Grid via the Eskom Uitkoms Substation. The proposed grid connection route application, to connect to the existing Eskom Uitkoms Substation, via approximately 20 – 32 km long 132 kV overhead transmission lines, is included in the WEF application.

Development Location: The preferred project site for Emvelo WEF and Sheepmoor WEF measures approximately up to 180 ha and is located approximately 25 - 30 km of the town of Ermelo, and falls within the Msukaligwa Local Municipality and Gert Sibande District Municipality, in the Mpumalanga Province.

Anticipated NEMA Listing Notice Activities for the respective WEF Cluster and Grid Connection Application are provided below:

Listing Notice	Activities
LN 1 GN R327	11(i), 12(ii)(a)(c), 14, 19, 24(ii), 27(i)(ii), 28(ii), 48 (i)(a)(c), 56(ii)
LN 2 GN 325	1, 15
LN 3 GN R324	4 (f)(i)(bb)(ee), 10(f)(i)(bb)(ee), 12 (f)(ii),14 (ii)(f)(i)(bb)(ff), 18 (f) (i) (bb)(ee), 23 (ii)(a)(c)(f)(i)(bb)(ee)

Application Process: The respective applications for the WEFs are currently in the draft EIA phase. The Public Participation Process for the EIA phase will run from 10 March 2025 – 10 April 2025. The relevant documents are available from the Ermelo Public Library or alternatively accessed via our website during the public participation period.

The EA Applications and respective Reports will be submitted to the competent authority, for a decision. Notification of submission of the Final Reports, and any other correspondence required to be included as part of the PPP, will be sent to all registered Interested and Affected Parties (I&APs).

Kennis geskied hiermee van 'n Openbare Deelnameproses (ODP) wat ingevolge die Wet op Nasionale Omgewingsbestuur, 1998 (Wet No. 107 van 1998) (NEMA, '998), soos gewysig, onderneem is.

DFFE-verwysing(s): Emvelo WEF - 14 / 12 / 16 / 3 / 3 / 2 / 2611
: Sheepmoor WEF - 14 / 12 / 16 / 3 / 3 / 2 / 2613

Ontwikkelingstitel: Voorgestelde windenergiefasiliteit (WEF) -groep en gepaardgaande infrastruktuur, geleë tussen Ermelo en Amsterdam, Mpumalanga Provinsie.

Aard van Aktiwiteit: Onderskeie projekontwikkelaars, onder die Spesiale Doelvertuie, naamlik Sheepmoor Wind Energy Facility (Edms) Bpk, en Emvelo Windenergiefasiliteit (Edms) Bpk, beoog om afsonderlike gewysigde aansoeke vir Omgewingsmagtging (EA) in te dien vir die voorgestelde Sheepmoor WEF en Emvelo WEF, insluitend hul gepaardgaande infrastruktuur. Die voorgestelde WEFs sal tot 40 turbines elk insluit met 'n maksimum uitsetkapasiteit van tot 260 MW, en 'n verwagte lewensduur van 25 - 30 jaar. Die WEFs sal almal direk by die Nasionale Eskom-netwerk aansluit via die Eskom Uitkoms-substasie. Die voorgestelde netwerkverbindingsroete-aansoek, om via ongever 20 – 32 km lange 132 kV-oorhoofse transmissielyne aan die bestaande Eskom Uitkoms-substasie te koppel, is by die WEF-aansoek ingesluit.

Ontwikkelingsligging: Die voorkeurprojekterrein vir Emvelo WEF en Sheepmoor WEF meet ongeveer tot '80 ha en is ongeveer 25 - 30 km van die dorp Ermelo geleë, en val binne die Msukaligwa Plaaslike Munisipaliteit en Gert Sibande Distriksmunisipaliteit, in die Mpumalanga Provinsie.

Verwagte NEMA-noteringskennisgewingaktiwiteite vir die onderskeie WEF-groep- en netwerkverbindingsaansoek word hieronder verskaf:

Noteringskennisgewing	Aktiwiteite
LN 1 GN R327	11(i), 12(ii)(a)(c), 14, 19, 24(ii), 27(i)(ii), 28(ii), 48 (i)(a)(c), 56(ii)
LN 2 GN 325	1, 15
LN 3 GN R324	4 (f)(i)(bb)(ee), 10(f)(i)(bb)(ee), 12 (f)(ii),14 (ii)(f)(i)(bb)(ff), 18 (f) (i) (bb)(ee), 23 (ii)(a)(c)(f)(i)(bb)(ee)

Aansoekproses: Die onderskeie aansoeke vir die WEF's is tans in die konsep-OIS-fase. Die Openbare Deelnameproses vir die OIS-fase sal van 10 Maart 2025 tot 10 April 2025 duur. Die betrokke dokumente is beskikbaar by die Ermelo Openbare Biblioteek of alternatiewelik verkry via ons webwerf gedurende die openbare deelnametydperk.

Die EA-aansoeke en onderskeie verslae sal aan die bevoegde owerheid voorgelê word vir 'n besluit. Kennisgewing van die indiening van die finale verslae, en enige ander korrespondensie wat as deel van die PPP ingesluit moet word, sal aan alle geregistreerde belanghebbende en geaffekteerde partye (I&AP's) gestuur word.

Should you wish to obtain information about the project or wish to register as an I&AP on the WEF Cluster, please contact us at the details below. / Indien U as 'n B&GP geregistreer wil wees, stuur asseblief u naam, belangstelling in die projek, e-pos- en posadres en telefoonnommer skriftelik na die onderstaande adres.

Environmental Resources Management Southern Africa (Pty) Ltd
Reference / Verwysing : 0684401 WEF Cluster
Email / E-pos : erm.arcusamsterdam@erm.com
Post : Postnet Suite 90, Private Bag X12, Tokai, 7966

Contact Person / Kontakpersoon : Lucien Barbeau
Telephone/ Telefoon : +27105961488

Online / Aanlyn Registrasie:
https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/
https://amsterdamclusterwef.aidaform.com/stakeholder-engagement

Correspondence throughout the Application Processes will only be distributed to Registered I&APs. Registration is possible throughout the Application Processes.

Notice regarding the Protection of Personal Information Act (PoPI Act 4 of 2013, as amended):
If you request to register as an I&AP, your personal information will be made available to an appellant in the case of an appeal, and an applicant/EAP/ independent person for purposes of being informed and given access to an audit report.

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- When advertising in any of Lowveld Media's publications, an artwork proof is sent to every client. Since we simultaneously work on numerous publications, each has certain deadlines to be adhered to, eg. for material to be handed in, design, client and production deadlines.
- Corrections will be done as requested and a second proof will be sent to the client. Thereafter a signature of approval is expected since it is of vital importance to continue with production.

NO RESPONSIBILITY WILL BE ACCEPTED BY LOWVELD MEDIA IF THIS SIGNED PROOF IS INCORRECT.

SIGNATURE

APPENDIX 4 DSR NOTIFICATION

From:	ERM Arcus Amsterdam
To:	ERM Arcus Amsterdam
Subject:	Notification of Submission: Draft scoping Report Amsterdam WEFs, near Ermelo, Mpumalanga
Date:	Thursday, 22 August 2024 17:33:28
Attachments:	image001.png I&AP Notification Letter Afrikaans.pdf I&AP Notification Letter English.pdf

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

Dear Interested and Affected Party,

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

The previous applications for these proposed projects have been withdrawn to allow for an additional comment period for all I&AP's. Please note that all comments received during the previous comment period will still be incorporated in the comments and responses for these new applications. Should you wish to confirm that your comment is being incorporated, please feel free to email us.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30 day comment period from 22 August to 21 September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final Scoping Report.

More information on how you are able to participate in this process is attached in the above documentation.
Please indicate which application your comment in respect of.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

APPENDIX 5 FSR NOTIFICATION

From:	ERM Arcus Amsterdam
To:	ERM Arcus Amsterdam
Subject:	Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date:	Thursday, 10 October 2024 13:52:23
Attachments:	image001.png

Dear Registered Interested and Affected Party,

NOTIFICATION OF SUBMISSION OF THE FINAL SCOPING REPORT(S) FOR APPROVAL TO PROCEED TO ENVIRONMENTAL IMPACT ASSESSMENT PHASE FOR THE PROPOSED SHEEPMOOR, ROCHDALE AND EMVELO WIND ENERGY FACILITIES, MPUMALANGA PROVINCE

DFFE Reference: 14/12/16/3/3/2/2611, 14/12/16/3/3/2/2612 and 14/12/16/3/3/2/2613

This email serves to inform you about the submission of the Final Scoping Reports for the proposed Sheepmoor, Rochdale and Emvelo WEFs , in the Mpumalanga Province.

The Draft Scoping Report for the Proposed Development(s) was subjected to the required 30-day comment and review period, from the 22 August 2024 to the 21 September 2024 (both days inclusive), taking into consideration Chapter 2 Regulation 3 (1); (2) and (3) of the NEMA, 1998 (Act No. 107 of 1998). Comments received from the public were incorporated, addressed and responded to in the Final Scoping Report.

Following the 30-day public comment and review period, the Final Scoping Reports has been submitted to the Department of Forestry, Fisheries and the Environment (competent authority) for decision and is available for the public to view and download via the ERM website.

With reference to the above, please send any queries to the below address. Please also indicate the contact details of any other potential I&APs that should be contacted and registered.

Email: mailto:ERM.ArcusAmsterdam@erm.com

Website: **https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/**

Thank you for the interest in the project.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town
+27105963488

erm.com

APPENDIX 6 DEIAR NOTIFICATION

1st Floor, Great Westerford,
240 Main Road, Rondebosch
7700

T +27 21 681 5400
F +27 21 686 0736

erm.com

15 Julie 2025

Geagte Belangstellende en Geaffekteerde Party, Belanghebbende, Staatsorgaan:

RE: KENNISGEWING VAN BESKIKBAARHEID VAN DIE KONSEP-OMGEWINGIMPAKVERSLAG VIR OPENBARE OORSIG EN KOMMENTAAR: VOORGESTELDE SHEEPMOOR EN EMVELO WINDENERGIE-INSTANSIES EN HULPINFRASTRUKTUUR, MPUMALANGA

Hiermee word kennis gegee van 'n Openbare Deelnameproses (ODP) ingevolge die Wet op Nasionale Omgewingsbestuur, 1998 (Wet No. 107 van 1998), soos gewysig.

DFFE Reference(s): 14/12/16/3/3/2/2611 and 14/12/16/3/3/2/2613

Natuur van die Aktiwiteit: Die Projekontwikkelaar, onder die Spesiale Doel Voertuie (SDV's), naamlik Sheepmoor Wind Energy Facility (Pty) Ltd, en Emvelo Wind Energy Facility (Pty) Ltd, is van voorneme om afsonderlike aansoeke vir Omgewingsmagtiging (OM) in te dien vir die voorgestelde Sheepmoor en Emvelo Wind Energy Facilities (WEF's) insluitende hul geassosieerde infrastruktuur. Die voorgestelde WEF's sal onderskeidelik 29 en 24 turbines insluit met 'n maksimum uitsetkapasiteit van tot 260 MW en 'n verwagte leeftyd van 30 jaar. Die WEF's sal almal direk aan die Nasionale Eskom-netwerk koppel via die Eskom Camden-substasie. Elke WEF sal aansoek doen vir magtiging van 'n voorgestelde netwerkverbindingsroete om aan die bestaande Eskom Camden-substasie te koppel, via 'n ongeveer 30 km lange 132 kV bogrondse transmissielyne.

Ontwikkelingsligging: Die Cluster WEF voorkeurprojekterrein (vir beide WEF's) is geleë tussen 15 - 30 km oos van die dorp Ermelo in die Mpumalanga Provinsie en val binne die Msukaligwa Plaaslike Munisipaliteit en Gert Sibande Distriksmunisipaliteit.

Aansoekproses: Ingevolge Hoofstuk 5 van die Nasionale Wet op Omgewingsbestuur, 1998 (Wet 107 van 1998 – NEMA), en die Omgewingsimpakassessering (OIA) Regulasies, 2014 (soos gewysig), het die Projekaansoekers Environmental Resources Management Southern Africa (Pty) Ltd (ERM) aangestel om die Omvangbepaling en Omgewingsimpakassessering (O&OIA) proses as die onafhanklike omgewingsimpakassesseringspraktisyn (OAP) te onderneem.

Na die openbare hersieningstydperk van die Konsep OIA-verslag, het kommentaar van MDARDLEA en MTPA, veral met betrekking tot biodiversiteitsversagtingmaatreëls, bykomende insette van die spesialiste genoodsaak. Die DFFE het 'n verlenging van die tydraamwerke van die OIA-proses toegestaan, in ooreenstemming met Regulasie 3(7) van die OIA-regulasies, 2014, soos gewysig, en die Finale OIA-verslag is verklaar as synde betaalbaar op of voor 25 Augustus 2025.

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Gevolglik word 'n tweede openbare kommentaar-tydperk van 30 dae geopen op die Konsep OIA-verslag om deursigtigheid te verseker en om belanghebbendes die geleentheid te gee om die hersiene verslag, studies en Kommentaar en Antwoorde na te gaan voor die indiening van die Finale OIA-verslag.

Ingevolge Artikel 21 van die Nasionale Waterwet (NWA) (36 van 1998), soos gewysig, mag die ontwikkeling moontlik 'n watergebruiklisensie benodig. Indien dit vereis word, sal 'n aansoek vir 'n Watergebruiklisensie by die Departement van Menslike Nedersettings en Water en Sanitasie vir magtiging ingedien word.

ERM het twee afsonderlike Omgewingsaansoeke by die Departement van Bosbou, Visserye en die Omgewing (DFFE) ingedien.

Uitnodiging om kommentaar te lewer: Lede van die publiek, plaaslike gemeenskappe en belanghebbendes word uitgenooi om kommentaar te lewer op die Konsep OIA-verslae, wat vir openbare hersiening en kommentaar beskikbaar is van **Dinsdag, 15 Julie 2025 tot Donderdag 14 Augustus 2025 (beide dae ingesluit),** soos per Tabel 1 hieronder.

Tabel 1: Ligging van Openbare Hersiening en Kommentaar

Ligging	Adres
Elektroniese Kopie Ligging	
ERM-webwerf *(beskikbaar vir aflaai)*	https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/
Via One Drive	BELANGHEBBENDES kan versoek dat afskrifte via 'n One Drive gedeelde gids gestuur word.
Harde Kopie Ligging	
Publieke Biblioteek Ermelo	Wedgewood Laan, Ermelo, Mpumalanga
CD-kopieë kan op versoek aan die OAP beskikbaar gestel word..	

Kontak asseblief die ondergetekende indien u enige navrae het.



Stephanie Gopaul
Geregistreerde OAP
Environmental Resources Management Southern Africa (Pty) Ltd

Lucien Barbeau

From:	ERM Arcus Amsterdam
Sent:	Tuesday, 15 July 2025 16:43
To:	ERM Arcus Amsterdam
Subject:	Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Attachments:	0684401_Mulilo WEF_DEIAr_IAP Notification on DEIA V2.eng.pdf; 0684401_Mulilo WEF_DEIAr_I&AP Notification on DEIA V2.Afr.pdf

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

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Lucien Barbeau
Senior Consultant

Cape Town erm.com

[redacted]


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10 July 2025

Dear Interested and Affected Party, Stakeholder, Organ of State:

RE: NOTIFICATION OF AVAILABILITY OF THE DRAFT EIA REPORTS FOR PUBLIC REVIEW AND COMMENT OF THE PROPOSED SHEEPMOOR, AND EMVELO WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, MPUMALANGA

Notice is hereby given of a Public Participation Process (PPP) to be undertaken in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA, 1998), as amended.

DFFE Reference(s): 14/12/16/3/3/2/2611 and 14/12/16/3/3/2/2613

Nature of Activity: The Project Developer, under the Special Purpose Vehicles (SPVs), namely Sheepmoor Wind Energy Facility (Pty) Ltd, and Emvelo Wind Energy Facility (Pty) Ltd, intend to submit separate applications for Environmental Authorisation (EA) for the proposed Sheepmoor and Emvelo Wind Energy Facilities (WEFs) including their associated infrastructure. The proposed WEFs will include 29 and 24 turbines respectively with a maximum output capacity of up to 260 MW and an anticipated lifespan of 30 years. The WEFs will all connect directly into National Eskom Grid via the Eskom Camden Substation. Each WEF will apply for authorisation of a proposed grid connection route to connect to the existing Eskom Camden Substation, via approximately 30 km long 132 kV overhead transmission lines.

Development Location: The Cluster WEF preferred project site (for both WEFs) is located between 15 - 30 km east of the town of Ermelo in Mpumalanga Province and falls within the Msukaligwa Local Municipality and Gert Sibande District Municipality.

Application Process: In terms of Chapter 5 of the National Environmental Management Act, 1998 (Act 107 of 1998 – NEMA), and the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), the Project Applicants appointed Environmental Resources Management Southern Africa (Pty) Ltd (ERM), to undertake the Scoping and Environmental Impact Assessment (S&EIA) process as the independent environmental impact assessment practitioner (EAP).

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025.

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As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

In terms of Section 21 of the National Water Act (NWA) (36 of 1998), as amended, the development may potentially require water use license. If required, an application for Water Use License will be submitted to the Department of Human Settlement and Water and Sanitation for authorisation.

ERM has submitted two separate Environmental Applications to the Department of Forestry, Fisheries and the Environment (DFFE).

Invitation to Comment: Members of the public, local communities, and stakeholders are invited to comment on the Draft EIA Reports, which is available for public review and comment, from **Tuesday, 15 July 2025 until the Thursday,** 14 **August 2025 (both days inclusive)**, as per Table 1 below.

Table 1: Public Review and Comment Locations

Location	Physical Address
Electronic Copy Locations	
ERM Website *(available for download)*	https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/
Via One Drive	I&APs can request for copies to be sent via one drive shared folder.
Hard Copy Location	
Public Library Ermelo	Wedgewood Ave, Ermelo, Mpumalanga
CD Copies can be made available upon request to the EAP.	

Please feel free to contact the undersigned should you have any queries.



Stephanie Gopaul
Registered EAP
Environmental Resources Management Southern Africa (Pty) Ltd

APPENDIX 7 CORRESPONDENCE – ALL COMMENTS & RESPONSES

Low de Vries
PhD Zoology
Pr. Sci. Nat. Zoological Science

Response letter: Comments on Draft EIA Report for the Proposed Sheepmoor and Emvelo Wind Energy Facilities

Mr. Joshua Meyer 14/08/2025

Dr. Low de Vries (Ph.D. Zoology; *Pr. Sci. Nat.* Zoological Science)
Volant Environmental
25/08/2025

Cell: +[redacted]
[redacted]com
Web: volantenvironmental.com

Low de Vries
PhD Zoology
Pr. Sci. Nat. Zoological Science

It was brought to our attention that Mr Joshua Meyer, a landowner who forms part of the Sheepmoor and Emvelo Wind Energy Facilities (WEF), reference reports written by Volant Environmental (VE) in comments made on the 14th of August 2025 on the Draft Environmental Impact Assessment for the abovementioned WEFs. VE was referenced numerous times, specifically citing buffer sizes that was implemented around Martial Eagle, Grey Crowned Crane and Secretarybird nests and ridgelines for other WEF where VE was involved.

Mr Meyer contacted us on the 14th of July 2025, and during this 17 min conversation it was made clear that VE cannot comment on surveys conducted by other specialist, as an in-depth knowledge of an area is needed to make any informed decisions. VE made it clear that the buffers that we implemented during our surveys around any sensitive areas were based on our specialist opinion and informed by our monitoring results, and considered not only the avifaunal species in question, but the habitat and habitat features. As the last two aspects is not always transferrable to other WEFs the buffer sizes are not always applicable. VE was never commissioned to go to these WEFs, and as such we carry no knowledge of these areas and the habitat and cannot comment on buffers suggested by other specialists.

While the research conducted by Mr Meyer is commendable the conclusions drawn from this research is not accurate and does not depict the opinions of VE.

Please contact me should you require additional information or have queries regarding the above.



Low de Vries Ph.D. Zoology; *Pr. Sci. Nat.* Zoological Science
Director and Bat and Bird Assessment Specialist
Volant Environmental
[redacted]
www.volantenvironmental.com

VOLANT
ENVIRONMENTAL

Company Profile






Content

1. Our Vision
2. Our Experience
3. Our Methods
4. Our Services
5. Meet the team
6. Contact us







Our Vision

In a word, conservation. Bats and birds are often overlooked and underappreciated, but by applying industry standards and strictly following the relevant guidelines we ensure that any development takes place ethically and maintain our responsibility to the environment. We look after the little guy.







Our Experience

We boast with more than four decades of experience in environmental science. This includes work done on mammals, both large and small, avifauna, herpetofauna and arthropods in habitats ranging from sub-antarctic to arid regions with forests in between. Our focus is on bats and birds, but our capabilities is much larger.







Our Methods

Since we come from a scientific background with advanced degrees in biological sciences, we take a scientific approach in all the problems that we tackle. We pride ourselves on the research done before any project, our field methods and analyses of the data collected. Whether you're seeking professional guidance for ecological projects or looking to learn more about wildlife conservation, Volant Environmental is here to lead the way with knowledge, experience, and a commitment to excellence.







Our Services

Bat Impact Assessments

Our bat surveys are meticulously conducted to assess bat populations and their habitats. This involves using advanced techniques such as acoustic monitoring, roost inspections, and mist netting to gather critical data for conservation planning and management.

Bird Impact Assessments

We provide thorough bird surveys to monitor avian species, their populations, and habitat use. These surveys are essential for understanding bird distribution, breeding patterns, and migration routes, aiding in the development of effective conservation and mitigation strategies.

Biodiversity Surveys

Volant Environmental conducts comprehensive biodiversity surveys to catalogue species diversity within specific areas. These surveys are crucial for identifying critical habitats, guiding conservation efforts, and promoting sustainable land use practices.

Public Talks

Our team is passionate about raising awareness and educating the public on conservation issues. We offer engaging public talks on various topics related to wildlife conservation, the importance of biodiversity, and practical steps individuals can take to support conservation efforts.









Meet the team

Low de Vries, PhD: Zoology

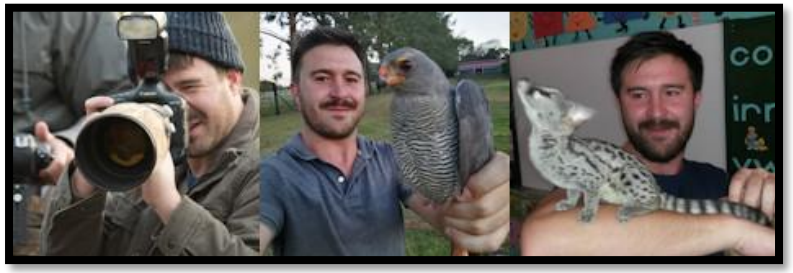


Director and Bat and Bird Specialist
Pr. Sci. Nat. Zoological Science

Low de Vries obtained a PhD in Zoology in 2014, after which he spent a year on Marion Island as a field assistant. Since then he has done two Postdoctoral fellowships, one at the National Zoological Gardens of South Africa and one in the Centre for Viral Zoonoses at the University of Pretoria. During his second Postdoc he focused his research on bats, lead field projects to sites in South Africa and was part of an expedition to Mozambique and Zimbabwe. All these projects were focused on bats, and the pathogens these animals carry. His focus was, however, on the ecology of bats.

He has a wide range of experience, and have been involved with survey projects on birds, reptiles and small and large mammals. This includes impact assessment at renewable energy facilities where he has acted as both bat and bird specialist. He has extensive experience in the capturing and handling of bats, birds and small mammals.

Niel Cillié



Raptor Specialist

Niel Cillié is a raptor specialist with over 20 years of experience in the field and boasts with a life list of over 800 species of birds. His experience includes field work, field guiding, writing, presentations and talks and he is regarded as the world authority on Ayre's Hawk-Eagle. He has contributed to numerous field guides with his expert knowledge and opinions along with photographs and he is one of the lead authors for the latest field guide "The Complete Photographic Guide to the birds of Southern Africa". Niel has been involved with numerous field surveys and impact assessments at wind and solar energy facilities over the past four years where his expertise on raptor behaviour, raptor nests and breeding behaviour has proved invaluable.

Colyn Grobler, MSc: Medical Virology

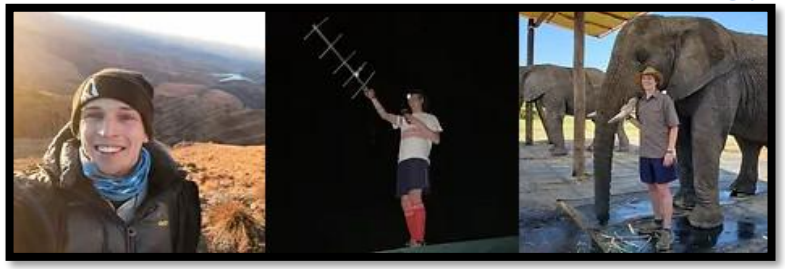


Field Coordinator

Colyn Grobler is a young and enthusiastic scientist specializing in pathogen research in bat and small mammal populations. He obtained a BSc Honour's and MSc from the University of Pretoria. During his studies he obtained extensive experience in the trapping, handling and identification of bat species, while also leading field projects to specific sites in South Africa. Although he specializes in the pathogens associated with bats, he is passionate about bat biology, ecology and the conservation of bat species. Colyn is a determined and focused individual that will not shy away from hard work and will ensure the task at hand is completed.

Meet the team

Matthew Wood, MSc: Medical Virology



GIS Specialist and Field Technician

Matthew Wood is an aspiring scientist with a broad background across several ecological fields. He achieved a BSc Honours in Zoology from the University of Pretoria and completed his MSc in Medical Virology, providing an ecological perspective to the virological field. Over the course of his studies, he has obtained experience in the capture and handling of a wide variety of bat species as well as the radio-tracking of fruit bats. Although he was introduced to bat ecology relatively late into his academic career, he demonstrates a keen interest in their ecology, a passion for their conservation and a willingness to learn. He is a committed individual that takes great pride in the quality of his work and is not afraid of long, difficult hours in the name of fieldwork and data collection.

Monique Shanahan, PhD Candidate



Statistician and Field Technician

Monique Shanahan is a PhD candidate at the University of Pretoria with extensive experience in zoology, ecology, and environmental research. Her work focuses on biodiversity assessments, ecological monitoring, and the conservation of wildlife and their habitats, with expertise in vector ecology, wildlife management, and habitat analysis. She has conducted field studies on vector species, including bats and mosquitoes, as well as biodiversity surveys. With skills in data management and biostatistics, she has worked on projects analyzing the effects of land use on species distribution and habitat integrity. In addition, she has expertise in freshwater ecosystem assessments, using biomonitoring techniques to evaluate water quality and biodiversity health. Monique is passionate about ecological sustainability and advancing research on the interactions between wildlife, habitats, and environmental change.

Sonja Visser



Database manager

Sonja is a highly motivated and results-oriented individual with a strong work ethic and a commitment to continuous learning and professional development. She has more than six years experience in data management and result administration. She has a proven track record of improving data quality, reducing data inconsistencies, and streamlining data workflows, leading to significant business benefits. Combining these attributes with her love of the outdoors and wildlife makes her a valuable asset to any team and business such as Volant Environmental.

Contact Us

Low de Vries
[redacted]

From: Riaan Meintjes
Sent on: Tuesday, 22 April 2025 13:10:03
To: ERM Arcus Amsterdam; eiaapplications@dffe.gov.za
Subject: Mulilo Amsterdam Wind Energy Facility Cluster
Urgent: High

Attachments: Letter to ERM Arcus Amsterdam 22.04.25.pdf (259.79 KB)

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EXTERNAL MESSAGE

Dear Sir/Madam

Kindly refer to our attached letter and kindly acknowledge receipt.

Regards
Riaan Meintjes
Director

BusinessDay Best Lawyers for 2025: Arbitration and Mediation; Litigation; Real Estate Law

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[redacted]
W: www.themislawchambers.co.za

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Cape Town, 8001

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ENVIRONMENTAL RESOURCES MANAGEMENT SOUTHERN AFRICA (PTY) LTD

Via email: ERM.ArcusAmsterdam@erm.com
EIAApplications@dffe.gov.za

Our Reference: RM / HR1599
Reply to Email: riaan@themis.co.za
Your Reference:

Date: 22 April 2025

Dear Sirs

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

1 We address this correspondence to you on the instructions of our clients, the Trustees for the time being of the Peter Celliers Trust ("**the Trust**").

2 The Trust is the owner of Portions 8, 19 and 28 of the Roodewal Farm (Farm number 270), Registration Division IT, Mpumalanga. It is an interested and affected party with regard to the proposed development of the Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province.

3 The Trust conducts an aerodrome and a helipad from Portion 28 of its farm. The aerodrome has been used for aircraft of the Learjet and KingAir categories and has, at all times material hereto, remained in regular use. The landing strip of the aerodrome is used in both directions.

4 The operation and safety requirements of aerodromes and helipads are governed by the provisions of the Civil Aviation Act, 13 of 2009, the Civil Aviation Regulations, 2011 (as amended) ("**the Regulations**") and Annex 14 to the Convention on International Civil Aviation, 7th Edition, July 2016.

5 The safety requirements for aerodromes and heliports are contained in Part 139 of the Regulations and Regulation 139.01.30 deals with obstacle limitation and marking outside aerodromes and heliports. Regulation 139.01.30(1) imposes an obligation on the holder of an aerodrome licence to monitor the surroundings of the aerodrome to assess permanent or temporary obstacle limitation and penetration surfaces, to establish if any obstacle has an impact on the safety of aircraft operations at such aerodrome. Sub-regulation (7) goes

on to provide that the holder of an aerodrome licence shall not allow to be erected, without the prior approval of the Director, an object higher than 45 meters above the mean level of a landing area or within 8 kilometres measured from the nearest point on a boundary of an aerodrome. Regulation 139.01.30 further incorporates the provisions of Document SA-CATS 139.

6 Document SA-CATS 139.01.30 elaborates upon the requirements for obstacle limitations and markings outside aerodromes or heliports. Paragraph 1.14 deals extensively with the requirements pertaining to wind turbine generators (wind farms) and paragraph 1.14(2), dealing with wind farm placement, states as follows:

> "*Due to the potential of wind turbine generators to interfere on* (sic) *radio navigation equipment, no Windfarm should be built closer than 35 km from an aerodrome. In addition, much care should be taken to consider visual flight rules routes, proximity of known recreational flight activity such as hang-gliders, en route navigational facilities etc.*" (our underlining)

7 In addition to the aerodrome, there is a registered nature conservancy named Nu-Scotland on the Trust's farm. The conservancy regularly hosts guests and bi-annually hosts cricket groups of between 80 to 100 people. The visual impact assessments of the proposed wind farms will need to take the use of the Trust's farm as a nature conservancy into account. The conservancy is home to a wide range of antelope, zebra and birds, including Secretary Birds, which have been classified as endangered, largely due to habitat degradation. Appropriate mitigation measures will need to be put in place to address the threats that the wind farms will pose to the fauna on the Trust's farm and surrounds.

8 The Trust is accordingly opposed to the erection of any wind turbines closer than 35 kilometres from the boundary of the Trust's aerodrome.

Yours faithfully



RIAAN MEINTJES
HAYES INCORPORATED

From: Clarice Arendse
Sent on: Tuesday, 15 July 2025 16:42:50
To: ERM Arcus Amsterdam
Subject: Automatic reply: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Thank you for your message. Please note that I am currently on maternity leave and will have limited access to email until 1 September 2025. If you need assistance before then, please contact Mrs. du Toit at reception@summersinc.co.za who will be able to direct your query to the relevant attorney.

I appreciate your understanding and look forward to reconnecting upon my return.

Kind regards,
Clarice Arendse
RICHARD SUMMERS INC.
SENIOR ASSOCIATE

Office [redacted]

From: Rebecca Thomas
Sent on: Tuesday, 15 July 2025 16:43:16
To: ERM Arcus Amsterdam
Subject: Automatic reply: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Good Day, please note I am on leave and will be returning back to the office on Monday 21st July.

Kind Regards,
Rebecca

CONFIDENTIALITY AND DATA PROTECTION. This email is intended only for the use of the intended recipient(s) and may contain information which is privileged and confidential, or personal data which is subject to data protection legislation. If you are not the intended recipient, any disclosure, copying and/or distribution of the content of this email, or reliance upon or other use of the contents of this email is strictly prohibited. If you have received this email in error, please erase all copies of it, including all attachments, do not forward it to anybody, and please also notify the sender immediately.

From: ERM Arcus Amsterdam
Sent on: Tuesday, 15 July 2025 16:42:34
To: ERM Arcus Amsterdam
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Attachments: 0684401_Mulilo WEF_DEIAr_IAP Notification on DEIA V2.eng.pdf (227.94 KB), 0684401_Mulilo WEF_DEIAr_I&AP Notification on DEIA V2.Afr.pdf (182.96 KB)

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**


ERM FOUNDATION: ANNUAL REVIEW 2025
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READ NOW
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FOUNDATION

From: Khululwa Matshoba
Sent on: Tuesday, 15 July 2025 16:44:01
To: ERM Arcus Amsterdam
Subject: Automatic reply: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

You don't often get email from stuurmkv@ntcsa.co.za. Learn why this is important

EXTERNAL MESSAGE

G
Good day

Please note that I am on sick leave until 28 July 2025, for urgent work related matters please contact Martina Phiri at phirim@ntcsa.co.za

Thank you.

Warm regards
Khush

Disclaimer

NB: This Email and its contents are subject to the NTCSA EMAIL LEGAL NOTICE which can be viewed here.

From: joofmerindavt@yahoo.com
Sent on: Tuesday, 15 July 2025 18:48:32
To: ERM Arcus Amsterdam
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

You don't often get email from joofmerindavt@yahoo.com. Learn why this is important

EXTERNAL MESSAGE

Ek is nie by huis nie en Afrikaans asb is een van ons landstaale dankie

On 15 Jul 2025 16:42, ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER
>
> Dear Interested and Affected Party,
>
> This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
>
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>
> Thank you and regards,
>
> Stephanie Gopaul
>
> Environmental Assessment Practitioner

Lucien Barbeau
Senior Consultant

Cape Town [redacted]

erm.com

From: Mervyn Lotter
Sent on: Tuesday, 15 July 2025 18:53:42
To: ERM Arcus Amsterdam
CC: Celia de Waal; Khumbelo Malele
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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

EXTERNAL MESSAGE



Dear Stephanie

Please could you provide me with a KML file of the latest placement of the turbines and associated infrastructure?

Thank you.

Regards
Mervyn

Disclaimer:
All views or opinions expressed in this electronic message and its attachments are the views of the sender and do not necessarily reflect the views and opinions of the Mpumalanga Tourism and Parks Agency. No employee of Mpumalanga Tourism and Parks Agency is entitled to conclude a binding contract on behalf of the Mpumalanga Tourism and Parks Agency unless he/ she is an Accounting Officer of the Mpumalanga Tourism and Parks Agency, or his or her authorized representative. The information contained in this message and its attachments may be confidential or privileged and is for the use of the named recipient only, except where the sender specifically states otherwise. If you are not the intended recipient you may not copy or deliver this message to anyone.

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Tuesday, July 15, 2025 4:42 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



From: Gavin Cowden
Sent on: Wednesday, 16 July 2025 09:12:46
To: ERM Arcus Amsterdam
CC: Robyn Luyt; Sindisiwe Shongwe; mervyn.lotter@mtpa.co.za
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Morning Lucien,

Please can you provide the specialist report for the Emvelo WEF as only the soecialist report for Sheepmoor is provided on the weblink.

Many thanks
Kind regards
Gavin

Gavin Cowden
Environmental Policy, Planning & Coordination

Mpumalanga Department of Agriculture, Rural Development, Land & Environmental Affairs
Private Bag X11219
Nelspruit, 1200
[redacted]

>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 07/15/25 4:43 PM >>>
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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

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From: ERM Arcus Amsterdam
Sent on: Wednesday, 16 July 2025 09:54:12
To: Mervyn Lotter; ERM Arcus Amsterdam
CC: Celia de Waal; Khumbelo Malele; Mpho Malema; Lucien Barbeau
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Attachments: Amsterdam Layout.kmz (104.58 KB), Emvelo DEIAr.kmz (1.35 KB), Sheepmoor DEIAr.kmz (1.5 KB)

Hi Mervyn, I hope this email finds you well.

Thank you for reaching out; kindly receive the KML files as requested.

Please reach out should you need any further information or clarification.

Kind Regards

ERM
Sustainability is our business

Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted]
erm.com



From: Mervyn Lotter <Mervyn.Lotter@mtpa.co.za>
Sent: Tuesday, July 15, 2025 6:54 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Celia de Waal <celia@mtpa.co.za>; Khumbelo Malele <Khumbelo.Malele@mtpa.co.za>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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

EXTERNAL MESSAGE



economic development & tourism
MPUMALANGA
THE PLACE OF THE RISING SUN

Dear Stephanie

Please could you provide me with a KML file of the latest placement of the turbines and associated infrastructure?

Thank you.

Regards
Mervyn

Disclaimer:
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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Tuesday, July 15, 2025 4:42 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Lucien Barbeau
Senior Consultant

Sustainability is our business

Cape Town [redacted]

erm.com



From: Ethics & Fraud Hotline
Sent on: Wednesday, 16 July 2025 10:11:52
To: ERM Arcus Amsterdam
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

You don't often get email from hotline@behonest.co.za. Learn why this is important

EXTERNAL MESSAGE

Good day

Please be advised that this is the Ethics and Fraud Hotline, managed by an independent service provider. You may get in touch with the Department of Forestry, Fisheries, and the Environmental Crime at the Head Office: 012 399 9000 Call Centre: 086 111 2468

Regards,
Ethics & Fraud Hotline
hotline@behonest.co.za

> On 15/07/25, at 16:43:54, ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

[Attachment: image001.png]

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

[Attachment: image002.png]

From: Robyn Luyt
Sent on: Wednesday, 16 July 2025 11:14:44
To: ERM Arcus Amsterdam; Stephanie Gopaul
CC: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Sindy Mbuyane; mervyn@mtpa.co.za
Subject: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Urgent: High

EXTERNAL MESSAGE

Good day Stephanie and Lucien,

1. Please provide links to the full Public Participation Reports for both Emvelo and Sheepmoor. Only the cover pages for the public participation reports are available.
2. You have stated that the public comment period is from 15 July to 14 Aug. However it seems you have not accounted for the public holiday on 9 Aug, which would mean that the 30 day comment period ends on 15 Aug. However the 30 comment period should only commence when we have access to the full reports (ie. we await the public consultation reports).
3. It is our understanding - based on the meeting that was held in Nelspruit - that the layouts have changed. Please urgently provide the shapefiles, which we require to undertake our review. Shapefiles to include turbines and all infrastructure.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
Nelspruit, 1200
[redacted]

>>> Gavin Cowden 07/16/25 9:12 AM >>>
Morning Lucien,

Please can you provide the specialist report for the Emvelo WEF as only the specialist report for Sheepmoor is provided on the weblink.

Many thanks
Kind regards
Gavin

Gavin Cowden
Environmental Policy, Planning & Coordination

Mpumalanga Department of Agriculture, Rural Development, Land & Environmental Affairs
Private Bag X11219
Nelspruit, 1200
[redacted]

>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 07/15/25 4:43 PM >>>
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Thank you and regards,

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Environmental Assessment Practitioner

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From: ERM Arcus Amsterdam
Sent on: Wednesday, 16 July 2025 13:54:00
To: Josua Meyer; ERM Arcus Amsterdam; Richard Summers
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Josua Meyer,

Kindly see updates to the website, easy access to website using below link:

https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Wednesday, July 16, 2025 11:58 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Richard Summers <richard@summersinc.co.za>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday me. Gopaul

It appears that the specialist report for Sheepmoor WEF was duplicated under Emvelo WEF.

Could not find specialist reports for Emvelo WEF.

Please check and rectify if needed.

Thanks

Josua Meyer

On Tue, Jul 15, 2025 at 4:42 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

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>
> Dear Interested and Affected Party,
>
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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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Sent on: Wednesday, 16 July 2025 13:54:16
To: ERM Arcus Amsterdam
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Attachments: 0684401_Mulilo WEF_DEIAr_IAP Notification on DEIA V2.eng.pdf (227.94 KB), 0684401_Mulilo WEF_DEIAr_I&AP Notification on DEIA V2.Afr.pdf (182.96 KB)

Dear Interested and Affected Party,

Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.

The revised comment period now ends on 15 August 2025.

All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.

Thank you for your continued participation.

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA Report. More information on how you

are able to participate in this process is attached in the above documentation. Please indicate which application your comment in respect of.

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM

Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted]

erm.com



From: ERM Arcus Amsterdam
Sent on: Wednesday, 16 July 2025 13:53:56
To: Robyn Luyt; ERM Arcus Amsterdam; Stephanie Gopaul
CC: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Sindy Mbuyane; mervyn@mtpa.co.za
Subject: RE: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Attachments: Amsterdam Layout.kmz (104.58 KB), Emvelo DEIAr.kmz (1.35 KB), Sheepmoor DEIAr.kmz (1.5 KB)

Hi Robyn

Thanks for your message.

1. The full Public Participation Reports for Emvelo and Sheepmoor are available on the website now — kindly do check again. Let us know if you still can't access them.

https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/

2. We've extended the comment period by one day, so it now ends on 15 August 2025. A notice will be sent out shortly.
3. Please see the attached updated layout and shapefiles, including all turbines and infrastructure.

Let us know if you need anything else.

Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Wednesday, July 16, 2025 11:15 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Cc: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; mervyn@mtpa.co.za
Subject: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

EXTERNAL MESSAGE

Good day Stephanie and Lucien,

1. Please provide links to the full Public Participation Reports for both Emvelo and Sheepmoor. Only the cover pages for the public participation reports are available.
2. You have stated that the public comment period is from 15 July to 14 Aug. However it seems you have not accounted for the public holiday on 9 Aug, which would mean that the 30 day comment period ends on 15 Aug. However the 30 comment period should only commence when we have access to the full reports (ie. we await the public consultation reports).
3. It is our understanding - based on the meeting that was held in Nelspruit - that the layouts have changed. Please urgently provide the shapefiles, which we require to undertake our review. Shapefiles to include turbines and all infrastructure.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)

Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
Nelspruit, 1200
[redacted]

>>> Gavin Cowden 07/16/25 9:12 AM >>>
Morning Lucien,

Please can you provide the specialist report for the Emvelo WEF as only the specialist report for Sheepmoor is provided on the weblink.

Many thanks
Kind regards
Gavin

Gavin Cowden
Environmental Policy, Planning & Coordination

Mpumalanga Department of Agriculture, Rural Development, Land & Environmental Affairs
Private Bag X11219
Nelspruit, 1200
[redacted]

>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 07/15/25 4:43 PM >>>
SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

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T +27 21 681 5400
F +27 21 686 0736

erm.com

15 Julie 2025

Geagte Belangstellende en Geaffekteerde Party, Belanghebbende, Staatsorgaan:

RE: KENNISGEWING VAN BESKIKBAARHEID VAN DIE KONSEP-OMGEWINGIMPAKVERSLAG VIR OPENBARE OORSIG EN KOMMENTAAR: VOORGESTELDE SHEEPMOOR EN EMVELO WINDENERGIE-INSTANSIES EN HULPINFRASTRUKTUUR, MPUMALANGA

Hiermee word kennis gegee van 'n Openbare Deelnameproses (ODP) ingevolge die Wet op Nasionale Omgewingsbestuur, 1998 (Wet No. 107 van 1998), soos gewysig.

DFFE Reference(s): 14/12/16/3/3/2/2611 and 14/12/16/3/3/2/2613

Natuur van die Aktiwiteit: Die Projekontwikkelaar, onder die Spesiale Doel Voertuie (SDV's), naamlik Sheepmoor Wind Energy Facility (Pty) Ltd, en Emvelo Wind Energy Facility (Pty) Ltd, is van voorneme om afsonderlike aansoeke vir Omgewingsmagtiging (OM) in te dien vir die voorgestelde Sheepmoor en Emvelo Wind Energy Facilities (WEF's) insluitende hul geassosieerde infrastruktuur. Die voorgestelde WEF's sal onderskeidelik 29 en 24 turbines insluit met 'n maksimum uitsetkapasiteit van tot 260 MW en 'n verwagte leeftyd van 30 jaar. Die WEF's sal almal direk aan die Nasionale Eskom-netwerk koppel via die Eskom Camden-substasie. Elke WEF sal aansoek doen vir magtiging van 'n voorgestelde netwerkverbindingsroete om aan die bestaande Eskom Camden-substasie te koppel, via 'n ongeveer 30 km lange 132 kV bogrondse transmissielyne.

Ontwikkelingsligging: Die Cluster WEF voorkeurprojekterrein (vir beide WEF's) is geleë tussen 15 - 30 km oos van die dorp Ermelo in die Mpumalanga Provinsie en val binne die Msukaligwa Plaaslike Munisipaliteit en Gert Sibande Distriksmunisipaliteit.

Aansoekproses: Ingevolge Hoofstuk 5 van die Nasionale Wet op Omgewingsbestuur, 1998 (Wet 107 van 1998 – NEMA), en die Omgewingsimpakassessering (OIA) Regulasies, 2014 (soos gewysig), het die Projekaansoekers Environmental Resources Management Southern Africa (Pty) Ltd (ERM) aangestel om die Omvangbepaling en Omgewingsimpakassessering (O&OIA) proses as die onafhanklike omgewingsimpakassesseringspraktisyn (OAP) te onderneem.

Na die openbare hersieningstydperk van die Konsep OIA-verslag, het kommentaar van MDARDLEA en MTPA, veral met betrekking tot biodiversiteitsversagtingmaatreëls, bykomende insette van die spesialiste genoodsaak. Die DFFE het 'n verlenging van die tydraamwerke van die OIA-proses toegestaan, in ooreenstemming met Regulasie 3(7) van die OIA-regulasies, 2014, soos gewysig, en die Finale OIA-verslag is verklaar as synde betaalbaar op of voor 25 Augustus 2025.

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Gevolglik word 'n tweede openbare kommentaar-tydperk van 30 dae geopen op die Konsep OIA-verslag om deursigtigheid te verseker en om belanghebbendes die geleentheid te gee om die hersiene verslag, studies en Kommentaar en Antwoorde na te gaan voor die indiening van die Finale OIA-verslag.

Ingevolge Artikel 21 van die Nasionale Waterwet (NWA) (36 van 1998), soos gewysig, mag die ontwikkeling moontlik 'n watergebruiklisensie benodig. Indien dit vereis word, sal 'n aansoek vir 'n Watergebruiklisensie by die Departement van Menslike Nedersettings en Water en Sanitasie vir magtiging ingedien word.

ERM het twee afsonderlike Omgewingsaansoeke by die Departement van Bosbou, Visserye en die Omgewing (DFFE) ingedien.

Uitnodiging om kommentaar te lewer: Lede van die publiek, plaaslike gemeenskappe en belanghebbendes word uitgenooi om kommentaar te lewer op die Konsep OIA-verslae, wat vir openbare hersiening en kommentaar beskikbaar is van **Dinsdag, 15 Julie 2025 tot Donderdag 14 Augustus 2025 (beide dae ingesluit),** soos per Tabel 1 hieronder.

Tabel 1: Ligging van Openbare Hersiening en Kommentaar

Ligging	Adres
Elektroniese Kopie Ligging	
ERM-webwerf *(beskikbaar vir aflaai)*	https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/
Via One Drive	BELANGHEBBENDES kan versoek dat afskrifte via 'n One Drive gedeelde gids gestuur word.
Harde Kopie Ligging	
Publieke Biblioteek Ermelo	Wedgewood Laan, Ermelo, Mpumalanga
CD-kopieë kan op versoek aan die OAP beskikbaar gestel word..	

Kontak asseblief die ondergetekende indien u enige navrae het.



Stephanie Gopaul
Geregistreerde OAP
Environmental Resources Management Southern Africa (Pty) Ltd

1st Floor, Great Westerford,
240 Main Road, Rondebosch
7700

T +27 21 681 5400
F +27 21 686 0736

erm.com

10 July 2025

Dear Interested and Affected Party, Stakeholder, Organ of State:

RE: NOTIFICATION OF AVAILABILITY OF THE DRAFT EIA REPORTS FOR PUBLIC REVIEW AND COMMENT OF THE PROPOSED SHEEPMOOR, AND EMVELO WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, MPUMALANGA

Notice is hereby given of a Public Participation Process (PPP) to be undertaken in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA, 1998), as amended.

DFFE Reference(s): 14/12/16/3/3/2/2611 and 14/12/16/3/3/2/2613

Nature of Activity: The Project Developer, under the Special Purpose Vehicles (SPVs), namely Sheepmoor Wind Energy Facility (Pty) Ltd, and Emvelo Wind Energy Facility (Pty) Ltd, intend to submit separate applications for Environmental Authorisation (EA) for the proposed Sheepmoor and Emvelo Wind Energy Facilities (WEFs) including their associated infrastructure. The proposed WEFs will include 29 and 24 turbines respectively with a maximum output capacity of up to 260 MW and an anticipated lifespan of 30 years. The WEFs will all connect directly into National Eskom Grid via the Eskom Camden Substation. Each WEF will apply for authorisation of a proposed grid connection route to connect to the existing Eskom Camden Substation, via approximately 30 km long 132 kV overhead transmission lines.

Development Location: The Cluster WEF preferred project site (for both WEFs) is located between 15 - 30 km east of the town of Ermelo in Mpumalanga Province and falls within the Msukaligwa Local Municipality and Gert Sibande District Municipality.

Application Process: In terms of Chapter 5 of the National Environmental Management Act, 1998 (Act 107 of 1998 – NEMA), and the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), the Project Applicants appointed Environmental Resources Management Southern Africa (Pty) Ltd (ERM), to undertake the Scoping and Environmental Impact Assessment (S&EIA) process as the independent environmental impact assessment practitioner (EAP).

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As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

In terms of Section 21 of the National Water Act (NWA) (36 of 1998), as amended, the development may potentially require water use license. If required, an application for Water Use License will be submitted to the Department of Human Settlement and Water and Sanitation for authorisation.

ERM has submitted two separate Environmental Applications to the Department of Forestry, Fisheries and the Environment (DFFE).

Invitation to Comment: Members of the public, local communities, and stakeholders are invited to comment on the Draft EIA Reports, which is available for public review and comment, from **Tuesday, 15 July 2025 until the Thursday,** 14 **August 2025 (both days inclusive)**, as per Table 1 below.

Table 1: Public Review and Comment Locations

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Electronic Copy Locations	
ERM Website *(available for download)*	https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/
Via One Drive	I&APs can request for copies to be sent via one drive shared folder.
Hard Copy Location	
Public Library Ermelo	Wedgewood Ave, Ermelo, Mpumalanga
CD Copies can be made available upon request to the EAP.	

Please feel free to contact the undersigned should you have any queries.



Stephanie Gopaul
Registered EAP
Environmental Resources Management Southern Africa (Pty) Ltd

From: Lizell Stroh
Sent on: Wednesday, 16 July 2025 14:07:21
To: Aviation Environmental Compliance; ERM Arcus Amsterdam
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Attachments: 0684401_Mulilo WEF_DEIAr_IAP Notification on DEIA V2.eng.pdf (227.94 KB), 0684401_Mulilo WEF_DEIAr_I&AP Notification on DEIA V2.Afr.pdf (182.96 KB)

You don't often get email from strohl@caa.co.za. Learn why this is important

EXTERNAL MESSAGE

Thank you for the EIA notification, kindly note all future correspondence should be send to environment@caa.co.za.

Environment could you kindly respond.

Kind regards

Lizell Stroh
Inspector Obstacles
Air Navigation Services
[redacted] | www.caa.co.za

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Wednesday, 16 July 2025 13:54
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.

Thank you for your continued participation.

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

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To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Stephanie Gopaul

Environmental Assessment Practitioner

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

Sustainability is our business



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T +27 21 681 5400
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10 July 2025

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CD Copies can be made available upon request to the EAP.	

Please feel free to contact the undersigned should you have any queries.



Stephanie Gopaul
Registered EAP
Environmental Resources Management Southern Africa (Pty) Ltd

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240 Main Road, Rondebosch
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T +27 21 681 5400
F +27 21 686 0736

erm.com

15 Julie 2025

Geagte Belangstellende en Geaffekteerde Party, Belanghebbende, Staatsorgaan:

RE: KENNISGEWING VAN BESKIKBAARHEID VAN DIE KONSEP-OMGEWINGIMPAKVERSLAG VIR OPENBARE OORSIG EN KOMMENTAAR: VOORGESTELDE SHEEPMOOR EN EMVELO WINDENERGIE-INSTANSIES EN HULPINFRASTRUKTUUR, MPUMALANGA

Hiermee word kennis gegee van 'n Openbare Deelnameproses (ODP) ingevolge die Wet op Nasionale Omgewingsbestuur, 1998 (Wet No. 107 van 1998), soos gewysig.

DFFE Reference(s): 14/12/16/3/3/2/2611 and 14/12/16/3/3/2/2613

Natuur van die Aktiwiteit: Die Projekontwikkelaar, onder die Spesiale Doel Voertuie (SDV's), naamlik Sheepmoor Wind Energy Facility (Pty) Ltd, en Emvelo Wind Energy Facility (Pty) Ltd, is van voorneme om afsonderlike aansoeke vir Omgewingsmagtiging (OM) in te dien vir die voorgestelde Sheepmoor en Emvelo Wind Energy Facilities (WEF's) insluitende hul geassosieerde infrastruktuur. Die voorgestelde WEF's sal onderskeidelik 29 en 24 turbines insluit met 'n maksimum uitsetkapasiteit van tot 260 MW en 'n verwagte leeftyd van 30 jaar. Die WEF's sal almal direk aan die Nasionale Eskom-netwerk koppel via die Eskom Camden-substasie. Elke WEF sal aansoek doen vir magtiging van 'n voorgestelde netwerkverbindingsroete om aan die bestaande Eskom Camden-substasie te koppel, via 'n ongeveer 30 km lange 132 kV bogrondse transmissielyne.

Ontwikkelingsligging: Die Cluster WEF voorkeurprojekterrein (vir beide WEF's) is geleë tussen 15 - 30 km oos van die dorp Ermelo in die Mpumalanga Provinsie en val binne die Msukaligwa Plaaslike Munisipaliteit en Gert Sibande Distriksmunisipaliteit.

Aansoekproses: Ingevolge Hoofstuk 5 van die Nasionale Wet op Omgewingsbestuur, 1998 (Wet 107 van 1998 – NEMA), en die Omgewingsimpakassessering (OIA) Regulasies, 2014 (soos gewysig), het die Projekaansoekers Environmental Resources Management Southern Africa (Pty) Ltd (ERM) aangestel om die Omvangbepaling en Omgewingsimpakassessering (O&OIA) proses as die onafhanklike omgewingsimpakassesseringspraktisyn (OAP) te onderneem.

Na die openbare hersieningstydperk van die Konsep OIA-verslag, het kommentaar van MDARDLEA en MTPA, veral met betrekking tot biodiversiteitsversagtingmaatreëls, bykomende insette van die spesialiste genoodsaak. Die DFFE het 'n verlenging van die tydraamwerke van die OIA-proses toegestaan, in ooreenstemming met Regulasie 3(7) van die OIA-regulasies, 2014, soos gewysig, en die Finale OIA-verslag is verklaar as synde betaalbaar op of voor 25 Augustus 2025.

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Gevolglik word 'n tweede openbare kommentaar-tydperk van 30 dae geopen op die Konsep OIA-verslag om deursigtigheid te verseker en om belanghebbendes die geleentheid te gee om die hersiene verslag, studies en Kommentaar en Antwoorde na te gaan voor die indiening van die Finale OIA-verslag.

Ingevolge Artikel 21 van die Nasionale Waterwet (NWA) (36 van 1998), soos gewysig, mag die ontwikkeling moontlik 'n watergebruiklisensie benodig. Indien dit vereis word, sal 'n aansoek vir 'n Watergebruiklisensie by die Departement van Menslike Nedersettings en Water en Sanitasie vir magtiging ingedien word.

ERM het twee afsonderlike Omgewingsaansoeke by die Departement van Bosbou, Visserye en die Omgewing (DFFE) ingedien.

Uitnodiging om kommentaar te lewer: Lede van die publiek, plaaslike gemeenskappe en belanghebbendes word uitgenooi om kommentaar te lewer op die Konsep OIA-verslae, wat vir openbare hersiening en kommentaar beskikbaar is van **Dinsdag, 15 Julie 2025 tot Donderdag 14 Augustus 2025 (beide dae ingesluit),** soos per Tabel 1 hieronder.

Tabel 1: Ligging van Openbare Hersiening en Kommentaar

Ligging	Adres
Elektroniese Kopie Ligging	
ERM-webwerf *(beskikbaar vir aflaai)*	https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/
Via One Drive	BELANGHEBBENDES kan versoek dat afskrifte via 'n One Drive gedeelde gids gestuur word.
Harde Kopie Ligging	
Publieke Biblioteek Ermelo	Wedgewood Laan, Ermelo, Mpumalanga
CD-kopieë kan op versoek aan die OAP beskikbaar gestel word..	

Kontak asseblief die ondergetekende indien u enige navrae het.



Stephanie Gopaul
Geregistreerde OAP
Environmental Resources Management Southern Africa (Pty) Ltd

From: Celia de Waal
Sent on: Wednesday, 16 July 2025 14:45:42
To: ERM Arcus Amsterdam
CC: Frans Krige
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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

EXTERNAL MESSAGE



Good afternoon

Kindly send us, the MTPA a hard copy of the Draft EIA for the Mulilo Amsterdam Wind Energy Facility Cluster, for our scientists to comment on, to the following physical address in Lydenburg:

To: Celia de Waal (EIA Data Capturer)
MTPA Office Building (Lydeburg)
End of Morganstreet
1120 Lydenburg

My cell number is [redacted]

[redacted]

Celia de Waal

Mpumalanga

TOURISM AND PARKS AGENCY

An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
[redacted]
e-mail: [redacted]

Disclaimer:
All views or opinions expressed in this electronic message and its attachments are the views of the sender and do not necessarily reflect the views and opinions of the Mpumalanga Tourism and Parks Agency. No employee of Mpumalanga Tourism and Parks Agency is entitled to conclude a binding contract on behalf of the Mpumalanga Tourism and Parks Agency unless he/ she is an Accounting Officer of the Mpumalanga Tourism and Parks Agency, or his or her authorized representative. The information contained in this message and its attachments may be confidential or privileged and is for the use of the named recipient only, except where the sender specifically states otherwise. If you are not the intended recipient you may not copy or deliver this message to anyone.

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: 15 July 2025 16:43
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted]

erm.com



From: Robyn Luyt
Sent on: Wednesday, 16 July 2025 15:37:07
To: ERM Arcus Amsterdam; Stephanie Gopaul
CC: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Sindy Mbuyane; mervyn@mtpa.co.za
Subject: Re: RE: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

The reports I was able to access for each WEF are titled "Public Participation Volume III". Does this imply that there are there are 2 more volumes for each WEF ?

Regards
Robyn

>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 07/16/25 1:54 PM >>>
Hi Robyn

Thanks for your message.

1. The full Public Participation Reports for Emvelo and Sheepmoor are available on the website now — kindly do check again. Let us know if you still can't access them.

https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/

1. We've extended the comment period by one day, so it now ends on 15 August 2025. A notice will be sent out shortly.
2. Please see the attached updated layout and shapefiles, including all turbines and infrastructure.

Let us know if you need anything else.

Regards

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Wednesday, July 16, 2025 11:15 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Cc: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; mervyn@mtpa.co.za
Subject: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

EXTERNAL MESSAGE

Good day Stephanie and Lucien,

1. Please provide links to the full Public Participation Reports for both Emvelo and Sheepmoor. Only the cover pages for the public participation reports are available.
2. You have stated that the public comment period is from 15 July to 14 Aug. However it seems you have not accounted for the public holiday on 9 Aug, which would mean that the 30 day comment period ends on 15 Aug. However the 30 comment period should only commence when we have access to the full reports (ie. we await the public consultation reports).
3. It is our understanding - based on the meeting that was held in Nelspruit - that the layouts have changed. Please urgently provide the shapefiles, which we require to undertake our review. Shapefiles to include turbines and all infrastructure.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)

Director: Environmental Impact Management

Department of Agriculture, Rural Development, Land & Environmental Affairs

Mpumalanga Provincial Government

Riverside Office Park, Aqua Street (Cycad Building - Block 4)

Nelspruit, 1200

[redacted]

[redacted]*za*

>>> Gavin Cowden 07/16/25 9:12 AM >>>
Morning Lucien,

Please can you provide the specialist report for the Emvelo WEF as only the specialist report for Sheepmoor is provided on the weblink.

Many thanks
Kind regards
Gavin

Gavin Cowden
Environmental Policy, Planning & Coordination

Mpumalanga Department of Agriculture, Rural Development, Land & Environmental Affairs
Private Bag X11219
Nelspruit, 1200
[redacted]

>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 07/15/25 4:43 PM >>>
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Dear Interested and Affected Party,

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Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

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From: ERM Arcus Amsterdam
Sent on: Wednesday, 16 July 2025 16:24:00
To: Robyn Luyt; ERM Arcus Amsterdam; Stephanie Gopaul
CC: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Sindy Mbuyane; mervyn@mtpa.co.za
Subject: RE: RE: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Robyn,

The configuration for each WEF's documents is as follows:

- 02 Volume I: Draft EIA Report
- 03 Volume II: Specialist EIA Reports
- 04 Volume III: Public Participation Reports

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Wednesday, July 16, 2025 3:37 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Cc: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; mervyn@mtpa.co.za
Subject: Re: RE: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/

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2. Please see the attached updated layout and shapefiles, including all turbines and infrastructure.

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From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Wednesday, July 16, 2025 11:15 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Cc: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; mervyn@mtpa.co.za
Subject: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

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Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
Nelspruit, 1200
[redacted]

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Morning Lucien,

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Kind regards
Gavin

Gavin Cowden
Environmental Policy, Planning & Coordination

Mpumalanga Department of Agriculture, Rural Development, Land & Environmental Affairs
Private Bag X11219
Nelspruit, 1200
[redacted]

>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 07/15/25 4:43 PM >>>
SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

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Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

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From: Serah Muobeleni
Sent on: Wednesday, 16 July 2025 16:39:55
To: ERM Arcus Amsterdam
CC: Nhlamulo Machume
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

You don't often get email from serahmu@nda.gov.za. Learn why this is important

EXTERNAL MESSAGE

Good day

The Department has noted the letter regarding the draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province. Therefore, the department of Agriculture would request a formal application in terms of the Subdivision of Agricultural Land Act, 70 of 1970 in order to provide formal comments.

Your assistance will highly be appreciated in this regard.

Regards
Serah

From: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>
Sent: Wednesday, July 16, 2025 2:53 PM
To: Serah Muobeleni <SerahMu@nda.gov.za>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

FYA

From: Anneliza Collett <AnnelizaC@nda.gov.za>
Sent: Wednesday, July 16, 2025 12:18 PM
To: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

FYA

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Tuesday, 15 July 2025 16:43
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL EMAIL: This email originated outside of "DALRRD Environment". CAUTION: Do not click on links or open attachments unless you recognize the sender and know the content is safe.

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



From: Josua Meyer
Sent on: Wednesday, 16 July 2025 16:41:50
To: ERM Arcus Amsterdam
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Sir

The avifaunal specialist removed in both reports, Sheepmoor WEF and Emvelo WEF, the High Sensitivity - Turbine Exclusion Zone in Figures 33 for the aquatic buffer zones from an avifaunal perspective.

It must be an unintentional mistake and request reinstatement of it.

If it was deliberate we request the detailed reasoning and motivation for such a drastic decision.

Thanks

Josua Meyer

On Wed, Jul 16, 2025 at 1:54 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Interested and Affected Party,
>
> Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.
>
> The revised comment period now ends on 15 August 2025.
>
> All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.
>
> Thank you for your continued participation.

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

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Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**


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From: ERM Arcus Amsterdam
Sent on: Thursday, 17 July 2025 09:44:29
To: Celia de Waal; ERM Arcus Amsterdam; ERM Arcus Amsterdam
CC: Frans Krige; Lucien Barbeau
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Good morning, Cecilia,

Thank you for your request.

Kindly confirm whether we may submit a USB drive containing the full set of Draft Environmental Impact Assessment (EIA) Reports for the Sheepmoor and Emvelo Wind Energy Facilities, in lieu of printed hard copies. The USB will include all relevant documentation to assist your scientists in their review and commentary.

If possible, we would appreciate it if you could get back to us today, so that we can arrange for delivery as soon as possible.

Kind Regards

ERM
Sustainability is our business

Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted]
erm.com



From: Celia de Waal <celia@mtpa.co.za>
Sent: Wednesday, July 16, 2025 2:46 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Frans Krige <frans@mtpa.co.za>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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EXTERNAL MESSAGE



economic development & tourism

MPUMALANGA
THE PLACE OF THE RISING SUN

Good afternoon

Kindly send us, the MTPA a hard copy of the Draft EIA for the Mulilo Amsterdam Wind Energy Facility Cluster, for our scientists to comment on, to the following physical address in Lydenburg:

To: Celia de Waal (EIA Data Capturer)
MTPA Office Building (Lydeburg)
End of Morganstreet
1120 Lydenburg

[redacted]

Kind regards

Celia de Waal

Mpumalanga
TOURISM AND PARKS AGENCY

An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services

[redacted]
e-mail: celia.dewaal@mtpa.co.za

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: 15 July 2025 16:43
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

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Environmental Assessment Practitioner

Lucien Barbeau
Senior Consultant

Sustainability is our business

Cape Town [redacted]

erm.com



From: Celia de Waal
Sent on: Thursday, 17 July 2025 09:47:30
To: ERM Arcus Amsterdam
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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EXTERNAL MESSAGE







Good morning

A USB drive is 100 %.

Kind regards

Celia

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: 17 July 2025 09:44
To: Celia de Waal <celia@mtpa.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Frans Krige <frans@mtpa.co.za>; Lucien Barbeau <Lucien.Barbeau@erm.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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If possible, we would appreciate it if you could get back to us today, so that we can arrange for delivery as soon as possible.

Kind Regards

Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted] **erm.com**



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End of Morganstreet
1120 Lydenburg

[redacted]

Kind regards

Celia de Waal



Mpumalanga

TOURISM AND PARKS AGENCY

An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
Cell: [redacted]
e-mail: celia.dewaal@mtpa.co.za

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: 15 July 2025 16:43
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



From: ERM Arcus Amsterdam
Sent on: Thursday, 17 July 2025 10:00:20
To: Celia de Waal; ERM Arcus Amsterdam
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Thank you so much for your understanding and swift response to the matter.

We will arrange the delivery ASAP and let you know when it is on the way to you.

Kind Regards

ERM
Sustainability is our business

Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted] **erm.com**



From: Celia de Waal <celia@mtpa.co.za>
Sent: Thursday, July 17, 2025 9:48 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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EXTERNAL MESSAGE



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Celia

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Sent: 17 July 2025 09:44
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Cc: Frans Krige <frans@mtpa.co.za>; Lucien Barbeau <Lucien.Barbeau@erm.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted]
[redacted]



From: Celia de Waal <celia@mtpa.co.za>
Sent: Wednesday, July 16, 2025 2:46 PM
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[redacted]

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An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
Cell: [redacted]
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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: 15 July 2025 16:43
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted]

erm.com



From: Robyn Luyt
Sent on: Thursday, 17 July 2025 10:16:46
To: ERM Arcus Amsterdam; Stephanie Gopaul
CC: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Sindy Mbuyane; mervyn@mtpa.co.za
Subject: Re: RE: RE: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Dear Lucien,

I can confirm that all documents are now on the website.

However, given that I&APs only had access to the full reports on 16 July and not 15 July (ie. Specialist Reports for Both WEFs, and the specialist reports for the Emvelo WEF were only accessible on 16 July 202), would this not mean that the regulated 30 days commences on 17 July and ends on 18 August (since 17 Aug is a Sunday) ?

Kind Regards
Robyn

>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 07/16/25 4:24 PM >>>
Hi Robyn,

The configuration for each WEF's documents is as follows:

- 02 Volume I: Draft EIA Report
- 03 Volume II: Specialist EIA Reports
- 04 Volume III: Public Participation Reports

Kind Regards

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Wednesday, July 16, 2025 3:37 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Cc: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; mervyn@mtpa.co.za
Subject: Re: RE: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

The reports I was able to access for each WEF are titled "Public Participation Volume III". Does this imply that there are there are 2 more volumes for each WEF ?

Regards
Robyn

>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 07/16/25 1:54 PM >>>
Hi Robyn

Thanks for your message.

1. The full Public Participation Reports for Emvelo and Sheepmoor are available on the website now — kindly do check again. Let us know if you still can't access them.

https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/

1. We've extended the comment period by one day, so it now ends on 15 August 2025. A notice will be sent out shortly.

2. Please see the attached updated layout and shapefiles, including all turbines and infrastructure.

Let us know if you need anything else.

Regards

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Wednesday, July 16, 2025 11:15 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Cc: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; mervyn@mtpa.co.za
Subject: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

EXTERNAL MESSAGE

Good day Stephanie and Lucien,

1. Please provide links to the full Public Participation Reports for both Emvelo and Sheepmoor. Only the cover pages for the public participation reports are available.
2. You have stated that the public comment period is from 15 July to 14 Aug. However it seems you have not accounted for the public holiday on 9 Aug, which would mean that the 30 day comment period ends on 15 Aug. However the 30 comment period should only commence when we have access to the full reports (ie. we await the public consultation reports).
3. It is our understanding - based on the meeting that was held in Nelspruit - that the layouts have changed. Please urgently provide the shapefiles, which we require to undertake our review. Shapefiles to include turbines and all infrastructure.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)

Director: Environmental Impact Management

Department of Agriculture, Rural Development, Land & Environmental Affairs

Mpumalanga Provincial Government

Riverside Office Park, Aqua Street (Cycad Building - Block 4)

Nelspruit, 1200

[redacted]

Email: rluyt@mpg.gov.za

>>> Gavin Cowden 07/16/25 9:12 AM >>>
Morning Lucien,

Please can you provide the specialist report for the Emvelo WEF as only the specialist report for Sheepmoor is provided on the weblink.

Many thanks
Kind regards
Gavin

Gavin Cowden
Environmental Policy, Planning & Coordination

Mpumalanga Department of Agriculture, Rural Development, Land & Environmental Affairs
Private Bag X11219
Nelspruit, 1200
[redacted]

>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 07/15/25 4:43 PM >>>
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Environmental Assessment Practitioner

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From: Robyn Luyt
Sent on: Thursday, 17 July 2025 10:23:37
To: ERM Arcus Amsterdam; Stephanie Gopaul
CC: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Gavin Cowden; Sindy Mbuyane; mervyn@mtpa.co.za
Subject: Re: RE: RE: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Robyn

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Sent: Wednesday, July 16, 2025 3:37 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Cc: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; mervyn@mtpa.co.za
Subject: Re: RE: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

The reports I was able to access for each WEF are titled "Public Participation Volume III". Does this imply that there are there are 2 more volumes for each WEF ?

Regards
Robyn

>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 07/16/25 1:54 PM >>>
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https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/

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Regards

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Wednesday, July 16, 2025 11:15 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
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Subject: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

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Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)

Director: Environmental Impact Management

Department of Agriculture, Rural Development, Land & Environmental Affairs

Mpumalanga Provincial Government

Riverside Office Park, Aqua Street (Cycad Building - Block 4)

Nelspruit, 1200

[redacted]

Email: rluyt@mpg.gov.za

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Morning Lucien,

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Many thanks
Kind regards
Gavin

Gavin Cowden
Environmental Policy, Planning & Coordination

Mpumalanga Department of Agriculture, Rural Development, Land & Environmental Affairs
Private Bag X11219
Nelspruit, 1200
[redacted]

>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 07/15/25 4:43 PM >>>
SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

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From: Sindy Mbuyane
Sent on: Thursday, 17 July 2025 10:27:53
To: ERM Arcus Amsterdam; Stephanie Gopaul; Robyn Luyt
CC: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Gavin Cowden; mervyn@mtpa.co.za
Subject: Re: RE: RE: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Dear All,

Please also note that our office has not yet received the hard copies. In the future, kindly ensure that reports are dispatched to all relevant offices at the same time so that the regulated timelines can commence and conclude on the same dates.

Kind Regards,
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Dear Lucien,

I can confirm that all documents are now on the website.

However, given that I&APs only had access to the full reports on 16 July and not 15 July (ie. Specialist Reports for Both WEFs, and the specialist reports for the Emvelo WEF were only accessible on 16 July 202), would this not mean that the regulated 30 days commences on 17 July and ends on 18 August (since 17 Aug is a Sunday) ?

Kind Regards
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To: ERM Arcus Amsterdam; Stephanie Gopaul; Sindy Mbuyane
CC: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Gavin Cowden; mervyn@mtpa.co.za
Subject: Re: RE: RE: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Correction to my email below:
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From: Lloyd Barnes
Sent on: Thursday, 17 July 2025 11:05:18
To: ERM Arcus Amsterdam
CC: Stephanie Gopaul
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Thank you for acting so swiftly on this Lucien.

Seems as though the I&APs were eagerly awaiting for our submission!

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
O: [redacted]
www.mulilo.com
21st Floor, Portside, 5 Buitengracht Street, Cape Town, 8001

mulilo

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, 17 July 2025 10:56
To: Albert Froneman <Albert@afriavian.com>; Marietjie <Marietjie@afriavian.com>
Cc: Lloyd Barnes <Lloyd@mulilo.com>; Mpho Malema <mpho.malema@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Subject: FW: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Albert,

Trusting you are well! As you know we are out for the second round of DEIAr PPP. I have an I&AP comment below regarding the figures on the avifaunal report.

I've looked at the Figure 33 in the latest report and it is labelled "No-Go Zones around Yellow-breasted Pipit Habitat"

I require your input to the comment below, are you able to provide clarity on the below? To my understanding you would not have aquatic buffer zones present for a Yellow-breasted Pipit.

I'm available to take a call should a brief discussion be needed.

Thank you

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town
+27105963488

erm.com

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Wednesday, July 16, 2025 4:42 PM

To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Sir

The avifaunal specialist removed in both reports, Sheepmoor WEF and Emvelo WEF, the High Sensitivity - Turbine Exclusion Zone in Figures 33 for the aquatic buffer zones from an avifaunal perspective.

It must be an unintentional mistake and request reinstatement of it.

If it was deliberate we request the detailed reasoning and motivation for such a drastic decision.

Thanks

Josua Meyer

On Wed, Jul 16, 2025 at 1:54 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Interested and Affected Party,
>
> Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.
>
> The revised comment period now ends on 15 August 2025.
>
> All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.
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> Thank you for your continued participation.

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

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Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: ERM Arcus Amsterdam
Sent on: Thursday, 17 July 2025 11:18:10
To: Sindy Mbuyane; ERM Arcus Amsterdam; Stephanie Gopaul; Robyn Luyt
CC: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Gavin Cowden; mervyn@mtpa.co.za
Subject: RE: RE: RE: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Good morning, Sindy, I hope this email finds you well.

Kindly note that the copies are on the way and will be delivered today.

Kind Regards

ERM
Sustainability is our business

Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted] **erm.com**



From: Sindy Mbuyane <mbuyanesb@mpg.gov.za>
Sent: Thursday, July 17, 2025 10:28 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Robyn Luyt <RLuyt@mpg.gov.za>
Cc: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Gavin Cowden <GCowden@mpg.gov.za>; mervyn@mtpa.co.za
Subject: Re: RE: RE: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Dear All,

Please also note that our office has not yet received the hard copies. In the future, kindly ensure that reports are dispatched to all relevant offices at the same time so that the regulated timelines can commence and conclude on the same dates.

Kind Regards,
Sindi

>>> Robyn Luyt 07/17/25 10:23 AM >>>
Dear Lucien,

I can confirm that all documents are now on the website.

However, given that I&APs only had access to the full reports on 16 July and not 15 July (ie. Specialist Reports for Both WEFs, and the specialist reports for the Emvelo WEF were only accessible on 16 July 202), would this not mean that the regulated 30 days commences on 17 July and ends on 18 August (since 17 Aug is a Sunday) ?

Kind Regards
Robyn

>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 07/16/25 4:24 PM >>>
Hi Robyn,

The configuration for each WEF's documents is as follows:

- 02 Volume I: Draft EIA Report
- 03 Volume II: Specialist EIA Reports
- 04 Volume III: Public Participation Reports

Kind Regards

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Wednesday, July 16, 2025 3:37 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Cc: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; mervyn@mtpa.co.za
Subject: Re: RE: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

The reports I was able to access for each WEF are titled "Public Participation Volume III". Does this imply that there are there are 2 more volumes for each WEF ?

Regards
Robyn

>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 07/16/25 1:54 PM >>>
Hi Robyn

Thanks for your message.

1. The full Public Participation Reports for Emvelo and Sheepmoor are available on the website now — kindly do check again. Let us know if you still can't access them.

https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/

1. We've extended the comment period by one day, so it now ends on 15 August 2025. A notice will be sent out shortly.
2. Please see the attached updated layout and shapefiles, including all turbines and infrastructure.

Let us know if you need anything else.

Regards

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Wednesday, July 16, 2025 11:15 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Cc: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; mervyn@mtpa.co.za
Subject: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

EXTERNAL MESSAGE

Good day Stephanie and Lucien,

1. Please provide links to the full Public Participation Reports for both Emvelo and Sheepmoor. Only the cover pages for the public participation reports are available.

2. You have stated that the public comment period is from 15 July to 14 Aug. However it seems you have not accounted for the public holiday on 9 Aug, which would mean that the 30 day comment period ends on 15 Aug. However the 30 comment period should only commence when we have access to the full reports (ie. we await the public consultation reports).
3. It is our understanding - based on the meeting that was held in Nelspruit - that the layouts have changed. Please urgently provide the shapefiles, which we require to undertake our review. Shapefiles to include turbines and all infrastructure.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
Nelspruit, 1200
[redacted]za

>>> Gavin Cowden 07/16/25 9:12 AM >>>
Morning Lucien,

Please can you provide the specialist report for the Emvelo WEF as only the specialist report for Sheepmoor is provided on the weblink.

Many thanks
Kind regards
Gavin

Gavin Cowden
Environmental Policy, Planning & Coordination

Mpumalanga Department of Agriculture, Rural Development, Land & Environmental Affairs
Private Bag X11219
Nelspruit, 1200
[redacted]

>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 07/15/25 4:43 PM >>>
SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

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From: Joy Padayachee on behalf of ERM South Africa Admin Mailbox
Sent on: Thursday, 17 July 2025 11:32:28
To: ERM Arcus Amsterdam; ERM South Africa Admin Mailbox
CC: Liesal Muller; Stephanie Gopaul; Mpho Malema
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Lucien.

Some clarity please.

Do you need me to copy those reports onto the USB and have it couriered to Lydenburg? OR are we asking Postnet Ermelo to facilitate this too and they invoice us for everything?

Joy Padayachee
Senior Administrator

Ground Floor, Building 27,
Woodlands Office Park, Woodlands Drive - Woodmead 2148
erm.com
[redacted]

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, July 17, 2025 10:04 AM
To: ERM South Africa Admin Mailbox <ERM.SouthAfricaAdminMailbox@erm.com>
Cc: Liesal Muller <Liesal.Muller@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Mpho Malema <mpho.malema@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Joy,

As discussed yesterday, please can we arrange a USB drive to Celia De Waal from MTPA.

The delivery details as follows:

To: Celia de Waal (EIA Data Capturer)
MTPA Office Building (Lydeburg)
End of Morganstreet
1120 Lydenburg

Information to go on the USB drive:

S:\Mulilo USB

Project Number: 0684401
PM: SB
PiC: SG

Please shout if you need further clarity

Thanks!

Lucien Barbeau
Senior Consultant

Cape Town **erm.com**
[redacted]

From: Celia de Waal <celia@mtpa.co.za>
Sent: Thursday, July 17, 2025 9:48 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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

EXTERNAL MESSAGE

Good morning

A USB drive is 100 %.

Kind regards

Celia

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: 17 July 2025 09:44
To: Celia de Waal <celia@mtpa.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Frans Krige <frans@mtpa.co.za>; Lucien Barbeau <Lucien.Barbeau@erm.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Good morning, Cecilia,

Thank you for your request.

Kindly confirm whether we may submit a USB drive containing the full set of Draft Environmental Impact Assessment (EIA) Reports for the Sheepmoor and Emvelo Wind Energy Facilities, in lieu of printed hard copies. The USB will include all relevant documentation to assist your scientists in their review and commentary.

If possible, we would appreciate it if you could get back to us today, so that we can arrange for delivery as soon as possible.

Kind Regards

ERM
Sustainability is our business

Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted] **erm.com**



From: Celia de Waal <celia@mtpa.co.za>
Sent: Wednesday, July 16, 2025 2:46 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Frans Krige <frans@mtpa.co.za>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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To: Celia de Waal (EIA Data Capturer)
MTPA Office Building (Lydeburg)
End of Morganstreet
1120 Lydenburg

[redacted]

Kind regards

Celia de Waal

Mpumalanga

TOURISM AND PARKS AGENCY

An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
[redacted]
e-mail: celia.dewaal@mtpa.co.za

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: 15 July 2025 16:43
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Environmental Assessment Practitioner

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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CC: Liesal Muller; Stephanie Gopaul; Mpho Malema
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hey Joy,

Yes please copy the information below onto the USB before delivery to the I&AP.

Thanks!

Lucien Barbeau
Senior Consultant

Cape Town **erm.com**
[redacted]

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Project Number: 0684401
PM: SB
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Please shout if you need further clarity

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Lucien Barbeau
Senior Consultant

Cape Town
+27105963488

erm.com

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[redacted]

Kind regards

Celia de Waal

Mpumalanga
TOURISM AND PARKS AGENCY

An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
[redacted]
e-mail: celia.dewaal@mtpa.co.za

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Stephanie Gopaul

Environmental Assessment Practitioner

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**


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FOUNDATION

From: ERM Arcus Amsterdam
Sent on: Thursday, 17 July 2025 11:57:10
To: Serah Muobeleni; ERM Arcus Amsterdam
CC: Nhlamulo Machume
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Serah, I hope this message finds you well.

We acknowledge receipt of your correspondence regarding the draft Environmental Impact Assessment (EIA) Report for the Sheepmoor and Emvelo Wind Energy Facilities in Mpumalanga Province.

We would like to kindly request clarity on the specific application you are referring to in your response. It is our understanding that as part of the EIA process, we submitted the relevant reports to your department for review and comment in your capacity as a commenting authority and Interested and Affected Party (I&AP).

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Your assistance and clarification in this regard will be highly appreciated.

Kind Regards

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Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted] **erm.com**



From: Serah Muobeleni <SerahMu@nda.gov.za>
Sent: Wednesday, July 16, 2025 4:40 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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EXTERNAL MESSAGE

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From: Anneliza Collett <AnnelizaC@nda.gov.za>
Sent: Wednesday, July 16, 2025 12:18 PM
To: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Tuesday, 15 July 2025 16:43
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Lucien Barbeau
Senior Consultant

Cape Town [redacted]

erm.com



From: Serah Muobeleni
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Stephanie Gopaul

Environmental Assessment Practitioner

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



From: Josua Meyer
Sent on: Friday, 18 July 2025 04:51:21
To: ERM Arcus Amsterdam
CC: Johans Van Wyk; Lloyd@mulilo.com
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday mr Lucien Barbeau,

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ERM
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Lucien Barbeau
Senior Consultant

Cape Town
+[redacted]

erm.com

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Senior Consultant

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From: ERM Arcus Amsterdam
Sent on: Friday, 18 July 2025 09:00:12
To: Serah Muobeleni; ERM Arcus Amsterdam
CC: Nhlamulo Machume; Jan V
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Good morning, Serah,

I hope this email finds you well.

Thank you so much for your feedback. Kindly receive the attached link to access all the reports related to the project.

https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/

Please do not hesitate to reach out should you need any further information or clarity.

Kind Regards

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Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted] **erm.com**



From: Serah Muobeleni <SerahMu@nda.gov.za>
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Sent on: Friday, 18 July 2025 11:17:59
To: ERM Arcus Amsterdam
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Sent on: Friday, 18 July 2025 12:25:14
To: Josua Meyer; ERM Arcus Amsterdam
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Attachments: WTG Coordinates_Amsterdam.xlsx (12.27 KB)

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> >
> > The revised comment period now ends on 15 August 2025.
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> > All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.
> >
> > Thank you for your continued participation.
> >
> > ERM
> > Sustainability is our business
> >
> > **Lucien Barbeau**
> > Senior Consultant
> >
> > Cape Town [redacted] **erm.com**
> >
> > **From:** ERM Arcus Amsterdam
> > **Sent:** Tuesday, July 15, 2025 4:43 PM
> > **To:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
> > **Subject:** Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
> >
> > SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER
> >
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> > Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations,

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



Turbine no.	Long	Lat
25	E030° 18' 59.72"	S26° 36' 35.39"
23	E030° 19' 17.36"	S26° 36' 25.12"
22	E030° 19' 31.33"	S26° 36' 6.85"
20	E030° 19' 57.09"	S26° 35' 32.73"
19	E030° 20' 29.39"	S26° 35' 24.95"
17	E030° 20' 59.24"	S26° 36' 38.13"
16	E030° 21' 13.6"	S26° 36' 11.33"
14	E030° 21' 40.36"	S26° 35' 30.79"
13	E030° 20' 40.1"	S26° 34' 42.29"
12	E030° 20' 5.68"	S26° 32' 53.27"
11	E030° 19' 42.78"	S26° 32' 31.66"
15	E030° 19' 44.09"	S26° 32' 16.22"
10	E030° 19' 57.37"	S26° 32' 4.26"
9	E030° 20' 15.2"	S26° 31' 42.13"
8	E030° 20' 27.85"	S26° 31' 29.73"
6	E030° 19' 50.87"	S26° 31' 9.95"
5	E030° 18' 15.94"	S26° 31' 54.58"
4	E030° 18' 23.07"	S26° 31' 41.06"
7	E030° 18' 30.56"	S26° 31' 27.58"
3	E030° 18' 36.22"	S26° 31' 13.65"
2	E030° 18' 41.45"	S26° 30' 59.38"
1	E030° 18' 51.06"	S26° 30' 41.67"

Turbine no.	Long	Lat
53	E030° 14' 50.23"	S26° 40' 33.0"
52	E030° 15' 3.78"	S26° 40' 16.43"
51	E030° 15' 26.43"	S26° 40' 6.99"
50	E030° 14' 35.73"	S26° 39' 54.54"
45	E030° 18' 19.39"	S26° 41' 0.16"
46	E030° 18' 27.25"	S26° 40' 46.85"
44	E030° 18' 11.32"	S26° 40' 24.15"
40	E030° 18' 5.63"	S26° 40' 7.49"
43	E030° 17' 45.61"	S26° 39' 20.54"
42	E030° 17' 35.31"	S26° 39' 3.08"
41	E030° 17' 24.19"	S26° 38' 45.49"
38	E030° 19' 56.06"	S26° 40' 0.88"
37	E030° 19' 8.37"	S26° 39' 55.32"
36	E030° 18' 52.85"	S26° 39' 35.43"
34	E030° 18' 44.12"	S26° 38' 51.23"
33	E030° 18' 46.4"	S26° 38' 36.21"
32	E030° 18' 38.39"	S26° 38' 19.2"
31	E030° 18' 31.5"	S26° 38' 2.39"
30	E030° 19' 40.3"	S26° 37' 53.55"
29	E030° 19' 2.66"	S26° 37' 37.45"
28	E030° 19' 11.72"	S26° 37' 24.45"
27	E030° 19' 12.2"	S26° 37' 8.87"
26	E030° 19' 6.49"	S26° 36' 52.2"
21	E030° 20' 42.28"	S26° 37' 41.41"
18	E030° 20' 55.15"	S26° 37' 29.57"

From: ERM Arcus Amsterdam
Sent on: Monday, 21 July 2025 11:36:49
To: Josua Meyer; ERM Arcus Amsterdam
CC: Johans Van Wyk; Lloyd@mulilo.com
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr. Meyer,

Good day, and thank you for your recent correspondence regarding the Draft EIA Reports.

We acknowledge your request for a meeting to discuss the concerns raised. In consultation with the applicant, Mulilo, we are proposing a provisional date of Wednesday, 7 August 2025, with the meeting to be held at a venue in Ermelo. Kindly confirm whether this date is suitable for you and whether you will be attending alone or accompanied by others.

As a registered I&AP, your comments form an important part of the formal public participation process and will be incorporated into the Final EIA Reports. We also acknowledge the concerns raised regarding the tagging of the Martial Eagles. Relevant documentation, including permits, will be made available where appropriate to support transparency and clarity during the engagement.

We look forward to your response.

Kind Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town
+27105963488

erm.com

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 18, 2025 4:51 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Johans Van Wyk <Piwy@mulilo.com>; Lloyd@mulilo.com
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday mr Lucien Barbeau,

Referring to your email dated 7/04/2025 it will be appreciated if you can arrange such a meeting urgently before the 9/08/2025 with the applicant, Mulilo, on site.

Concerns as previously raised with Mulilo in an email dated 19/02/2025 will be on the agenda. That request for a meeting was refused by Mulilo.

Another urgent item which also must be discussed is the tagging of the two martial eagles. According to the MTPA report in my possession, the martial eagles were tagged by Mulilo without a permit. Copy of the report can be provided at the meeting.

That leaves the tagging of the martial eagles illegally, if not criminal.

Therefore the data being used in the specialist report is illegally obtained and all sections, models and references where data has been used must be removed from the report.

Looking forward to your urgent response.

Regards

Josua Meyer (I&AP)

On Wed, Jul 16, 2025 at 4:41 PM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Goodday Sir
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> The avifaunal specialist removed in both reports, Sheepmoor WEF and Emvelo WEF, the High Sensitivity - Turbine Exclusion Zone in Figures 33 for the aquatic buffer zones from an avifaunal perspective.
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> It must be an unintentional mistake and request reinstatement of it.
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> If it was deliberate we request the detailed reasoning and motivation for such a drastic decision.
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> Thanks
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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



From: Lucien Barbeau
Sent on: Monday, 21 July 2025 12:08:09
To: ERM Arcus Amsterdam
CC: Stephanie Gopaul; Stephen Burton; Mpho Malema
Subject: Mulilo Amsterdam Update: Request for Specialist Input – Draft EIA PPP to Final EIA Submission

Dear Specialist,

I hope this message finds you well.

This is to inform you that the Draft EIA Report for the proposed project has been released once again for Public Participation, using the updated layout that was intended for the Final EIA Report (which was not previously submitted).

We kindly request your input and assistance in reviewing and responding to comments received during this round of public participation. The comment period ends 15 August 2025, and your responses will be essential in finalising reports.

Please also note that the Final EIA Report is scheduled for submission on or before 25 August 2025. An updated layout of the report will be circulated ahead of this date for your reference and final inputs.

We would appreciate it if you could confirm your availability to assist with specialist comment responses and ensure you are aware of the tight timeline for final submissions.

If you do anticipate any challenges in meeting these deadlines, please feel free to reach out to me directly so we can discuss possible arrangements.

Kind Regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Gavin Anderson
Sent on: Monday, 21 July 2025 20:39:51
To: Lucien Barbeau
CC: ERM Arcus Amsterdam; Stephanie Gopaul; Stephen Burton; Mpho Malema
Subject: Re: Mulilo Amsterdam Update: Request for Specialist Input – Draft EIA PPP to Final EIA Submission

EXTERNAL MESSAGE

I will be available.

On Mon, 21 Jul 2025 at 12:08, Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Dear Specialist,
>
> I hope this message finds you well.
>
> This is to inform you that the Draft EIA Report for the proposed project has been released once again for Public Participation, using the updated layout that was intended for the Final EIA Report (which was not previously submitted).
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> Senior Consultant
>
> Cape Town [redacted] **erm.com**



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--
==========
21 years of Heritage Impact Assessments
==========
UMLANDO: Archaeological Surveys & Heritage Management
PO Box 10153, Meerensee, KwaZulu-Natal 3901
[redacted]
Facebook: Umlando SouthAfrica
Email:umlando@gmail.com

From: Jamie Pote
Sent on: Monday, 21 July 2025 20:56:09
To: Lucien Barbeau; ERM Arcus Amsterdam
CC: Stephanie Gopaul; Stephen Burton; Mpho Malema
Subject: Re: Mulilo Amsterdam Update: Request for Specialist Input – Draft EIA PPP to Final EIA Submission

EXTERNAL MESSAGE

Hi Lucien,

I'll do what I can to accommodate your request. These ongoing multiple layout revisions and additional review phases we're not part of the original scope or expectation in my quotation tho, so it does pose some challenges as the time hi allocate to this project is long since been depleted.

I will do what I can to get it put to bed once and for all tho.

Regards
Jamie

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, July 21, 2025 12:08:09 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>
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Lucien Barbeau
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Cape Town [redacted]

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From: jonathan@camissaconsulting.com
Sent on: Tuesday, 22 July 2025 08:01:47
To: Lucien Barbeau; ERM Arcus Amsterdam
CC: Stephanie Gopaul; Stephen Burton; Mpho Malema
Subject: RE: Mulilo Amsterdam Update: Request for Specialist Input – Draft EIA PPP to Final EIA Submission

EXTERNAL MESSAGE

Hi Lucien

Thanks for the update.
I will be on leave from 18 – 22 August so ideally Id like to complete my reporting before then. Would I be able to update the report after the 25th?

All the best

Jonathan Aronson
Director | Biodiversity Specialist

CAMISSA
SUSTAINABILITY CONSULTING

[redacted]
W www.camissaconsulting.com
A 1057 CX Amsterdam, Netherlands
Camissa

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, 21 July 2025 12:08
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>
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From: Josua Meyer
Sent on: Tuesday, 22 July 2025 10:30:01
To: ERM Arcus Amsterdam
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien

There might be a mistake in your day or date ..... 7 August 2025 is a Thursday.

Nevertheless the 6 or 7 th August 2025 is fine with us.

Will appreciate it if we can meet on my farm.

We intend to be three (3) I&AP

Regards

Josua Meyer

On Mon, Jul 21, 2025 at 11:36 AM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Mr. Meyer,
>
> Good day, and thank you for your recent correspondence regarding the Draft EIA Reports.
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> We acknowledge your request for a meeting to discuss the concerns raised. In consultation with the applicant, Mulilo, we are proposing a provisional date of Wednesday, 7 August 2025, with the meeting to be held at a venue in Ermelo. Kindly confirm whether this date is suitable for you and whether you will be attending alone or accompanied by others.
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> Kind Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 18, 2025 4:51 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Johans Van Wyk <Piwy@mulilo.com>; Lloyd@mulilo.com
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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> If it was deliberate we request the detailed reasoning and motivation for such a drastic decision.
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> > **Lucien Barbeau**
> > Senior Consultant
> >
> > Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted]

erm.com



From: Lloyd Barnes
Sent on: Tuesday, 22 July 2025 11:43:42
To: ERM Arcus Amsterdam
CC: Johans Van Wyk; Rebecca Thomas; Andrew Pearson
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Good day Lucien,

Please be sure to provide any responses Mr Meyer provides.

We will start planning for the discussion. We will most likely plan to use the Holbank River lodge as a meeting venue location.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
www.mulilo.com
21st Floor, Portside, 5 Buitengracht Street, Cape Town, 8001

mulilo

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Monday, 21 July 2025 11:37
To: Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Johans Van Wyk <piwy@mulilo.com>; Lloyd Barnes <Lloyd@mulilo.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Kind Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 18, 2025 4:51 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Johans Van Wyk <Piwy@mulilo.com>; Lloyd@mulilo.com
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

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Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Lucien Barbeau
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From: Lloyd Barnes
Sent on: Tuesday, 22 July 2025 11:56:30
To: ERM Arcus Amsterdam
CC: Lucien Barbeau; Rebecca Thomas
Subject: FW: SHEEPMOOR WINDPLAAS en 132 Kraglyn

EXTERNAL MESSAGE

Good day ERM team,

Please be sure to include the email chain below in the CRR.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
www.mulilo.com
21st Floor, Portside, 5 Buitengracht Street, Cape Town, 8001

From: Johans Van Wyk <piwy@mulilo.com>
Sent: Wednesday, 19 February 2025 15:56
To: Josua Meyer <meyerjosua55@gmail.com>
Cc: Lloyd Barnes <Lloyd@mulilo.com>; Annitta Attieh <Annitta@mulilo.com>
Subject: RE: SHEEPMOOR WINDPLAAS en 132 Kraglyn

Geagte Mnr. Meyer,

Dit is my voorstel dat u wag vir die Konsepomgwingsimpakstudie rapport (DEIArr) wat teen Vrydag 28 Feb beskikbaar gestel gaan word aan almal, via epos. Dit laat ook toe u die nuutste informasie byderhand het om op kommentaar te lewer.

WSP sal ‘n epos uitstuur met die besonderhede vir wie die kommentaar aan gerig moet word. WSP moet dan formeel op alle kommentaar reageer.

Sodoende volg ons die korrekte formele prosses.

Die epos besonderhede virkommentaar sal in die Konsepomgwingsimpakstudie rapport wees.

Laat gerus indien u verderre vrae het.

Sincerely,

Johans van Wyk
Senior Associate: Landowner Liaison
[redacted]
www.mulilo.com
21st Floor, Portside, 5 Buitengracht Street, Cape Town, 8001

From: Johans Van Wyk
Sent: Wednesday, February 19, 2025 1:45 PM
To: Josua Meyer <meyerjosua55@gmail.com>
Cc: Lloyd Barnes <Lloyd@mulilo.com>
Subject: RE: SHEEPMOOR WINDPLAAS en 132 Kraglyn

Geagte Mr Meyer,

Dankie vir u epos. Ons neem kennis en sal spoedig reageer met ’n formele antwoord.

Groete

Sincerely,

Johans van Wyk
Senior Associate: Landowner Liaison
[redacted]
www.mulilo.com
21st Floor, Portside, 5 Buitengracht Street, Cape Town, 8001

mulilo

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Wednesday, February 19, 2025 12:36 PM
To: Johans Van Wyk <piwy@mulilo.com>
Cc: Lloyd Barnes <Lloyd@mulilo.com>
Subject: SHEEPMOOR WINDPLAAS en 132 Kraglyn

Vir AANDAG : Johans van Wyk

Dagse

Op 6/2/2025 het mnr. Schalk van der Merwe, wat blykbaar die Sosiale Impakstudie vir Mulilo doen, kaarte ge-epos wat die Finale uitleg van die IWT vir EIA beoordeling van bogemelde windplaas toon.

Die uitleg verskil aansienlik van die konsep aansoek wat noodwendig ook die kommentaar daarop wesenlik beinvloed.

As opsommend die volgende kommentaar

- paaie en kraglyne word oor my eiendom getoon sonder enige konsultasie

- van die turbines is onaanvaarbaar naby wooneenhede. Die meerderheid internationale aanvaarbare minimum afstand is 1,5 km.

- kommersiële jag word op eiendom beoefen waar buitelandse jagters jaarliks deur Lloyd Safaris gereel word. Dit is finansieel baie voordelig. Sigbare turbines is egter onaanvaarbaar vir die jagters.

- ongedierte jag word deur die jaar beoefen op eiendom en vir veiligheid word buffersone van minstens 2 km vanaf my eiendom grense aanbeveel.

- lodge met gras vliegveld word beplan by die waterval vir die buitelandse jagters wat ook toeriste sal insluit. Dit sal nie kan realiseer met sigbare turbines in omgewing wat derhalwe eiendom waarde nadelig sal beinvloed.

- verskeie turbines is te na aan lande geplaas wat lugbespuiting van gewasse onmoontlik sal maak en gevolglik negatief met boerdery praktyke inmeng.

- ondersoek word vereis om impak van turbines op bye kolonies te ondersoek. Bye het essensieule funksie vir bestuiwing van omgewing flora en alternatiewe landbou gewasse o.a. nierbone.

- van die turbine is onaanvaarbaar naby bestaande broei area van bedreigde voël spesies. Die voorgestelde vlieg roetes verteenwoordig nie die werklikheid nie en is onaanvaarbaar.

- groot aantal turbines is op die borand van kruine geplaas wat baie opsigtelik en visueel onaanvaarbaar is.

- die brand versekering laat toe dat van vliegtuie (bommers) gebruik gemaak kan word ingeval van veldbrande. Dit sal nie moontlik wees met die windplaas nie wat eise van die aangrende bosbou kan meebring waarvoor Mulilo aanspreeklik gehou sal word.

- die groot aantal turbines reg oos van my eiendom gaan die mikroklimaat nadelig beinvloed wat negatiewe gevolge op my boerdery en omgewing inhou. Daar word saam met DARDLEA aan gedring op 'n volledige Mikroklimaat Impak Studie deur geakrediteerde onafhanklike instansie deur alle partye goedgekeur.

Deskundige advies word ingewin of die konsolidasie met gepaardgaande veranderings t.o.v. u oorspronklike aansoek nie 'n totaal nuwe aansoek regverdig nie.

Aangesien rooi ligte reeds begin flikker uit u reaksie op kommentaar deur partye in die konsep verslag, versoek ek 'n dringende vergadering met Mulilo en betrokke spesialiste om aangeleentheid te bespreek.

Dit is 'n poging om vertragings en duur uitgerekte regsgedinge te vermei.

Vertrou op 'n spoedige positiewe reaksie vanaf u.

J.Meyer
081 019 2213
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From: Lloyd Barnes
Sent on: Wednesday, 23 July 2025 09:23:56
To: ERM Arcus Amsterdam
CC: Stephanie Gopaul; Mpho Malema; Anton Lohse
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Good day Lucien,

Thank you for passing on the communications.

We will revert with a date, is ERM available? Please provide a quotation for this.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
www.mulilo.com
21st Floor, Portside, 5 Buitengracht Street, Cape Town, 8001

mulilo

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Tuesday, 22 July 2025 16:30
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Good day Lloyd,

Please see response from Josua, he is happy to meet on 6/7 August.

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
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We intend to be three (3) I&AP

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> **Lucien Barbeau**
> Senior Consultant
>
> Cape Town [redacted] **erm.com**
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> **From:** Josua Meyer <meyerjosua55@gmail.com>
> **Sent:** Friday, July 18, 2025 4:51 AM
> **To:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
> **Cc:** Johans Van Wyk <Piwy@mulilo.com>; Lloyd@mulilo.com
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> >
> > Cape Town [redacted] **erm.com**
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> > **Subject:** Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
> >
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Environmental Assessment Practitioner

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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To: Lloyd Barnes; ERM Arcus Amsterdam
CC: Stephanie Gopaul; Mpho Malema; Anton Lohse
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Lloyd,

I am available to attend, will be sharing a costing with you.

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Lloyd Barnes <Lloyd@mulilo.com>
Sent: Wednesday, July 23, 2025 9:24 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Mpho Malema <mpho.malema@erm.com>; Anton Lohse <Anton@mulilo.com>
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Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Lloyd Barnes
Sent on: Wednesday, 23 July 2025 13:04:11
To: ERM Arcus Amsterdam
CC: Stephanie Gopaul; Mpho Malema; Anton Lohse
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Thank you Lucien.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
www.mulilo.com
21st Floor, Portside, 5 Buitengracht Street, Cape Town, 8001

mulilo

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Wednesday, 23 July 2025 11:48
To: Lloyd Barnes <Lloyd@mulilo.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Mpho Malema <mpho.malema@erm.com>; Anton Lohse <Anton@mulilo.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Lloyd,

I am available to attend, will be sharing a costing with you.

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Lloyd Barnes <Lloyd@mulilo.com>
Sent: Wednesday, July 23, 2025 9:24 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Mpho Malema <mpho.malema@erm.com>; Anton Lohse <Anton@mulilo.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Good day Lucien,

Thank you for passing on the communications.

We will revert with a date, is ERM available? Please provide a quotation for this.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
www.mulilo.com
21st Floor, Portside, 5 Buitengracht Street, Cape Town, 8001

mulilo

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Tuesday, 22 July 2025 16:30
To: Lloyd Barnes <Lloyd@mulilo.com>
Cc: Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Mpho Malema <mpho.malema@erm.com>; Anton Lohse <Anton@mulilo.com>
Subject: FW: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Good day Lloyd,

Please see response from Josua, he is happy to meet on 6/7 August.

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant
Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Tuesday, July 22, 2025 10:30 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien

There might be a mistake in your day or date ..... 7 August 2025 is a Thursday.

Nevertheless the 6 or 7 th August 2025 is fine with us.

Will appreciate it if we can meet on my farm.

We intend to be three (3) I&AP

Regards

Josua Meyer

On Mon, Jul 21, 2025 at 11:36 AM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Mr. Meyer,
>
> Good day, and thank you for your recent correspondence regarding the Draft EIA Reports.

We acknowledge your request for a meeting to discuss the concerns raised. In consultation with the applicant, Mulilo, we are proposing a provisional date of Wednesday, 7 August 2025, with the meeting to be held at a venue in Ermelo. Kindly confirm whether this date is suitable for you and whether you will be attending alone or accompanied by others.

As a registered I&AP, your comments form an important part of the formal public participation process and will be incorporated into the Final EIA Reports. We also acknowledge the concerns raised regarding the tagging of the Martial Eagles. Relevant documentation, including permits, will be made available where appropriate to support transparency and clarity during the engagement.

We look forward to your response.

Kind Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 18, 2025 4:51 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Johans Van Wyk <Piwy@mulilo.com>; Lloyd@mulilo.com
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday mr Lucien Barbeau,

Referring to your email dated 7/04/2025 it will be appreciated if you can arrange such a meeting urgently before the 9/08/2025 with the applicant, Mulilo, on site.

Concerns as previously raised with Mulilo in an email dated 19/02/2025 will be on the agenda. That request for a meeting was refused by Mulilo.

Another urgent item which also must be discussed is the tagging of the two martial eagles. According to the MTPA report in my possession, the martial eagles were tagged by Mulilo without a permit. Copy of the report can be provided at the meeting.

That leaves the tagging of the martial eagles illegally, if not criminal.

Therefore the data being used in the specialist report is illegally obtained and all sections, models and references where data has been used must be removed from the report.

Looking forward to your urgent response.

Regards

Josua Meyer (I&AP)

On Wed, Jul 16, 2025 at 4:41 PM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Goodday Sir

The avifaunal specialist removed in both reports, Sheepmoor WEF and Emvelo WEF, the High Sensitivity - Turbine Exclusion Zone in Figures 33 for the aquatic buffer zones from an avifaunal perspective.

It must be an unintentional mistake and request reinstatement of it.

If it was deliberate we request the detailed reasoning and motivation for such a drastic decision.

Thanks

Josua Meyer

On Wed, Jul 16, 2025 at 1:54 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Interested and Affected Party,
>
> Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.
>
> The revised comment period now ends on 15 August 2025.
>
> All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.
>
> Thank you for your continued participation.
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Senior Consultant
>
> Cape Town [redacted] **erm.com**
>
> ---
>
> **From:** ERM Arcus Amsterdam
> **Sent:** Tuesday, July 15, 2025 4:43 PM
> **To:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
> **Subject:** Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
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>
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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Lucien Barbeau
Sent on: Wednesday, 23 July 2025 14:58:26
To: ERM Arcus Amsterdam; Albert Froneman; Marietjie Froneman
CC: Lloyd Barnes; Mpho Malema; Stephanie Gopaul
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Albert,

I am just following up with the below, we require your inputs prior to responding to the I&AP.

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Thursday, July 17, 2025 10:56 AM
To: Albert Froneman <albert@afriavian.com>; Marietjie Froneman <marietjie@afriavian.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Mpho Malema <mpho.malema@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Subject: FW: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Albert,

Trusting you are well! As you know we are out for the second round of DEIAr PPP. I have an I&AP comment below regarding the figures on the avifaunal report.

I've looked at the Figure 33 in the latest report and it is labelled "No-Go Zones around Yellow-breasted Pipit Habitat"

I require your input to the comment below, are you able to provide clarity on the below? To my understanding you would not have aquatic buffer zones present for a Yellow-breasted Pipit.

I'm available to take a call should a brief discussion be needed.

Thank you

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Wednesday, July 16, 2025 4:42 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>

Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Sir

The avifaunal specialist removed in both reports, Sheepmoor WEF and Emvelo WEF, the High Sensitivity - Turbine Exclusion Zone in Figures 33 for the aquatic buffer zones from an avifaunal perspective.

It must be an unintentional mistake and request reinstatement of it.

If it was deliberate we request the detailed reasoning and motivation for such a drastic decision.

Thanks

Josua Meyer

On Wed, Jul 16, 2025 at 1:54 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Interested and Affected Party,
>
> Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.
>
> The revised comment period now ends on 15 August 2025.
>
> All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.
>
> Thank you for your continued participation.
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Senior Consultant
>
> Cape Town [redacted] **erm.com**
>
> **From:** ERM Arcus Amsterdam
> **Sent:** Tuesday, July 15, 2025 4:43 PM
> **To:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
> **Subject:** Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Lucien Barbeau
Sent on: Wednesday, 23 July 2025 20:22:29
To: Gavin Anderson
CC: ERM Arcus Amsterdam; Stephanie Gopaul; Stephen Burton; Mpho Malema
Subject: RE: Mulilo Amsterdam Update: Request for Specialist Input – Draft EIA PPP to Final EIA Submission

Thanks Gavin,

When you have a moment, could you please send me a statement of account for the Mulilo WEF project, reflecting all invoices paid to date and any outstanding amounts, if applicable?

This will help us ensure our records are aligned and allow us to arrange payment for any outstanding amounts due to you. Thank you for your continued support and patience, it's much appreciated. Please let me know if you need anything further from my side.

Warm regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Gavin Anderson <umlando@gmail.com>
Sent: Monday, July 21, 2025 8:40 PM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>
Subject: Re: Mulilo Amsterdam Update: Request for Specialist Input – Draft EIA PPP to Final EIA Submission

EXTERNAL MESSAGE

I will be available.

On Mon, 21 Jul 2025 at 12:08, Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Dear Specialist,
>
> I hope this message finds you well.
>
> This is to inform you that the Draft EIA Report for the proposed project has been released once again for Public Participation, using the updated layout that was intended for the Final EIA Report (which was not previously submitted).
>
> We kindly request your input and assistance in reviewing and responding to comments received during this round of public participation. The comment period ends 15 August 2025, and your responses will be essential in finalising reports.
>
> Please also note that the Final EIA Report is scheduled for submission on or before 25 August 2025. An updated layout of the report will be circulated ahead of this date for your reference and final inputs.
>
> We would appreciate it if you could confirm your availability to assist with specialist comment responses and ensure you are aware of the tight timeline for final submissions.

If you do anticipate any challenges in meeting these deadlines, please feel free to reach out to me directly so we can discuss possible arrangements.

Kind Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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==========
21 years of Heritage Impact Assessments
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UMLANDO: Archaeological Surveys & Heritage Management
PO Box 10153, Meerensee, KwaZulu-Natal 3901
[redacted]
Facebook: Umlando SouthAfrica
Email:umlando@gmail.com

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From: Gavin Anderson
Sent on: Thursday, 24 July 2025 08:39:31
To: Lucien Barbeau
CC: ERM Arcus Amsterdam; Stephanie Gopaul; Stephen Burton; Mpho Malema
Subject: Re: Mulilo Amsterdam Update: Request for Specialist Input – Draft EIA PPP to Final EIA Submission

EXTERNAL MESSAGE

Hi Lucien
Unfortunately you do not owe me anymore money.
I will ask Louise to search for the payments, but this will take a while as it goes back a few years.

Gavin

On Wed, 23 Jul 2025 at 20:22, Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Thanks Gavin,
>
> When you have a moment, could you please send me a statement of account for the Mulilo WEF project, reflecting all invoices paid to date and any outstanding amounts, if applicable?
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ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

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To: Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>
Subject: Re: Mulilo Amsterdam Update: Request for Specialist Input – Draft EIA PPP to Final EIA Submission

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I will be available.

On Mon, 21 Jul 2025 at 12:08, Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

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Lucien Barbeau
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21 years of Heritage Impact Assessments

==========

UMLANDO: Archaeological Surveys & Heritage Management
PO Box 10153, Meerensee, KwaZulu-Natal 3901
[redacted]
Email:umlando@gmail.com

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21 years of Heritage Impact Assessments
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UMLANDO: Archaeological Surveys & Heritage Management
PO Box 10153, Meerensee, KwaZulu-Natal 3901
[redacted]
Email:umlando@gmail.com

From: ERM Arcus Amsterdam
Sent on: Thursday, 24 July 2025 10:40:38
To: ERM Arcus Amsterdam
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Attachments: 0684401_Mulilo WEF_DEIAr_IAP Notification on DEIA V2.eng.pdf (227.94 KB), 0684401_Mulilo WEF_DEIAr_I&AP Notification on DEIA V2.Afr.pdf (182.96 KB)

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**


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FOUNDATION

1st Floor, Great Westerford,
240 Main Road, Rondebosch
7700

T +27 21 681 5400
F +27 21 686 0736

erm.com

10 July 2025

Dear Interested and Affected Party, Stakeholder, Organ of State:

RE: NOTIFICATION OF AVAILABILITY OF THE DRAFT EIA REPORTS FOR PUBLIC REVIEW AND COMMENT OF THE PROPOSED SHEEPMOOR, AND EMVELO WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, MPUMALANGA

Notice is hereby given of a Public Participation Process (PPP) to be undertaken in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA, 1998), as amended.

DFFE Reference(s): 14/12/16/3/3/2/2611 and 14/12/16/3/3/2/2613

Nature of Activity: The Project Developer, under the Special Purpose Vehicles (SPVs), namely Sheepmoor Wind Energy Facility (Pty) Ltd, and Emvelo Wind Energy Facility (Pty) Ltd, intend to submit separate applications for Environmental Authorisation (EA) for the proposed Sheepmoor and Emvelo Wind Energy Facilities (WEFs) including their associated infrastructure. The proposed WEFs will include 29 and 24 turbines respectively with a maximum output capacity of up to 260 MW and an anticipated lifespan of 30 years. The WEFs will all connect directly into National Eskom Grid via the Eskom Camden Substation. Each WEF will apply for authorisation of a proposed grid connection route to connect to the existing Eskom Camden Substation, via approximately 30 km long 132 kV overhead transmission lines.

Development Location: The Cluster WEF preferred project site (for both WEFs) is located between 15 - 30 km east of the town of Ermelo in Mpumalanga Province and falls within the Msukaligwa Local Municipality and Gert Sibande District Municipality.

Application Process: In terms of Chapter 5 of the National Environmental Management Act, 1998 (Act 107 of 1998 – NEMA), and the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), the Project Applicants appointed Environmental Resources Management Southern Africa (Pty) Ltd (ERM), to undertake the Scoping and Environmental Impact Assessment (S&EIA) process as the independent environmental impact assessment practitioner (EAP).

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025.

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As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

In terms of Section 21 of the National Water Act (NWA) (36 of 1998), as amended, the development may potentially require water use license. If required, an application for Water Use License will be submitted to the Department of Human Settlement and Water and Sanitation for authorisation.

ERM has submitted two separate Environmental Applications to the Department of Forestry, Fisheries and the Environment (DFFE).

Invitation to Comment: Members of the public, local communities, and stakeholders are invited to comment on the Draft EIA Reports, which is available for public review and comment, from **Tuesday, 15 July 2025 until the Thursday,** 14 **August 2025 (both days inclusive)**, as per Table 1 below.

Table 1: Public Review and Comment Locations

Location	Physical Address
Electronic Copy Locations	
ERM Website *(available for download)*	https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/
Via One Drive	I&APs can request for copies to be sent via one drive shared folder.
Hard Copy Location	
Public Library Ermelo	Wedgewood Ave, Ermelo, Mpumalanga
CD Copies can be made available upon request to the EAP.	

Please feel free to contact the undersigned should you have any queries.



Stephanie Gopaul
Registered EAP
Environmental Resources Management Southern Africa (Pty) Ltd

1st Floor, Great Westerford,
240 Main Road, Rondebosch
7700

T +27 21 681 5400
F +27 21 686 0736

erm.com

15 Julie 2025

Geagte Belangstellende en Geaffekteerde Party, Belanghebbende, Staatsorgaan:

RE: KENNISGEWING VAN BESKIKBAARHEID VAN DIE KONSEP-OMGEWINGIMPAKVERSLAG VIR OPENBARE OORSIG EN KOMMENTAAR: VOORGESTELDE SHEEPMOOR EN EMVELO WINDENERGIE-INSTANSIES EN HULPINFRASTRUKTUUR, MPUMALANGA

Hiermee word kennis gegee van 'n Openbare Deelnameproses (ODP) ingevolge die Wet op Nasionale Omgewingsbestuur, 1998 (Wet No. 107 van 1998), soos gewysig.

DFFE Reference(s): 14/12/16/3/3/2/2611 and 14/12/16/3/3/2/2613

Natuur van die Aktiwiteit: Die Projekontwikkelaar, onder die Spesiale Doel Voertuie (SDV's), naamlik Sheepmoor Wind Energy Facility (Pty) Ltd, en Emvelo Wind Energy Facility (Pty) Ltd, is van voorneme om afsonderlike aansoeke vir Omgewingsmagtiging (OM) in te dien vir die voorgestelde Sheepmoor en Emvelo Wind Energy Facilities (WEF's) insluitende hul geassosieerde infrastruktuur. Die voorgestelde WEF's sal onderskeidelik 29 en 24 turbines insluit met 'n maksimum uitsetkapasiteit van tot 260 MW en 'n verwagte leeftyd van 30 jaar. Die WEF's sal almal direk aan die Nasionale Eskom-netwerk koppel via die Eskom Camden-substasie. Elke WEF sal aansoek doen vir magtiging van 'n voorgestelde netwerkverbindingsroete om aan die bestaande Eskom Camden-substasie te koppel, via 'n ongeveer 30 km lange 132 kV bogrondse transmissielyne.

Ontwikkelingsligging: Die Cluster WEF voorkeurprojekterrein (vir beide WEF's) is geleë tussen 15 - 30 km oos van die dorp Ermelo in die Mpumalanga Provinsie en val binne die Msukaligwa Plaaslike Munisipaliteit en Gert Sibande Distriksmunisipaliteit.

Aansoekproses: Ingevolge Hoofstuk 5 van die Nasionale Wet op Omgewingsbestuur, 1998 (Wet 107 van 1998 – NEMA), en die Omgewingsimpakassessering (OIA) Regulasies, 2014 (soos gewysig), het die Projekaansoekers Environmental Resources Management Southern Africa (Pty) Ltd (ERM) aangestel om die Omvangbepaling en Omgewingsimpakassessering (O&OIA) proses as die onafhanklike omgewingsimpakassesseringspraktisyn (OAP) te onderneem.

Na die openbare hersieningstydperk van die Konsep OIA-verslag, het kommentaar van MDARDLEA en MTPA, veral met betrekking tot biodiversiteitsversagtingmaatreëls, bykomende insette van die spesialiste genoodsaak. Die DFFE het 'n verlenging van die tydraamwerke van die OIA-proses toegestaan, in ooreenstemming met Regulasie 3(7) van die OIA-regulasies, 2014, soos gewysig, en die Finale OIA-verslag is verklaar as synde betaalbaar op of voor 25 Augustus 2025.

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Gevolglik word 'n tweede openbare kommentaar-tydperk van 30 dae geopen op die Konsep OIA-verslag om deursigtigheid te verseker en om belanghebbendes die geleentheid te gee om die hersiene verslag, studies en Kommentaar en Antwoorde na te gaan voor die indiening van die Finale OIA-verslag.

Ingevolge Artikel 21 van die Nasionale Waterwet (NWA) (36 van 1998), soos gewysig, mag die ontwikkeling moontlik 'n watergebruiklisensie benodig. Indien dit vereis word, sal 'n aansoek vir 'n Watergebruiklisensie by die Departement van Menslike Nedersettings en Water en Sanitasie vir magtiging ingedien word.

ERM het twee afsonderlike Omgewingsaansoeke by die Departement van Bosbou, Visserye en die Omgewing (DFFE) ingedien.

Uitnodiging om kommentaar te lewer: Lede van die publiek, plaaslike gemeenskappe en belanghebbendes word uitgenooi om kommentaar te lewer op die Konsep OIA-verslae, wat vir openbare hersiening en kommentaar beskikbaar is van **Dinsdag, 15 Julie 2025 tot Donderdag 14 Augustus 2025 (beide dae ingesluit),** soos per Tabel 1 hieronder.

Tabel 1: Ligging van Openbare Hersiening en Kommentaar

Ligging	Adres
Elektroniese Kopie Ligging	
ERM-webwerf *(beskikbaar vir aflaai)*	https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/
Via One Drive	BELANGHEBBENDES kan versoek dat afskrifte via 'n One Drive gedeelde gids gestuur word.
Harde Kopie Ligging	
Publieke Biblioteek Ermelo	Wedgewood Laan, Ermelo, Mpumalanga
CD-kopieë kan op versoek aan die OAP beskikbaar gestel word..	

Kontak asseblief die ondergetekende indien u enige navrae het.



Stephanie Gopaul
Geregistreerde OAP
Environmental Resources Management Southern Africa (Pty) Ltd

From: Lloyd Barnes
Sent on: Thursday, 24 July 2025 10:54:31
To: ERM Arcus Amsterdam
CC: Daniel Struwig
Subject: RE: Mulilo Amsterdam Update: Request for Specialist Input – Draft EIA PPP to Final EIA Submission

EXTERNAL MESSAGE

Hi Lucien,

Thank you for checking with the specialists and feeding this back to me.

We are planning to provide the FEIAr layouts by tomorrow COB. We are awaiting final buffers from Jonathan.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
www.mulilo.com
21st Floor, Portside, 5 Buitengracht Street, Cape Town, 8001

mulilo

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, 24 July 2025 10:44
To: Lloyd Barnes <Lloyd@mulilo.com>
Subject: FW: Mulilo Amsterdam Update: Request for Specialist Input – Draft EIA PPP to Final EIA Submission

Hi Lloyd,

Please see Jonathan's limited availability between 18 - 22 Aug. Are you able to let me know when the updated layout will be available? Perhaps it would be good to share the layout with him soonest to give him a HeadStart.

Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: jonathan@camissaconsulting.com <jonathan@camissaconsulting.com>
Sent: Tuesday, July 22, 2025 8:02 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>
Subject: RE: Mulilo Amsterdam Update: Request for Specialist Input – Draft EIA PPP to Final EIA Submission

EXTERNAL MESSAGE

Hi Lucien

Thanks for the update.
I will be on leave from 18 – 22 August so ideally Id like to complete my reporting before then. Would I be able to update the report after the 25th?

All the best

Jonathan Aronson
Director | Biodiversity Specialist

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SUSTAINABILITY CONSULTING

[redacted]
W www.camissaconsulting.com
A 1057 CX Amsterdam, Netherlands
Camissa

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, 21 July 2025 12:08
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>
Subject: Mulilo Amsterdam Update: Request for Specialist Input – Draft EIA PPP to Final EIA Submission

Dear Specialist,

I hope this message finds you well.

This is to inform you that the Draft EIA Report for the proposed project has been released once again for Public Participation, using the updated layout that was intended for the Final EIA Report (which was not previously submitted).

We kindly request your input and assistance in reviewing and responding to comments received during this round of public participation. The comment period ends 15 August 2025, and your responses will be essential in finalising reports.

Please also note that the Final EIA Report is scheduled for submission on or before 25 August 2025. An updated layout of the report will be circulated ahead of this date for your reference and final inputs.

We would appreciate it if you could confirm your availability to assist with specialist comment responses and ensure you are aware of the tight timeline for final submissions.

If you do anticipate any challenges in meeting these deadlines, please feel free to reach out to me directly so we can discuss possible arrangements.

Kind Regards,

Lucien Barbeau
Senior Consultant

Cape Town [redacted]

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From: ERM Arcus Amsterdam
Sent on: Thursday, 24 July 2025 14:51:35
To: Robyn Luyt; ERM Arcus Amsterdam; Stephanie Gopaul; Sindy Mbuyane
CC: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Gavin Cowden; mervyn@mtpa.co.za
Subject: RE: RE: RE: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Robyn,

We intend to submit the FEIAr on the 25th of August 2025 and we are commitment to thoroughly addressing all comments received during the Public Participation Process.

We acknowledge that this process requires both time and resources, and as such, we are limited in our ability to extend the timeline beyond 15 August 2025. That said, we fully recognise the challenges faced in accessing the Draft EIA documents. If you are unable to submit your comments by the 15th, we're willing to accept them by the 18th of August to ensure you have had a full and fair opportunity to review and engage with the Draft EIA documents.

Additionally, should the Mpumalanga Tourism and Parks Agency (MTPA) or MDARDLEA still wish to engage further on our applications, we would be happy to arrange a physical meeting at a mutually convenient time. Please feel free to let us know if such an engagement would be of interest.

Regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Thursday, July 17, 2025 10:35 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>
Cc: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Gavin Cowden <GCowden@mpg.gov.za>; mervyn@mtpa.co.za
Subject: Re: RE: RE: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Correction to my email below:
Public Participation reports for both WEFs and the specialist reports for Emvelo WEF were only available on 16 July 2025.

>>> Sindy Mbuyane 07/17/25 10:27 AM >>>
Dear All,

Please also note that our office has not yet received the hard copies. In the future, kindly ensure that reports are dispatched to all relevant offices at the same time so that the regulated timelines can commence and conclude on the same dates.

Kind Regards,
Sindi

>>> Robyn Luyt 07/17/25 10:23 AM >>>
Dear Lucien,

I can confirm that all documents are now on the website.

However, given that I&APs only had access to the full reports on 16 July and not 15 July (ie. Specialist Reports for Both WEFs, and the specialist reports for the Emvelo WEF were only accessible on 16 July 202), would this not mean that the regulated 30 days commences on 17 July and ends on 18 August (since 17 Aug is a Sunday) ?

Kind Regards
Robyn

>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 07/16/25 4:24 PM >>>
Hi Robyn,

The configuration for each WEF's documents is as follows:

- 02 Volume I: Draft EIA Report
- 03 Volume II: Specialist EIA Reports
- 04 Volume III: Public Participation Reports

Kind Regards

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Wednesday, July 16, 2025 3:37 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Cc: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; mervyn@mtpa.co.za
Subject: Re: RE: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

The reports I was able to access for each WEF are titled "Public Participation Volume III". Does this imply that there are there are 2 more volumes for each WEF ?

Regards
Robyn

>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 07/16/25 1:54 PM >>>
Hi Robyn

Thanks for your message.

1. The full Public Participation Reports for Emvelo and Sheepmoor are available on the website now — kindly do check again. Let us know if you still can't access them.

https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/

1. We've extended the comment period by one day, so it now ends on 15 August 2025. A notice will be sent out shortly.
2. Please see the attached updated layout and shapefiles, including all turbines and infrastructure.

Let us know if you need anything else.

Regards

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Wednesday, July 16, 2025 11:15 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Cc: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; mervyn@mtpa.co.za
Subject: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

EXTERNAL MESSAGE

Good day Stephanie and Lucien,

1. Please provide links to the full Public Participation Reports for both Emvelo and Sheepmoor. Only the cover pages for the public participation reports are available.
2. You have stated that the public comment period is from 15 July to 14 Aug. However it seems you have not accounted for the public holiday on 9 Aug, which would mean that the 30 day comment period ends on 15 Aug. However the 30 comment period should only commence when we have access to the full reports (ie. we await the public consultation reports).
3. It is our understanding - based on the meeting that was held in Nelspruit - that the layouts have changed. Please urgently provide the shapefiles, which we require to undertake our review. Shapefiles to include turbines and all infrastructure.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
[redacted]za

>>> Gavin Cowden 07/16/25 9:12 AM >>>
Morning Lucien,

Please can you provide the specialist report for the Emvelo WEF as only the specialist report for Sheepmoor is provided on the weblink.

Many thanks
Kind regards
Gavin

Gavin Cowden
Environmental Policy, Planning & Coordination

Mpumalanga Department of Agriculture, Rural Development, Land & Environmental Affairs
Private Bag X11219
Nelspruit, 1200
[redacted]

>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 07/15/25 4:43 PM >>>
SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

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From: jonathan@camissaconsulting.com
Sent on: Thursday, 24 July 2025 19:19:42
To: Lucien Barbeau; ERM Arcus Amsterdam
CC: Stephanie Gopaul; Stephen Burton; Mpho Malema
Subject: RE: Mulilo Amsterdam Update: Request for Specialist Input – Draft EIA PPP to Final EIA Submission
Attachments: Amsterdam_Bat_Contraints_v6.zip (6.41 MB), Fig 3 Emvelo Constraints.pdf (1.65 MB), Fig 3 Sheepmoor Constraints.pdf (1.57 MB), Emvelo_EIA_v2-0_20250724.docx (497.29 KB), Sheepmoor_EIA_v2-0_20250724.docx (1.04 MB)

EXTERNAL MESSAGE

Hi Lloyd and Lucien

I have updated the bat constraints to include the new areas, and also to adjust the blade tip buffer to reflect the new turbine dimensions. Have a look through the attached and let me know if you have any questions or need anything else.

Lucien – note that I will be on leave from 18 – 22 August which may impact my PPP responses.

All the best

Jonathan Aronson
Director | Biodiversity Specialist

CAMISSA
SUSTAINABILITY CONSULTING

[redacted]
W www.camissaconsulting.com
A 1057 CX Amsterdam, Netherlands
Camissa

From: jonathan@camissaconsulting.com <jonathan@camissaconsulting.com>
Sent: Tuesday, 22 July 2025 08:02
To: 'Lucien Barbeau' <Lucien.Barbeau@erm.com>; 'ERM Arcus Amsterdam' <ERM.ArcusAmsterdam@erm.com>
Cc: 'Stephanie Gopaul' <Stephanie.Gopaul@erm.com>; 'Stephen Burton' <Stephen.Burton@erm.com>; 'Mpho Malema' <mpho.malema@erm.com>
Subject: RE: Mulilo Amsterdam Update: Request for Specialist Input – Draft EIA PPP to Final EIA Submission

Hi Lucien

Thanks for the update.
I will be on leave from 18 – 22 August so ideally Id like to complete my reporting before then. Would I be able to update the report after the 25th?

All the best

Jonathan Aronson
Director | Biodiversity Specialist

CAMISSA
SUSTAINABILITY CONSULTING

[redacted]
A 1057 CX Amsterdam, Netherlands
Camissa

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, 21 July 2025 12:08
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>
Subject: Mulilo Amsterdam Update: Request for Specialist Input – Draft EIA PPP to Final EIA Submission

Dear Specialist,

I hope this message finds you well.

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Please also note that the Final EIA Report is scheduled for submission on or before 25 August 2025. An updated layout of the report will be circulated ahead of this date for your reference and final inputs.

We would appreciate it if you could confirm your availability to assist with specialist comment responses and ensure you are aware of the tight timeline for final submissions.

If you do anticipate any challenges in meeting these deadlines, please feel free to reach out to me directly so we can discuss possible arrangements.

Kind Regards,

ERM
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Lucien Barbeau
Senior Consultant

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EMVELO WIND ENERGY FACILITY AND GRID CONNECTION
MPUMALANGA, SOUTH AFRICA
BAT (CHIROPTERA) EIA REPORT

February 2025

Produced for

Emvelo Wind Energy Facility (Pty) Ltd

Produced by

Camissa Sustainability Consulting

Amsterdam, Netherlands

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NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND ENVIRONMENTAL IMPACT REGULATIONS, 2014 (AS AMENDED) - REQUIREMENTS FOR SPECIALIST REPORTS (APPENDIX 6)

Regulation GNR 326 of 4 December 2014, as amended 7 April 2017, Appendix 6	Section of Report
1. (1) A specialist report prepared in terms of these Regulations must contain- a) details of- i. the specialist who prepared the report; and ii. the expertise of that specialist to compile a specialist report including a curriculum vitae;	Appendix 2
b) a declaration that the specialist is independent in a form as may be specified by the competent authority;	Appendix 3
c) an indication of the scope of, and the purpose for which, the report was prepared;	Section 1.1
(cA) an indication of the quality and age of base data used for the specialist report;	Section 4
(cB) a description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change;	Section 5.1, Section 6
d) the date and season of the site investigation and the relevance of the season to the outcome of the assessment;	Section 4
e) a description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used;	Section 4
f) details of an assessment of the specific identified sensitivity of the site related to the proposed activity or activities and its associated structures and infrastructure, inclusive of a site plan identifying site alternatives;	Section 6
g) an identification of any areas to be avoided, including buffers;	Section 6, Figure 5
h) a map superimposing the activity including the associated structures and infrastructure on the environmental sensitivities of the site including areas to be avoided, including buffers;	Appendix 1 (Figure 3)
i) a description of any assumptions made and any uncertainties or gaps in knowledge;	Section 2
j) a description of the findings and potential implications of such findings on the impact of the proposed activity, (including identified alternatives on the environment) or activities;	Section 5
k) any mitigation measures for inclusion in the EMPr;	Section 6, Section 7

Regulation GNR 326 of 4 December 2014, as amended 7 April 2017, Appendix 6	Section of Report
l) any conditions for inclusion in the environmental authorisation;	Section 6, Section 7
m) any monitoring requirements for inclusion in the EMPr or environmental authorisation;	Section 6, Section 7
n) a reasoned opinion- i. (as to) whether the proposed activity, activities or portions thereof should be authorised; (iA) regarding the acceptability of the proposed activity or activities; and ii. if the opinion is that the proposed activity, activities or portions thereof should be authorised, any avoidance, management and mitigation measures that should be included in the EMPr, and where applicable, the closure plan;	Section 8
o) a description of any consultation process that was undertaken during the course of preparing the specialist report;	NA
p) a summary and copies of any comments received during any consultation process and where applicable all responses thereto; and	NA
q) any other information requested by the competent authority.	NA
2) Where a government notice *gazetted* by the Minister provides for any protocol or minimum information requirement to be applied to a specialist report, the requirements as indicated in such notice will apply.	Appendix 5: Site Sensitivity Verification Report

1 INTRODUCTION

Emvelo Wind Energy Facility (Pty) Ltd are proposing the development of a commercial wind energy project located near Ermelo, within the Msukaligwa Local Municipality and the Gert Sibande District Municipality, in the Mpumalanga Province. The project forms part of a development cluster that is expected to comprise two separate Wind Energy Facilities (WEFs).

This EIA report covers the Emvelo WEF which is proposed to comprise up to 25 turbines with a maximum output capacity of up to 260 MW. The WEF will have an anticipated lifespan of 25 – 30 years. In addition to the wind energy infrastructure, it is proposed that an on-site substation with a capacity up 132 kV and an up to 132 kV Overhead Powerline (OHPL) of approximately 30 km (300 m corridor) in distance, traversing eighteen (18) land parcels, be constructed to connect the proposed WEF to the proposed new Camden B substation. The proposed technical details of Emvelo WEF are presented below:

Developer / Applicant	Emvelo WEF
DFFE Reference	To be confirmed
WEF Generation Capacity	Up to 260 MW
Site Access	Locality to be confirmed. Total width up to 15 m (12 m after rehabilitation) consisting of up to 3m width for underground 33 kV reticulation.
Number of Turbines	Up to 25
Hub Height from ground level	Up to 150 m
Blade Length	Up to 110 m
Rotor Diameter	Up to 220 m
Length of internal roads	Unknown at this point.
Width of internal roads	Up to 12 m to be rehabilitated to up to 9 m.
On-site substation capacity	Up to 132 kV
Proximity to grid connection	Approximately 25 km
Grid Connection Capacity	Up to 132 kV
Temporary turbine construction laydown and storage areas.	Crane platforms and hardstand laydown area up to 40 ha (Up to 1 ha per turbine)
Permanent footprint area dimensions, including roads, turbine hardstand areas, O&M buildings and battery pad.	O&M: Up to 1 ha Hardstand areas: Up to 1 ha Total area of final footprint (including roads): up to 180 ha
Operations and maintenance buildings (O&M building) with parking area	Up to 1 ha
Height of fencing	2.8 m
Type of fencing	Where site offices are required, temporary screen fencing used to screen offices from the wider landscape.

1.1 Scope and Objectives

This EIA report presents a Bat (Chiroptera) Impact Assessment for the Emvelo WEF and associated grid connection. Collisions with wind turbine blades are a leading cause of bat mortality globally (Cryan, 2011; O'Shea et al., 2016). Given the nature, scale, and uncertainty of these impacts to bats, specialist studies are required to assess the risks of renewable energy infrastructure on bats (Rodrigues 2015, MacEwan et al. 2020b, SANBI 2020, Bennun et al. 2021).

The objectives of this assessment are to present the baseline ecological condition of the project site for bats, and to use these characterisations to predict and assess the potential impact of the project on bat species and their habitats as well as to provide actions to mitigate impacts if required.

2 ASSUMPTIONS AND LIMITATIONS

The core techniques used to assess bat activity in this study are acoustic monitoring and roost surveys, both of which have several limitations which will influence the findings and recommendations of this study.

Acoustic monitoring allows for rapid, passive collection of a large volume of bat activity data which can help identify the bat species present within a particular location and their associated spatio-temporal relative activity patterns. In the context of wind farms, acoustic monitoring is therefore a useful technique however, there are several constraints that must be acknowledged. These are discussed in detail by Voigt et al. (2021), Adams et al. (2012), and Kunz et al. (2007a) and fundamentally, include that acoustic monitoring cannot provide an indication of bat abundance or population size at a site. In addition, population demographics such as age and sex of bats cannot generally be determined from echolocation calls.

Due to the large volume of data collected by bat detectors it is impractical and prohibitively time-consuming to inspect each file for echolocation calls and to identify the associated bat species. Specialised statistical software uses bat call reference libraries to automate the identification process but developing such libraries is challenging given the variation individual species display in their echolocation call structure and overlap between species. This study used the Wildlife Acoustics library "Bats of South Africa Version 5.4.2", but this excludes reference calls for most South African species thus these may have been overlooked. However, given the duration of the monitoring and spatial coverage of the detectors, the acoustic data provides a reasonable inventory of the species present, and a good indication of the relative magnitude of bat activity. Lastly, bat activity is notably variable in response to a number of factors such as land use change, climactic variability, variations in prey abundance and meteorological conditions which can vary over different time scales. Since this study is limited to 12 months, the baseline conditions presented here may not be representative of activity over longer time frames meaning risk may be misinterpreted.

The major limitation with roost surveys is finding roosting bats. Bats use a diversity of roosting sites including trees, buildings, crevices, and underground sites (caves and mines). The presence of these features at a site can help to target roost searches but evidence of bats may not always be apparent even if bats are present. Importantly, the absence of bat evidence in these situations does not equate to evidence of bat absence (Collins 2006). Thus, this study uses a precautionary approach and will apply buffers to roosts (largely buildings and rocky crevices) even if bats were not located given their potential role in supporting roosting bats.

It is difficult to assess the risk to bats during operation of the proposed facility based on acoustic data collected during pre-construction surveys. For example, Hein et al. (2013) showed that pre-construction bat activity was not a significant indicator of collision risk. Lintott et al. (2016) argued that environmental impact assessments do not predict the risks to bats accurately. This may partly be because it is hypothesized that bats may be attracted to wind turbines (Cryan and Barclay 2009, Guest et al. 2022) which some evidence suggests may be the case (Horn et al. 2008, Richardson et al. 2021). While this report makes predications about the potential risk to bats posed by the project, these carry a degree of uncertainty and

must be verified by using post-construction surveys to ensure that the predictions are accurate and bat behaviour has not altered from pre-construction levels (Lintott et al. 2016).

Risk to bats was determined based on median bat activity per night derived from the bat activity dataset collected with acoustic monitoring. Median values were compared to those in Table 5 in MacEwan et al. (2020b) which provides height-specific fatality risk categories (high, medium, low) based on bat activity sampled in different South African terrestrial ecoregions. The Project Area of Influence (PAOI) is situated in the Highveld Grasslands ecoregion (Dinerstein et al. 2019) however reference values are not available for this ecoregion in MacEwan et al. (2020b). Instead, median values were compared to reference values for the Drakensberg Grasslands, Woodlands and Forest ecoregion. While bat activity levels differ between these two ecoregions this difference is small (MacEwan et al. 2020a). The lack of a direct reference for the Highveld Grasslands ecoregion is therefore not a major limitation and the comparison is suitable to provide an evaluation of risk.

3 LEGAL REQUIREMENTS AND GUIDELINES

The EIA processes for this project is being undertaken in terms of Government Notice (GN) No. R. 983 of 4 December 2014 (as amended to GNR 327), promulgated under the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) EIA Regulations, 2014 (as amended). In addition, there are various international, regional, and local legislation, policies, regulations, guidelines, conventions, and treaties in place for the protection of biodiversity, under which bats would also be protected or considered. These create a policy environment and impact management framework aiming to prevent excessive impacts to biodiversity and which was used to assess risk of this specific project. Specific policies include the following:

- Convention on Biological Diversity Post-2020 Global Biodiversity Framework
- United Nations Sustainable Development Goals
- Convention on the Conservation of Migratory Species of Wild Animals (1979)
- Convention on Biological Diversity (1993)
- Constitution of the Republic of South Africa, 1996 (Act No. 108 of 1996)
- National Environmental Management Act, 1998 (NEMA, Act No. 107 of 1998)
- National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004)
- Northern Cape Nature Conservation Act (Act 9 of 2009)
- The Equator Principles (2013)
- International Finance Corporation Performance Standards (PS6)
- The Red List of Mammals of South Africa, Swaziland, and Lesotho (2016)
- South Africa National Biodiversity Strategy and Action Plan (2005)
- Guidelines for the implementation of the Terrestrial Flora (3c) & Terrestrial Fauna (3d) Species Protocols for environmental impact assessments in South Africa
- Mitigating biodiversity impacts associated with solar and wind energy development. IUCN Guidelines for project developers (2021)
- South African Good Practise Guidelines for Surveying Bats in Wind Energy Facility Developments – Pre-Construction (2020)
- South African Good Practise Guidelines for Operational Monitoring for Bats at Wind Energy Facilities (2020)
- South African Bat Fatality Threshold Guidelines (2018)
- Mitigation Guidance for Bats at Operational Wind Energy Facilities in South Africa (2018)

4 SURVEY METHODOLOGY

The Project Area of Influence (PAOI) was defined as the Area of Interest (AoI) of the development cluster plus a 10 km buffer given that bats are flying mammals (Scottish Natural Heritage 2019). This area was studied at a desktop level to determine which bat species (i.e., impact receptors) are likely to occur within the PAOI, to

provide information on their natural history and conservation status, and to contextualise the project site within the larger social-ecological environment with respect to bats.

Bats were also studied through 12 months of acoustic monitoring in the AoI which began on 26 April 2022 and ended on 4 July 2023. After this, monitoring continued at one met mast location until 11 November 2023. Bat activity was sampled at 11 locations (Figure 1, Table 1) within the AoI with Wildlife Acoustics, Inc. SM4 bat detectors. At nine locations (AM4 – AM12), SMM-U2 microphones were positioned at the top of a 10 m aluminium mast. At the remaining two locations (AM1 and AM3), microphones were positioned on meteorological towers at 10 m, 50 m, and 90 mrespectively. Equipment at AM12 was stolen and therefore data from this location were not available to be assessed in this report.

The bat detectors were programmed to record activity nightly, from 30 minutes before sunset to 30 minutes after sunrise, and this report summarises 518 nights of bat activity data. This monitoring period therefore spans of all four seasons providing a representative account of temporal bat activity patterns across a year. Acoustic data retrieved from each bat detector were processed using Kaleidoscope® Pro (Version 5.4.2, Wildlife Acoustics, Inc.). Bats were automatically identified using the embedded "Bats of South Africa Version 5.4.0" reference library and verified by inspecting echolocation files. The number of acoustic files recorded was used as a measure to quantify bat activity, whereby each file was considered one bat pass of the microphone.

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

Table 1: Summary of the Bat Acoustic Monitoring Sampling Locations and Effort

Bat Detector	Coordinates	# Sample Nights	Altitude (m)	Habitat Features
AM1 (Met mast)	-26.612298°S 30.317572°E	10m: 518 50 m: 226 90 m: 478	1,778	In Wakkerstroom Montane Grassland, 400 m west of small escarpment, 560 m north of farm dam, 440 m west of woodland patch, 560 m northeast of wetland
AM3 (Met Mast)	-26.587572°S 30.284137°E	10 m: 340 50 m: 435 90 m: 326	1,748	In Wakkerstroom Montane Grassland, 420 m west of farmstead, 420 m east of stream and seep wetland
AM4	-26.665933°S 30.321221°E	208	1,550	In Eastern Highveld Grassland, 360 m west of cultivated area, 230 m southeast of woodland, 240 m north east of stream, 430 m south east of depression wetland
AM5	-26.611025°S 30.363393°E	377	1,515	In Eastern Highveld Grassland, on border of cultivated areas and disturbed grassland, 470 m southeast of stream, wetland and woodland patch, 2.4 km northwest of farmstead
AM6	-26.562101°S 30.296970°E	242	1,732	In Wakkerstroom Montane Grassland, at edge of woodland patch, 80 m east of depression wetland, 255 m west of stream
AM7	-26.640015°S 30.306442°E	194	1,655	Within wooded valley, 60 m west of stream, 300 m east of seep wetland
AM8	-26.621551°S 30.277550°E	137	1,735	In Wakkerstroom Montane Grassland, 680 m west of woodland patch,167 m north of seep wetland
AM9	-26.549013°S 30.315353°E	51	1,667	In Eastern Highveld Grassland adjacent to wetland and surrounded by trees
AM10	-26.592367° S 30.336850°E	163	1,696	In Wakkerstroom Montane Grassland, above small escarpment in shallow wooded valley

Table 1: Summary of the Bat Acoustic Monitoring Sampling Locations and Effort

Bat Detector	Coordinates	# Sample Nights	Altitude (m)	Habitat Features
AM11	-26.632172°S 30.265925°E	163	1,694	In Eastern Highveld Grassland adjacent to tree edge line, 220 m south east of wetland, installed at farmstead

5 SPECIALIST FINDINGS

5.1 Ecological Baseline

The Project Area of Influence (PAOI) is situated in the Grassland Biome and comprises predominantly Eastern Highveld Grassland vegetation (Figure 1). The landscape associated with this vegetation consists of slight to moderately undulating plains with small scattered rocky outcrops. The vegetation is short, dense grassland (Mucina and Rutherford 2006). Wakkerstroom Montane Grassland occurs in the middle of the PAOI, on low mountains and undulating plains. Here the vegetation comprises short montane grassland on plateaus and flat areas. On steep, east facing slopes and in drainage areas, short forest and thicket occurs. Both vegetation types are endemic, and Eastern Highveld Grassland is classified as Vulnerable while Wakkerstroom Montane Grassland is classified as Least Concern (SANBI 2018). The PAOI includes some low hills and wetland depressions and has largely been transformed by cultivation in the west, commercial forestry in the east and urban sprawl, including extensive areas of alien invasive trees. The PAOI is in a summer rainfall region and has a cool-temperate climate with dry winters, frequent occurrence of frost and large differences in both diurnal and seasonal temperature extremes (Mucina and Rutherford 2006).

Critical Biodiversity Areas (CBA), areas of high biodiversity value that must be maintained in a natural state, are located throughout the PAOI, classified as either "CBA Irreplaceable" and "CBA Optimal" (Figure 1). The former category comprises 1) areas required to meet conservation targets and those with irreplaceability values greater than 80 %, 2) areas which represent critical linkages or pinch-points in the landscape that must remain natural, and 3) Critically Endangered ecosystems (MTPA 2014). The latter category comprises areas that are not 'irreplaceable', but they are the most optimal land configuration to meet all biodiversity targets. Ecological Support Areas (ESA), not essential for meeting biodiversity targets but important in supporting the functioning of CBAs and delivering important ecosystem services, are also located throughout the PAOI.

Parts of the PAOI fall within a National Protected Areas Expansion Strategy (NPAES) Focus area (Moist Escarpment Grasslands), targeted for protected area expansion for improved ecosystem representation, ecological sustainability and resilience to climate change. Chrissiesmeer Protected Environment and Jericho Dam Nature Reserve overlap the north and east of the PAOI respectively (Figure 1).

Bat roosting sites in the PAOI are relatively limited and unlikely to support large congregations of bats, with no underground sites (e.g., caves, mines, sinkholes) known to be present. The closest known major bat roost is approximately 70 km north of the PAOI. Although occasional ridges and rocky outcrops are features of the landscape (Mucina and Rutherford 2006) these are not extensive. Some bat species could roost in these features. Bats are likely to roost in buildings associated with farmsteads within and bordering the AoI especially Cape Serotine and Egyptian Free-tailed Bat (Monadjem et al. 2020). Trees growing at these farmsteads and elsewhere on site where they form clumps, could also provide roosting spaces for bats, even though most are alien invasive species. Completed surveys of some buildings in the of the PAOI did not reveal the presence of roosting bats and as such were assessed as being of low relative suitability. However, these could be used by bats as night-roosts (locations used by bats to feed on captured prey, or to rest between foraging bouts) and should therefore still be considered, and avoided where possible, in the spatial planning.

Sensitive features in the PAOI at which bat foraging activity may be concentrated include farm buildings where they would forage for insects attracted to lighting (Rydell 1992, Jung and Kalko 2010), dams and wetland areas (Sirami et al. 2013), within and along the edge of woodland/tree patches, and over cultivated

areas (Bohmann et al. 2011, Noer et al. 2012). Free-tailed bats (Molossidae) will fly at high altitudes, and their foraging habitat is essentially all airspaces (McCracken et al. 2008, Nguyen et al. 2019).

Based on current taxonomic information and bat occurrence data, 23 species could occur within the PAOI (Table 2). The majority have a low likelihood of occurrence however the potential suite of species includes 10 high risk species, including fruit bats (Pteropodiae) and free-tailed bats (Molossidae) which are vulnerable to wind energy impacts in South Africa (MacEwan 2016, Aronson 2022).

Table 2: Bat Species Potentially Occurring within the PAOI

Common Name Species Name	Key Habitat Requirements*	Prob. Of Occurrence	Conservation Status		Wind Energy Risk[δ]
			IUCN[†]	RSA[‡]	
Natal Long-fingered bat *Miniopterus natalensis*	Temperate or subtropical species. Primarily in savannahs and grasslands. Roosts in caves, mines, and road culverts. Clutter- edge forager. Migratory.	Confirmed (5,018 passes)	LC/U	LC	High
Lessor Long-fingered bat *Miniopterus fraterculus*	Temperate species, associated with grasslands. Cave-dependant but also roosts in tunnels and mines. Habitat includes savannah bushveld, moister mistbelt and coastal forest habitats. Clutter-edge forager. Migratory.	Moderate	LC/U	LC	High
Cape Serotine *Laephotis capensis*	Arid semi-desert, montane grassland, forests, savannah and shrubland. Roosts in vegetation and human-made structures. Clutter-edge forager.	Confirmed (50,243 passes)	LC/S	LC	High
Mauritian tomb bat *Taphozous mauritianus*	Savannah woodland preferring open habitat. Roosts on rock faces, the outer bark of trees or on the outer walls of buildings under the eaves of roofs. Forages in urban areas and over cultivation. Open- air forager.	High	LC/U	LC	High
Little Free-tailed bat *Mops pumilus*	Semi-arid savannah, forested regions, woodland habitats. Roosts in narrow cracks in rock and trees but also in buildings. Open-air forager. Forages in urban areas and over cultivation.	Confirmed (1,767 passes)	LC/U	LC	High
Midas Free-tailed bat *Mops midas*	Hot low-lying savannah and woodland. Roosts in narrow cracks in rock and trees but also in buildings. Open-air forager.	Low	LC/D	LC	High
Egyptian Free-tailed bat *Tadarida aegyptiaca*	Desert, semi-arid scrub, savannah, grassland, and agricultural land. Roosts in rocky crevices, caves, vegetation, and human-made structures. Open-air forager.	Confirmed (20,995 passes)	LC/U	LC	High
Wahlberg's Epauletted fruit bat *Epomophorus wahlbergi*	Roost in dense foliage of large, leafy trees. Associated with forest and forest-edge habitats but will forage in urban environments.	Low	LC/S	LC	High
African Straw-coloured fruit bat *Eidolon helvum*	Non-breeding migrant in the PAOI.	Low	NT/D	LC	High
Egyptian Rousette *Rousettus aegyptiacus*	Distribution influenced by availability of suitable caves roosts.	Low	LC/S	LC	High
Temminck's Myotis *Myotis tricolor*	Montane forests, rainforests, coastal forests, savannah woodlands, arid thicket, and fynbos. Roosts communally in caves (and mines) and closely associated with mountainous terrain. Migratory. Clutter-edge forager.	Low	LC/U	LC	Medium-High
Welwitsch's Myotis *Myotis welwitschii*	Mainly open woodland and savannah but also high-altitude grassland, tropical dry forest, montane tropical moist forest, savannah and shrublands. Clutter-edge forager.	Low	LC/U	LC	Medium-High
Yellow-bellied house bat *Scotophilus dinganii*	Occurs throughout the Savannah Biome but avoids open habitats such as grasslands and Karoo scrub. Roosts in hollow trees and buildings. Clutter-edge forager.	Confirmed (169 passes)	LC/U	LC	Medium-High
Dusky Pipistrelle *Pipistrellus hesperidus*	Woody habitats, such as riparian vegetation and forest patches. Recorded roosting in narrow cracks in rocks and under the loose bark of dead trees. Clutter-edge forager.	Low	LC/U	LC	Medium-High
Rusty Pipistrelle	Savannah woodland and associated with open water	Low	LC/U	LC	Medium-

Pipistrellus rusticus	bodies. Roosts in trees and old buildings. Clutter-edge forager.				High
Long-tailed Serotine *Eptesicus hottentotus*	Montane grasslands, marshland and well- wooded riverbanks, mountainous terrain near water. Roosts in caves, mines, and rocky crevices. Clutter-edge forager.	Confirmed (368 passes)	LC/U	LC	Medium
Egyptian Slit-faced bat *Nycteris thebaica*	Savannah, desert, arid rocky areas, and riparian strips. Gregarious and roosts in caves but also in mine adits, Aardvark holes, rock crevices, road culverts, roofs, and hollow trees. Clutter forager.	Medium	LC/U	LC	Low
Geoffroy's Horseshoe bat *Rhinolophus clivosus*	Savannah woodland, shrubland, dry, riparian forest, open grasslands, and semi- desert. Roosts in caves, rock crevices, disused mines, hollow baobabs, and buildings. Clutter forager.	Medium	LC/U	LC	Low
Bushveld Horseshoe bat *Rhinolophus simulator*	Occurs in caves within areas of moist savannah, adjacent to rivers and savannah woodland, montane habitats, and coastal mosaics. Commonly associated with riparian forest and along wooded drainage lines. Roosts in caves and mines. Clutter forager.	Medium	LC/D	LC	Low
Blasius's Horseshoe bat *Rhinolophus blasii*	Savannah woodlands and are dependent on the availability of daylight roosting sites such as caves, mines, or boulder piles.Clutter forager.	Low	LC/D	NT	Low
Darling's Horseshoe bat *Rhinolophus darlingi*	Mesic woodland savannahs. Roosts in caves, boulder piles, mines, culverts, large hollow trees and disused buildings. Clutter forager.	Low	LC/U	LC	Low
Sundevall's Leaf-nosed bat *Hipposideros caffer*	Savannah, bushveld and/or coastal forests, near to rivers and other water sources. Roosts in caves, sinkholes, rock fissures, hollow trees, mines, and culverts. Clutter forager.	Low	LC/D	LC	Low
Percival's Short-eared Trident bat *Cloeotis percivali*	Savannah and woodland areas. Roosts in caves and mine tunnels. Clutter forager.	Low	LC/U	EN	Low

*Child et al. (2016), *Monadjem et al. (2020); [!] Child et al. (2016); [†]IUCN (2021); [§] MacEwan et al. (2020b)

5.2 Pre-Construction Bat Monitoring Results

Six bat species were confirmed to occur in the PAOI (Table 2) including four species classified as high risk from wind energy development: Natal Long-fingered bat, Cape Serotine, Little Free-tailed bat, and Egyptian Free-tailed bat. All of these species have a conservation status of Least Concern (both globally and regionally) and no red data species with a higher conservation status were detected. Although these species are currently classified as Least Concern, Rodhouse et al. (2019), Davy et al. (2020) and Frick et al. (2017) have all shown that in North America, Least Concern bats may be experiencing impacts due to wind farms that could result in changes to their conservation status. The global population trend is unknown for Natal Long-fingered bat, Little Free-tailed bat, and Egyptian Free-tailed bat but stable for Cape serotine. Given the unknown population trends for some of these species and the evidence of impacts from wind farms, ongoing monitoring and adaptive management will be essential to ensure their conservation status does not deteriorate.

A total of 80,051[1] bat passes were recorded over 518 sample nights. Most activity was attributed to Cape serotine (63 %) and Egyptian free-tailed bat (27 %). These species comprise the majority of bat fatalities at South African wind farms (Aronson 2022). Natal long-fingered bat accounted for 6 % of total activity. The remaining three species (Little free-tailed bat, Long-tailed serotine and Yellow-bellied house bat) were seldomly recorded and the magnitude of their activity suggests they would be at low risk of impacts. As such, the remainder of this section focuses on impacts to Egyptian free-tailed bat, Cape serotine and Natal long-fingered bat.

Based on MacEwan et al. (2020b), Cape serotine activity was predominantly low but high activity was recorded at AM5, AM8, AM9 and AM11, in summer and autumn (Table 3). The latter two monitoring stations were located at a farm dam and at a farmstead respectively indicating higher activity in relation to

[1] Exclusive of an additional 1,491 bat passes unable to be identified to a species.

these landscape features. This species was also recorded at 50 m and 90 m but the magnitude of its activity was mostly low except for at AM3-50 during March and April when its activity suggests medium risk. Based on the dataset, this species is largely predicted to be at low collision risk. However, bats in the same family (Vespertilionidae) are known to be attracted to wind turbines in the United Kingdom (Richardson et al. 2021). Thus, although the data suggest a low collision risk, the installation of wind turbines in the landscape can alter bat activity patterns. Collision risk for this species will also depend on how close turbine blades reach the ground, with risk increasing the closer the blades reach the ground (Garvin et al. 2024).

Table 3: Median number of bat passes per hour per night for Cape serotine and associated risk based on MacEwan et al. (2020b).

site	jan	feb	mar	apr	may	jun	jul	aug	sep	oct	nov	dec	
AM1-10	0.19	0.18	1.21	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.09	0.00	Risk Rating
AM1-50		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00	0.00		High
AM1-90		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		Medium
AM3-10	1.35	0.56		0.08	0.00	0.00	0.00	0.00	0.00	0.09	0.00	0.49	Low
AM3-50	0.00	0.00	0.08	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	No Data
AM3-90	0.00			0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
AM4	0.29	1.20		0.39	0.08	0.00	0.00	0.08	0.93	0.74	0.00		
AM5	0.19	4.65	3.32	1.27	0.08		0.00	0.08	0.54	0.79	0.56	0.88	
AM6				1.01	0.22	0.00	0.07	0.23	0.61	0.00	0.28		
AM7				0.00	0.00	0.00	0.00	0.00	0.20		0.00		
AM8				0.08	0.00	1.11	0.81	0.08	2.18				
AM9		8.19	8.53	0.00									
AM10	0.19	0.00	0.26	0.08	0.08							0.00	
AM11	25.90	20.76	12.50	6.14	3.10							15.07	

The timeseries data indicate a clear seasonal pattern in bat activity for the Cape serotine (Table 4), with the mean number of bat passes per hour peaking significantly during summer, reaching up to 13.66 passes per hour. This is largely driven by activity at AM11 and AM9. This heightened activity in summer likely reflects optimal weather conditions and increased prey availability. In autumn, bat activity remains relatively moderate, with values between 0.02 and 3.48 passes per hour, suggesting continued but reduced presence compared to summer. In contrast, winter and spring exhibit notably lower levels of activity, with mean passes per hour not exceeding 1.17 in spring and 0.68 in winter. This seasonal trend suggests that Cape serotine bats are minimally active during colder months, likely due to reduced foraging opportunities or temperature constraints. Additionally, within each season, there is a gradual decrease in bat passes across a night. Peak activity in summer and spring is between 19:00 and 21:00, in autumn between 18:00 and 20:00, and in winter between 17:00 and 19:00.

Table 4: Heatmap showing the mean number of bat passes per hour for Cape serotine. Colour gradient is relative and not based on thresholds.

Time Period	Autumn	Spring	Summer	Winter
17:00 – 18:00	1.28	0.01	0.00	0.58
18:00 – 19:00	3.48	0.73	0.27	0.68
19:00 – 20:00	2.51	1.17	13.66	0.21
20:00 – 21:00	1.80	1.06	7.40	0.13
21:00 – 22:00	1.29	0.92	4.01	0.06
22:00 – 23:00	1.07	0.68	3.39	0.02
23:00 – 00:00	0.82	0.45	2.63	0.00
00:00 – 01:00	0.73	0.46	2.13	0.00
01:00 – 02:00	0.73	0.27	1.56	0.00
02:00 – 03:00	0.66	0.25	1.24	0.00

03:00 – 04:00	0.49	0.20	1.08	0.00
04:00 – 05:00	0.41	0.08	2.64	0.00
05:00 – 06:00	0.51	0.00	0.62	0.00
06:00 – 07:00	0.02	0.00	0.00	0.04

The data showed that at 50 m and 90 m, moderate collision risk is predicted for Egyptian free-tailed bat apart from during autumn and spring when high risk is predicted (Table 5). High risk is predicted near AM11 in autumn, and AM4 and AM5 during spring. Egyptian free-tailed bat is flexible in its foraging strategy, and it is thought that the habitat below has little influence on this species (Monadjem et al. 2020). These bats are open-air foragers based on their morphology and echolocation (Norberg and Rayner 1987) which means they tends to forage high in the air.

Table 5: Median number of bat passes per hour per night for Egyptian free-tailed bat and associated risk based on MacEwan et al. (2020b).

site	jan	feb	mar	apr	may	jun	jul	aug	sep	oct	nov	dec	Risk Rating
AM1-10	0.10	0.18	0.86	0.00	0.07	0.00	0.00	0.08	0.08	0.40	0.75	0.29	
AM1-50		0.18	0.34	0.56	0.15		0.00	0.08	0.08	0.17	0.28		High
AM1-90		0.00	0.17	0.25	0.08	0.00	0.00	0.00	0.08	0.18	0.19		Medium
AM3-10	0.09	0.00		0.23	0.15	0.00	0.00	0.08	0.33	0.17	0.62	0.39	Low
AM3-50	0.10	0.04	0.51	0.62	0.08	0.00	0.00	0.08	0.16	0.45	0.52	0.20	No Data
AM3-90	0.00			0.08	0.08	0.00	0.00	0.08	0.17	0.44	0.24	0.00	
AM4	0.00	0.00		0.39	0.23	0.00	0.07	0.39	1.95	2.57	0.55		
AM5	0.00	0.09	0.51	0.78	0.26		0.19	0.39	1.59	2.00	1.83	0.59	
AM6				0.08	0.08	0.00	0.00	0.00	0.37	0.17	0.00		
AM7				0.00	0.00	0.00	0.00	0.00	0.08		0.00		
AM8				0.15	0.08	0.07	0.00	0.08	0.57				
AM9		0.31	0.60	0.00									
AM10	0.00	0.00	0.00	0.08	0.08							0.00	
AM11	0.39	0.45	1.55	2.23	0.54							1.13	

Table 6: Heatmap showing the mean number of bat passes per hour for Egyptian free-tailed bat. Colour gradient is relative and not based on thresholds.

Time Period	Autumn	Spring	Summer	Winter
17:00 – 18:00	0.04	0.03	0.00	0.08
18:00 – 19:00	0.47	0.54	0.02	0.36
19:00 – 20:00	0.67	0.96	0.46	0.22
20:00 – 21:00	0.78	1.03	0.50	0.17
21:00 – 22:00	0.77	1.11	0.46	0.10
22:00 – 23:00	0.75	1.09	0.54	0.08
23:00 – 00:00	0.57	1.11	0.46	0.05
00:00 – 01:00	0.55	1.40	0.57	0.03
01:00 – 02:00	0.51	1.14	0.55	0.02
02:00 – 03:00	0.44	0.83	0.36	0.01
03:00 – 04:00	0.26	0.54	0.16	0.02
04:00 – 05:00	0.15	0.13	0.11	0.00
05:00 – 06:00	0.03	0.01	0.00	0.00
06:00 – 07:00	0.01	0.00	0.00	0.02

In spring, Egyptian free-tailed bat shows the highest activity levels overall, with peak passes per hour occurring around midnight (00:00 – 01:00) at 1.4 passes per hour (Table 6). This elevated activity during

spring nights aligns somewhat with the Cape serotine data, where spring showed moderate activity; however, for the Egyptian free-tailed bat, spring is a clear peak season. In summer, activity for the Egyptian free-tailed bat is relatively lower compared to spring, with values not exceeding 0.57 passes per hour and generally concentrated in the earlier hours of the night. This is a notable contrast to Cape serotine, which displayed its highest seasonal activity in summer. This suggests that while the Cape serotine is more active during summer, the Egyptian free-tailed bat is less active during this period, potentially indicating differing ecological preferences or behavioural patterns. Autumn displays a moderate level of activity for the Egyptian free-tailed bat, with values peaking around 20:00 – 21:00 at 0.78 passes per hour and then gradually decreasing through the night. This pattern is consistent with the Cape serotine, where autumn also showed moderate activity. In winter, the Egyptian free-tailed bat shows low activity levels across all hours, with peak activity reaching only 0.36 passes per hour early in the evening (18:00–19:00) and decreasing to nearly zero later at night. This aligns with the winter results for the Cape serotine bat, confirming that winter is a low-activity season for both species.

Table 7: Median number of bat passes per hour per night for Natal long-fingered bat and associated risk based on MacEwan et al. (2020b).

site	jan	feb	mar	apr	may	jun	jul	aug	sep	oct	nov	dec
AM1-10	0.10	0.09	3.84	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AM1-50		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00	0.00	
AM1-90		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
AM3-10	0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AM3-50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AM3-90	0.00			0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AM4	0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
AM5	0.00	0.13	0.26	0.23	0.00		0.00	0.00	0.00	0.00	0.00	0.00
AM6				0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
AM7				0.00	0.00	0.00	0.00	0.00	0.00		0.00	
AM8				0.00	0.00	0.00	0.04	0.08	0.24			
AM9		3.30	2.86	0.04								
AM10	0.00	0.00	0.00	0.00	0.00							0.00
AM11	0.19	0.27	0.75	0.24	0.08							0.00

Risk Rating
High
Medium
Low
No Data

Activity of Natal long-fingered bat was predominantly low but high activity was recorded during spring at AM1 and AM9. Medium activity was also recorded during spring at AM5 and AM11 (Table 7). As such, overall impacts to this species are anticipated to be low, especially since activity levels at 50 m and 90 m were assessed as low based on criteria in MacEwan et al (2020b). However, this species may experience high cumulative impacts (see Section 6.3).

Table 7: Heatmap showing the mean number of bat passes per hour for Natal long-fingered bat. Colour gradient is relative and not based on thresholds.

Time Period	Autumn	Spring	Summer	Winter
17:00 – 18:00	0.06	0.00	0.00	0.12
18:00 – 19:00	0.22	0.00	0.02	0.07
19:00 – 20:00	0.18	0.01	0.15	0.02
20:00 – 21:00	0.58	0.01	0.07	0.02
21:00 – 22:00	0.69	0.02	0.34	0.02
22:00 – 23:00	0.42	0.01	0.35	0.02
23:00 – 00:00	0.27	0.02	0.24	0.01
00:00 – 01:00	0.22	0.02	0.21	0.01

01:00 – 02:00	0.15	0.00	0.13	0.00
02:00 – 03:00	0.16	0.00	0.06	0.00
03:00 – 04:00	0.10	0.00	0.02	0.00
04:00 – 05:00	0.05	0.00	0.02	0.00
05:00 – 06:00	0.19	0.00	0.02	0.00
06:00 – 07:00	0.00	0.00	0.00	0.00

The timeseries data showed that this species exhibits relatively low and stable activity levels across all seasons, with a modest peak in autumn, where its activity reaches a maximum of 0.69 bat passes per hour between 21:00 and 22:00. This peak, though limited, suggests a slight preference for early evening hours in the autumn months. Throughout spring, summer, and winter, however, the Natal long-fingered bat maintains very low activity, rarely exceeding 0.35 passes per hour at any given time. The hourly distribution shows that this species activity slightly tapers off in the late evening and early morning hours, with a marked decline around midnight. This pattern suggests that the Natal long-fingered bat may have brief foraging periods early in the night, possibly returning to roost sites earlier than other nocturnal species. This species is migratory, and although difficult to show, the peak in activity in autumn could be suggestive of some bats (e.g. females) moving through the site to roosting sites north elsewhere in Mpumalanga or Limpopo after mating.

6 IDENTIFICATION AND ASSESSMENT OF IMPACTS

Impacts to bats that are likely to occur because of the construction, operation and decommissioning of the wind energy facility and grid connection are identified and assessed in the following section. The unit of analysis against which impacts were assessed is the local bat community and their associated habitats within the PAOI. Impacts considered for assessment include habitat modification and disturbance, displacement, fatality due to collisions with wind turbine blades, and light pollution since these are the major impacts likely to be associated with the project (Kunz et al. 2007b, Cryan and Barclay 2009, Bará and C. Lima 2024, Voigt et al. 2024). For each impact, the respective mitigation measures were categorised into those aimed at first avoiding impacts, then minimising impacts, and finally restoring areas impacted (Figure 2).

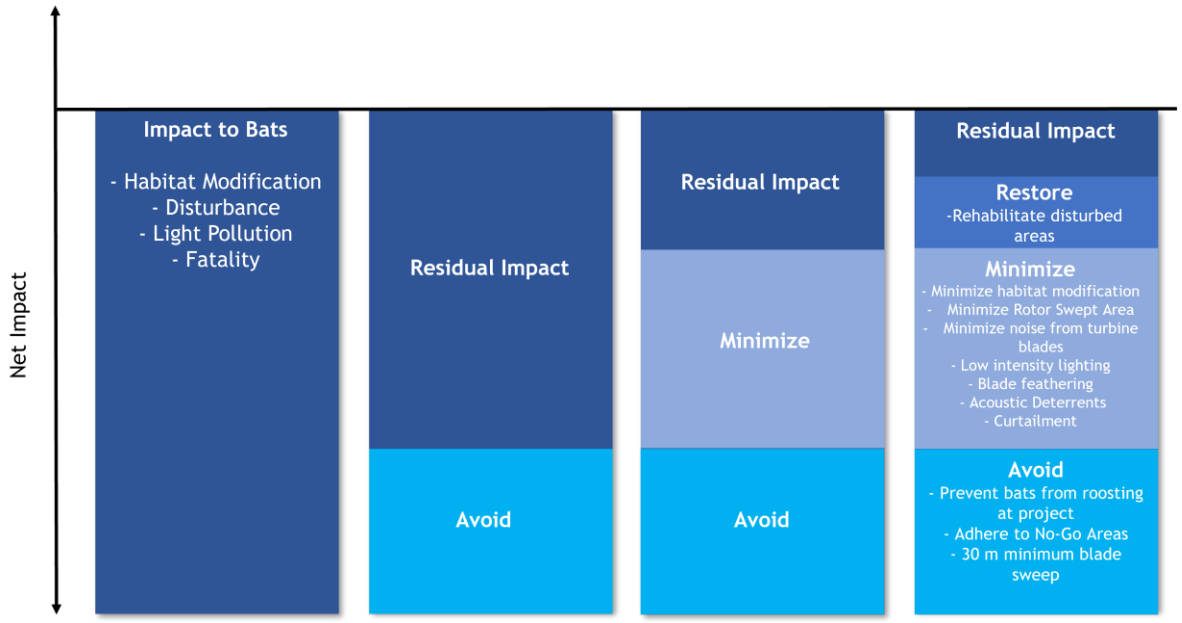


Figure 2: Mitigation Hierarchy applied to the Project with Mitigation Measures.

6.1 Wind Energy Facility

6.1.1 Construction Phase

IMPACTS

Removal of native vegetation, noise and dust generated during construction activities, and the presence of new infrastructure in the landscape, will negatively and indirectly impact bats by removing habitat used for foraging and commuting, through disturbance, and displacement (Kunz et al. 2007b, Millon et al. 2015, Millon et al. 2018, Bennun et al. 2021, Leroux et al. 2022, Tolvanen et al. 2023).

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

Mitigation (Avoid)

Habitat modification impacts can be avoided by buffering habitat and landscape features (Table 8) that bats use to spatially limit the potential for bats to interact with project infrastructure, and to avoid impacting key bat habitat (Barré et al. 2018, Leroux et al. 2022). All key habitat features were buffered by 200 m as per best practise (Rodrigues 2015, MacEwan et al. 2020b).

To align with regional conservation and integrated development planning, the Mpumalanga Biodiversity Sector Plan Handbook (MTPA 2014) was consulted to guide spatial risk in the AoI. The intention was to align biodiversity conservation policy objectives with renewable energy policy objectives, attempting to minimize trade-offs between conflicting goals (Jackson 2011, Gasparatos et al. 2017). The handbook includes a map of terrestrial areas that are important for conserving biodiversity and ecological processes – Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs) respectively.

CBA Irreplaceable Areas were categorised as No-Go (Table 8) because the conservation goals for these areas are to maintain them in a natural state with no loss of ecosystems, functionality or species, and with no flexibility in land-use options (MTPA 2014). CBA optimal and areas with Highveld grassland were classified as high risk. Although the primary objective of the CBA optimal areas is to maintain these spaces in a natural state with no loss of ecosystems, functionality or species, some flexibility in land-use options is permitted (MTPA 2014), therefore these areas must be avoid as much as possible. The remaining areas were assigned low or medium risk where all infrastructure development should be prioritized. These included modified land, areas with invasive alien trees (plantations), ESA, and other Natural Areas (Table 8). Similarly, in ecological supports areas (ESAs), the objective is to maintain habitats in a natural, or near-natural, state with limited loss of ecosystems or functionality. Hence, these areas were classified as medium risk, permitting the siting of turbines in these spaces.

All turbines will be subjected to a post-construction bat fatality monitoring program which will monitor residual impacts at turbines located in CBA optimal and ecological support areas, as well as turbines in low-risk areas. The results of this monitoring will inform management actions where needed to ensure alignment with the MTPA objectives to limit impacts to biodiversity.

Table 8: Features used to assign spatial risk categories in the AoI for bats (Chiroptera)

Risk Level			
Low	Medium	High	No-Go
Heavily modified land	NPAES	CBA Optimal	CBA Irreplaceable Areas
Moderately modified land	ESA Landscape corridor	Highveld Grassland	Minor Watercourses (50 m buffer)
Cleared Invaded	ESA Local corridor		Farm Dams (200 m buffer)
Transformed	Other Natural Areas		Pan depressions (200m buffer)
Plantation/Invaded	Montane Grassland		Houses (200 m buffer)
			Buildings (200 m buffer)
			Seeps (200 m)

			CVB Wetlands (200 m)
			Rivers with floodplains (200 m buffer)
			Rocky Outcrops (200 m buffer)
			Protected Areas (200m buffer)

No infrastructure (including O&M buildings) may be placed within buffered No-Go areas (Figure 3). However, road infrastructure may need to be routed through sensitive areas for practical reasons. Existing road networks should be used as much as possible in these cases to limit the creation of additional roads which have known impacts on wildlife (Perumal et al. 2021).

To avoid bats roosting in new project infrastructure, all buildings must be properly sealed to prevent bats from roosting. If bats colonize these spaces, a suitably qualified bat ecologist must be engaged to remove them.

Disturbance effects can be avoided by restricting construction activities to daylight hours (i.e., no construction at night) and avoiding blasting near rocky outcrops.

Mitigation (Minimize and Restore)

Modification and disturbance of bat habitat is likely to have species specific effects depending on species foraging guild, season, and distance to wind turbines (Barré et al. 2018, Leroux et al. 2022). For example, clutter edge species (e.g., Cape serotine) are more likely to be impacted by habitat modification given their greater association with physical habitat features compared to high-flying species (e.g., Egyptian free-tailed bat). As such, buffers may not be effective to fully remove all impacts.

Beyond avoidance, measures to minimize further impacts include minimizing the clearing of native vegetation, minimizing disturbance and destruction of rocky outcrops, and applying good construction abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste) created during construction. Where native trees, rocky outcrops or buildings need to be removed (although this must be avoided), these features must be examined by a suitably qualified bat ecologist before construction commences to search for roosting bats. Following construction, all areas disturbed must be rehabilitated through native species planting within all areas under the projects control.

IMPACT PHASE: CONSTRUCTION					
Nature of the impact: MODIFICATION & DISTURBANCE OF BAT HABITAT (ROOSTING, FORAGING, COMMUTING)					
Description of impact Removal of native vegetation, noise and dust generated during construction activities, and the presence of new infrastructure in the landscape, will negatively and indirectly impact bats by removing habitat used for foraging and commuting, through disturbance, and displacement. Construction of WEF infrastructure could result in destruction and/or disturbance to bat roosts, and inadvertently provide new roosting spaces for some bat species in risky locations.					
	Extent (E)	Duration (D)	Reversibility (R)	Magnitude (M)	Probability (P)
Without Mitigation	1	1	3	2	2
With Mitigation	1	1	2	1	1
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	Low Negative Impact (14)			Low Negative Impact (5)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No, no comments received				
Mitigation measures to reduce residual risk or enhance opportunities: - Limit potential for bats to roost in project infrastructure (e.g., buildings, turbines) by ensuring they are properly sealed such that bats cannot gain access. - No construction activities at night. - No placement of infrastructure (except roads) in no-go areas.					

- No blasting near rocky crevices. - Minimize clearing of native vegetation - Minimize disturbance and destruction of rocky outcrops, native trees and buildings, and where this is required, these features should be examined for roosting bats. - Apply good construction abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste) created during construction. - Rehabilitate and enhance all areas disturbed during construction (including aquatic habitat).	
Residual impact	Residual impacts are likely to be minor although buffer distances have been shown to be ineffective at avoiding and minimizing risk to bats because these are two small for some species (Barré et al. 2018, Tolvanen et al. 2023).

6.1.2 Operational Phase

IMPACTS

Bat mortality (direct impact) through collisions with wind turbine blades is the principal impact of wind energy facilities on bats during operation of the facility (Cryan and Barclay 2009, Arnett et al. 2016, Voigt et al. 2024). Displacement of bats from their preferred areas may also occur due to turbine noise emissions (Ellerbrok et al. 2024, Voigt et al. 2024).

Mitigation (Avoid)

Collisions can be avoided by not placing wind turbines in the vicinity of bat habitats which for bats includes both physical landscape features themselves (near wetlands, vegetation etc.) and open airspace away from these features (Schnitzler et al. 2003). Risk of collision impact is related to bat morphology with fast flying, open-air species more likely to be impacted than low-flying species who forage closer to the ground, in edge spaces near vegetation, or in dense cluttered spaces (Schnitzler et al. 2003, Thaxter et al. 2017, Aronson 2022). Impacts to low-flying species can be further avoided by ensuring blades do not sweep close to ground level (Figure 4).

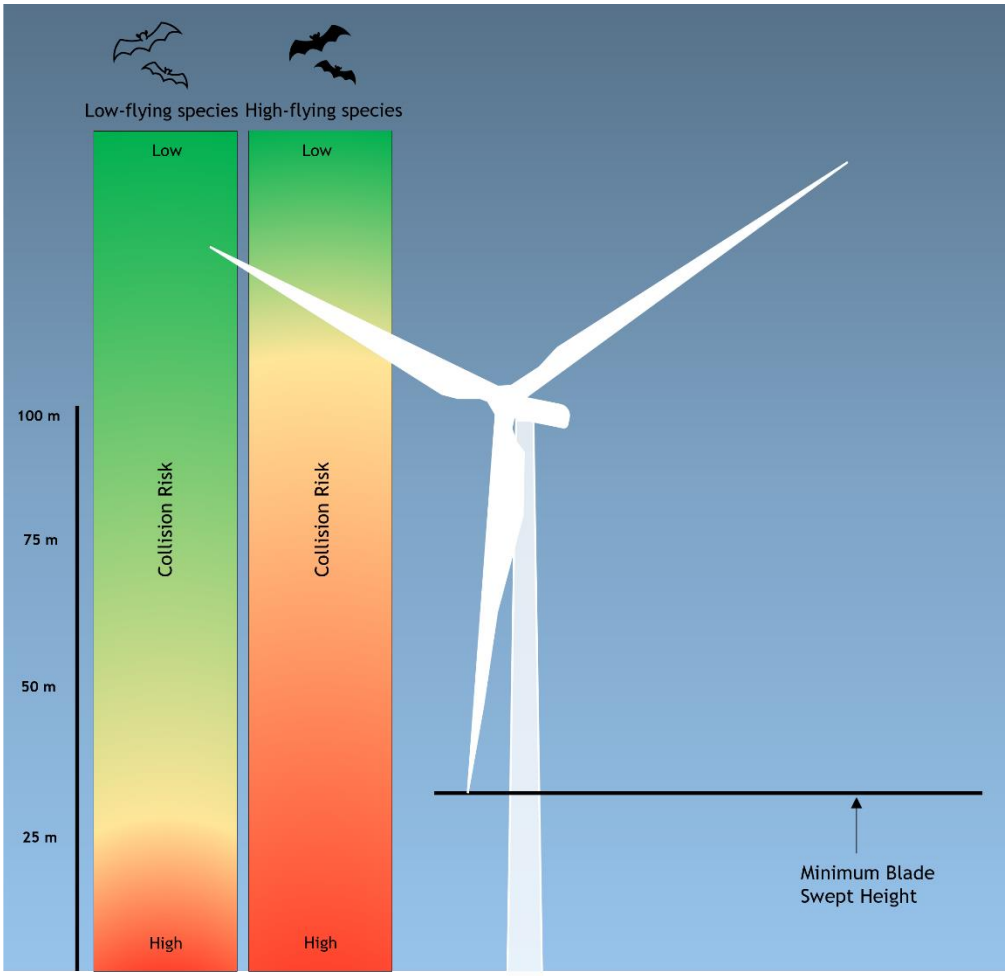


Figure 4: Conceptual Framework used to differentiate risk between low and high-flying bat species and the relationship with turbine size.

The species principally at collision risk from the proposed project are Cape serotine and Egyptian free-tailed bat since other species were recorded less often. High risk was identified for Cape serotine at ground level (represented by 10 m) at some locations (Table 3) but generally low risk at height (above 50 m). Activity is likely to decrease exponentially between these two heights (Wellig et al. 2018) meaning risk would decrease from high at 10 m to low at 50 m and above. The size of the rotor swept area should account for this because the lower the blades sweep the ground, the higher risk they will present to bats (Garvin et al. 2024). It is therefore recommended to maintain a minimum blade sweep of 30 m to avoid collision impacts as much as possible. There is limited published emperical evidence for this specific height but based on the activity of Cape serotine this is likely to be a reasonable height were risk would reduce from high to moderate or low.

Collision impacts can also be avoided by not installing wind turbines within or adjacent to key bat habitats, and adhering to the No-Go buffers (Figure 3). To ensure no parts of the wind turbines, including the blade tips, intrude into bat buffers, all 200 m buffers were adjusted (increased by 49 m) to account for the blade length and hub height of the assessed turbine in line with Mitchell-Jones and Carlin (2014) and based on the following equation:

[Eq. 1]

$$b = \sqrt{(buffer + bl)^2 - (hh - fh)^2}$$

$$b = \sqrt{(200 + 91)^2 - (150 - 0)^2}$$

$$b = 249\ m$$

Where:
b = adjusted/blade tip buffer
buffer = 200 m
bl: Turbine blade length = 91 m
hh: Hub height = 150 m
fh: Feature height = 0 m

The specific turbine height assessed in this report has a 150 m hub height and 91 m blade length, resulting in a minimum blade sweep of 59 m. Should the turbine size change, the adjusted/blade tip buffers must be updated to account for any changes in the hub height or blade length. No turbines are within buffered areas and hence the turbine layout is acceptable in its current form (Figure 3).

Mitigation (Minimize and Restore)

For some high-flying species such as Egyptian free-tailed bat, the habitat or land use below does not generally influence their activity (Monadjem et al. 2020) which makes habitat based mitigations (e.g., buffers) less effective. This species was recorded at 50 m and 90 m, where median activity levels suggest high risk during autumn and spring (Table 5). Mitigation to avoid impacts to higher-flying species should include the choice of turbine design since this has the potential to influence bat fatality (Barclay et al. 2007) but the impact of turbine size on bat fatality is poorly understood. Generally, impacts to high-flying species should be avoided by limiting the size of the rotor swept area as much as practicable since they are active across much of the rotor swept zone.

However, due to the characteristics of the species present on site, i.e., high risk, open-air foraging species, residual impacts could occur since there is still likely to be a high degree of risky airspace even with a minimized rotor swept area. In addition, some bats may be attracted to turbines (Horn et al. 2008, Cryan and Barclay 2009, Richardson et al. 2021, Guest et al. 2022, Leroux et al. 2022) once installed and operational and therefore additional mitigation measures would be needed to minimize impacts.

The first additional mitigation measure to minimize residual collision impacts is the use of blade feathering to prevent free-wheeling of blades below the turbine cut-in speed. This has been shown to reduce bat fatality with the benefit of not impacting on energy production (Young et al. 2011, Good et al. 2012).

During operation, bat fatality monitoring must be undertaken to search for bat carcasses beneath wind turbines to measure the residual impact of the WEF on bats for a minimum of two years (Aronson et al. 2020). Mitigation measures that are known to further minimize bat fatality if needed based on the fatality monitoring results include curtailment and/or acoustic deterrents (Arnett et al. 2013, Romano et al. 2019, Weaver et al. 2020). These techniques must be used if post-construction fatality monitoring indicates that species fatality thresholds have been exceeded (MacEwan et al. 2018) to minimize impacts, maintain the impacts to bats within acceptable limits of change and prevent declines in the impacted bat population. The bat fatality thresholds for the project were determined based on area of influence of the turbines of 2,007 hectares. This was based on a minimum convex polygon around all turbines, plus an additional buffer around this space of 110 m corresponding to the turbine blade length. Based on the bat fatality threshold for the Highveld Grasslands ecoregion (MacEwan et al. 2018), the bat fatality threshold for the Emvelo project is 16 bats per least concern species.

According to the threshold guidance (MacEwan et al. 2018), should the annual fatality threshold be exceeded, curtailment and/or acoustic deterrents must be used to reduce fatality levels to below the threshold. For frugivorous bats, conservation important or rare/range restricted bats, i.e., Species of Special Concern (SSC), the annual fatality threshold is 1 individual. The likelihood of SSC's being present on site is low (Table 2).

A Biodiversity Management Plan (BMP) for bats must be developed by a bat ecologist before commencement of operation which includes the post-construction fatality monitoring plan design, fatality thresholds calculations and rationale, and an adaptive management response plan that provides a timeous action pathway for mitigation (e.g. curtailment or deterrents) should fatality thresholds be exceeded. Smart curtailment approaches which shut down turbines based on real time bat acoustic activity data are favoured over blanket curtailment because these will be less disruptive to turbine operation.

Since displacement of bats is likely driven by turbine noise, this can be minimized by serration of the back edges of the blade, by using a low-noise blade airfoil design or with blade trailing-edge brushes (Bošnjaković et al. 2024; Ellerbrok et al. 2024).

IMPACT PHASE: OPERATION					
Nature of the impact: BAT FATALITY					
Description of impact Bat mortality (direct impact) through collisions and/or barotrauma with wind turbine blades is the principal impact of wind energy facilities on bats.					
	Extent (E)	Duration (D)	Reversibility (R)	Magnitude (M)	Probability (P)
Without Mitigation	3	4	3	4	5
With Mitigation	3	4	2	3	3
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	High Negative Impact (70)			Moderate Negative Impact (36)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No, no comments received				
Mitigation measures to reduce residual risk or enhance opportunities: - No placement of turbines and infrastructure (apart from roads and the OHL) within no-go areas - Maintain a minimum blade sweep of 30 m to avoid impacts to lower flying bats such as clutter-edge species (e.g., Cape serotine, Natal long-fingered bat). - Minimize the rotor diameter - Feather blades to prevent free-wheeling below the turbine cut-in speed - Implement post-construction fatality monitoring and apply smart curtailment or deterrents if fatality thresholds are exceeded.					
Residual impact	Curtailment and deterrents can successfully reduce bat fatality (Arnett 2011, Arnett et al. 2016, Weaver et al. 2020), but not completely. Through the application of fatality thresholds, residual impacts should be minimized.				

IMPACT PHASE: OPERATION					
Nature of the impact: DISPLACEMENT					
Description of impact Avoidance of wind turbines by bats, in some cases over several hundred meters distance, has been observed for various species in different habitats, including farmland, resulting in displacement impacts (Tolvanen et al. 2023, Voigt et al. 2024). Displacement, likely caused by wind turbine operation (e.g., wake turbulences and noise emissions), tends to increase with the number and size of turbines.					
	Extent (E)	Duration (D)	Reversibility (R)	Magnitude (M)	Probability (P)
Without Mitigation	3	4	3	3	3
With Mitigation	3	4	2	2	2
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	Moderate Negative Impact (39)			Low Negative Impact (22)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No, no comments received				
Mitigation measures to reduce residual risk or enhance opportunities:					

- Reduce turbine noise emissions by serration of the back edges of the blade, by using a low-noise blade airfoil design or with blade trailing-edge brushes (Bošnjaković et al. 2024; Ellerbrok et al. 2024).	
Residual impact	Residual impacts are likely to be minor although buffer distances have been shown to be ineffective at avoiding and minimizing risk to bats because these are two small for some species (Barré et al. 2018, Tolvanen et al. 2023).

6.1.3 Decommissioning Phase

IMPACTS

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

Mitigation (Avoid)

Disturbance effects can be avoided by restricting decommissioning activities to daylight hours (i.e., no works at night).

Mitigation (Minimize and Restore)

Disturbance can be minimized by applying good abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste) created during decommissioning works. All areas disturbed must be rehabilitated through native species planting within all areas under the projects control.

IMPACT PHASE: DECOMMISSIONING					
Nature of the impact: DISTURBANCE OF BATS					
Description of impact Impacts during the decommissioning phase will be indirect and involve disturbance to bats through excessive noise and dust, and damage to vegetation.					
	Extent (E)	Duration (D)	Reversibility (R)	Magnitude (M)	Probability (P)
Without Mitigation	1	1	3	3	3
With Mitigation	1	1	2	2	2
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	Low Negative Impact (24)			Low Negative Impact (12)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No, no comments received				
Mitigation measures to reduce residual risk or enhance opportunities: - No decommissioning activities at night. - Apply good abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste) created during decommissioning activities. - Rehabilitate and enhance all areas disturbed during construction (including aquatic habitat).					
Residual impact	Residual impacts are likely to be minor since ceasing project activities on site is likely to benefit bats.				

6.2 Grid Connection

6.2.1 Construction Phase

The direct impact of grid connection infrastructure is collisions with powerlines. Insectivorous bats are unlikely to collide with powerlines since they can avoid these obstacles using echolocation but fruit bats do collide with powerlines (Tella et al. 2020). The likelihood of occurrence for fruit bats species in the AoI

is low (Table 2). Indirect impacts include loss of habitat to construct substations and OHL pylons, and ecological light pollution (Longcore and Rich 2004).

IMPACT PHASE: CONSTRUCTION					
Nature of the impact: MODIFICATION & DISTURBANCE OF BAT HABITAT (ROOSTING, FORAGING, COMMUTING)					
Description of impact Vegetation clearing for grid connection infrastructure (access roads, substation buildings, pylons), as well as noise and dust generated during the construction phase, will impact bats by removing habitat used for foraging and commuting, through disturbance, and displacement (Kunz et al. 2007b, Millon et al. 2018, Bennun et al. 2021). This impact is likely to have species specific effects; clutter edge species (e.g., Cape serotine) are more likely to be impacted by habitat modification given their greater association with physical habitat features compared to high-flying species (e.g., Egyptian free-tailed bat). Construction of grid connection infrastructure could result in destruction (direct impact) of bat roosts (trees, buildings) and disturbance (indirect impact) of bat roosts potentially resulting in roost abandonment. Bat mortality can occur if roosts which contain bats are destroyed. Installation of new infrastructure in the landscape (e.g., buildings) can inadvertently provide new roosting spaces for some bat species, attracting them to areas with wind turbines and potentially increasing the likelihood of collisions.					
	Extent (E)	Duration (D)	Reversibility (R)	Magnitude (M)	Probability (P)
Without Mitigation	1	1	3	2	2
With Mitigation	1	1	2	1	1
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	Low Negative Impact (14)			Low Negative Impact (5)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No, no comments received				
Mitigation measures to reduce residual risk or enhance opportunities: - Limit potential for bats to roost in project infrastructure (e.g., buildings) by ensuring they are properly sealed such that bats cannot gain access. - No construction activities at night. - No placement of pylons within 200 m of key habitat features specifically including buildings, dams/wetlands, and rivers/streams. The OHL itself is permitted to cross over No-Go Areas for practical routing reasons but pylon positions must avoid No-Go Areas where feasible. Therefore the maximum possible span should be implemented to avoid the sensitive area while ensuring the technical feasibility of the development. - No blasting near rocky crevices. - The construction compounds, laydown areas, and batching plants must avoid No-Go areas. - Minimize clearing of native vegetation - Minimize disturbance and destruction of rocky outcrops, native trees and buildings, and where this is required, these features should be examined for roosting bats. - Apply good construction abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste) created during construction. - Rehabilitate and enhance all areas disturbed during construction (including aquatic habitat).					
Residual impact	Residual impacts are likely to be minor although buffer distances have been shown to be ineffective at avoiding and minimizing risk to bats because these are two small for some species (Barré et al. 2018, Tolvanen et al. 2023).				

6.2.2 Operational Phase

IMPACT PHASE: OPERATION
Nature of the impact: LIGHT POLLUTION

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

	Extent (E)	Duration (D)	Reversibility (R)	Magnitude (M)	Probability (P)
Without Mitigation	3	4	3	3	3
With Mitigation	3	4	2	2	2

Significance Calculation	Without Mitigation	With Mitigation
S=(E+D+R+M)*P	Moderate Negative Impact (39)	Low Negative Impact (22)
Was public comment received?	No	
Has public comment been included in mitigation measures?	No, no comments received	

Mitigation measures to reduce residual risk or enhance opportunities:
- No placement of substations and operational and maintenance buildings within no-go areas. - Avoid excessive lighting - Use of motion-sensor lighting, avoid sky-glow by using hoods and downward facing lighting, increase spacing between lighting units, and use low pressure sodium lights (Rydell 1992, Stone 2012).

Residual impact	Given the limited extent of light pollution currently in the region, the application of the above mitigation measures is likely to result in minor residual impacts.

6.2.3 Decommissioning Phase

IMPACT PHASE: DECOMMISSIONING
Nature of the impact: DISTURBANCE OF BATS
Description of impact Impacts during the decommissioning phase will be indirect and involve disturbance to bats through excessive noise and dust, and damage to vegetation.

	Extent (E)	Duration (D)	Reversibility (R)	Magnitude (M)	Probability (P)
Without Mitigation	1	1	3	3	3
With Mitigation	1	1	2	2	2

Significance Calculation	Without Mitigation	With Mitigation
S=(E+D+R+M)*P	Low Negative Impact (24)	Low Negative Impact (12)
Was public comment received?	No	
Has public comment been included in mitigation measures?	No, no comments received	

Mitigation measures to reduce residual risk or enhance opportunities:
- No decommissioning activities at night. - Apply good abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste) created during decommissioning activities. - Rehabilitate and enhance all areas disturbed during construction (including aquatic habitat).

Residual impact	Residual impacts are likely to be minor since ceasing project activities on site is likely to benefit bats.

6.3 Cumulative Impacts

For the purposes of the cumulative impact assessment (CIA), cumulative impacts are defined as the total impacts resulting from the successive, incremental, and/or combined effects of a project when added to other existing, planned and/or reasonably anticipated future projects, as well as background pressures (IFC 2013). The project considered here is the Emvelo Wind Energy Facility. The goal of this assessment is to evaluate the potential resulting impact to the vulnerability and/or risk to the sustainability of the bat species affected (IFC 2013).

6.3.1 Step 1: VECs and spatial-temporal boundary

Following guidance in IFC (2013), the first step in the CIA was to determine the Valued Environmental Components (VECs), the bat species most likely to be affected by cumulative impacts, and the temporal and geographic scope of the analysis.

Of the species recorded in the PAOI during the acoustic monitoring, and based on bat distribution records (ACR 2020), Cape serotine (*Laephotis capensis*), Natal long-fingered (*Miniopterus natalensis*) and Egyptian free-tailed bat (*Tadarida aegyptiaca*) are most likely to be impacted cumulatively. This is because they are the most widespread bat species in South Africa (Monadjem et al. 2020), classified as high risk species to wind energy impacts (MacEwan et al. 2020b), the most impacted by operating wind energy facilities in the country (Aronson 2022).

The temporal time frame over which cumulative impacts are considered was 25 years, the typical lifespan of a renewable energy facility. However, cumulative effects could extend beyond this timeframe if development of the cluster of three projects is phased over time.

The Ecologically Appropriate Area of Analysis (EAAA) for the assessment was determined by considering the ecology of the three VECs.

The acoustic monitoring confirmed the presence of Natal long-fingered bat in the PAOI, a migratory species which moves seasonally between winter hibernacula and summer maternity cave roosts in South Africa (van der Merwe 1975, Miller-Butterworth et al. 2003). In north-eastern South Africa, where the proposed development is planned, van der Merwe (1975) showed migration between maternity caves in Limpopo and hibernacula caves in Gauteng/North-West undertaken by pregnant females (who later return south with weaned pups), with caves separated by 150 km at least. Males typically undertake shorter movements (> 60 km) between various highveld caves (van der Merwe 1975). This migration increases the potential that these bats will encounter wind turbines or be displaced by them (Millon et al. 2018), especially if these are placed along migratory routes. Although these movements are typically north-south, Pretorius et al. (2020) suggest that movement could also occur east-west between Gauteng and a maternity cave in Sudwala, Mpumalanga, a distance of approximately 250 km. Although additional research is needed to better understand long and short distance movements of Natal long-fingered bat in South Africa more precisely, given the numerous roost sites (both caves and mines) in Mpumalanga and body of work already demonstrating or suggesting migratory behavior in the north-east of the country between these sites, it is reasonable that cumulative impacts of wind energy may impact this species at large scales and hence cumulative impacts need to be assessed accordingly. Based on van der Merwe (1975), a 150 km radius around the PAOI was therefore defined as EAAA1 (Figure 5), especially since cumulative impacts should be evaluated across scales potentially affected species are likely to occur (Voigt et al. 2012, Lehnert et al. 2014).

The remaining VECs are not migratory and hence a second, smaller EAAA was used. Data on the spatial ecology of the Egyptian free-tailed bat and Cape serotine, specifically the sizes of their foraging or community ranges, are not available. Data from European free-tailed bat, *Tadarida teniotis*, in Portugal (Marques et al. 2004) and Serotine bat, *Eptesicus serotinus*, in England (Robinson and Stebbings 1997) were used as surrogates. Feeding areas for some *T. teniotis* individuals were over 30 km from their roost while the maximum distance between *E. serotinus* feeding areas was over 41 km.

Cumulative impact assessment in South African typically consider developments within a radius of 35 km which therefore is potentially in line with the movement ecology of the two VECs. Hence the EAAA2 was a 35 km radius around the PAOI.

6.3.2 Step 2: Other Activities and External Drivers

The second step in the CIA was to identify other past, existing, or planned activities within the EAAA1 and EAAA2 and to assess the external influences and stressors on the three VECs. With reference to the Renewable Energy Application database (Q2, 2024), currently two others wind energy projects are located within the EAAA2 including the Sheepmoor WEF. Approximately 35 other development projects are located within EAAA1 (Figure 5). Given that EAAA1 also includes a Renewable Energy Development Zone (REDZ), it is reasonable to expect further development over the 25-year period considered in this assessment.

There are no documented major past threats to Egyptian free-tailed bat and Cape serotine or current threats to them other than renewable energy (Child et al. 2016). Egyptian free-tailed bats can also be threated indirectly by roost disturbance, especially caves. This CIA considers renewable energy the primary impact to these VECs. Natal long-fingered bat is locally threatened in parts of its range by habitat loss resulting from conversion of land to agricultural use, incidental poisoning with insecticides, loss of prey base, and the disturbance of roosting and maternity caves (Child et al. 2016).

6.3.3 Step 3: Baseline Status of VECs

Egyptian free-tailed bat is very widely distributed, locally common and recorded from many protected areas in South Africa however, although the population is stable, the population size is unknown (Child et al. 2016). It is classified as Least Concern nationally and globally. This species is present in the PAOI and based on its activity levels, it is at high risk of collision during autumn and spring (Table 5). It is flexible in its habitat requirements and one reason for its wide distribution is its affinity to roost in buildings or other man-made structures (Monadjem et al. 2020).

Cape serotine is also widely distributed in South Africa with a large population and hence is classified as Least Concern nationally and globally. However, it is possible that this species comprises a complex of closely related species (Monadjem et al. 2020). The population trend is stable, but the population size is unknown. Although this species is present in the PAOI its activity levels suggest low risk of collision (Table 3) although no data between 10 m and 50 m were recorded on site to verify this. This species was recorded at 50 m, so it is reasonable to assume some level of risk between 10 m and 50 m. Cape serotine is also flexible in its habitat requirements and its use of buildings and other anthropogenic structures as roosts has possibly led to its numbers increasing.

Natal long-fingered bat is a common and widespread species, classified as Least Concern nationally and globally with a stable national population, but it may be experiencing local declines (Child et al. 2016). The size of the national population is unknown but this species roosts in large colonies; De Hoop Guano cave in the Western Cape hosts approximately 200,000 individuals, and in the Highveld, some caves may contain up to 4000 individuals (Child et al. 2016). Activity levels of this species in the AoI were relatively low and this species was seldomly recorded in the rotor swept area but high activity was recorded closer to ground level in spring (Table 7).

6.3.4 Step 4: Assess Cumulative Impacts on VECs

The key potential impacts that could affect the long-term sustainability and/or viability of the three VECs in EAAA1 and EAAA2 are collisions with wind turbines. This may lead to local extinctions and fragmentation of the national population since bats have low reproductive rates (Barclay and Harder 2003). Other impacts may include displacement from foraging and commuting areas, and along migration routes, due to wind turbines (Millon et al. 2018, Leroux et al. 2022).

6.3.5 Step 5: Assess Significance of Predicted Cumulative Impacts

Rodhouse et al. (2019), Davy et al. (2020) and Frick et al. (2017) have all shown that in North America, Least Concern bats may be experiencing impacts due to wind farms that could result in changes to their conservation status. This may be a future scenario for widespread, common Least Concern bats species in South Africa. As such, the significance of cumulative impacts is assessed as High without mitigation. The application of mitigation measures is anticipated to reduce the overall cumulative impact of the project to a moderate level.

Nature of the impact: CUMULATIVE IMPACTS					
Description of impact The total impacts resulting from the successive, incremental, and/or combined effects of the project when added to other existing, planned and/or reasonably anticipated future projects, as well as background pressures.					
	Extent (E)	Duration (D)	Reversibility (R)	Magnitude (M)	Probability (P)
Without Mitigation	3	4	3	4	5
With Mitigation	3	4	2	3	3
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	High Negative Impact (70)			Moderate Negative Impact (36)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No, no comments received				
Mitigation measures to reduce residual risk or enhance opportunities: The mitigation measures proposed in this report (buffering key habitats used by bats, use of appropriate lighting technology, blade feathering, and using smart curtailment and/or acoustic deterrents) should be applied to all future projects so that there is a collective management responsibility (IFC 2013).					
Residual impact	Curtailment and deterrents can successfully reduce bat fatality (Arnett 2011, Arnett et al. 2016, Weaver et al. 2020), but not completely. Through the application of fatality thresholds across all projects in the cumulative impact area, residual impacts should be minimized.				

6.3.6 Step 6: Management of Cumulative Impacts

Management interventions for bats at operating wind farms in South Africa are guided by fatality thresholds, which aim to mitigate population-level impacts. These thresholds are set below the rate at which populations could decline due to anthropogenic pressures (MacEwan et al. 2018). For this project, thresholds have been established, and similar measures should be applied to all future wind energy developments. In theory, if each development implements thresholds and appropriate mitigation measures when exceedances occur, the EAAA1 and EAAA2 VEC populations should not decline due to wind energy impacts.

The mitigation measures proposed in this report (buffering key habitats used by bats, use of appropriate lighting technology, blade feathering, and using smart curtailment and/or acoustic deterrents) should be applied to all future projects so that there is a collective management responsibility (IFC 2013).

7 ENVIRONMENTAL MANAGEMENT PROGRAMME

Objective: Avoid and minimize modification of bat habitats

Project component/s	All project infrastructure
Potential Impact	Vegetation clearing for project infrastructure, as well as noise, dust and pollution generated during construction activities, will impact bats by removing habitat used for foraging and commuting, through disturbance, and displacement. Construction of WEF infrastructure could result in destruction and/or disturbance to bat roosts and inadvertently provide new roosting spaces for some bat species in risky locations.
Activity/risk source	All construction activities and associated activities (e.g., driving)
Mitigation: Target/Objective	1. Avoid potential for bats to roost in project infrastructure (e.g., buildings, and turbines) 2. Minimize disturbance to bats 3. Minimize habitat loss 4. Minimize displacement of bats

Mitigation	Responsibility	Timeframe
1. Ensure all project infrastructure (e.g., buildings, and turbines) is properly sealed such that bats cannot gain access. 2. No construction activities at night, apply good construction abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste). 3. No placement of infrastructure (except roads and OHL) within No-Go areas. 4. Minimize clearing of native vegetation, minimize disturbance and destruction of farm buildings on site, minimize removal of native trees. Rehabilitate and enhance all areas disturbed during construction, (including aquatic habitat). 5. Reduce turbine noise emissions by serration of the back edges of the blade, by using a low-noise blade airfoil design or using blade trailing-edge brushes.	Project Developer Contractor	During design and planning phase and throughout construction phase

Performance Indicator	No bat roosts are destroyed No bats colonise new project infrastructure for roosting No infrastructure in No-Go areas (except roads and OHL) All areas disturbed during construction are rehabilitated
Monitoring	An appointed ECO must inspect all new project infrastructure, in conjunction with or via training from a bat ecologist, to ensure bats cannot gain access. ECO to ensure compliance with good construction abatement control practices. ECO must ensure no infrastructure is placed in No-Go areas (see Figure 3). If a bat roost is encountered during construction, the ECO must consult a bat ecologist to determine appropriate actions. ECO to ensure all disturbed areas are rehabilitated. ECO to ensure turbine blades have appropriate noise-reduction technology.

Objective: Avoid and minimize bat fatality	
Project component/s	Wind turbines
Potential Impact	Bat mortality through collisions with wind turbine blades.
Activity/risk source	Operating Wind Turbines
Mitigation: Target/Objective	1. Avoid bat fatalities through turbine layout design and turbine dimensions 2. Minimize bat fatalities using smart curtailment or deterrents during operation

Mitigation	Responsibility	Timeframe
1. No placement of turbines in No-Go Areas (Figure 3). 2. Maintain a minimum blade sweep of 30 m to avoid impacts to lower flying bats such as clutter-edge species (e.g., Cape serotine, Natal long-fingered bat). 3. Minimize the rotor diameter 4. Feather blades to prevent free-wheeling below the turbine cut-in speed 5. Implement fatality monitoring throughout the operational phase 6. Apply smart curtailment or deterrents if fatality thresholds are exceeded. Annual fatality threshold per Least Concern species = 16 individuals. Annual fatality threshold per Species of Special Concern = 1 individual for each of [African Straw-coloured fruit bat, Wahlberg's Epauletted fruit bat, Percival's Short-eared Trident bat, Blasius's Horseshoe bat, Egyptian Rousette and Lessor Long-fingered bat].	Project Developer Operator	BMP developed prior to operation. BMP active throughout operation phase.

Performance Indicator	≤ 16 individuals per Least Concern species killed annually ≤ 1 individual per Species of Special Concern killed annually
Monitoring	ECO must ensure no turbines are placed in No-Go areas, including the blade tips (Figure 3). ECO must ensure the dimensions of the final selected turbine adhere to requirements (A minimum blade sweep of 30 m). A Biodiversity Management Plan (BMP) for bats must be developed which includes the design of a post-construction fatality monitoring program (PCFM) for bats, and an adaptive management response plan that provides an escalating scale of mitigation should fatality thresholds be exceeded. ECO to ensure adherence to BMP and any mitigation measures implemented

Objective: Reduce impact of light pollution	
Project component/s	All project infrastructure
Potential Impact	Construction of project infrastructure will increase ecological light pollution from artificial lighting associated with turbines, the substation and other operational and maintenance buildings. Light pollution can alter ecological dynamics (Horváth et al. 2009, Bará and C. Lima 2024). Lighting attracts and can cause direct mortality of insects, reducing the prey base for bats, especially bat species that are light-phobic. These species may also be displaced from previous foraging areas due to lighting. Other bat species forage around lights, attracted by higher numbers of insects. This may bring these species into the vicinity of the project and indirectly increase the risk of collision with wind turbines.
Activity/risk source	Light sources from project infrastructure
Mitigation: Target/Objective	1. Avoid light pollution 2. Minimize light pollution

Mitigation	Responsibility	Timeframe

1. No placement of infrastructure within No-Go areas (Figure 3). 2. Use motion-sensor lighting, avoid sky-glow by using hoods and downward facing lighting, increase spacing between lighting units, and use low pressure sodium lights	Project Developer Operator	During design and planning phase and throughout operation phase.

Performance Indicator	Limited attraction of insects to light sources Limited foraging of bats around light sources Limited mortality at insects at light sources
Monitoring	ECO must ensure no infrastructure is in No-Go areas (Figure 3). ECO must ensure motion-sensor lighting is used. ECO must ensure all lighting fixtures have hoods and/or are downward facing, where appropriate, to prevent sky-glow. ECO must ensure minimum lighting is used and lighting is spaced to prevent excessive use of lighting. ECO must ensure low-pressure sodium lighting is used.

8 CONCLUSION

This EIA report assessed impacts to bats that could occur because of the construction, operation and decommission of the Emvelo WEF and grid connection. The assessment was based on 16 months of baseline data on bat activity recorded at the project. Based on these data, the key issue for the WEF will be managing collision impacts to Cape serotine and Egyptian free-tailed bat, and cumulative impacts.

The first mitigation measure proposed to manage risk is to adhere to the no-go buffers which aim to spatially avoid impacts by buffering key habitat features used by bats. This measure is likely to be effective for most bat species recorded at the project, but additional mitigation measures are needed to avoid impacts to free-tailed bats, which forage high in the air, and to reduce residual impacts.

Turbine design can be effective, and it is recommended to maintain a minimum blade sweep of at least 30 m. However, free-tailed bats will still collide with turbine blades above this height and as such, the rotor diameter must be limited as much as practicable to minimize the space where collisions might occur. Additionally, blade feathering must be implemented to limit the rotation of turbine blades below the turbine cut-in speed when electricity is not being generated.

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

The overall impact to bats was assessed as moderate after the application of the mitigation measures proposed to avoid and minimize impacts to bats. However, on a species level, the project presents differential risk and impacts to bats must be managed adaptively during the operational phase, particularly for those species (e.g. Egyptian free-tailed bat and Cape serotine) for which high risk is predicted during some periods.

This adaptive management will be guided by the Environmental Management Programme for bats which must include the development of a Biodiversity Management Plan (BMP) to manage impacts to bats during

the operation of the facility. The BMP for bats must be developed by a bat ecologist before the commencement of operation and must include the post-construction fatality monitoring plan design, fatality thresholds calculations and rationale (updated as required), and an adaptive management response plan that provides a timeous action pathway for mitigation, including roles and responsibilities, should fatality thresholds be exceeded. Provided these measures are adhered to, the project assessed can be approved.

9 REFERENCES

ACR. 2020. African Chiroptera Report 2020. V. Van Cakenberghe and E.C.J. Seamark (Eds). AfricanBats NPC, Pretoria. i-xv + 8542 pp.

Adams, A. M., M. K. Jantzen, R. M. Hamilton, and M. B. Fenton. 2012. Do you hear what I hear? Implications of detector selection for acoustic monitoring of bats. Methods in Ecology and Evolution 3:992-998.

Arnett, E. B. 2011. Altering turbine speed reduces bat mortality at wind-energy facilities. Frontiers in Ecology and the Environment 9:209-214.

Arnett, E. B., E. F. Baerwald, F. Mathews, Luisa Rodrigues, A. Rodríguez-Durán, J. Rydell, R. Villegas-Patraca, and C. C. Voigt. 2016. Impacts of Wind Energy Development on Bats: A Global Perspective. Pages 295 - 323 *in* C. C. Voigt and T. Kingston, editors. Bats in the Anthropocene: Conservation of Bats in a Changing World. Springer.

Arnett, E. B., G. D. Johnson, W. P. Erickson, and C. D. Hein. 2013. A Synthesis Of Operational Mitigation Studies To Reduce Bat Fatalities At Wind Energy Facilities In North America. A report submitted to the National Renewable Energy Laboratory. Bat Conservation International. Austin, Texas, USA.

Aronson, J. 2022. Current state of knowledge of wind energy impacts on bats in South Africa. Acta Chiropterologica 24(1):221-238.

Aronson, J., E. Richardson, K. MacEwan, D. Jacobs, W. Marais, P. Taylor, S. Sowler, H. C., and L. Richards. 2020. South African Good Practice Guidelines for Operational Monitoring for Bats at Wind Energy Facilities – ed 2. South African Bat Assessment Association.

Bará, S., and R. C. Lima. 2024. Quantifying the visual impact of wind farm lights on the nocturnal landscape. Journal of Quantitative Spectroscopy and Radiative Transfer 329:109203.

Barclay, R. M. R., E. F. Baerwald, and J. C. Gruver. 2007. Variation in bat and bird fatalities at wind energy facilities: assessing the effects of rotor size and tower height. Canadian Journal of Zoology 85:381-387.

Barclay, R. M. R., and L. D. Harder. 2003. Life histories of bats: Life in the slow lane. Pages 209-253 *in* T. H. Kunz and M. B. Fenton, editors. Bat Ecology. The University of Chicago Press, Chicago.

Barré, K., I. Le Viol, Y. Bas, R. Julliard, and C. Kerbiriou. 2018. Estimating habitat loss due to wind turbine avoidance by bats: Implications for European siting guidance. Biological Conservation 226:205-214.

Bennun, L., J. van Bochove, C. Ng, C. Samper, H. Rainey, and H. C. Rosenbaum. 2021. Mitigating Biodiversity Impacts Associated with Solar and Wind Energy Development: Guidelines for Project Developers.

Bohmann, K., A. Monadjem, C. Lehmkuhl Noer, M. Rasmussen, M. R. K. Zeale, E. Clare, G. Jones, E. Willerslev, and M. T. P. Gilbert. 2011. Molecular Diet Analysis of Two African Free-Tailed Bats (Molossidae) Using High Throughput Sequencing. PloS one 6:e21441.

Bošnjaković, M., Hrkać, F., Stoić, M., & Hradovi, I. (2024). Environmental Impact of Wind Farms. Environments, 11(11), 257.

Child, M. F., L. Roxburgh, E. Do Linh San, D. Raimondo, and H. T. Davies-Mostert, editors. 2016. The Red List of Mammals of South Africa, Swaziland and Lesotho. South African National Biodiversity Institute and Endangered Wildlife Trust, South Africa.

Collins, J. 2006. Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn). Bat Conservation Trust, London.

Cryan, P. M., and R. M. R. Barclay. 2009. Causes of Bat Fatalities at Wind Turbines: Hypotheses and Predictions. Journal of Mammalogy 90:1330-1340.

Davy, C. M., K. Squires, and J. R. Zimmerling. 2020. Estimation of spatiotemporal trends in bat abundance from mortality data collected at wind turbines. Conservation Biology:12.

Dinerstein, E., C. Vynne, E. Sala, A. R. Joshi, S. Fernando, T. E. Lovejoy, J. Mayorga, D. Olson, G. P. Asner, J. E. M. Baillie, N. D. Burgess, K. Burkart, R. F. Noss, Y. P. Zhang, A. Baccini, T. Birch, N. Hahn, L. N. Joppa, and E. Wikramanayake. 2019. A Global Deal For Nature: Guiding principles, milestones, and targets. Science Advances 5:eaaw2869.

Ellerbrok, J. S., Farwig, N., Peter, F., & Voigt, C. C. (2024). Forest bat activity declines with increasing wind speed in proximity of operating wind turbines. Global Ecology and Conservation, 49, e02782.
Frick, W. F., E. F. Baerwald, J. F. Pollock, R. M. R. Barclay, J. A. Szymanski, T. J. Weller, A. L. Russell, S. C. Loeb, R. A. Medellin, and L. P. McGuire. 2017. Fatalities at wind turbines may threaten population viability of a migratory bat. Biological Conservation 209:172-177.
Garvin, J. C., J. L. Simonis, and J. L. Taylor. 2024. Does size matter? Investigation of the effect of wind turbine size on bird and bat mortality. Biological Conservation 291:110474.
Gasparatos, A., C. N. H. Doll, M. Esteban, A. Ahmed, and T. A. Olang. 2017. Renewable energy and biodiversity: Implications for transitioning to a Green Economy. Renewable and Sustainable Energy Reviews 70:161-184.
Good, R. E., W. Erickson, A. Merrill, S. Simon, K. Murray, and K. Bay. 2012. Bat monitoring studies at the Fowler Ridge Wind Energy Facility, Benton County, Indiana. Prepared for Fowler Ridge Wind Farm by Western EcoSystems Technology, Inc. (WEST), Cheyenne, Wyoming.
Guest, E. E., B. F. Stamps, N. D. Durish, A. M. Hale, C. D. Hein, B. P. Morton, S. P. Weaver, and S. R. Fritts. 2022. An Updated Review of Hypotheses Regarding Bat Attraction to Wind Turbines. Animals 12:343.
Hein, C. D., J. Gruver, and E. B. Arnett. 2013. Relating pre-construction bat activity and post-construction bat fatality to predict risk at wind energy facilities: a synthesis. A report submitted to the National Renewable Energy Laboratory. Bat Conservation International, Austin, TX, USA.
Horn, J. W., E. B. Arnett, and T. H. Kunz. 2008. Behavioral responses of bats to operating wind turbines. The Journal of Wildlife Management 72:123-132.
Horváth, G., G. Kriska, P. Malik, and B. Robertson. 2009. Polarized light pollution: a new kind of ecological photopollution. Frontiers in Ecology and the Environment 7:317-325.
International Finance Corporation (IFC). 2013. Cumulative Impact Assessment and Management: Guidance for the Private Sector in Emerging Markets. Washington D.C., USA. Available at: https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/ publications_handbook_cumulativeimpactassessment.
IUCN. 2021. The IUCN Red List of Threatened Species. Version 2021-1. https://www.iucnredlist.org. Downloaded on 11 Aug 2021.
Jackson, A. L. R. 2011. Renewable energy vs. biodiversity: Policy conflicts and the future of nature conservation. Global Environmental Change 21:1195-1208.
Jung, K., and E. K. V. Kalko. 2010. Where forest meets urbanization: foraging plasticity of aerial insectivorous bats in an anthropogenically altered environment. Journal of Mammalogy 91:144-153.
Kunz, T. H., E. B. Arnett, B. M. Cooper, W. P. Erickson, R. P. Larkin, T. Mabee, M. L. Morrison, M. D. Strickland, and J. M. Szewczak. 2007a. Assessing impacts of wind-energy development on nocturnally active birds and bats: A guidance document. The Journal of Wildlife Management 71:2449-2486.
Kunz, T. H., E. B. Arnett, W. P. Erickson, A. R. Hoar, G. D. Johnson, R. P. Larkin, M. D. Strickland, R. W. Thresher, and M. D. Tuttle. 2007b. Ecological impacts of wind energy development on bats: questions, research needs, and hypotheses. Frontiers in Ecology and the Environment 5:315-324.
Lehnert, L. S., S. Kramer-Schadt, S. Schönborn, O. Lindecke, I. Niermann, and C. C. Voigt. 2014. Wind farm facilities in Germany kill noctule bats from near and far. PloS one 9:e103106.
Leroux, C., C. Kerbiriou, I. Le Viol, N. Valet, and K. Barré. 2022. Distance to hedgerows drives local repulsion and attraction of wind turbines on bats: Implications for spatial siting. Journal of Applied Ecology 59:2142-2153.
Lintott, P. R., S. M. Richardson, D. J. Hosken, S. A. Fensome, and F. Mathews. 2016. Ecological impact assessments fail to reduce risk of bat casualties at wind farms. Current Biology 26:R1135-R1136.
Longcore, T., and C. Rich. 2004. Ecological light pollution. Frontiers in Ecology and the Environment 2:191–198.
MacEwan, K. 2016. Fruit bats and wind turbine fatalities in South Africa. African Bat Conservation News 42.
MacEwan, K., J. Aronson, E. Richardson, P. Taylor, B. Coverdale, D. Jacobs, L. Leeuwner, W. Marais, and L. Richards. 2018. South African Bat Fatality Threshold Guidelines – ed 2. South African Bat Assessment Association.
MacEwan, K., T. W. Morgan, C. A. Lötter, and A. T. Tredennick. 2020a. Bat Activity Across South Africa: Implications for Wind Energy Development. African Journal of Wildlife Research 50.
MacEwan, K., S. Sowler, J. Aronson, and C. A. Lötter. 2020b. South African Best Practice Guidelines for Pre-construction Monitoring of Bats at Wind Energy Facilities - ed 5. South African Bat Assessment Association.

Marques, J. T., A. Rainho, M. CarapuÃ§o, P. Oliveira, and J. M. Palmeirim. 2004. Foraging Behaviour and Habitat use by the European Free-Tailed Bat Tadarida teniotis. Acta Chiropterologica 6:99-110.

McCracken, G. F., E. H. Gillam, J. K. Westbrook, Y.-F. Lee, M. L. Jensen, and B. B. Balsley. 2008. Brazilian free-tailed bats (*Tadarida brasiliensis*: Molossidae, Chiroptera) at high altitude: links to migratory insect populations. Integrative and Comparative Biology 48:107-118.

Miller-Butterworth, C. M., D. S. Jacobs, and E. H. Harley. 2003. Strong population substructure is correlated with morphology and ecology in a migratory bat. Nature 424:187-191.

Millon, L., C. Colin, F. Brescia, and C. Kerbiriou. 2018. Wind turbines impact bat activity, leading to high losses of habitat use in a biodiversity hotspot. Ecological Engineering 112:51-54.

Millon, L., J.-F. Julien, R. Julliard, and C. Kerbiriou. 2015. Bat activity in intensively farmed landscapes with wind turbines and offset measures. Ecological Engineering 75:250-257.

Mitchell-Jones, T., and C. Carlin. 2014. Bats and Onshore Wind Turbines Interim Guidance. Natural England Technical Information Note TIN051. Natural England.

Monadjem, A., P. J. Taylor, F. P. D. Cotterill, and M. C. Schoeman. 2020. Bats of Southern and Central Africa: A Biogeographic and Taxonomic Synthesis. 2nd edition.

MTPA. 2014. Mpumalanga Biodiversity Sector Plan Handbook.*in* C. Lötter M.C., M.J. and Lechmere-Oertel R.G., editor. Mpumalanga Tourism & Parks Agency, Mbombela (Nelspruit).

Mucina, L., and M. C. Rutherford. 2006. The vegetation of South Africa, Lesotho and Swaziland. *Strelitzia* 19. South African National Biodiversity Institute, Pretoria.

Nguyen, T. N., A. Ruangwiset, and S. Bumrungsri. 2019. Vertical stratification in foraging activity of Chaerephon plicatus (Molossidae, Chiroptera) in Central Thailand. Mammalian Biology 96:1-6.

Noer, C. L., T. Dabelsteen, K. Bohmann, and A. Monadjem. 2012. Molossid bats in an African agro-ecosystem select sugarcane fields as foraging habitat. African Zoology 47:1-11.

Pretorius, M., H. Broders, and M. Keith. 2020. Threat analysis of modelled potential migratory routes for Miniopterus natalensis in South Africa. Austral Ecology 45:1110 - 1122.

Richardson, S. M., P. R. Lintott, D. J. Hosken, T. Economou, and F. Mathews. 2021. Peaks in bat activity at turbines and the implications for mitigating the impact of wind energy developments on bats. Scientific Reports 11:3636.

Robinson, M. F., and R. E. Stebbings. 1997. Home range and habitat use by the serotine bat, Eptesicus serotinus, in England. Journal of Zoology 243:117-136.

Rodhouse, T. J., R. M. Rodriguez, K. M. Banner, P. C. Ormsbee, J. Barnett, and K. M. Irvine. 2019. Evidence of region-wide bat population decline from long-term monitoring and Bayesian occupancy models with empirically informed priors. Ecology and Evolution 9:11078-11088.

Rodrigues, L. B., L.; Dubourg-Savage, M.; Karapandža, B.; Kovač, D.; Kervyn, T.; Dekker, J.; Kepel, A.; Bach, P.; Collins, J.; Harbusch, C.; Park, K.; Micevski, B.; Minderman, J. 2015. Guidelines for Consideration of Bats in Wind Farm Projects Revision 2014. EUROBATS Publication Series No. 6 (English Version). UNEP/EUROBATS Secretariat, Bonn, Germany, 133 pp.

Romano, W. B., J. R. Skalski, R. L. Townsend, K. W. Kinzie, K. D. Coppinger, and M. F. Miller. 2019. Evaluation of an acoustic deterrent to reduce bat mortalities at an Illinois wind farm. Wildlife Society Bulletin 43:608-618.

Rydell, J. 1992. Exploitation of insects around streetlamps by bats in Sweden. Functional Ecology 6:744-750.

Schnitzler, H.-U., C. F. Moss, and A. Denzinger. 2003. From spatial orientation to food acquisition in echolocating bats. TRENDS in Ecology and Evolution 18:386-394.

Scottish Natural Heritage. 2019. Bats and Onshore Wind Turbines: Survey, Assessment and Mitigation.

Sirami, C. I., D. S. Jacobs, and G. S. Cumming. 2013. Artificial wetlands and surrounding habitats provide important foraging habitat for bats in agricultural landscapes in the Western Cape, South Africa. Biological Conservation 164:30-38.

South African National Biodiversity Institute (SANBI). 2020. Species Environmental Assessment Guideline. Guidelines for the implementation of the Terrestrial Fauna and Terrestrial Flora Species Protocols for environmental impact assessments in South Africa. South African National Biodiversity Institute, Pretoria. Version 2.1 2021.

Stone, E. L. 2012. Bats and Lighting: Overview of current evidence and mitigation.

Tella, J. L., D. Hernández-Brito, G. Blanco, and F. Hiraldo. 2020. Urban Sprawl, Food Subsidies and Power Lines: An Ecological Trap for Large Frugivorous Bats in Sri Lanka? Diversity 12:94.

Thaxter, C. B., G. M. Buchanan, J. Carr, S. H. M. Butchart, T. Newbold, R. E. Green, J. A. Tobias, W. B. Foden, S. Brien, and J. W. Pearce-Higgins. 2017. Bird and bat species' global vulnerability to collision mortality at wind farms revealed through a trait-based assessment. Proceedings of the Royal Society B: Biological Sciences 284.

Tolvanen, A., H. Routavaara, M. Jokikokko, and P. Rana. 2023. How far are birds, bats, and terrestrial mammals displaced from onshore wind power development? – A systematic review. Biological Conservation 288:110382.

van der Merwe, M. 1975. Preliminary study on the annual movements of the Natal clinging bat. South African Journal of Science 71:237-241.

Voigt, C. C., E. Bernard, J. C.-C. Huang, W. F. Frick, C. Kerbiriou, K. MacEwan, F. Mathews, A. Rodríguez-Durán, C. Scholz, P. W. Webala, J. Welbergen, and M. Whitby. 2024. Toward solving the global green–green dilemma between wind energy production and bat conservation. Bioscience 74:240-252.

Voigt, C. C., A. G. Popa-Lisseanu, I. Niermann, and S. Kramer-Schadt. 2012. The catchment area of wind farms for European bats: A plea for international regulations. Biological Conservation 153:80-86.

Voigt, C. C., D. Russo, V. Runkel, and H. R. Goerlitz. 2021. Limitations of acoustic monitoring at wind turbines to evaluate fatality risk of bats. Mammal Review n/a.

Weaver, S. P., C. D. Hein, T. R. Simpson, J. W. Evans, and I. Castro-Arellano. 2020. Ultrasonic acoustic deterrents significantly reduce bat fatalities at wind turbines. Global Ecology and Conservation:e01099.

Wellig, S. D., S. Nusslé, D. Miltner, O. Kohle, O. Glaizot, V. Braunisch, M. K. Obrist, and R. Arlettaz. 2018. Mitigating the negative impacts of tall wind turbines on bats: Vertical activity profiles and relationships to wind speed. PloS one 13:e0192493.

Young, D. P., Jr, K. Bay, S. Nomani, and W. L. Tidhar. 2011. Nedpower Mount Storm Wind Energy Facility Post-Construction Avian and Bat Monitoring: July - October 2010. Prepared for NedPower Mount Storm, LLC, Houston, Texas. Prepared by Western EcoSystems Technology, Inc. (WEST), Cheyenne, Wyoming.

Appendix 1: Figures

Appendix 2: Specialist CV

Appendix 3: Specialist Declaration

Appendix 4: SACNASP Certificate

CAMISSA
SUSTAINABILITY CONSULTING

- Emvelo Site Boundary
- Wind Turbines
- Mulilo - MV Cable routing
- Mulilo - Emvelo Eskom SwS
- Mulilo - Emvelo IPP Substation
- Preferred
- Roads
- Mulilo - Construction camp areas
- Mulilo - O&M site facilities
- Mulilo - Tower Laydown areas

Risk to Bats

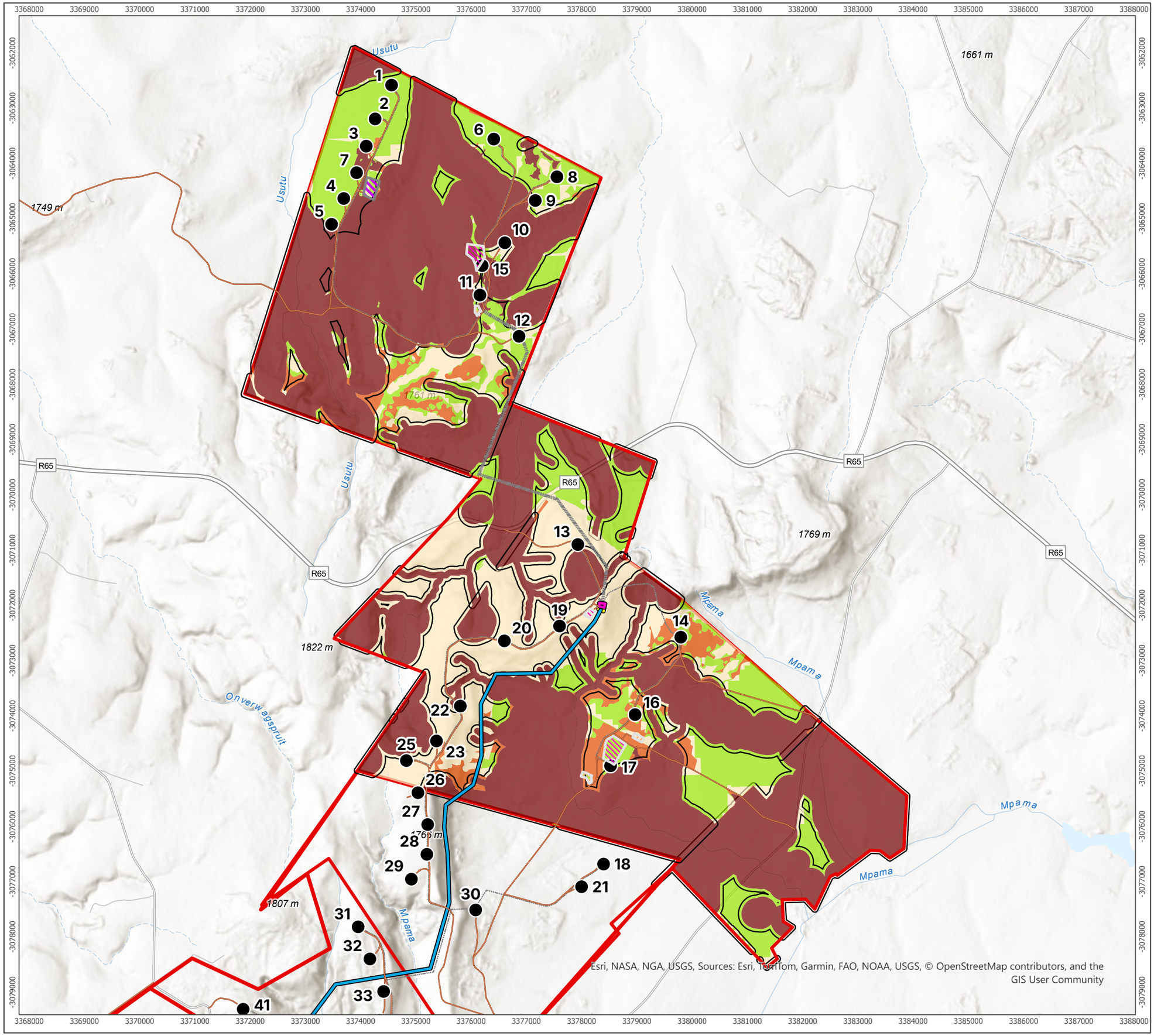
- High
- Low
- Medium
- No-Go
- Blade Tip No-Go

1:65,000

0 1 2 km

Date: 24/07/2025

Emvelo Wind Energy Facility
Bat Constraints Map
Figure 3



CAMISSA
SUSTAINABILITY CONSULTING

- Sheepmoor Site Boundary
- Wind Turbines
- Mulilo - MV Cable routing
- Mulilo - Emvelo Eskom SwS
- Mulilo - Emvelo IPP Substation
- Preferred
- Roads
- Mulilo - Construction camp areas
- Mulilo - O&M site facilities
- Mulilo - Tower Laydown areas

Risk

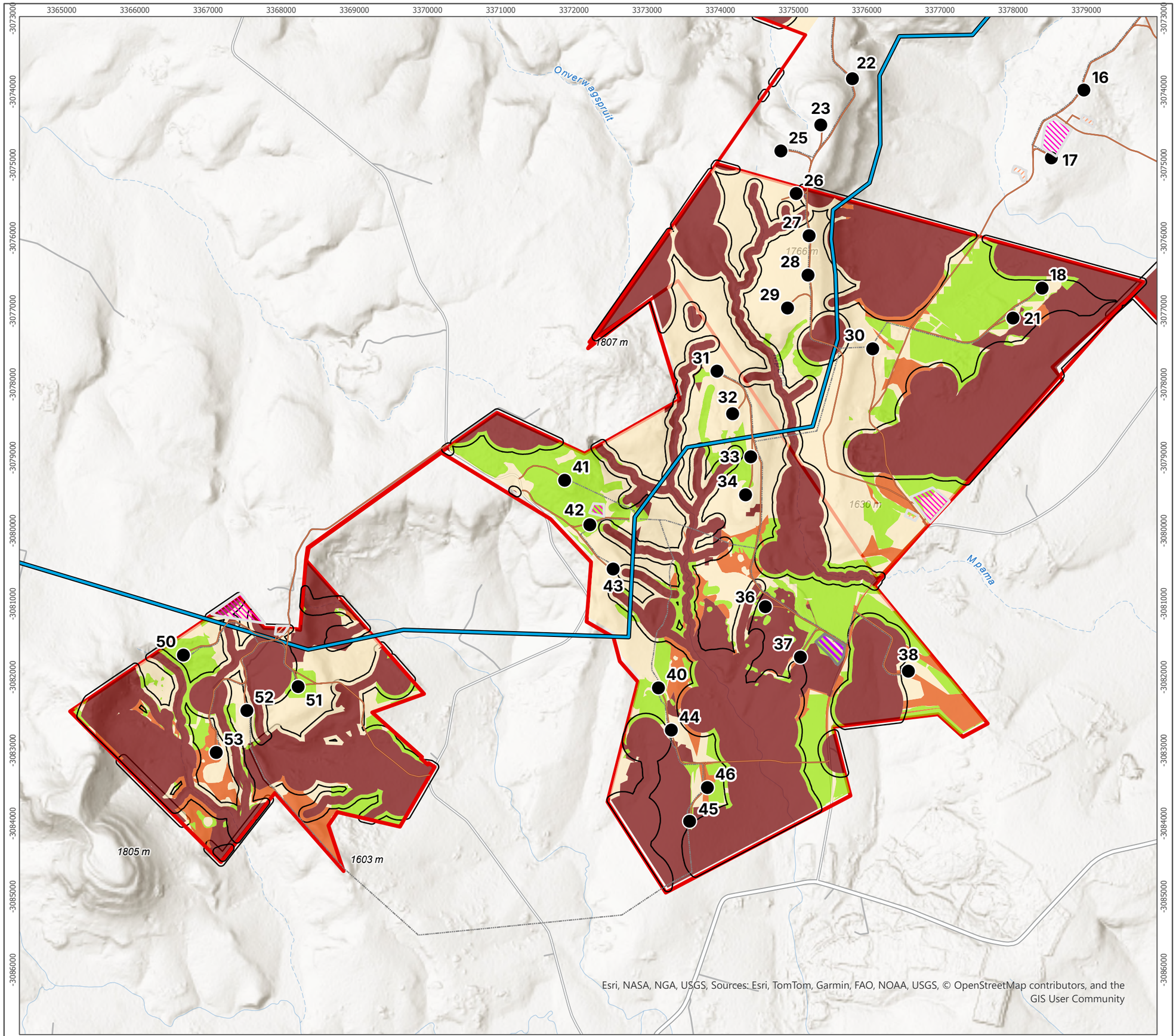
- High
- Low
- Medium
- No-Go
- Blade Tip No-Go Buffer

1:50,000

0 1 2 km

Date: 24/07/2025

Sheepmoor Wind Energy Facility
Bat Constraints Map
Figure 3



SHEEPMOOR WIND ENERGY FACILITY AND GRID CONNECTION
MPUMALANGA, SOUTH AFRICA
BAT (CHIROPTERA) EIA REPORT

February 2025

Produced for

Sheepmoor Wind Energy Facility (Pty) Ltd

Produced by

Camissa Sustainability Consulting

Amsterdam, Netherlands

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NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND ENVIRONMENTAL IMPACT REGULATIONS, 2014 (AS AMENDED) - REQUIREMENTS FOR SPECIALIST REPORTS (APPENDIX 6)

Regulation GNR 326 of 4 December 2014, as amended 7 April 2017, Appendix 6	Section of Report
1. (1) A specialist report prepared in terms of these Regulations must contain- a) details of- i. the specialist who prepared the report; and ii. the expertise of that specialist to compile a specialist report including a curriculum vitae;	Appendix 2
b) a declaration that the specialist is independent in a form as may be specified by the competent authority;	Appendix 3
c) an indication of the scope of, and the purpose for which, the report was prepared;	Section 1.1
(cA) an indication of the quality and age of base data used for the specialist report;	Section 4
(cB) a description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change;	Section 5.1, Section 6
d) the date and season of the site investigation and the relevance of the season to the outcome of the assessment;	Section 4
e) a description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used;	Section 4
f) details of an assessment of the specific identified sensitivity of the site related to the proposed activity or activities and its associated structures and infrastructure, inclusive of a site plan identifying site alternatives;	Section 6
g) an identification of any areas to be avoided, including buffers;	Section 6, Figure 5
h) a map superimposing the activity including the associated structures and infrastructure on the environmental sensitivities of the site including areas to be avoided, including buffers;	Appendix 1 (Figure 3)
i) a description of any assumptions made and any uncertainties or gaps in knowledge;	Section 2
j) a description of the findings and potential implications of such findings on the impact of the proposed activity, (including identified alternatives on the environment) or activities;	Section 5
k) any mitigation measures for inclusion in the EMPr;	Section 6, Section 7

Regulation GNR 326 of 4 December 2014, as amended 7 April 2017, Appendix 6	Section of Report
l) any conditions for inclusion in the environmental authorisation;	Section 6, Section 7
m) any monitoring requirements for inclusion in the EMPr or environmental authorisation;	Section 6, Section 7
n) a reasoned opinion- i. (as to) whether the proposed activity, activities or portions thereof should be authorised; (iA) regarding the acceptability of the proposed activity or activities; and ii. if the opinion is that the proposed activity, activities or portions thereof should be authorised, any avoidance, management and mitigation measures that should be included in the EMPr, and where applicable, the closure plan;	Section 8
o) a description of any consultation process that was undertaken during the course of preparing the specialist report;	NA
p) a summary and copies of any comments received during any consultation process and where applicable all responses thereto; and	NA
q) any other information requested by the competent authority.	NA
2) Where a government notice *gazetted* by the Minister provides for any protocol or minimum information requirement to be applied to a specialist report, the requirements as indicated in such notice will apply.	Appendix 5: Site Sensitivity Verification Report

1 INTRODUCTION

Sheepmoor Wind Energy Facility (Pty) Ltd are proposing the development of a commercial wind energy project located near Ermelo, within the Msukaligwa Local Municipality and the Gert Sibande District Municipality, in the Mpumalanga Province. The project forms part of a development cluster that is expected to comprise two separate Wind Energy Facilities (WEFs).

This EIA report covers the Sheepmoor WEF which is proposed to comprise up to 25 turbines with a maximum output capacity of up to 260 MW. The WEF will have an anticipated lifespan of 25 – 30 years. In addition to the wind energy infrastructure, it is proposed that an on-site substation with a capacity up 132 kV and an up to 132 kV Overhead Powerline (OHPL) of approximately 30 km (300 m corridor) in distance, traversing eighteen (18) land parcels, be constructed to connect the proposed WEF to the proposed new Camden B substation. The proposed technical details of Sheepmoor WEF are presented below:

Developer / Applicant	Sheepmoor WEF
DFFE Reference	To be confirmed
WEF Generation Capacity	Up to 260 MW
Site Access	Locality to be confirmed. Total width up to 15 m (12 m after rehabilitation) consisting of up to 3m width for underground 33 kV reticulation.
Number of Turbines	Up to 23
Hub Height from ground level	Up to 150 m
Blade Length	Up to 110 m
Rotor Diameter	Up to 220 m
Length of internal roads	Unknown at this point.
Width of internal roads	Up to 12 m to be rehabilitated to up to 9 m.
On-site substation capacity	Up to 132 kV
Proximity to grid connection	Approximately 25 km
Grid Connection Capacity	Up to 132 kV
Temporary turbine construction laydown and storage areas.	Crane platforms and hardstand laydown area up to 40 ha (Up to 1 ha per turbine)
Permanent footprint area dimensions, including roads, turbine hardstand areas, O&M buildings and battery pad.	O&M: Up to 1 ha Hardstand areas: Up to 1 ha Total area of final footprint (including roads): up to 180 ha
Operations and maintenance buildings (O&M building) with parking area	Up to 1 ha
Height of fencing	2.8 m
Type of fencing	Where site offices are required, temporary screen fencing used to screen offices from the wider landscape.

1.1 Scope and Objectives

This EIA report presents a Bat (Chiroptera) Impact Assessment for the Sheepmoor WEF and associated grid connection. Collisions with wind turbine blades are a leading cause of bat mortality globally (Cryan, 2011; O'Shea et al., 2016). Given the nature, scale, and uncertainty of these impacts to bats, specialist studies are required to assess the risks of renewable energy infrastructure on bats (Rodrigues 2015, MacEwan et al. 2020b, SANBI 2020, Bennun et al. 2021).

The objectives of this assessment are to present the baseline ecological condition of the project site for bats, and to use these characterisations to predict and assess the potential impact of the project on bat species and their habitats as well as to provide actions to mitigate impacts if required.

2 ASSUMPTIONS AND LIMITATIONS

The core techniques used to assess bat activity in this study are acoustic monitoring and roost surveys, both of which have several limitations which will influence the findings and recommendations of this study.

Acoustic monitoring allows for rapid, passive collection of a large volume of bat activity data which can help identify the bat species present within a particular location and their associated spatio-temporal relative activity patterns. In the context of wind farms, acoustic monitoring is therefore a useful technique however, there are several constraints that must be acknowledged. These are discussed in detail by Voigt et al. (2021), Adams et al. (2012), and Kunz et al. (2007a) and fundamentally, include that acoustic monitoring cannot provide an indication of bat abundance or population size at a site. In addition, population demographics such as age and sex of bats cannot generally be determined from echolocation calls. Due to the large volume of data collected by bat detectors it is impractical and prohibitively time-consuming to inspect each file for echolocation calls and to identify the associated bat species. Specialised statistical software uses bat call reference libraries to automate the identification process but developing such libraries is challenging given the variation individual species display in their echolocation call structure and overlap between species. This study used the Wildlife Acoustics library "Bats of South Africa Version 5.4.2", but this excludes reference calls for most South African species thus these may have been overlooked. However, given the duration of the monitoring and spatial coverage of the detectors, the acoustic data provides a reasonable inventory of the species present, and a good indication of the relative magnitude of bat activity. Lastly, bat activity is notably variable in response to a number of factors such as land use change, climactic variability, variations in prey abundance and meteorological conditions which can vary over different time scales. Since this study is limited to 12 months, the baseline conditions presented here may not be representative of activity over longer time frames meaning risk may be misinterpreted.

The major limitation with roost surveys is finding roosting bats. Bats use a diversity of roosting sites including trees, buildings, crevices, and underground sites (caves and mines). The presence of these features at a site can help to target roost searches but evidence of bats may not always be apparent even if bats are present. Importantly, the absence of bat evidence in these situations does not equate to evidence of bat absence (Collins 2006). Thus, this study uses a precautionary approach and will apply buffers to roosts (largely buildings and rocky crevices) even if bats were not located given their potential role in supporting roosting bats.

It is difficult to assess the risk to bats during operation of the proposed facility based on acoustic data collected during pre-construction surveys. For example, Hein et al. (2013) showed that pre-construction bat activity was not a significant indicator of collision risk. Lintott et al. (2016) argued that environmental impact assessments do not predict the risks to bats accurately. This may partly be because it is hypothesized that bats may be attracted to wind turbines (Cryan and Barclay 2009, Guest et al. 2022) which some evidence suggests may be the case (Horn et al. 2008, Richardson et al. 2021). While this report makes predications about the potential risk to bats posed by the project, these carry a degree of uncertainty and must be verified by using post-construction surveys to ensure that the predictions are accurate and bat behaviour has not altered from pre-construction levels (Lintott et al. 2016).

Risk to bats was determined based on median bat activity per night derived from the bat activity dataset collected with acoustic monitoring. Median values were compared to those in Table 5 in MacEwan et al. (2020b) which provides height-specific fatality risk categories (high, medium, low) based on bat activity sampled in different South African terrestrial ecoregions. The Project Area of Influence (PAOI) is situated in the Highveld Grasslands ecoregion (Dinerstein et al. 2019) however reference values are not available for this ecoregion in MacEwan et al. (2020b). Instead, median values were compared to reference values for the Drakensberg Grasslands, Woodlands and Forest ecoregion. While bat activity levels differ between these two ecoregions this difference is small (MacEwan et al. 2020a). The lack of a direct reference for the Highveld Grasslands ecoregion is therefore not a major limitation and the comparison is suitable to provide an evaluation of risk.

3 LEGAL REQUIREMENTS AND GUIDELINES

The EIA processes for this project is being undertaken in terms of Government Notice (GN) No. R. 983 of 4 December 2014 (as amended to GNR 327), promulgated under the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) EIA Regulations, 2014 (as amended). In addition, there are various international, regional, and local legislation, policies, regulations, guidelines, conventions, and treaties in place for the protection of biodiversity, under which bats would also be protected or considered. These create a policy environment and impact management framework aiming to prevent excessive impacts to biodiversity and which was used to assess risk of this specific project. Specific policies include the following:

- Convention on Biological Diversity Post-2020 Global Biodiversity Framework
- United Nations Sustainable Development Goals
- Convention on the Conservation of Migratory Species of Wild Animals (1979)
- Convention on Biological Diversity (1993)
- Constitution of the Republic of South Africa, 1996 (Act No. 108 of 1996)
- National Environmental Management Act, 1998 (NEMA, Act No. 107 of 1998)
- National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004)
- Northern Cape Nature Conservation Act (Act 9 of 2009)
- The Equator Principles (2013)
- International Finance Corporation Performance Standards (PS6)
- The Red List of Mammals of South Africa, Swaziland, and Lesotho (2016)
- South Africa National Biodiversity Strategy and Action Plan (2005)
- Guidelines for the implementation of the Terrestrial Flora (3c) & Terrestrial Fauna (3d) Species Protocols for environmental impact assessments in South Africa
- Mitigating biodiversity impacts associated with solar and wind energy development. IUCN Guidelines for project developers (2021)
- South African Good Practise Guidelines for Surveying Bats in Wind Energy Facility Developments – Pre-Construction (2020)
- South African Good Practise Guidelines for Operational Monitoring for Bats at Wind Energy Facilities (2020)
- South African Bat Fatality Threshold Guidelines (2018)
- Mitigation Guidance for Bats at Operational Wind Energy Facilities in South Africa (2018)

4 SURVEY METHODOLOGY

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

Bats were also studied through 12 months of acoustic monitoring in the AoI which began on 26 April 2022 and ended on 4 July 2023. After this, monitoring continued at one met mast location until 11 November 2023. Bat activity was sampled at 11 locations (Figure 1, Table 1) within the AoI with Wildlife Acoustics, Inc. SM4 bat detectors. At nine locations (AM4 – AM12), SMM-U2 microphones were positioned at the top of a 10 m aluminium mast. At the remaining two locations (AM1 and AM3), microphones were positioned on meteorological towers at 10 m, 50 m, and 90 mrespectively. Equipment at AM12 was stolen and therefore data from this location were not available to be assessed in this report.

The bat detectors were programmed to record activity nightly, from 30 minutes before sunset to 30 minutes after sunrise, and this report summarises 518 nights of bat activity data. This monitoring period therefore spans of all four seasons providing a representative account of temporal bat activity patterns across a year. Acoustic data retrieved from each bat detector were processed using Kaleidoscope® Pro (Version 5.4.2, Wildlife Acoustics, Inc.). Bats were automatically identified using the embedded "Bats of South Africa Version 5.4.0" reference library and verified by inspecting echolocation files. The number of acoustic files recorded was used as a measure to quantify bat activity, whereby each file was considered one bat pass of the microphone.

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

Table 1: Summary of the Bat Acoustic Monitoring Sampling Locations and Effort

Bat Detector	Coordinates	# Sample Nights	Altitude (m)	Habitat Features
AM1 (Met mast)	-26.612298°S 30.317572°E	10m: 518 50 m: 226 90 m: 478	1,778	In Wakkerstroom Montane Grassland, 400 m west of small escarpment, 560 m north of farm dam, 440 m west of woodland patch, 560 m northeast of wetland
AM3 (Met Mast)	-26.587572°S 30.284137°E	10 m: 340 50 m: 435 90 m: 326	1,748	In Wakkerstroom Montane Grassland, 420 m west of farmstead, 420 m east of stream and seep wetland
AM4	-26.665933°S 30.321221°E	208	1,550	In Eastern Highveld Grassland, 360 m west of cultivated area, 230 m southeast of woodland, 240 m north east of stream, 430 m south east of depression wetland
AM5	-26.611025°S 30.363393°E	377	1,515	In Eastern Highveld Grassland, on border of cultivated areas and disturbed grassland, 470 m southeast of stream, wetland and woodland patch, 2.4 km northwest of farmstead
AM6	-26.562101°S 30.296970°E	242	1,732	In Wakkerstroom Montane Grassland, at edge of woodland patch, 80 m east of depression wetland, 255 m west of stream
AM7	-26.640015°S 30.306442°E	194	1,655	Within wooded valley, 60 m west of stream, 300 m east of seep wetland
AM8	-26.621551°S 30.277550°E	137	1,735	In Wakkerstroom Montane Grassland, 680 m west of woodland patch,167 m north of seep wetland
AM9	-26.549013°S 30.315353°E	51	1,667	In Eastern Highveld Grassland adjacent to wetland and surrounded by trees
AM10	-26.592367° S 30.336850°E	163	1,696	In Wakkerstroom Montane Grassland, above small escarpment in shallow wooded valley
AM11	-26.632172°S 30.265925°E	163	1,694	In Eastern Highveld Grassland adjacent to tree edge line, 220 m south east of wetland, installed at farmstead

5 SPECIALIST FINDINGS

5.1 Ecological Baseline

The Project Area of Influence (PAOI) is situated in the Grassland Biome and comprises predominantly Eastern Highveld Grassland vegetation (Figure 1). The landscape associated with this vegetation consists of slight to moderately undulating plains with small scattered rocky outcrops. The vegetation is short, dense grassland (Mucina and Rutherford 2006). Wakkerstroom Montane Grassland occurs in the middle of the PAOI, on low mountains and undulating plains. Here the vegetation comprises short montane grassland on plateaus and flat areas. On steep, east facing slopes and in drainage areas, short forest and thicket occurs. Both vegetation types are endemic, and Eastern Highveld Grassland is classified as Vulnerable while Wakkerstroom Montane Grassland is classified as Least Concern (SANBI 2018). The PAOI includes some low hills and wetland depressions and has largely been transformed by cultivation in the west, commercial forestry in the east and urban sprawl, including extensive areas of alien invasive trees. The PAOI is in a summer rainfall region and has a cool-temperate climate with dry winters, frequent occurrence of frost and large differences in both diurnal and seasonal temperature extremes (Mucina and Rutherford 2006).

Critical Biodiversity Areas (CBA), areas of high biodiversity value that must be maintained in a natural state, are located throughout the PAOI, classified as either "CBA Irreplaceable" and "CBA Optimal" (Figure 1). The former category comprises 1) areas required to meet conservation targets and those with irreplaceability values greater than 80 %, 2) areas which represent critical linkages or pinch-points in the landscape that must remain natural, and 3) Critically Endangered ecosystems (MTPA 2014). The latter category comprises areas that are not 'irreplaceable', but they are the most optimal land configuration to meet all biodiversity targets. Ecological Support Areas (ESA), not essential for meeting biodiversity targets but important in supporting the functioning of CBAs and delivering important ecosystem services, are also located throughout the PAOI.

Parts of the PAOI fall within a National Protected Areas Expansion Strategy (NPAES) Focus area (Moist Escarpment Grasslands), targeted for protected area expansion for improved ecosystem representation, ecological sustainability and resilience to climate change. Chrissiesmeer Protected Environment and Jericho Dam Nature Reserve overlap the north and east of the PAOI respectively (Figure 1).

Bat roosting sites in the PAOI are relatively limited and unlikely to support large congregations of bats, with no underground sites (e.g., caves, mines, sinkholes) known to be present. The closest known major bat roost is approximately 70 km north of the PAOI. Although occasional ridges and rocky outcrops are features of the landscape (Mucina and Rutherford 2006) these are not extensive. Some bat species could roost in these features. Bats are likely to roost in buildings associated with farmsteads within and bordering the AoI especially Cape Serotine and Egyptian Free-tailed Bat (Monadjem et al. 2020). Trees growing at these farmsteads and elsewhere on site where they form clumps, could also provide roosting spaces for bats, even though most are alien invasive species. Completed surveys of some buildings in the of the PAOI did not reveal the presence of roosting bats and as such were assessed as being of low relative suitability. However, these could be used by bats as night-roosts (locations used by bats to feed on captured prey, or to rest between foraging bouts) and should therefore still be considered, and avoided where possible, in the spatial planning.

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

Based on current taxonomic information and bat occurrence data, 23 species could occur within the PAOI (Table 2). The majority have a low likelihood of occurrence however the potential suite of species includes 10 high risk species, including fruit bats (Pteropodiae) and free-tailed bats (Molossidae) which are vulnerable to wind energy impacts in South Africa (MacEwan 2016, Aronson 2022).

Table 2: Bat Species Potentially Occurring within the PAOI

Common Name Species Name	Key Habitat Requirements*	Prob. Of Occurrence	Conservation Status		Wind Energy Risk[δ]
			IUCN[†]	RSA[‡]	
Natal Long-fingered bat *Miniopterus natalensis*	Temperate or subtropical species. Primarily in savannahs and grasslands. Roosts in caves, mines, and road culverts. Clutter- edge forager. Migratory.	Confirmed (5,018 passes)	LC/U	LC	High
Lessor Long-fingered bat *Miniopterus fraterculus*	Temperate species, associated with grasslands. Cave-dependant but also roosts in tunnels and mines. Habitat includes savannah bushveld, moister mistbelt and coastal forest habitats. Clutter-edge forager. Migratory.	Moderate	LC/U	LC	High
Cape Serotine *Laephotis capensis*	Arid semi-desert, montane grassland, forests, savannah and shrubland. Roosts in vegetation and human-made structures. Clutter-edge forager.	Confirmed (50,243 passes)	LC/S	LC	High
Mauritian tomb bat *Taphozous mauritianus*	Savannah woodland preferring open habitat. Roosts on rock faces, the outer bark of trees or on the outer walls of buildings under the eaves of roofs. Forages in urban areas and over cultivation. Open- air forager.	High	LC/U	LC	High
Little Free-tailed bat *Mops pumilus*	Semi-arid savannah, forested regions, woodland habitats. Roosts in narrow cracks in rock and trees but also in buildings. Open-air forager. Forages in urban areas and over cultivation.	Confirmed (1,767 passes)	LC/U	LC	High
Midas Free-tailed bat *Mops midas*	Hot low-lying savannah and woodland. Roosts in narrow cracks in rock and trees but also in buildings. Open-air forager.	Low	LC/D	LC	High
Egyptian Free-tailed bat *Tadarida aegyptiaca*	Desert, semi-arid scrub, savannah, grassland, and agricultural land. Roosts in rocky crevices, caves, vegetation, and human-made structures. Open-air forager.	Confirmed (20,995 passes)	LC/U	LC	High
Wahlberg's Epauletted fruit bat *Epomophorus wahlbergi*	Roost in dense foliage of large, leafy trees. Associated with forest and forest-edge habitats but will forage in urban environments.	Low	LC/S	LC	High
African Straw-coloured fruit bat *Eidolon helvum*	Non-breeding migrant in the PAOI.	Low	NT/D	LC	High
Egyptian Rousette *Rousettus aegyptiacus*	Distribution influenced by availability of suitable caves roosts.	Low	LC/S	LC	High
Temminck's Myotis *Myotis tricolor*	Montane forests, rainforests, coastal forests, savannah woodlands, arid thicket, and fynbos. Roosts communally in caves (and mines) and closely associated with mountainous terrain. Migratory. Clutter-edge forager.	Low	LC/U	LC	Medium-High
Welwitsch's Myotis *Myotis welwitschii*	Mainly open woodland and savannah but also high-altitude grassland, tropical dry forest, montane tropical moist forest, savannah and shrublands. Clutter-edge forager.	Low	LC/U	LC	Medium-High
Yellow-bellied house bat *Scotophilus dinganii*	Occurs throughout the Savannah Biome but avoids open habitats such as grasslands and Karoo scrub. Roosts in hollow trees and buildings. Clutter-edge forager.	Confirmed (169 passes)	LC/U	LC	Medium-High
Dusky Pipistrelle *Pipistrellus hesperidus*	Woody habitats, such as riparian vegetation and forest patches. Recorded roosting in narrow cracks in rocks and under the loose bark of dead trees. Clutter-edge forager.	Low	LC/U	LC	Medium-High
Rusty Pipistrelle *Pipistrellus rusticus*	Savannah woodland and associated with open water bodies. Roosts in trees and old buildings. Clutter-edge forager.	Low	LC/U	LC	Medium-High
Long-tailed Serotine *Eptesicus hottentotus*	Montane grasslands, marshland and well- wooded riverbanks, mountainous terrain near water. Roosts in caves, mines, and rocky crevices. Clutter-edge forager.	Confirmed (368 passes)	LC/U	LC	Medium
Egyptian Slit-faced bat *Nycteris thebaica*	Savannah, desert, arid rocky areas, and riparian strips. Gregarious and roosts in caves but also in mine adits, Aardvark holes, rock crevices, road	Medium	LC/U	LC	Low

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

*Child et al. (2016), *Monadjem et al. (2020); [!] Child et al. (2016); [†] IUCN (2021); [δ] MacEwan et al. (2020b)

5.2 Pre-Construction Bat Monitoring Results

Six bat species were confirmed to occur in the PAOI (Table 2) including four species classified as high risk from wind energy development: Natal Long-fingered bat, Cape Serotine, Little Free-tailed bat, and Egyptian Free-tailed bat. All of these species have a conservation status of Least Concern (both globally and regionally) and no red data species with a higher conservation status were detected. Although these species are currently classified as Least Concern, Rodhouse et al. (2019), Davy et al. (2020) and Frick et al. (2017) have all shown that in North America, Least Concern bats may be experiencing impacts due to wind farms that could result in changes to their conservation status. The global population trend is unknown for Natal Long-fingered bat, Little Free-tailed bat, and Egyptian Free-tailed bat but stable for Cape serotine. Given the unknown population trends for some of these species and the evidence of impacts from wind farms, ongoing monitoring and adaptive management will be essential to ensure their conservation status does not deteriorate.

A total of 80,051[1] bat passes were recorded over 518 sample nights. Most activity was attributed to Cape serotine (63 %) and Egyptian free-tailed bat (27 %). These species comprise the majority of bat fatalities at South African wind farms (Aronson 2022). Natal long-fingered bat accounted for 6 % of total activity. The remaining three species (Little free-tailed bat, Long-tailed serotine and Yellow-bellied house bat) were seldomly recorded and the magnitude of their activity suggests they would be at low risk of impacts. As such, the remainder of this section focuses on impacts to Egyptian free-tailed bat, Cape serotine and Natal long-fingered bat.

Based on MacEwan et al. (2020b), Cape serotine activity was predominantly low but high activity was recorded at AM5, AM8, AM9 and AM11, in summer and autumn (Table 3). The latter two monitoring stations were located at a farm dam and at a farmstead respectively indicating higher activity in relation to these landscape features. This species was also recorded at 50 m and 90 m but the magnitude of its activity was mostly low except for at AM3-50 during March and April when its activity suggests medium risk. Based on the dataset, this species is largely predicted to be at low collision risk. However, bats in the same family (Vespertilionidae) are known to be attracted to wind turbines in the United Kingdom (Richardson et al. 2021). Thus, although the data suggest a low collision risk, the installation of wind turbines in the landscape can alter bat activity patterns. Collision risk for this species will also depend on how close turbine blades reach the ground, with risk increasing the closer the blades reach the ground (Garvin et al. 2024).

[1] Exclusive of an additional 1,491 bat passes unable to be identified to a species.

Table 3: Median number of bat passes per hour per night for Cape serotine and associated risk based on MacEwan et al. (2020b).

site	jan	feb	mar	apr	may	jun	jul	aug	sep	oct	nov	dec	Risk Rating
AM1-10	0.19	0.18	1.21	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.09	0.00	High
AM1-50		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00	0.00		Medium
AM1-90		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		Low
AM3-10	1.35	0.56		0.08	0.00	0.00	0.00	0.00	0.00	0.09	0.00	0.49	No Data
AM3-50	0.00	0.00	0.08	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
AM3-90	0.00			0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
AM4	0.29	1.20		0.39	0.08	0.00	0.00	0.08	0.93	0.74	0.00		
AM5	0.19	4.65	3.32	1.27	0.08		0.00	0.08	0.54	0.79	0.56	0.88	
AM6				1.01	0.22	0.00	0.07	0.23	0.61	0.00	0.28		
AM7				0.00	0.00	0.00	0.00	0.00	0.20		0.00		
AM8				0.08	0.00	1.11	0.81	0.08	2.18				
AM9		8.19	8.53	0.00									
AM10	0.19	0.00	0.26	0.08	0.08							0.00	
AM11	25.90	20.76	12.50	6.14	3.10							15.07	

The timeseries data indicate a clear seasonal pattern in bat activity for the Cape serotine (Table 4), with the mean number of bat passes per hour peaking significantly during summer, reaching up to 13.66 passes per hour. This is largely driven by activity at AM11 and AM9. This heightened activity in summer likely reflects optimal weather conditions and increased prey availability. In autumn, bat activity remains relatively moderate, with values between 0.02 and 3.48 passes per hour, suggesting continued but reduced presence compared to summer. In contrast, winter and spring exhibit notably lower levels of activity, with mean passes per hour not exceeding 1.17 in spring and 0.68 in winter. This seasonal trend suggests that Cape serotine bats are minimally active during colder months, likely due to reduced foraging opportunities or temperature constraints. Additionally, within each season, there is a gradual decrease in bat passes across a night. Peak activity in summer and spring is between 19:00 and 21:00, in autumn between 18:00 and 20:00, and in winter between 17:00 and 19:00.

Table 4: Heatmap showing the mean number of bat passes per hour for Cape serotine. Colour gradient is relative and not based on thresholds.

Time Period	Autumn	Spring	Summer	Winter
17:00 – 18:00	1.28	0.01	0.00	0.58
18:00 – 19:00	3.48	0.73	0.27	0.68
19:00 – 20:00	2.51	1.17	13.66	0.21
20:00 – 21:00	1.80	1.06	7.40	0.13
21:00 – 22:00	1.29	0.92	4.01	0.06
22:00 – 23:00	1.07	0.68	3.39	0.02
23:00 – 00:00	0.82	0.45	2.63	0.00
00:00 – 01:00	0.73	0.46	2.13	0.00
01:00 – 02:00	0.73	0.27	1.56	0.00
02:00 – 03:00	0.66	0.25	1.24	0.00
03:00 – 04:00	0.49	0.20	1.08	0.00
04:00 – 05:00	0.41	0.08	2.64	0.00
05:00 – 06:00	0.51	0.00	0.62	0.00
06:00 – 07:00	0.02	0.00	0.00	0.04

The data showed that at 50 m and 90 m, moderate collision risk is predicted for Egyptian free-tailed bat apart from during autumn and spring when high risk is predicted (Table 5). High risk is predicted near AM11 in autumn, and AM4 and AM5 during spring. Egyptian free-tailed bat is flexible in its foraging strategy, and

it is thought that the habitat below has little influence on this species (Monadjem et al. 2020). These bats are open-air foragers based on their morphology and echolocation (Norberg and Rayner 1987) which means they tends to forage high in the air.

Table 5: Median number of bat passes per hour per night for Egyptian free-tailed bat and associated risk based on MacEwan et al. (2020b).

site	jan	feb	mar	apr	may	jun	jul	aug	sep	oct	nov	dec	Risk Rating
AM1-10	0.10	0.18	0.86	0.00	0.07	0.00	0.00	0.08	0.08	0.40	0.75	0.29	High
AM1-50		0.18	0.34	0.56	0.15		0.00	0.08	0.08	0.17	0.28		Medium
AM1-90		0.00	0.17	0.25	0.08	0.00	0.00	0.00	0.08	0.18	0.19		Low
AM3-10	0.09	0.00		0.23	0.15	0.00	0.00	0.08	0.33	0.17	0.62	0.39	No Data
AM3-50	0.10	0.04	0.51	0.62	0.08	0.00	0.00	0.08	0.16	0.45	0.52	0.20	
AM3-90	0.00			0.08	0.08	0.00	0.00	0.08	0.17	0.44	0.24	0.00	
AM4	0.00	0.00		0.39	0.23	0.00	0.07	0.39	1.95	2.57	0.55		
AM5	0.00	0.09	0.51	0.78	0.26		0.19	0.39	1.59	2.00	1.83	0.59	
AM6				0.08	0.08	0.00	0.00	0.00	0.37	0.17	0.00		
AM7				0.00	0.00	0.00	0.00	0.00	0.08		0.00		
AM8				0.15	0.08	0.07	0.00	0.08	0.57				
AM9		0.31	0.60	0.00									
AM10	0.00	0.00	0.00	0.08	0.08							0.00	
AM11	0.39	0.45	1.55	2.23	0.54							1.13	

Table 6: Heatmap showing the mean number of bat passes per hour for Egyptian free-tailed bat. Colour gradient is relative and not based on thresholds.

Time Period	Autumn	Spring	Summer	Winter
17:00 – 18:00	0.04	0.03	0.00	0.08
18:00 – 19:00	0.47	0.54	0.02	0.36
19:00 – 20:00	0.67	0.96	0.46	0.22
20:00 – 21:00	0.78	1.03	0.50	0.17
21:00 – 22:00	0.77	1.11	0.46	0.10
22:00 – 23:00	0.75	1.09	0.54	0.08
23:00 – 00:00	0.57	1.11	0.46	0.05
00:00 – 01:00	0.55	1.40	0.57	0.03
01:00 – 02:00	0.51	1.14	0.55	0.02
02:00 – 03:00	0.44	0.83	0.36	0.01
03:00 – 04:00	0.26	0.54	0.16	0.02
04:00 – 05:00	0.15	0.13	0.11	0.00
05:00 – 06:00	0.03	0.01	0.00	0.00
06:00 – 07:00	0.01	0.00	0.00	0.02

In spring, Egyptian free-tailed bat shows the highest activity levels overall, with peak passes per hour occurring around midnight (00:00 – 01:00) at 1.4 passes per hour (Table 6). This elevated activity during spring nights aligns somewhat with the Cape serotine data, where spring showed moderate activity; however, for the Egyptian free-tailed bat, spring is a clear peak season. In summer, activity for the Egyptian free-tailed bat is relatively lower compared to spring, with values not exceeding 0.57 passes per hour and generally concentrated in the earlier hours of the night. This is a notable contrast to Cape serotine, which displayed its highest seasonal activity in summer. This suggests that while the Cape serotine is more active during summer, the Egyptian free-tailed bat is less active during this period, potentially indicating differing ecological preferences or behavioural patterns. Autumn displays a moderate level of activity for the

Egyptian free-tailed bat, with values peaking around 20:00 – 21:00 at 0.78 passes per hour and then gradually decreasing through the night. This pattern is consistent with the Cape serotine, where autumn also showed moderate activity. In winter, the Egyptian free-tailed bat shows low activity levels across all hours, with peak activity reaching only 0.36 passes per hour early in the evening (18:00–19:00) and decreasing to nearly zero later at night. This aligns with the winter results for the Cape serotine bat, confirming that winter is a low-activity season for both species.

Table 7: Median number of bat passes per hour per night for Natal long-fingered bat and associated risk based on MacEwan et al. (2020b).

site	jan	feb	mar	apr	may	jun	jul	aug	sep	oct	nov	dec
AM1-10	0.10	0.09	3.84	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AM1-50		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00	0.00	
AM1-90		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
AM3-10	0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AM3-50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AM3-90	0.00			0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AM4	0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
AM5	0.00	0.13	0.26	0.23	0.00		0.00	0.00	0.00	0.00	0.00	0.00
AM6				0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
AM7				0.00	0.00	0.00	0.00	0.00	0.00		0.00	
AM8				0.00	0.00	0.00	0.04	0.08	0.24			
AM9		3.30	2.86	0.04								
AM10	0.00	0.00	0.00	0.00	0.00							0.00
AM11	0.19	0.27	0.75	0.24	0.08							0.00

Risk Rating
High
Medium
Low
No Data

Activity of Natal long-fingered bat was predominantly low but high activity was recorded during spring at AM1 and AM9. Medium activity was also recorded during spring at AM5 and AM11 (Table 7). As such, overall impacts to this species are anticipated to be low, especially since activity levels at 50 m and 90 m were assessed as low based on criteria in MacEwan et al (2020b). However, this species may experience high cumulative impacts (see Section 6.3).

Table 7: Heatmap showing the mean number of bat passes per hour for Natal long-fingered bat. Colour gradient is relative and not based on thresholds.

Time Period	Autumn	Spring	Summer	Winter
17:00 – 18:00	0.06	0.00	0.00	0.12
18:00 – 19:00	0.22	0.00	0.02	0.07
19:00 – 20:00	0.18	0.01	0.15	0.02
20:00 – 21:00	0.58	0.01	0.07	0.02
21:00 – 22:00	0.69	0.02	0.34	0.02
22:00 – 23:00	0.42	0.01	0.35	0.02
23:00 – 00:00	0.27	0.02	0.24	0.01
00:00 – 01:00	0.22	0.02	0.21	0.01
01:00 – 02:00	0.15	0.00	0.13	0.00
02:00 – 03:00	0.16	0.00	0.06	0.00
03:00 – 04:00	0.10	0.00	0.02	0.00
04:00 – 05:00	0.05	0.00	0.02	0.00
05:00 – 06:00	0.19	0.00	0.02	0.00
06:00 – 07:00	0.00	0.00	0.00	0.00

The timeseries data showed that this species exhibits relatively low and stable activity levels across all seasons, with a modest peak in autumn, where its activity reaches a maximum of 0.69 bat passes per hour between 21:00 and 22:00. This peak, though limited, suggests a slight preference for early evening hours in the autumn months. Throughout spring, summer, and winter, however, the Natal long-fingered bat maintains very low activity, rarely exceeding 0.35 passes per hour at any given time. The hourly distribution shows that this species activity slightly tapers off in the late evening and early morning hours, with a marked decline around midnight. This pattern suggests that the Natal long-fingered bat may have brief foraging periods early in the night, possibly returning to roost sites earlier than other nocturnal species. This species is migratory, and although difficult to show, the peak in activity in autumn could be suggestive of some bats (e.g. females) moving through the site to roosting sites north elsewhere in Mpumalanga or Limpopo after mating.

6 IDENTIFICATION AND ASSESSMENT OF IMPACTS

Impacts to bats that are likely to occur because of the construction, operation and decommissioning of the wind energy facility and grid connection are identified and assessed in the following section. The unit of analysis against which impacts were assessed is the local bat community and their associated habitats within the PAOI. Impacts considered for assessment include habitat modification and disturbance, displacement, fatality due to collisions with wind turbine blades, and light pollution since these are the major impacts likely to be associated with the project (Kunz et al. 2007b, Cryan and Barclay 2009, Bará and C. Lima 2024, Voigt et al. 2024). For each impact, the respective mitigation measures were categorised into those aimed at first avoiding impacts, then minimising impacts, and finally restoring areas impacted (Figure 2).

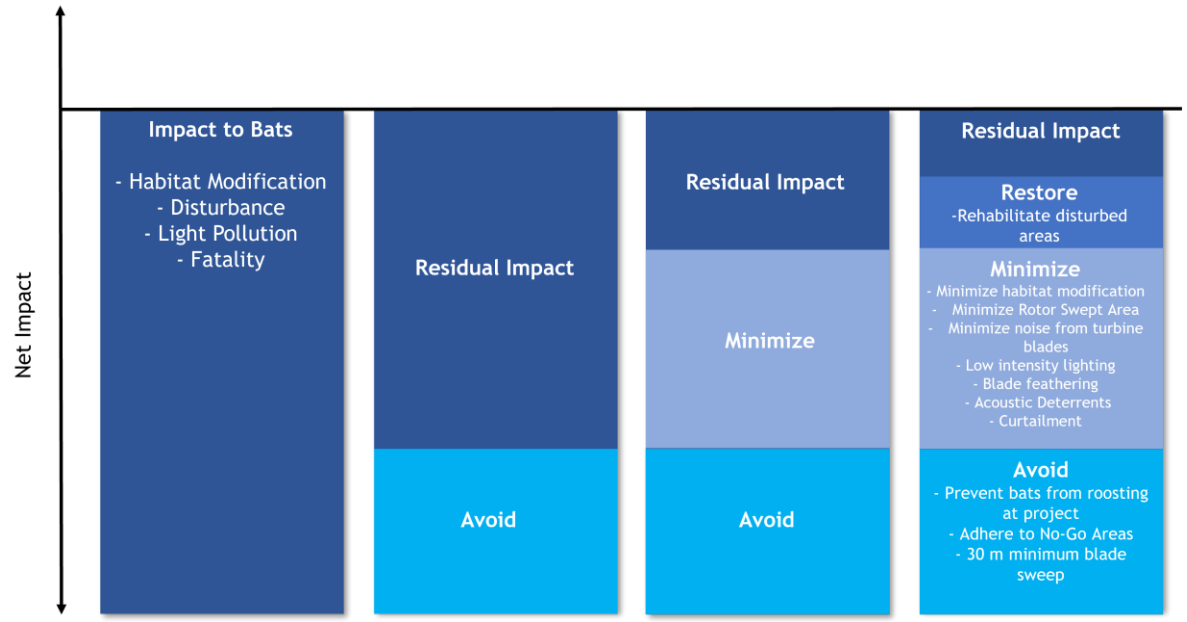


Figure 2: Mitigation Hierarchy applied to the Project with Mitigation Measures.

6.1 Wind Energy Facility

6.1.1 Construction Phase

IMPACTS

Removal of native vegetation, noise and dust generated during construction activities, and the presence of new infrastructure in the landscape, will negatively and indirectly impact bats by removing habitat used for foraging and commuting, through disturbance, and displacement (Kunz et al. 2007b, Millon et al. 2015, Millon et al. 2018, Bennun et al. 2021, Leroux et al. 2022, Tolvanen et al. 2023).

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

Mitigation (Avoid)

Habitat modification impacts can be avoided by buffering habitat and landscape features (Table 8) that bats use to spatially limit the potential for bats to interact with project infrastructure, and to avoid impacting key bat habitat (Barré et al. 2018, Leroux et al. 2022). All key habitat features were buffered by 200 m as per best practise (Rodrigues 2015, MacEwan et al. 2020b).

To align with regional conservation and integrated development planning, the Mpumalanga Biodiversity Sector Plan Handbook (MTPA 2014) was consulted to guide spatial risk in the AoI. The intention was to align biodiversity conservation policy objectives with renewable energy policy objectives, attempting to minimize trade-offs between conflicting goals (Jackson 2011, Gasparatos et al. 2017). The handbook includes a map of terrestrial areas that are important for conserving biodiversity and ecological processes – Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs) respectively.

CBA Irreplaceable Areas were categorised as No-Go (Table 8) because the conservation goals for these areas are to maintain them in a natural state with no loss of ecosystems, functionality or species, and with no flexibility in land-use options (MTPA 2014). CBA optimal and areas with Highveld grassland were classified as high risk. Although the primary objective of the CBA optimal areas is to maintain these spaces in a natural state with no loss of ecosystems, functionality or species, some flexibility in land-use options is permitted (MTPA 2014), therefore these areas must be avoid as much as possible. The remaining areas were assigned low or medium risk where all infrastructure development should be prioritized. These included modified land, areas with invasive alien trees (plantations), ESA, and other Natural Areas (Table 8). Similarly, in ecological supports areas (ESAs), the objective is to maintain habitats in a natural, or near-natural, state with limited loss of ecosystems or functionality. Hence, these areas were classified as medium risk, permitting the siting of turbines in these spaces.

All turbines will be subjected to a post-construction bat fatality monitoring program which will monitor residual impacts at turbines located in CBA optimal and ecological support areas, as well as turbines in low-risk areas. The results of this monitoring will inform management actions where needed to ensure alignment with the MTPA objectives to limit impacts to biodiversity.

Table 8: Features used to assign spatial risk categories in the AoI for bats (Chiroptera)

Risk Level			
Low	Medium	High	No-Go
Heavily modified land	NPAES	CBA Optimal	CBA Irreplaceable Areas
Moderately modified land	ESA Landscape corridor	Highveld Grassland	Minor Watercourses (50 m buffer)
Cleared Invaded	ESA Local corridor		Farm Dams (200 m buffer)
Transformed	Other Natural Areas		Pan depressions (200m buffer)
Plantation/Invaded	Montane Grassland		Houses (200 m buffer)
			Buildings (200 m buffer)
			Seeps (200 m)
			CVB Wetlands (200 m)
			Rivers with floodplains (200 m buffer)
			Rocky Outcrops (200 m buffer)
			Protected Area (200 m buffer)

No infrastructure (including O&M buildings) may be placed within buffered No-Go areas (Figure 3). However, road infrastructure may need to be routed through sensitive areas for practical reasons. Existing road networks should be used as much as possible in these cases to limit the creation of additional roads which have known impacts on wildlife (Perumal et al. 2021).

One of the O&M buildings is located within a No-Go buffer zone designated due to the presence of a

wetland (Figure A). This building must be relocated, or additional mitigation measures applied to this building. Specifically, these additional mitigation measures include: minimizing the footprint of the building, constructing the building as far as possible away from the wetland within the identified footprint polygon, the use of any lighting at night is prohibited to prevent attracting bats, and to prevent light pollution.

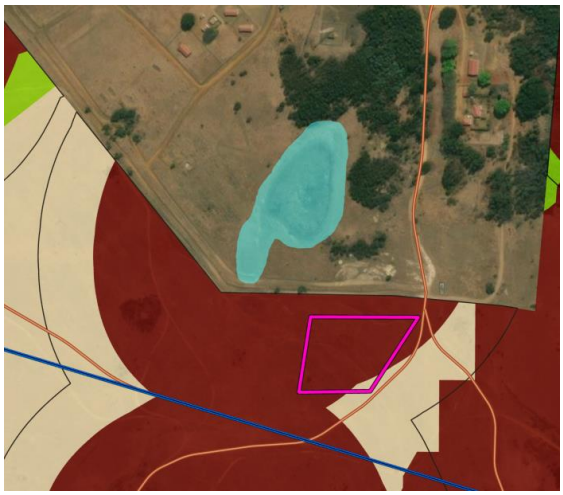


Figure A: O&M Building within a No-Go buffer (dark red) must be relocated or additional mitigation measures applied.

To avoid bats roosting in new project infrastructure, all buildings must be properly sealed. If bats colonize these spaces, a suitably qualified bat ecologist must be engaged to remove them.

Disturbance effects can be avoided by restricting construction activities to daylight hours (i.e., no construction at night) and avoiding blasting near rocky outcrops.

Mitigation (Minimize and Restore)

Modification and disturbance of bat habitat is likely to have species specific effects depending on species foraging guild, season, and distance to wind turbines (Barré et al. 2018, Leroux et al. 2022). For example, clutter edge species (e.g., Cape serotine) are more likely to be impacted by habitat modification given their greater association with physical habitat features compared to high-flying species (e.g., Egyptian free-tailed bat). As such, buffers may not be effective to fully remove all impacts.

Beyond avoidance, measures to minimize further impacts include minimizing the clearing of vegetation, minimizing disturbance and destruction of rocky outcrops, and applying good construction abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste) created during construction. Where native trees, rocky outcrops or buildings need to be removed (although this must be avoided), these features must be examined by a suitably qualified bat ecologist before construction commences to search for roosting bats. Following construction, all areas disturbed must be rehabilitated through native species planting within all areas under the projects control.

IMPACT PHASE: CONSTRUCTION					
Nature of the impact: MODIFICATION & DISTURBANCE OF BAT HABITAT (ROOSTING, FORAGING, COMMUTING)					
Description of impact Removal of native vegetation, noise and dust generated during construction activities, and the presence of new infrastructure in the landscape, will negatively and indirectly impact bats by removing habitat used for foraging and commuting, through disturbance, and displacement. Construction of WEF infrastructure could result in destruction and/or disturbance to bat roosts, and inadvertently provide new roosting spaces for some bat species in risky locations.					
	Extent (E)	Duration (D)	Reversibility (R)	Magnitude (M)	Probability (P)
Without Mitigation	1	1	3	2	2
With Mitigation	1	1	2	1	1

Significance Calculation	Without Mitigation	With Mitigation
S=(E+D+R+M)*P	Low Negative Impact (14)	Low Negative Impact (5)
Was public comment received?	No	
Has public comment been included in mitigation measures?	No, no comments received	
Mitigation measures to reduce residual risk or enhance opportunities: - Limit potential for bats to roost in project infrastructure (e.g., buildings, turbines) by ensuring they are properly sealed such that bats cannot gain access. - No construction activities at night. - No placement of infrastructure (except roads) in no-go areas. - Relocate the O&M building within a No-Go area (Figure A) or, minimize the footprint of the building, construct the building as far as possible away from the wetland within the identified footprint polygon, do not use any lighting at night. - No blasting near rocky crevices. - Minimize clearing of native vegetation - Minimize disturbance and destruction of rocky outcrops, trees and buildings, and where this is required, these features should be examined for roosting bats. - Apply good construction abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste) created during construction. - Rehabilitate and enhance all areas disturbed during construction (including aquatic habitat).		
Residual impact	Residual impacts are likely to be minor although buffer distances have been shown to be ineffective at avoiding and minimizing risk to bats because these are two small for some species (Barré et al. 2018, Tolvanen et al. 2023).	

6.1.2 Operational Phase

IMPACTS

Bat mortality (direct impact) through collisions with wind turbine blades is the principal impact of wind energy facilities on bats during operation of the facility (Cryan and Barclay 2009, Arnett et al. 2016, Voigt et al. 2024). Displacement of bats from their preferred areas may also occur due to turbine noise emissions (Ellerbrok et al. 2024, Voigt et al. 2024).

Mitigation (Avoid)

Collisions can be avoided by not placing wind turbines in the vicinity of bat habitats which for bats includes both physical landscape features themselves (near wetlands, vegetation etc.) and open airspace away from these features (Schnitzler et al. 2003). Risk of collision impact is related to bat morphology with fast flying, open-air species more likely to be impacted than low-flying species who forage closer to the ground, in edge spaces near vegetation, or in dense cluttered spaces (Schnitzler et al. 2003, Thaxter et al. 2017, Aronson 2022). Impacts to low-flying species can be further avoided by ensuring blades do not sweep close to ground level (Figure 4).

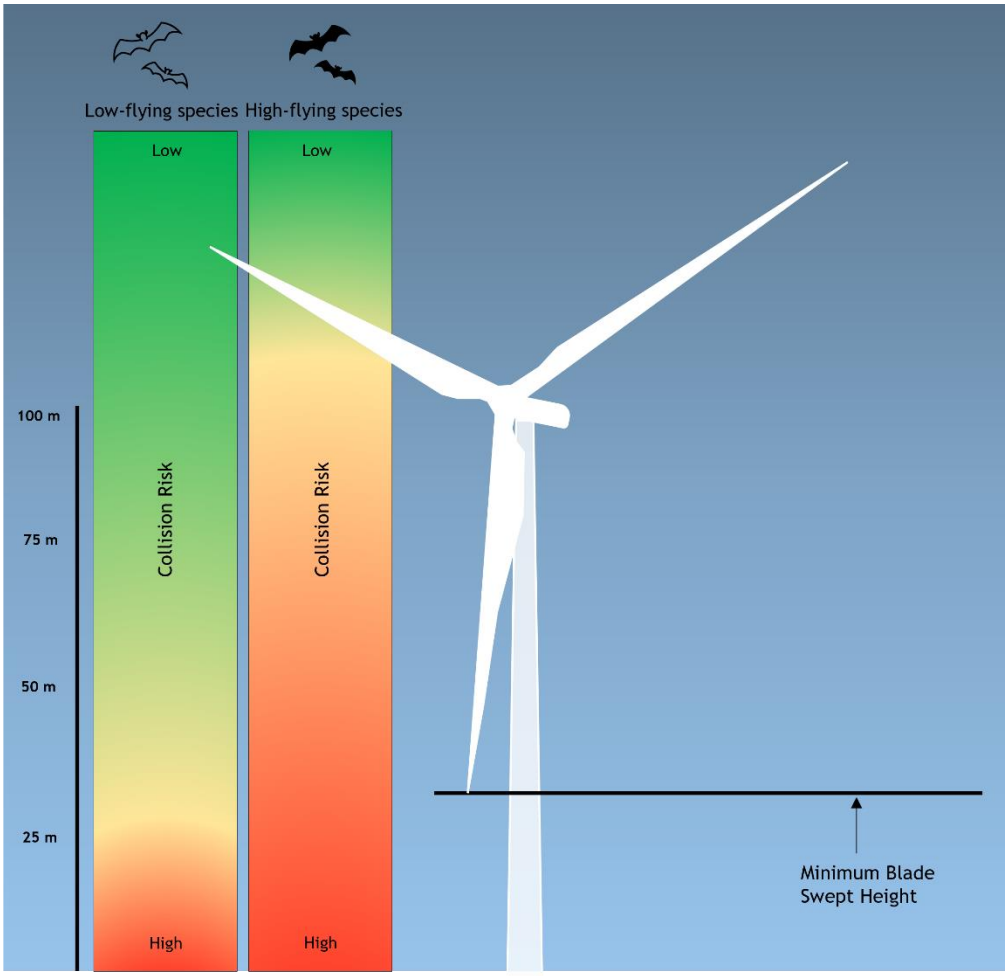


Figure 4: Conceptual Framework used to differentiate risk between low and high-flying bat species and the relationship with turbine size.

The species principally at collision risk from the proposed project are Cape serotine and Egyptian free-tailed bat since other species were recorded less often. High risk was identified for Cape serotine at ground level (represented by 10 m) at some locations (Table 3) but generally low risk at height (above 50 m). Activity is likely to decrease exponentially between these two heights (Wellig et al. 2018) meaning risk would decrease from high at 10 m to low at 50 m and above. The size of the rotor swept area should account for this because the lower the blades sweep the ground, the higher risk they will present to bats (Garvin et al. 2024). It is therefore recommended to maintain a minimum blade sweep of 30 m to avoid collision impacts as much as possible. There is limited published emperical evidence for this specific height but based on the activity of Cape serotine this is likely to be a reasonable height were risk would reduce from high to moderate or low.

Collision impacts can also be avoided by not installing wind turbines within or adjacent to key bat habitats, and adhering to the No-Go buffers (Figure 3). To ensure no parts of the wind turbines, including the blade tips, intrude into bat buffers, all 200 m buffers were adjusted (increased by 49 m) to account for the blade length and hub height of the assessed turbine in line with Mitchell-Jones and Carlin (2014) and based on the following equation:

$$b = \sqrt{(buffer + bl)^2 - (hh - fh)^2}$$

[Eq. 1]

$$b = \sqrt{(200 + 91)^2 - (150 - 0)^2}$$

$$b = 249\ m$$

Where:
b = adjusted/blade tip buffer
buffer = 200 m
bl: Turbine blade length = 91 m
hh: Hub height = 150 m
fh: Feature height = 0 m

The specific turbine height assessed in this report has a 150 m hub height and 91 m blade length, resulting in a minimum blade sweep of 59 m. Should the turbine size change, the adjusted/blade tip buffers must be updated to account for any changes in the hub height or blade length. No turbines are within buffered areas and hence the turbine layout is acceptable in its current form (Figure 3).

Mitigation (Minimize and Restore)

For some high-flying species such as Egyptian free-tailed bat, the habitat or land use below does not generally influence their activity (Monadjem et al. 2020) which makes habitat based mitigations (e.g., buffers) less effective. This species was recorded at 50 m and 90 m, where median activity levels suggest high risk during autumn and spring (Table 5). Mitigation to avoid impacts to higher-flying species should include the choice of turbine design since this has the potential to influence bat fatality (Barclay et al. 2007) but the impact of turbine size on bat fatality is poorly understood. Generally, impacts to high-flying species should be avoided by limiting the size of the rotor swept area as much as practicable since they are active across much of the rotor swept zone.

However, due to the characteristics of the species present on site, i.e., high risk, open-air foraging species, residual impacts could occur since there is still likely to be a high degree of risky airspace even with a minimized rotor swept area. In addition, some bats may be attracted to turbines (Horn et al. 2008, Cryan and Barclay 2009, Richardson et al. 2021, Guest et al. 2022, Leroux et al. 2022) once installed and operational and therefore additional mitigation measures would be needed to minimize impacts.

The first additional mitigation measure to minimize residual collision impacts is the use of blade feathering to prevent free-wheeling of blades below the turbine cut-in speed. This has been shown to reduce bat fatality with the benefit of not impacting on energy production (Young et al. 2011, Good et al. 2012).

During operation, bat fatality monitoring must be undertaken to search for bat carcasses beneath wind turbines to measure the residual impact of the WEF on bats for a minimum of two years (Aronson et al. 2020). Mitigation measures that are known to further minimize bat fatality if needed based on the fatality monitoring results include curtailment and/or acoustic deterrents (Arnett et al. 2013, Romano et al. 2019, Weaver et al. 2020). These techniques must be used if post-construction fatality monitoring indicates that species fatality thresholds have been exceeded (MacEwan et al. 2018) to minimize impacts, maintain the impacts to bats within acceptable limits of change and prevent declines in the impacted bat population. The bat fatality thresholds for the project were determined based on area of influence of the turbines of 4,774 hectares. This was based on a minimum convex polygon around all turbines, plus an additional buffer around this space of 110 m corresponding to the turbine blade length. Based on the bat fatality threshold for the Highveld Grasslands ecoregion (MacEwan et al. 2018), the bat fatality threshold for the Sheepmoor project is 38 bats per least concern species.

According to the threshold guidance (MacEwan et al. 2018), should the annual fatality threshold be exceeded, curtailment and/or acoustic deterrents must be used to reduce fatality levels to below the threshold. For frugivorous bats, conservation important or rare/range restricted bats, i.e., Species of Special Concern (SSC), the annual fatality threshold is 1 individual. The likelihood of SSC's being present on site is low (Table 2).

A Biodiversity Management Plan (BMP) for bats must be developed by a bat ecologist before commencement of operation which includes the post-construction fatality monitoring plan design, fatality thresholds calculations and rationale, and an adaptive management response plan that provides a timeous action pathway for mitigation (e.g. curtailment or deterrents) should fatality thresholds be exceeded. Smart curtailment approaches which shut down turbines based on real time bat acoustic activity data are favoured over blanket curtailment because these will be less disruptive to turbine operation.

Since displacement of bats is likely driven by turbine noise, this can be minimized by serration of the back edges of the blade, by using a low-noise blade airfoil design or with blade trailing-edge brushes (Bošnjaković et al. 2024; Ellerbrok et al. 2024).

IMPACT PHASE: OPERATION					
Nature of the impact: BAT FATALITY					
Description of impact Bat mortality (direct impact) through collisions and/or barotrauma with wind turbine blades is the principal impact of wind energy facilities on bats.					
	Extent (E)	Duration (D)	Reversibility (R)	Magnitude (M)	Probability (P)
Without Mitigation	3	4	3	4	5
With Mitigation	3	4	2	3	3
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	High Negative Impact (70)			Moderate Negative Impact (36)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No, no comments received				
Mitigation measures to reduce residual risk or enhance opportunities: - No placement of turbines and infrastructure (apart from roads and the OHL) within no-go areas - Maintain a minimum blade sweep of 30 m to avoid impacts to lower flying bats such as clutter-edge species (e.g., Cape serotine, Natal long-fingered bat). - Minimize the rotor diameter - Feather blades to prevent free-wheeling below the turbine cut-in speed - Implement post-construction fatality monitoring and apply smart curtailment or deterrents if fatality thresholds are exceeded.					
Residual impact	Curtailment and deterrents can successfully reduce bat fatality (Arnett 2011, Arnett et al. 2016, Weaver et al. 2020), but not completely. Through the application of fatality thresholds, residual impacts should be minimized.				

IMPACT PHASE: OPERATION					
Nature of the impact: DISPLACEMENT					
Description of impact Avoidance of wind turbines by bats, in some cases over several hundred meters distance, has been observed for various species in different habitats, including farmland, resulting in displacement impacts (Tolvanen et al. 2023, Voigt et al. 2024). Displacement, likely caused by wind turbine operation (e.g., wake turbulences and noise emissions), tends to increase with the number and size of turbines.					
	Extent (E)	Duration (D)	Reversibility (R)	Magnitude (M)	Probability (P)
Without Mitigation	3	4	3	3	3
With Mitigation	3	4	2	2	2
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	Moderate Negative Impact (39)			Low Negative Impact (22)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No, no comments received				
Mitigation measures to reduce residual risk or enhance opportunities:					

- Reduce turbine noise emissions by serration of the back edges of the blade, by using a low-noise blade airfoil design or with blade trailing-edge brushes (Bošnjaković et al. 2024; Ellerbrok et al. 2024).	
Residual impact	Residual impacts are likely to be minor although buffer distances have been shown to be ineffective at avoiding and minimizing risk to bats because these are two small for some species (Barré et al. 2018, Tolvanen et al. 2023).

6.1.3 Decommissioning Phase

IMPACTS

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

Mitigation (Avoid)

Disturbance effects can be avoided by restricting decommissioning activities to daylight hours (i.e., no works at night).

Mitigation (Minimize and Restore)

Disturbance can be minimized by applying good abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste) created during decommissioning works. All areas disturbed must be rehabilitated through native species planting within all areas under the projects control.

IMPACT PHASE: DECOMMISSIONING					
Nature of the impact: DISTURBANCE OF BATS					
Description of impact Impacts during the decommissioning phase will be indirect and involve disturbance to bats through excessive noise and dust, and damage to vegetation.					
	Extent (E)	Duration (D)	Reversibility (R)	Magnitude (M)	Probability (P)
Without Mitigation	1	1	3	3	3
With Mitigation	1	1	2	2	2
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	Low Negative Impact (24)			Low Negative Impact (12)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No, no comments received				
Mitigation measures to reduce residual risk or enhance opportunities: - No decommissioning activities at night. - Apply good abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste) created during decommissioning activities. - Rehabilitate and enhance all areas disturbed during construction (including aquatic habitat).					
Residual impact	Residual impacts are likely to be minor since ceasing project activities on site is likely to benefit bats.				

6.2 Grid Connection

6.2.1 Construction Phase

The direct impact of grid connection infrastructure is collisions with powerlines. Insectivorous bats are unlikely to collide with powerlines since they can avoid these obstacles using echolocation but fruit bats do collide with powerlines (Tella et al. 2020). The likelihood of occurrence for fruit bats species in the AoI

is low (Table 2). Indirect impacts include loss of habitat to construct substations and OHL pylons, and ecological light pollution (Longcore and Rich 2004).

IMPACT PHASE: CONSTRUCTION					
Nature of the impact: MODIFICATION & DISTURBANCE OF BAT HABITAT (ROOSTING, FORAGING, COMMUTING)					
Description of impact Vegetation clearing for grid connection infrastructure (access roads, substation buildings, pylons), as well as noise and dust generated during the construction phase, will impact bats by removing habitat used for foraging and commuting, through disturbance, and displacement (Kunz et al. 2007b, Millon et al. 2018, Bennun et al. 2021). This impact is likely to have species specific effects; clutter edge species (e.g., Cape serotine) are more likely to be impacted by habitat modification given their greater association with physical habitat features compared to high-flying species (e.g., Egyptian free-tailed bat). Construction of grid connection infrastructure could result in destruction (direct impact) of bat roosts (trees, buildings) and disturbance (indirect impact) of bat roosts potentially resulting in roost abandonment. Bat mortality can occur if roosts which contain bats are destroyed. Installation of new infrastructure in the landscape (e.g., buildings) can inadvertently provide new roosting spaces for some bat species, attracting them to areas with wind turbines and potentially increasing the likelihood of collisions.					
	Extent (E)	Duration (D)	Reversibility (R)	Magnitude (M)	Probability (P)
Without Mitigation	1	1	3	2	2
With Mitigation	1	1	2	1	1
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	Low Negative Impact (14)			Low Negative Impact (5)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No, no comments received				
Mitigation measures to reduce residual risk or enhance opportunities: - Limit potential for bats to roost in project infrastructure (e.g., buildings) by ensuring they are properly sealed such that bats cannot gain access. - No construction activities at night. - No placement of pylons within 200 m of key habitat features specifically including buildings, dams/wetlands, and rivers/streams. The OHL itself is permitted to cross over No-Go Areas for practical routing reasons but pylon positions must avoid No-Go Areas where feasible. Therefore the maximum possible span should be implemented to avoid the sensitive area while ensuring the technical feasibility of the development. - No blasting near rocky crevices. - The construction compounds, laydown areas, and batching plants must avoid No-Go areas. - Minimize clearing of native vegetation - Minimize disturbance and destruction of rocky outcrops, native trees and buildings, and where this is required, these features should be examined for roosting bats. - Apply good construction abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste) created during construction. - Rehabilitate and enhance all areas disturbed during construction (including aquatic habitat).					
Residual impact	Residual impacts are likely to be minor although buffer distances have been shown to be ineffective at avoiding and minimizing risk to bats because these are two small for some species (Barré et al. 2018, Tolvanen et al. 2023).				

6.2.2 Operational Phase

IMPACT PHASE: OPERATION
Nature of the impact: LIGHT POLLUTION

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

	Extent (E)	Duration (D)	Reversibility (R)	Magnitude (M)	Probability (P)
Without Mitigation	3	4	3	3	3
With Mitigation	3	4	2	2	2

Significance Calculation	Without Mitigation	With Mitigation
S=(E+D+R+M)*P	Moderate Negative Impact (39)	Low Negative Impact (22)
Was public comment received?	No	
Has public comment been included in mitigation measures?	No, no comments received	

Mitigation measures to reduce residual risk or enhance opportunities:
- No placement of substations and operational and maintenance buildings within no-go areas. - Avoid excessive lighting - Use of motion-sensor lighting, avoid sky-glow by using hoods and downward facing lighting, increase spacing between lighting units, and use low pressure sodium lights (Rydell 1992, Stone 2012).

Residual impact	Given the limited extent of light pollution currently in the region, the application of the above mitigation measures is likely to result in minor residual impacts.

6.2.3 Decommissioning Phase

IMPACT PHASE: DECOMMISSIONING
Nature of the impact: DISTURBANCE OF BATS
Description of impact Impacts during the decommissioning phase will be indirect and involve disturbance to bats through excessive noise and dust, and damage to vegetation.

	Extent (E)	Duration (D)	Reversibility (R)	Magnitude (M)	Probability (P)
Without Mitigation	1	1	3	3	3
With Mitigation	1	1	2	2	2

Significance Calculation	Without Mitigation	With Mitigation
S=(E+D+R+M)*P	Low Negative Impact (24)	Low Negative Impact (12)
Was public comment received?	No	
Has public comment been included in mitigation measures?	No, no comments received	

Mitigation measures to reduce residual risk or enhance opportunities:
- No decommissioning activities at night. - Apply good abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste) created during decommissioning activities. - Rehabilitate and enhance all areas disturbed during construction (including aquatic habitat).

Residual impact	Residual impacts are likely to be minor since ceasing project activities on site is likely to benefit bats.

6.3 Cumulative Impacts

For the purposes of the cumulative impact assessment (CIA), cumulative impacts are defined as the total impacts resulting from the successive, incremental, and/or combined effects of a project when added to other existing, planned and/or reasonably anticipated future projects, as well as background pressures (IFC 2013). The project considered here is the Sheepmoor Wind Energy Facility. The goal of this assessment is to evaluate the potential resulting impact to the vulnerability and/or risk to the sustainability of the bat species affected (IFC 2013).

6.3.1 Step 1: VECs and spatial-temporal boundary

Following guidance in IFC (2013), the first step in the CIA was to determine the Valued Environmental Components (VECs), the bat species most likely to be affected by cumulative impacts, and the temporal and geographic scope of the analysis.

Of the species recorded in the PAOI during the acoustic monitoring, and based on bat distribution records (ACR 2020), Cape serotine (*Laephotis capensis*), Natal long-fingered (*Miniopterus natalensis*) and Egyptian free-tailed bat (*Tadarida aegyptiaca*) are most likely to be impacted cumulatively. This is because they are the most widespread bat species in South Africa (Monadjem et al. 2020), classified as high risk species to wind energy impacts (MacEwan et al. 2020b), the most impacted by operating wind energy facilities in the country (Aronson 2022).

The temporal time frame over which cumulative impacts are considered was 25 years, the typical lifespan of a renewable energy facility. However, cumulative effects could extend beyond this timeframe if development of the cluster of three projects is phased over time.

The Ecologically Appropriate Area of Analysis (EAAA) for the assessment was determined by considering the ecology of the three VECs.

The acoustic monitoring confirmed the presence of Natal long-fingered bat in the PAOI, a migratory species which moves seasonally between winter hibernacula and summer maternity cave roosts in South Africa (van der Merwe 1975, Miller-Butterworth et al. 2003). In north-eastern South Africa, where the proposed development is planned, van der Merwe (1975) showed migration between maternity caves in Limpopo and hibernacula caves in Gauteng/North-West undertaken by pregnant females (who later return south with weaned pups), with caves separated by 150 km at least. Males typically undertake shorter movements (> 60 km) between various highveld caves (van der Merwe 1975). This migration increases the potential that these bats will encounter wind turbines or be displaced by them (Millon et al. 2018), especially if these are placed along migratory routes. Although these movements are typically north-south, Pretorius et al. (2020) suggest that movement could also occur east-west between Gauteng and a maternity cave in Sudwala, Mpumalanga, a distance of approximately 250 km. Although additional research is needed to better understand long and short distance movements of Natal long-fingered bat in South Africa more precisely, given the numerous roost sites (both caves and mines) in Mpumalanga and body of work already demonstrating or suggesting migratory behavior in the north-east of the country between these sites, it is reasonable that cumulative impacts of wind energy may impact this species at large scales and hence cumulative impacts need to be assessed accordingly. Based on van der Merwe (1975), a 150 km radius around the PAOI was therefore defined as EAAA1 (Figure 5), especially since cumulative impacts should be evaluated across scales potentially affected species are likely to occur (Voigt et al. 2012, Lehnert et al. 2014).

The remaining VECs are not migratory and hence a second, smaller EAAA was used. Data on the spatial ecology of the Egyptian free-tailed bat and Cape serotine, specifically the sizes of their foraging or community ranges, are not available. Data from European free-tailed bat, *Tadarida teniotis*, in Portugal (Marques et al. 2004) and Serotine bat, *Eptesicus serotinus*, in England (Robinson and Stebbings 1997) were used as surrogates. Feeding areas for some *T. teniotis* individuals were over 30 km from their roost while the maximum distance between *E. serotinus* feeding areas was over 41 km.

Cumulative impact assessment in South African typically consider developments within a radius of 35 km which therefore is potentially in line with the movement ecology of the two VECs. Hence the EAAA2 was a 35 km radius around the PAOI.

6.3.2 Step 2: Other Activities and External Drivers

The second step in the CIA was to identify other past, existing, or planned activities within the EAAA1 and EAAA2 and to assess the external influences and stressors on the three VECs. With reference to the Renewable Energy Application database (Q2, 2024), currently one other wind energy project is located within the EAAA2, namely the Emvelo WEF. Approximately 35 other development projects are located within EAAA1 (Figure 5). Given that EAAA1 also includes a Renewable Energy Development Zone (REDZ), it is reasonable to expect further development over the 25-year period considered in this assessment.

There are no documented major past threats to Egyptian free-tailed bat and Cape serotine or current threats to them other than renewable energy (Child et al. 2016). Egyptian free-tailed bats can also be threated indirectly by roost disturbance, especially caves. This CIA considers renewable energy the primary impact to these VECs. Natal long-fingered bat is locally threatened in parts of its range by habitat loss resulting from conversion of land to agricultural use, incidental poisoning with insecticides, loss of prey base, and the disturbance of roosting and maternity caves (Child et al. 2016).

6.3.3 Step 3: Baseline Status of VECs

Egyptian free-tailed bat is very widely distributed, locally common and recorded from many protected areas in South Africa however, although the population is stable, the population size is unknown (Child et al. 2016). It is classified as Least Concern nationally and globally. This species is present in the PAOI and based on its activity levels, it is at high risk of collision during autumn and spring (Table 5). It is flexible in its habitat requirements and one reason for its wide distribution is its affinity to roost in buildings or other man-made structures (Monadjem et al. 2020).

Cape serotine is also widely distributed in South Africa with a large population and hence is classified as Least Concern nationally and globally. However, it is possible that this species comprises a complex of closely related species (Monadjem et al. 2020). The population trend is stable, but the population size is unknown. Although this species is present in the PAOI its activity levels suggest low risk of collision (Table 3) although no data between 10 m and 50 m were recorded on site to verify this. This species was recorded at 50 m, so it is reasonable to assume some level of risk between 10 m and 50 m. Cape serotine is also flexible in its habitat requirements and its use of buildings and other anthropogenic structures as roosts has possibly led to its numbers increasing.

Natal long-fingered bat is a common and widespread species, classified as Least Concern nationally and globally with a stable national population, but it may be experiencing local declines (Child et al. 2016). The size of the national population is unknown but this species roosts in large colonies; De Hoop Guano cave in the Western Cape hosts approximately 200,000 individuals, and in the Highveld, some caves may contain up to 4000 individuals (Child et al. 2016). Activity levels of this species in the AoI were relatively low and this species was seldomly recorded in the rotor swept area but high activity was recorded closer to ground level in spring (Table 7).

6.3.4 Step 4: Assess Cumulative Impacts on VECs

The key potential impacts that could affect the long-term sustainability and/or viability of the three VECs in EAAA1 and EAAA2 are collisions with wind turbines. This may lead to local extinctions and fragmentation of the national population since bats have low reproductive rates (Barclay and Harder 2003). Other impacts may include displacement from foraging and commuting areas, and along migration routes, due to wind turbines (Millon et al. 2018, Leroux et al. 2022).

6.3.5 Step 5: Assess Significance of Predicted Cumulative Impacts

Rodhouse et al. (2019), Davy et al. (2020) and Frick et al. (2017) have all shown that in North America, Least Concern bats may be experiencing impacts due to wind farms that could result in changes to their conservation status. This may be a future scenario for widespread, common Least Concern bats species in South Africa. As such, the significance of cumulative impacts is assessed as High without mitigation. The application of mitigation measures is anticipated to reduce the overall cumulative impact of the project to a moderate level.

Nature of the impact: CUMULATIVE IMPACTS					
Description of impact The total impacts resulting from the successive, incremental, and/or combined effects of the project when added to other existing, planned and/or reasonably anticipated future projects, as well as background pressures.					
	Extent (E)	Duration (D)	Reversibility (R)	Magnitude (M)	Probability (P)
Without Mitigation	3	4	3	4	5
With Mitigation	3	4	2	3	3
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	High Negative Impact (70)			Moderate Negative Impact (36)	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No, no comments received				
Mitigation measures to reduce residual risk or enhance opportunities: The mitigation measures proposed in this report (buffering key habitats used by bats, use of appropriate lighting technology, blade feathering, and using smart curtailment and/or acoustic deterrents) should be applied to all future projects so that there is a collective management responsibility (IFC 2013).					
Residual impact	Curtailment and deterrents can successfully reduce bat fatality (Arnett 2011, Arnett et al. 2016, Weaver et al. 2020), but not completely. Through the application of fatality thresholds across all projects in the cumulative impact area, residual impacts should be minimized.				

6.3.6 Step 6: Management of Cumulative Impacts

Management interventions for bats at operating wind farms in South Africa are guided by fatality thresholds, which aim to mitigate population-level impacts. These thresholds are set below the rate at which populations could decline due to anthropogenic pressures (MacEwan et al. 2018). For this project, thresholds have been established, and similar measures should be applied to all future wind energy developments. In theory, if each development implements thresholds and appropriate mitigation measures when exceedances occur, the EAAA1 and EAAA2 VEC populations should not decline due to wind energy impacts.

The mitigation measures proposed in this report (buffering key habitats used by bats, use of appropriate lighting technology, blade feathering, and using smart curtailment and/or acoustic deterrents) should be applied to all future projects so that there is a collective management responsibility (IFC 2013).

7 ENVIRONMENTAL MANAGEMENT PROGRAMME

Objective: Avoid and minimize modification of bat habitats

Project component/s	All project infrastructure
Potential Impact	Vegetation clearing for project infrastructure, as well as noise, dust and pollution generated during construction activities, will impact bats by removing habitat used for foraging and commuting, through disturbance, and displacement. Construction of WEF infrastructure could result in destruction and/or disturbance to bat roosts and inadvertently provide new roosting spaces for some bat species in risky locations.
Activity/risk source	All construction activities and associated activities (e.g., driving)
Mitigation: Target/Objective	1. Avoid potential for bats to roost in project infrastructure (e.g., buildings, and turbines) 2. Minimize disturbance to bats 3. Minimize habitat loss 4. Minimize displacement of bats

Mitigation	Responsibility	Timeframe
1. Ensure all project infrastructure (e.g., buildings, and turbines) is properly sealed such that bats cannot gain access. 2. No construction activities at night, apply good construction abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste). 3. No placement of infrastructure (except roads and OHL) within No-Go areas. 4. Minimize clearing of native vegetation, minimize disturbance and destruction of farm buildings on site, minimize removal of native trees. Rehabilitate and enhance all areas disturbed during construction, (including aquatic habitat). 5. Reduce turbine noise emissions by serration of the back edges of the blade, by using a low-noise blade airfoil design or using blade trailing-edge brushes.	Project Developer Contractor	During design and planning phase and throughout construction phase

Performance Indicator	No bat roosts are destroyed No bats colonise new project infrastructure for roosting No infrastructure in No-Go areas (except roads and OHL) All areas disturbed during construction are rehabilitated
Monitoring	An appointed ECO must inspect all new project infrastructure, in conjunction with or via training from a bat ecologist, to ensure bats cannot gain access. ECO to ensure compliance with good construction abatement control practices. ECO must ensure no infrastructure is placed in No-Go areas (see Figure 3). If a bat roost is encountered during construction, the ECO must consult a bat ecologist to determine appropriate actions. ECO to ensure all disturbed areas are rehabilitated. ECO to ensure turbine blades have appropriate noise-reduction technology.

Objective: Avoid and minimize bat fatality	
Project component/s	Wind turbines
Potential Impact	Bat mortality through collisions with wind turbine blades.
Activity/risk source	Operating Wind Turbines
Mitigation: Target/Objective	1. Avoid bat fatalities through turbine layout design and turbine dimensions 2. Minimize bat fatalities using smart curtailment or deterrents during operation

Mitigation	Responsibility	Timeframe
1. No placement of turbines in No-Go Areas (Figure 3). 2. Maintain a minimum blade sweep of 30 m to avoid impacts to lower flying bats such as clutter-edge species (e.g., Cape serotine, Natal long-fingered bat). 3. Minimize the rotor diameter 4. Feather blades to prevent free-wheeling below the turbine cut-in speed 5. Implement fatality monitoring throughout the operational phase 6. Apply smart curtailment or deterrents if fatality thresholds are exceeded. Annual fatality threshold per Least Concern species = 38 individuals. Annual fatality threshold per Species of Special Concern = 1 individual for each of [African Straw-coloured fruit bat, Wahlberg's Epauletted fruit bat, Percival's Short-eared Trident bat, Blasius's Horseshoe bat, Egyptian Rousette and Lessor Long-fingered bat].	Project Developer Operator	BMP developed prior to operation. BMP active throughout operation phase.

Performance Indicator	≤ 38 individuals per Least Concern species killed annually ≤ 1 individual per Species of Special Concern killed annually
Monitoring	ECO must ensure no turbines are placed in No-Go areas, including the blade tips (Figure 3). ECO must ensure the dimensions of the final selected turbine adhere to requirements (A minimum blade sweep of 30 m). A Biodiversity Management Plan (BMP) for bats must be developed which includes the design of a post-construction fatality monitoring program (PCFM) for bats, and an adaptive management response plan that provides an escalating scale of mitigation should fatality thresholds be exceeded. ECO to ensure adherence to BMP and any mitigation measures implemented

Objective: Reduce impact of light pollution	
Project component/s	All project infrastructure
Potential Impact	Construction of project infrastructure will increase ecological light pollution from artificial lighting associated with turbines, the substation and other operational and maintenance buildings. Light pollution can alter ecological dynamics (Horváth et al. 2009, Bará and C. Lima 2024). Lighting attracts and can cause direct mortality of insects, reducing the prey base for bats, especially bat species that are light-phobic. These species may also be displaced from previous foraging areas due to lighting. Other bat species forage around lights, attracted by higher numbers of insects. This may bring these species into the vicinity of the project and indirectly increase the risk of collision with wind turbines.
Activity/risk source	Light sources from project infrastructure
Mitigation: Target/Objective	1. Avoid light pollution 2. Minimize light pollution

Mitigation	Responsibility	Timeframe

1. No placement of infrastructure within No-Go areas (Figure 3). 2. Use motion-sensor lighting, avoid sky-glow by using hoods and downward facing lighting, increase spacing between lighting units, and use low pressure sodium lights	Project Developer Operator	During design and planning phase and throughout operation phase.
Performance Indicator	Limited attraction of insects to light sources Limited foraging of bats around light sources Limited mortality at insects at light sources	
Monitoring	ECO must ensure no infrastructure is in No-Go areas (Figure 3). ECO must ensure motion-sensor lighting is used. ECO must ensure all lighting fixtures have hoods and/or are downward facing, where appropriate, to prevent sky-glow. ECO must ensure minimum lighting is used and lighting is spaced to prevent excessive use of lighting. ECO must ensure low-pressure sodium lighting is used.	

8 CONCLUSION

This EIA report assessed impacts to bats that could occur because of the construction, operation and decommission of the Sheepmoor WEF and grid connection. The assessment was based on 16 months of baseline data on bat activity recorded at the project. Based on these data, the key issue for the WEF will be managing collision impacts to Cape serotine and Egyptian free-tailed bat, and cumulative impacts.

The first mitigation measure proposed to manage risk is to adhere to the no-go buffers which aim to spatially avoid impacts by buffering key habitat features used by bats. This measure is likely to be effective for most bat species recorded at the project, but additional mitigation measures are needed to avoid impacts to free-tailed bats, which forage high in the air, and to reduce residual impacts.

Turbine design can be effective, and it is recommended to maintain a minimum blade sweep of at least 30 m. However, free-tailed bats will still collide with turbine blades above this height and as such, the rotor diameter must be limited as much as practicable to minimize the space where collisions might occur. Additionally, blade feathering must be implemented to limit the rotation of turbine blades below the turbine cut-in speed when electricity is not being generated.

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

The overall impact to bats was assessed as moderate after the application of the mitigation measures proposed to avoid and minimize impacts to bats. However, on a species level, the project presents differential risk and impacts to bats must be managed adaptively during the operational phase, particularly for those species (e.g. Egyptian free-tailed bat and Cape serotine) for which high risk is predicted during some periods.

This adaptive management will be guided by the Environmental Management Programme for bats which must include the development of a Biodiversity Management Plan (BMP) to manage impacts to bats during

the operation of the facility. The BMP for bats must be developed by a bat ecologist before the commencement of operation and must include the post-construction fatality monitoring plan design, fatality thresholds calculations and rationale (updated as required), and an adaptive management response plan that provides a timeous action pathway for mitigation, including roles and responsibilities, should fatality thresholds be exceeded. Provided these measures are adhered to, the project assessed can be approved.

9 REFERENCES

ACR. 2020. African Chiroptera Report 2020. V. Van Cakenberghe and E.C.J. Seamark (Eds). AfricanBats NPC, Pretoria. i-xv + 8542 pp.

Adams, A. M., M. K. Jantzen, R. M. Hamilton, and M. B. Fenton. 2012. Do you hear what I hear? Implications of detector selection for acoustic monitoring of bats. Methods in Ecology and Evolution 3:992-998.

Arnett, E. B. 2011. Altering turbine speed reduces bat mortality at wind-energy facilities. Frontiers in Ecology and the Environment 9:209-214.

Arnett, E. B., E. F. Baerwald, F. Mathews, Luisa Rodrigues, A. Rodríguez-Durán, J. Rydell, R. Villegas-Patraca, and C. C. Voigt. 2016. Impacts of Wind Energy Development on Bats: A Global Perspective. Pages 295 - 323 *in* C. C. Voigt and T. Kingston, editors. Bats in the Anthropocene: Conservation of Bats in a Changing World. Springer.

Arnett, E. B., G. D. Johnson, W. P. Erickson, and C. D. Hein. 2013. A Synthesis Of Operational Mitigation Studies To Reduce Bat Fatalities At Wind Energy Facilities In North America. A report submitted to the National Renewable Energy Laboratory. Bat Conservation International. Austin, Texas, USA.

Aronson, J. 2022. Current state of knowledge of wind energy impacts on bats in South Africa. Acta Chiropterologica 24(1):221-238.

Aronson, J., E. Richardson, K. MacEwan, D. Jacobs, W. Marais, P. Taylor, S. Sowler, H. C., and L. Richards. 2020. South African Good Practice Guidelines for Operational Monitoring for Bats at Wind Energy Facilities – ed 2. South African Bat Assessment Association.

Bará, S., and R. C. Lima. 2024. Quantifying the visual impact of wind farm lights on the nocturnal landscape. Journal of Quantitative Spectroscopy and Radiative Transfer 329:109203.

Barclay, R. M. R., E. F. Baerwald, and J. C. Gruver. 2007. Variation in bat and bird fatalities at wind energy facilities: assessing the effects of rotor size and tower height. Canadian Journal of Zoology 85:381-387.

Barclay, R. M. R., and L. D. Harder. 2003. Life histories of bats: Life in the slow lane. Pages 209-253 *in* T. H. Kunz and M. B. Fenton, editors. Bat Ecology. The University of Chicago Press, Chicago.

Barré, K., I. Le Viol, Y. Bas, R. Julliard, and C. Kerbiriou. 2018. Estimating habitat loss due to wind turbine avoidance by bats: Implications for European siting guidance. Biological Conservation 226:205-214.

Bennun, L., J. van Bochove, C. Ng, C. Samper, H. Rainey, and H. C. Rosenbaum. 2021. Mitigating Biodiversity Impacts Associated with Solar and Wind Energy Development: Guidelines for Project Developers.

Bohmann, K., A. Monadjem, C. Lehmkuhl Noer, M. Rasmussen, M. R. K. Zeale, E. Clare, G. Jones, E. Willerslev, and M. T. P. Gilbert. 2011. Molecular Diet Analysis of Two African Free-Tailed Bats (Molossidae) Using High Throughput Sequencing. PloS one 6:e21441.

Bošnjaković, M., Hrkać, F., Stoić, M., & Hradovi, I. (2024). Environmental Impact of Wind Farms. Environments, 11(11), 257.

Child, M. F., L. Roxburgh, E. Do Linh San, D. Raimondo, and H. T. Davies-Mostert, editors. 2016. The Red List of Mammals of South Africa, Swaziland and Lesotho. South African National Biodiversity Institute and Endangered Wildlife Trust, South Africa.

Collins, J. 2006. Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn). Bat Conservation Trust, London.

Cryan, P. M., and R. M. R. Barclay. 2009. Causes of Bat Fatalities at Wind Turbines: Hypotheses and Predictions. Journal of Mammalogy 90:1330-1340.

Davy, C. M., K. Squires, and J. R. Zimmerling. 2020. Estimation of spatiotemporal trends in bat abundance from mortality data collected at wind turbines. Conservation Biology:12.

Dinerstein, E., C. Vynne, E. Sala, A. R. Joshi, S. Fernando, T. E. Lovejoy, J. Mayorga, D. Olson, G. P. Asner, J. E. M. Baillie, N. D. Burgess, K. Burkart, R. F. Noss, Y. P. Zhang, A. Baccini, T. Birch, N. Hahn, L. N. Joppa, and E. Wikramanayake. 2019. A Global Deal For Nature: Guiding principles, milestones, and targets. Science Advances 5:eaaw2869.

Ellerbrok, J. S., Farwig, N., Peter, F., & Voigt, C. C. (2024). Forest bat activity declines with increasing wind speed in proximity of operating wind turbines. Global Ecology and Conservation, 49, e02782.
Frick, W. F., E. F. Baerwald, J. F. Pollock, R. M. R. Barclay, J. A. Szymanski, T. J. Weller, A. L. Russell, S. C. Loeb, R. A. Medellin, and L. P. McGuire. 2017. Fatalities at wind turbines may threaten population viability of a migratory bat. Biological Conservation 209:172-177.
Garvin, J. C., J. L. Simonis, and J. L. Taylor. 2024. Does size matter? Investigation of the effect of wind turbine size on bird and bat mortality. Biological Conservation 291:110474.
Gasparatos, A., C. N. H. Doll, M. Esteban, A. Ahmed, and T. A. Olang. 2017. Renewable energy and biodiversity: Implications for transitioning to a Green Economy. Renewable and Sustainable Energy Reviews 70:161-184.
Good, R. E., W. Erickson, A. Merrill, S. Simon, K. Murray, and K. Bay. 2012. Bat monitoring studies at the Fowler Ridge Wind Energy Facility, Benton County, Indiana. Prepared for Fowler Ridge Wind Farm by Western EcoSystems Technology, Inc. (WEST), Cheyenne, Wyoming.
Guest, E. E., B. F. Stamps, N. D. Durish, A. M. Hale, C. D. Hein, B. P. Morton, S. P. Weaver, and S. R. Fritts. 2022. An Updated Review of Hypotheses Regarding Bat Attraction to Wind Turbines. Animals 12:343.
Hein, C. D., J. Gruver, and E. B. Arnett. 2013. Relating pre-construction bat activity and post-construction bat fatality to predict risk at wind energy facilities: a synthesis. A report submitted to the National Renewable Energy Laboratory. Bat Conservation International, Austin, TX, USA.
Horn, J. W., E. B. Arnett, and T. H. Kunz. 2008. Behavioral responses of bats to operating wind turbines. The Journal of Wildlife Management 72:123-132.
Horváth, G., G. Kriska, P. Malik, and B. Robertson. 2009. Polarized light pollution: a new kind of ecological photopollution. Frontiers in Ecology and the Environment 7:317-325.
International Finance Corporation (IFC). 2013. Cumulative Impact Assessment and Management: Guidance for the Private Sector in Emerging Markets. Washington D.C., USA. Available at: https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/ publications_handbook_cumulativeimpactassessment.
IUCN. 2021. The IUCN Red List of Threatened Species. Version 2021-1. https://www.iucnredlist.org. Downloaded on 11 Aug 2021.
Jackson, A. L. R. 2011. Renewable energy vs. biodiversity: Policy conflicts and the future of nature conservation. Global Environmental Change 21:1195-1208.
Jung, K., and E. K. V. Kalko. 2010. Where forest meets urbanization: foraging plasticity of aerial insectivorous bats in an anthropogenically altered environment. Journal of Mammalogy 91:144-153.
Kunz, T. H., E. B. Arnett, B. M. Cooper, W. P. Erickson, R. P. Larkin, T. Mabee, M. L. Morrison, M. D. Strickland, and J. M. Szewczak. 2007a. Assessing impacts of wind-energy development on nocturnally active birds and bats: A guidance document. The Journal of Wildlife Management 71:2449-2486.
Kunz, T. H., E. B. Arnett, W. P. Erickson, A. R. Hoar, G. D. Johnson, R. P. Larkin, M. D. Strickland, R. W. Thresher, and M. D. Tuttle. 2007b. Ecological impacts of wind energy development on bats: questions, research needs, and hypotheses. Frontiers in Ecology and the Environment 5:315-324.
Lehnert, L. S., S. Kramer-Schadt, S. Schönborn, O. Lindecke, I. Niermann, and C. C. Voigt. 2014. Wind farm facilities in Germany kill noctule bats from near and far. PloS one 9:e103106.
Leroux, C., C. Kerbiriou, I. Le Viol, N. Valet, and K. Barré. 2022. Distance to hedgerows drives local repulsion and attraction of wind turbines on bats: Implications for spatial siting. Journal of Applied Ecology 59:2142-2153.
Lintott, P. R., S. M. Richardson, D. J. Hosken, S. A. Fensome, and F. Mathews. 2016. Ecological impact assessments fail to reduce risk of bat casualties at wind farms. Current Biology 26:R1135-R1136.
Longcore, T., and C. Rich. 2004. Ecological light pollution. Frontiers in Ecology and the Environment 2:191–198.
MacEwan, K. 2016. Fruit bats and wind turbine fatalities in South Africa. African Bat Conservation News 42.
MacEwan, K., J. Aronson, E. Richardson, P. Taylor, B. Coverdale, D. Jacobs, L. Leeuwner, W. Marais, and L. Richards. 2018. South African Bat Fatality Threshold Guidelines – ed 2. South African Bat Assessment Association.
MacEwan, K., T. W. Morgan, C. A. Lötter, and A. T. Tredennick. 2020a. Bat Activity Across South Africa: Implications for Wind Energy Development. African Journal of Wildlife Research 50.
MacEwan, K., S. Sowler, J. Aronson, and C. A. Lötter. 2020b. South African Best Practice Guidelines for Pre-construction Monitoring of Bats at Wind Energy Facilities - ed 5. South African Bat Assessment Association.

Marques, J. T., A. Rainho, M. CarapuÃ§o, P. Oliveira, and J. M. Palmeirim. 2004. Foraging Behaviour and Habitat use by the European Free-Tailed Bat Tadarida teniotis. Acta Chiropterologica 6:99-110.

McCracken, G. F., E. H. Gillam, J. K. Westbrook, Y.-F. Lee, M. L. Jensen, and B. B. Balsley. 2008. Brazilian free-tailed bats (*Tadarida brasiliensis*: Molossidae, Chiroptera) at high altitude: links to migratory insect populations. Integrative and Comparative Biology 48:107-118.

Miller-Butterworth, C. M., D. S. Jacobs, and E. H. Harley. 2003. Strong population substructure is correlated with morphology and ecology in a migratory bat. Nature 424:187-191.

Millon, L., C. Colin, F. Brescia, and C. Kerbiriou. 2018. Wind turbines impact bat activity, leading to high losses of habitat use in a biodiversity hotspot. Ecological Engineering 112:51-54.

Millon, L., J.-F. Julien, R. Julliard, and C. Kerbiriou. 2015. Bat activity in intensively farmed landscapes with wind turbines and offset measures. Ecological Engineering 75:250-257.

Mitchell-Jones, T., and C. Carlin. 2014. Bats and Onshore Wind Turbines Interim Guidance. Natural England Technical Information Note TIN051. Natural England.

Monadjem, A., P. J. Taylor, F. P. D. Cotterill, and M. C. Schoeman. 2020. Bats of Southern and Central Africa: A Biogeographic and Taxonomic Synthesis. 2nd edition.

MTPA. 2014. Mpumalanga Biodiversity Sector Plan Handbook.*in* C. Lötter M.C., M.J. and Lechmere-Oertel R.G., editor. Mpumalanga Tourism & Parks Agency, Mbombela (Nelspruit).

Mucina, L., and M. C. Rutherford. 2006. The vegetation of South Africa, Lesotho and Swaziland. *Strelitzia* 19. South African National Biodiversity Institute, Pretoria.

Nguyen, T. N., A. Ruangwiset, and S. Bumrungsri. 2019. Vertical stratification in foraging activity of Chaerephon plicatus (Molossidae, Chiroptera) in Central Thailand. Mammalian Biology 96:1-6.

Noer, C. L., T. Dabelsteen, K. Bohmann, and A. Monadjem. 2012. Molossid bats in an African agro-ecosystem select sugarcane fields as foraging habitat. African Zoology 47:1-11.

Pretorius, M., H. Broders, and M. Keith. 2020. Threat analysis of modelled potential migratory routes for Miniopterus natalensis in South Africa. Austral Ecology 45:1110 - 1122.

Richardson, S. M., P. R. Lintott, D. J. Hosken, T. Economou, and F. Mathews. 2021. Peaks in bat activity at turbines and the implications for mitigating the impact of wind energy developments on bats. Scientific Reports 11:3636.

Robinson, M. F., and R. E. Stebbings. 1997. Home range and habitat use by the serotine bat, Eptesicus serotinus, in England. Journal of Zoology 243:117-136.

Rodhouse, T. J., R. M. Rodriguez, K. M. Banner, P. C. Ormsbee, J. Barnett, and K. M. Irvine. 2019. Evidence of region-wide bat population decline from long-term monitoring and Bayesian occupancy models with empirically informed priors. Ecology and Evolution 9:11078-11088.

Rodrigues, L. B., L.; Dubourg-Savage, M.; Karapandža, B.; Kovač, D.; Kervyn, T.; Dekker, J.; Kepel, A.; Bach, P.; Collins, J.; Harbusch, C.; Park, K.; Micevski, B.; Minderman, J. 2015. Guidelines for Consideration of Bats in Wind Farm Projects Revision 2014. EUROBATS Publication Series No. 6 (English Version). UNEP/EUROBATS Secretariat, Bonn, Germany, 133 pp.

Romano, W. B., J. R. Skalski, R. L. Townsend, K. W. Kinzie, K. D. Coppinger, and M. F. Miller. 2019. Evaluation of an acoustic deterrent to reduce bat mortalities at an Illinois wind farm. Wildlife Society Bulletin 43:608-618.

Rydell, J. 1992. Exploitation of insects around streetlamps by bats in Sweden. Functional Ecology 6:744-750.

Schnitzler, H.-U., C. F. Moss, and A. Denzinger. 2003. From spatial orientation to food acquisition in echolocating bats. TRENDS in Ecology and Evolution 18:386-394.

Scottish Natural Heritage. 2019. Bats and Onshore Wind Turbines: Survey, Assessment and Mitigation.

Sirami, C. I., D. S. Jacobs, and G. S. Cumming. 2013. Artificial wetlands and surrounding habitats provide important foraging habitat for bats in agricultural landscapes in the Western Cape, South Africa. Biological Conservation 164:30-38.

South African National Biodiversity Institute (SANBI). 2020. Species Environmental Assessment Guideline. Guidelines for the implementation of the Terrestrial Fauna and Terrestrial Flora Species Protocols for environmental impact assessments in South Africa. South African National Biodiversity Institute, Pretoria. Version 2.1 2021.

Stone, E. L. 2012. Bats and Lighting: Overview of current evidence and mitigation.

Tella, J. L., D. Hernández-Brito, G. Blanco, and F. Hiraldo. 2020. Urban Sprawl, Food Subsidies and Power Lines: An Ecological Trap for Large Frugivorous Bats in Sri Lanka? Diversity 12:94.

Thaxter, C. B., G. M. Buchanan, J. Carr, S. H. M. Butchart, T. Newbold, R. E. Green, J. A. Tobias, W. B. Foden, S. Brien, and J. W. Pearce-Higgins. 2017. Bird and bat species' global vulnerability to collision mortality at wind farms revealed through a trait-based assessment. Proceedings of the Royal Society B: Biological Sciences 284.

Tolvanen, A., H. Routavaara, M. Jokikokko, and P. Rana. 2023. How far are birds, bats, and terrestrial mammals displaced from onshore wind power development? – A systematic review. Biological Conservation 288:110382.

van der Merwe, M. 1975. Preliminary study on the annual movements of the Natal clinging bat. South African Journal of Science 71:237-241.

Voigt, C. C., E. Bernard, J. C.-C. Huang, W. F. Frick, C. Kerbiriou, K. MacEwan, F. Mathews, A. Rodríguez-Durán, C. Scholz, P. W. Webala, J. Welbergen, and M. Whitby. 2024. Toward solving the global green–green dilemma between wind energy production and bat conservation. Bioscience 74:240-252.

Voigt, C. C., A. G. Popa-Lisseanu, I. Niermann, and S. Kramer-Schadt. 2012. The catchment area of wind farms for European bats: A plea for international regulations. Biological Conservation 153:80-86.

Voigt, C. C., D. Russo, V. Runkel, and H. R. Goerlitz. 2021. Limitations of acoustic monitoring at wind turbines to evaluate fatality risk of bats. Mammal Review n/a.

Weaver, S. P., C. D. Hein, T. R. Simpson, J. W. Evans, and I. Castro-Arellano. 2020. Ultrasonic acoustic deterrents significantly reduce bat fatalities at wind turbines. Global Ecology and Conservation:e01099.

Wellig, S. D., S. Nusslé, D. Miltner, O. Kohle, O. Glaizot, V. Braunisch, M. K. Obrist, and R. Arlettaz. 2018. Mitigating the negative impacts of tall wind turbines on bats: Vertical activity profiles and relationships to wind speed. PloS one 13:e0192493.

Young, D. P., Jr, K. Bay, S. Nomani, and W. L. Tidhar. 2011. Nedpower Mount Storm Wind Energy Facility Post-Construction Avian and Bat Monitoring: July - October 2010. Prepared for NedPower Mount Storm, LLC, Houston, Texas. Prepared by Western EcoSystems Technology, Inc. (WEST), Cheyenne, Wyoming.

Appendix 1: Figures

Appendix 2: Specialist CV

Appendix 3: Specialist Declaration

Appendix 4: SACNASP Certificate

From: Josua Meyer
Sent on: Friday, 25 July 2025 05:11:02
To: ERM Arcus Amsterdam
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Sustainability is our business

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Cape Town
+[redacted]
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Cape Town [redacted] **erm.com**

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To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
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Environmental Assessment Practitioner

ERM

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Lucien Barbeau
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Cape Town [redacted] **erm.com**



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mulilo

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CC: Stephanie Gopaul; Stephen Burton; Rebecca Thomas; Andrew Pearson
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Hi Lloyd,

Noted, will touch base with Mr Meyer regarding the 4th August, but just on his request for the below information, permits etc. Will we be sharing this info prior to the meeting as per his request?

ERM
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Lucien Barbeau
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Cape Town [redacted] **erm.com**

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Lloyd Barnes
Sent on: Friday, 25 July 2025 10:35:38
To: ERM Arcus Amsterdam; Johans Van Wyk
CC: Stephanie Gopaul; Stephen Burton; Rebecca Thomas; Andrew Pearson
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

It shouldn't be a problem, I am just reverting with our internal legal department.

Kind Regards,

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Senior Associate: Developer.
[redacted]
mulilo

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, 25 July 2025 10:24
To: Lloyd Barnes <Lloyd@mulilo.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Johans Van Wyk <piwy@mulilo.com>
Cc: Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Rebecca Thomas <reth@mulilo.com>; Andrew Pearson <Andrew@mulilo.com>
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> > Senior Consultant
> >
> > Cape Town [redacted] **erm.com**
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> > **From:** Josua Meyer <meyerjosua55@gmail.com>
> > **Sent:** Friday, July 18, 2025 4:51 AM
> > **To:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>

Cc: Johans Van Wyk <Piwy@mulilo.com>; Lloyd@mulilo.com
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Lucien Barbeau
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From: Johans Van Wyk
Sent on: Friday, 25 July 2025 10:48:09
To: Lloyd Barnes; ERM Arcus Amsterdam
CC: Stephanie Gopaul; Stephen Burton; Rebecca Thomas; Andrew Pearson; Avra Moodley; Anton Lohse
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Good morning all,

Mr. Meyer informed me over the phone that he would like to have the meeting preferably *before* the 1st of Aug to allow his team to draft an appropriate response before PPP concludes.

Mr. Meyer indicated his availability as follow:

- Mon 28th Jul
- Tue 29th Jul
- Thu 30th Jul
- Mon 4th Aug

I am not available in the 1st Aug unfortunately – the above dates suites me well also.

Sincerely,

Johans van Wyk
Senior Associate: Landowner Liaison
[redacted]
mulilo

From: Lloyd Barnes <Lloyd@mulilo.com>
Sent: Friday, July 25, 2025 10:05 AM
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We require our LO Manager - @Johans Van Wyk, to attend the meeting. He has an existing relationship with Mr Meyer and will send him a whatsapp also requesting a meeting on the 4th.

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[redacted]
www.mulilo.com

mulilo

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[redacted]: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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I have followed up with Albert regarding those figures in his report, I'll try and reach him telephonically to gain a faster response.

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Cape Town [redacted] **erm.com**

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To: Lloyd Barnes; ERM Arcus Amsterdam; Johans Van Wyk
CC: Stephanie Gopaul; Stephen Burton; Rebecca Thomas; Andrew Pearson
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Thanks Lloyd, appreciate the update. Let us know once legal has confirmed.

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We look forward to your response.

Kind Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 18, 2025 4:51 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Johans Van Wyk <Piwy@mulilo.com>; Lloyd@mulilo.com
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

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Cape Town [redacted] **erm.com**

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Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

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Thank you and regards,

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Environmental Assessment Practitioner

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Sent on: Friday, 25 July 2025 12:05:07
To: Johans Van Wyk; Lloyd Barnes; ERM Arcus Amsterdam
CC: Stephanie Gopaul; Stephen Burton; Rebecca Thomas; Andrew Pearson; Avra Moodley; Anton Lohse
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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We require our LO Manager - @Johans Van Wyk, to attend the meeting. He has an existing relationship with Mr Meyer and will send him a whatsapp also requesting a meeting on the 4th.

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Senior Associate: Developer.
[redacted]

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Cape Town
+27105963488

erm.com

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Environmental Assessment Practitioner

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From: Rebecca Thomas
Sent on: Friday, 25 July 2025 12:13:03
To: ERM Arcus Amsterdam; Johans Van Wyk; Lloyd Barnes
CC: Stephanie Gopaul; Stephen Burton; Andrew Pearson; Avra Moodley; Anton Lohse
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi All,

I will send a concluding email shortly on the way forward.

Kind Regards,
Rebecca Thomas
Director: Project Development
[redacted]

mulilo

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>
> Josua Meyer
>
> On Wed, Jul 16, 2025 at 1:54 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:
>
> > Dear Interested and Affected Party,
> >
> > Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.
> >
> > The revised comment period now ends on 15 August 2025.
> >
> > All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.
> >
> > Thank you for your continued participation.
> >
> > ERM
> > Sustainability is our business
> >
> > **Lucien Barbeau**
> > Senior Consultant
> >
> > Cape Town [redacted] **erm.com**
> >
> > **From:** ERM Arcus Amsterdam
> > **Sent:** Tuesday, July 15, 2025 4:43 PM

To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: ERM Arcus Amsterdam
Sent on: Friday, 25 July 2025 12:25:12
To: ERM Arcus Amsterdam; Celia de Waal
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Good day Celia, I hope this email finds you well.

I am reaching out to follow up if you have received the USB, we have receive confirmation that the package was delivered but have not received confirmation from your office.

Kind Regards

ERM
Sustainability is our business

Mpho Bridget Malema
Consulting Associate

Johannesburg
[redacted]

erm.com



From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, July 17, 2025 10:00 AM
To: Celia de Waal <celia@mtpa.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Thank you so much for your understanding and swift response to the matter.

We will arrange the delivery ASAP and let you know when it is on the way to you.

Kind Regards

ERM
Sustainability is our business

Mpho Bridget Malema
Consulting Associate

Johannesburg
[redacted]

erm.com



From: Celia de Waal <celia@mtpa.co.za>
Sent: Thursday, July 17, 2025 9:48 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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

EXTERNAL MESSAGE



Good morning

A USB drive is 100 %.

Kind regards

Celia

Disclaimer:
All views or opinions expressed in this electronic message and its attachments are the views of the sender and do not necessarily reflect the views and opinions of the Mpumalanga Tourism and Parks Agency. No employee of Mpumalanga Tourism and Parks Agency is entitled to conclude a binding contract on behalf of the Mpumalanga Tourism and Parks Agency unless he/ she is an Accounting Officer of the Mpumalanga Tourism and Parks Agency, or his or her authorized representative. The information contained in this message and its attachments may be confidential or privileged and is for the use of the named recipient only, except where the sender specifically states otherwise. If you are not the intended recipient you may not copy or deliver this message to anyone.

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: 17 July 2025 09:44
To: Celia de Waal <celia@mtpa.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Frans Krige <frans@mtpa.co.za>; Lucien Barbeau <Lucien.Barbeau@erm.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Good morning, Cecilia,

Thank you for your request.

Kindly confirm whether we may submit a USB drive containing the full set of Draft Environmental Impact Assessment (EIA) Reports for the Sheepmoor and Emvelo Wind Energy Facilities, in lieu of printed hard copies. The USB will include all relevant documentation to assist your scientists in their review and commentary.

If possible, we would appreciate it if you could get back to us today, so that we can arrange for delivery as soon as possible.

Kind Regards

ERM
Sustainability is our business

Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted] **erm.com**



From: Celia de Waal <celia@mtpa.co.za>
Sent: Wednesday, July 16, 2025 2:46 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Frans Krige <frans@mtpa.co.za>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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

EXTERNAL MESSAGE



Good afternoon

Kindly send us, the MTPA a hard copy of the Draft EIA for the Mulilo Amsterdam Wind Energy Facility Cluster, for our scientists to comment on, to the following physical address in Lydenburg:

To: Celia de Waal (EIA Data Capturer)
MTPA Office Building (Lydeburg)
[redacted]

[redacted]

Kind regards

Celia de Waal

Mpumalanga
TOURISM AND PARKS AGENCY

An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
[redacted]

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: 15 July 2025 16:43
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

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Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



From: Graham Young
Sent on: Friday, 25 July 2025 12:29:52
To: ERM Arcus Amsterdam
CC: Stephen Burton; Stephanie Gopaul; Menno Klapwijk
Subject: Re: GYLA STATEMENT
Attachments: 0215_Mulilo WEF Cluster_VIA_2025 03 03_Rev 01.pdf (215.22 KB), ERM Statement_20250725.pdf (127.36 KB)

EXTERNAL MESSAGE

Dear Lucien,
My apologies, there was a subtraction mistake on my invoice no. 215 (a previous invoice, no. 160, which had been paid, was not subtracted from the due amount). Invoice no. 215 was initially issued on 03 March 2025.

1. I have corrected this and reissued the invoice as No. 215 Rev 01, but kept the original issue date (attached);
2. My statement has also been corrected to reflect this (attached);
3. I have also included my spreadsheet that sets out my fees and the scope changes over time (this was previously submitted to you).

I trust all is in order. Let me know if you have any questions.
Kind regards
G

African Journal of Landscape Architecture https://www.ajlajournal.org/ifla-africa
African Landscape Network https://bit.ly/ALNstorymap

On Thu, 24 Jul 2025 at 16:42, ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Graham,
>
> Thanks for your statement, when you have a moment, could you please send me a breakdown of the R 191,253.00 amount on the statement of account for the Mulilo WEF project.
>
> This will help us ensure our records are aligned and allow us to arrange payment for any outstanding amounts due to you. Thank you for your continued support and patience, it's much appreciated. Please let me know if you need anything further from my side.
>
> Warm regards,
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Senior Consultant
> [redacted]
> Cape Town
> **erm.com**

From: Graham Young <grahamyounglandarch@gmail.com>
Sent: Thursday, May 29, 2025 3:54 PM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: GYLA STATEMENT

EXTERNAL MESSAGE

Dear Lucien,

Please find attached my Statement for processing.

Kind regards

G

African Journal of Landscape Architecture https://www.ajlajournal.org/ifla-africa

African Landscape Network https://bit.ly/ALNstorymap

From: Celia de Waal
Sent on: Friday, 25 July 2025 12:30:18
To: ERM Arcus Amsterdam
CC: Frans Krige
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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

EXTERNAL MESSAGE



Dear Ms. Malema

The USB was received on 22 July 2025.

Our EIA/LUA registration numbers are:

- Emvelo Wind Energy Facility - Our ref: LUA 25/3966 (4)
- Sheepmoor Wind Energy Facility – Our ref: LUA 25/3967(4)

Kind regards

Celia

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: 25 July 2025 12:25
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Celia de Waal <celia@mtpa.co.za>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Good day Celia, I hope this email finds you well.

I am reaching out to follow up if you have received the USB, we have receive confirmation that the package was delivered but have not received confirmation from your office.

Kind Regards

Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted]

erm.com



From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, July 17, 2025 10:00 AM
To: Celia de Waal <celia@mtpa.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Thank you so much for your understanding and swift response to the matter.

We will arrange the delivery ASAP and let you know when it is on the way to you.

Kind Regards

Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted]

erm.com



From: Celia de Waal <celia@mtpa.co.za>
Sent: Thursday, July 17, 2025 9:48 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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EXTERNAL MESSAGE



economic development & tourism

MPUMALANGA
THE PLACE OF THE RISING SUN

Good morning

A USB drive is 100 %.

Kind regards

Celia

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Sent: 17 July 2025 09:44
To: Celia de Waal <celia@mtpa.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Frans Krige <frans@mtpa.co.za>; Lucien Barbeau <Lucien.Barbeau@erm.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Sustainability is our business

Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted]
[redacted]



[redacted] Celia de Waal <celia@mtpa.co.za>
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EXTERNAL MESSAGE



Good afternoon

Kindly send us, the MTPA a hard copy of the Draft EIA for the Mulilo Amsterdam Wind Energy Facility Cluster, for our scientists to comment on, to the following physical address in Lydenburg:

To: Celia de Waal (EIA Data Capturer)
MTPA Office Building (Lydeburg)
End of Morganstreet
1120 Lydenburg

[redacted]

[redacted]

Celia de Waal

Mpumalanga

TOURISM AND PARKS AGENCY

An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
[redacted]

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: 15 July 2025 16:43
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



GRAHAM A YOUNG LANDSCAPE ARCHITECT

INVOICE

Environmental Resources Management Southern Africa (Pty) Limited
240 Main Road
1st Floor Great Westerford, Rondebosch
Cape Town
South Africa
7700

GYLA Not VAT Registered	
Invoice No:	215-Rev 01
Client Invoice No:	#3
Period:	to February 2025
GYLA Project No:	106/2023
Client VAT no:	4360274239
Client Reg No.	2015/416206/07

Attention: Lucien Barbeau **Date:** 03 March 2025
lucien.barbeau@erm.com Stephen.Burton@erm.com

Project: Mulilo Amsterdam WEFs Project No. 0684401 - Visual Impact Assessment
As per LoA dated 10 May 2023 and subsequent extra over amounts

Item	Description		Quantity	Rate	Amount
	Total Original Value				**R 162 160,00**
1	**Professional Fees and Disbursements:**				
	To: Visual Impact Assessment		1	R162 160,00	R 162 160,00
	Extra over as per attached spreadsheet		1	R61 525,00	R 61 525,00
	Sub Total				**R 223 685,00**
2	**Less Previous Invoices**	No. 144 (15 June 2023)			R 32 432,00
		No. 160 (15 Nov 2023)			R 40 540,00
	Sub Total				**R 150 713,00**
3	**Total (excl. VAT)**				R 150 713,00
	No VAT (GYLA is not a VAT Vendor)				R -
	Total amount due				**R 150 713,00**

Bank Details:
GA Young
Standard Bank of South Africa
Rivonia Branch 001255
42-010-134-9

Address:
PO Box 331
Groenkloof, 0027
608 Leyds Street, Muckleneuk
Pretoria, 0002

GRAHAM A YOUNG **LANDSCAPE ARCHITECT**
PO Box 331 Groenkloof 0027

Environmental Resources Management Southern Africa (Pty) Limited
240 Main Road
1st Floor Great Westerford, Rondebosch
Cape Town
South Africa, 7700

C/o: Stephen Burton and Lucien Barbeau stephen.burton@erm.com
ERM.SouthAfricaRenewablesAccountsPayable@erm.com Lucien.Barbeau@erm.com **Date:** 29-May-25

Statement of Account

Date	Invoice No.	Description	Invoiced Amount	Amount Paid	Amount Due
15-Jun-23	144	Mulilo WEF Cluster VIA: SITE VISIT	R32 432,00		R32 432,00
30-Jun-23		**PAYMENT**		R32 432,00	R0,00
14-Sept-23	156	Boshoek Solar PV Cluster: SITE VISIT AND SCOPING	R64 346,62		R64 346,62
29-Sept-23		**PAYMENT**		R64 346,62	R0,00
15-Nov-23	160	Mulilo WEF Cluster VIA: SCOPING REPORTS	R40 540,00		R40 540,00
21-May-24	187	Boshoek Solar PV Cluster: ASSESSMENT	R34 193,38		R74 733,38
30-May-24		**PAYMENT**		R34 193,38	R40 540,00
17-Oct-24		**PAYMENT**		R40 540,00	R0,00
03-Mar-25	215	Mulilo WEF Cluster VIA: Assessment Reports plus Extra Over	R150 713,00		R150 713,00
		Total Outstanding (NO VAT)	R322 225,00	R171 512,00	**R150 713,00**

120 + Days	90 Days	60 Days	30 Days	Current	Balance Due
R0,00	**R150 713,00**	**R0,00**	**R0,00**	**R0,00**	**R150 713,00**



Payment Details
Bank: Standardbank, Rivonia Branch
Branch code: 00 1255
Name: Graham A Young
Account nr.: 420 101 349

From: ERM Arcus Amsterdam
Sent on: Friday, 25 July 2025 12:35:13
To: Celia de Waal; ERM Arcus Amsterdam
CC: Frans Krige
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Thank you so much for your feedback and confirmation.

Please do not hesitate to contact us should you need any further information or clarity.

Kind Regards

ERM
Sustainability is our business

Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted] **erm.com**



From: Celia de Waal <celia@mtpa.co.za>
Sent: Friday, July 25, 2025 12:30 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
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EXTERNAL MESSAGE



Dear Ms. Malema

The USB was received on 22 July 2025.

Our EIA/LUA registration numbers are:

- Emvelo Wind Energy Facility - Our ref: LUA 25/3966 (4)
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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: 25 July 2025 12:25
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Celia de Waal <celia@mtpa.co.za>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Good day Celia, I hope this email finds you well.

I am reaching out to follow up if you have received the USB, we have receive confirmation that the package was delivered but have not received confirmation from your office.

Kind Regards

ERM
Sustainability is our business

Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted]

erm.com



[redacted] ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, July 17, 2025 10:00 AM
To: Celia de Waal <celia@mtpa.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Thank you so much for your understanding and swift response to the matter.

We will arrange the delivery ASAP and let you know when it is on the way to you.

Kind Regards

ERM
Sustainability is our business

Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted] **erm.com**



From: Celia de Waal <celia@mtpa.co.za>
Sent: Thursday, July 17, 2025 9:48 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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

EXTERNAL MESSAGE



Good morning

A USB drive is 100 %.

Kind regards

Celia

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: 17 July 2025 09:44
To: Celia de Waal <celia@mtpa.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Frans Krige <frans@mtpa.co.za>; Lucien Barbeau <Lucien.Barbeau@erm.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Good morning, Cecilia,

Thank you for your request.

Kindly confirm whether we may submit a USB drive containing the full set of Draft Environmental Impact Assessment (EIA) Reports for the Sheepmoor and Emvelo Wind Energy Facilities, in lieu of printed hard copies. The USB will include all relevant documentation to assist your scientists in their review and commentary.

If possible, we would appreciate it if you could get back to us today, so that we can arrange for delivery as soon as possible.

Kind Regards

ERM
Sustainability is our business

Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted] **erm.com**



From: Celia de Waal <celia@mtpa.co.za>
Sent: Wednesday, July 16, 2025 2:46 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Frans Krige <frans@mtpa.co.za>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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

EXTERNAL MESSAGE



economic development & tourism

MPUMALANGA
THE PLACE OF THE RISING SUN

Good afternoon

Kindly send us, the MTPA a hard copy of the Draft EIA for the Mulilo Amsterdam Wind Energy Facility Cluster, for our scientists to comment on, to the following physical address in Lydenburg:

To: Celia de Waal (EIA Data Capturer)
MTPA Office Building (Lydeburg)
End of Morganstreet
1120 Lydenburg

[redacted]

Kind regards

Celia de Waal

Mpumalanga
TOURISM AND PARKS AGENCY

An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services

[redacted]

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: 15 July 2025 16:43
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Lucien Barbeau
Senior Consultant

Sustainability is our business

Cape Town [redacted]

erm.com



From: Rebecca Thomas
Sent on: Friday, 25 July 2025 15:48:44
To: ERM Arcus Amsterdam; Johans Van Wyk; Lloyd Barnes
CC: Stephanie Gopaul; Stephen Burton; Andrew Pearson; Avra Moodley; Anton Lohse
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Afternoon all,

Please can we continue to confirm a meeting date with Mr Meyer for 4th August.

Kind Regards,
Rebecca Thomas
Director: Project Development
[redacted]

mulilo

CONFIDENTIALITY AND DATA PROTECTION. This email is intended only for the use of the intended recipient(s) and may contain information which is privileged and confidential, or personal data which is subject to data protection legislation. If you are not the intended recipient, any disclosure, copying and/or distribution of the content of this email, or reliance upon or other use of the contents of this email is strictly prohibited. If you have received this email in error, please erase all copies of it, including all attachments, do not forward it to anybody, and please also notify the sender immediately.

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, 25 July 2025 12:05
To: Johans Van Wyk <piwy@mulilo.com>; Lloyd Barnes <Lloyd@mulilo.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Rebecca Thomas <reth@mulilo.com>; Andrew Pearson <Andrew@mulilo.com>; Avra Moodley <avmo@mulilo.com>; Anton Lohse <Anton@mulilo.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Lloyd,

Are we then still aiming for the 4th of August for the meeting? That date would allow sufficient time for preparation and internal approvals on our side.

If you're considering a date before the 1st of August instead, could you please confirm which one you're leaning toward? I'd like to plan accordingly, including finalising the costing.

Thanks

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Johans Van Wyk <piwy@mulilo.com>
Sent: Friday, July 25, 2025 10:48 AM
To: Lloyd Barnes <Lloyd@mulilo.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Rebecca Thomas <reth@mulilo.com>; Andrew Pearson <Andrew@mulilo.com>; Avra Moodley <avmo@mulilo.com>; Anton Lohse <Anton@mulilo.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Good morning all,

Mr. Meyer informed me over the phone that he would like to have the meeting preferably *before* the 1st of Aug to allow his team to draft an appropriate response before PPP concludes.

Mr. Meyer indicated his availability as follow:

- Mon 28th Jul
- Tue 29th Jul
- Thu 30th Jul
- Mon 4th Aug

I am not available in the 1st Aug unfortunately – the above dates suites me well also.

Sincerely,

Johans van Wyk
Senior Associate: Landowner Liaison
[redacted]
mulilo

From: Lloyd Barnes <Lloyd@mulilo.com>
Sent: Friday, July 25, 2025 10:05 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Johans Van Wyk <piwy@mulilo.com>
Cc: Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Rebecca Thomas <reth@mulilo.com>; Andrew Pearson <Andrew@mulilo.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Good day Lucien,

Thank you for informing us of the below communications.

I understand his point of view, but our availability is slightly restricted, may we please request that we instead meet on Monday the 4th?

We require our LO Manager - @Johans Van Wyk, to attend the meeting. He has an existing relationship with Mr Meyer and will send him a whatsapp also requesting a meeting on the 4th.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]

mulilo

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, 25 July 2025 08:08
To: Lloyd Barnes <Lloyd@mulilo.com>
Cc: Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: FW: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Lloyd,

Please see below correspondence from My Meyer regarding the upcoming meeting. He would like to shift this meeting to next week prior to 1st August. He is requesting several documents listed below before the meeting commences.

I have followed up with Albert regarding those figures in his report, I'll try and reach him telephonically to gain a faster response.

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 25, 2025 5:11 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

Proposed date for the meeting seems to be too close to submission of comments which is already 9/08/25.

Can you arrange the meeting for us before 1/07/2025.

Can you in the meantime forward the detail previously requested

- All the documentation with Department concerning the 3 months extension granted even after time lapps to submit final report

- Mulilo's permits to fit telemetry device on the two martial eagles

- AfriAvian motivation for altering Figure 33 in both avifaunal reports

Above info are urgently required and no reason to wait for the meeting

Regards

Josua

On Tue, Jul 22, 2025 at 10:30 AM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Hi Lucien
>
> There might be a mistake in your day or date ..... 7 August 2025 is a Thursday.
>
> Nevertheless the 6 or 7 th August 2025 is fine with us.
>
> Will appreciate it if we can meet on my farm.
>
> We intend to be three (3) I&AP
>
> Regards
>
> Josua Meyer
>
> On Mon, Jul 21, 2025 at 11:36 AM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:
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> > Dear Mr. Meyer,
> >
> > Good day, and thank you for your recent correspondence regarding the Draft EIA Reports.
> >
> > We acknowledge your request for a meeting to discuss the concerns raised. In consultation with the applicant, Mulilo, we are proposing a provisional date of Wednesday, 7 August 2025, with the meeting to be held at a venue in Ermelo. Kindly confirm whether this date is suitable for you and whether you will be attending alone or accompanied by others.
> >
> > As a registered I&AP, your comments form an important part of the formal public participation process and will be incorporated into the Final EIA Reports. We also acknowledge the concerns raised regarding the tagging of the Martial Eagles. Relevant documentation, including permits, will be made available where appropriate to support transparency and clarity during the engagement.
> >
> > We look forward to your response.
> >
> > Kind Regards,
> >
> > ERM
> > Sustainability is our business
> >
> > **Lucien Barbeau**
> > Senior Consultant
> >
> > Cape Town [redacted] **erm.com**
> >
> > **From:** Josua Meyer <meyerjosua55@gmail.com>
> > **Sent:** Friday, July 18, 2025 4:51 AM
> > **To:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
> > **Cc:** Johans Van Wyk <Piwy@mulilo.com>; Lloyd@mulilo.com
> > **Subject:** Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
> >
> > **EXTERNAL MESSAGE**
> >
> > Goodday mr Lucien Barbeau,
> >
> > Referring to your email dated 7/04/2025 it will be appreciated if you can arrange such a meeting urgently before the 9/08/2025 with the applicant, Mulilo, on site.

Concerns as previously raised with Mulilo in an email dated 19/02/2025 will be on the agenda. That request for a meeting was refused by Mulilo.

Another urgent item which also must be discussed is the tagging of the two martial eagles. According to the MTPA report in my possession, the martial eagles were tagged by Mulilo without a permit. Copy of the report can be provided at the meeting.

That leaves the tagging of the martial eagles illegally, if not criminal.

Therefore the data being used in the specialist report is illegally obtained and all sections, models and references where data has been used must be removed from the report.

Looking forward to your urgent response.

Regards

Josua Meyer (I&AP)

On Wed, Jul 16, 2025 at 4:41 PM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Goodday Sir
>
> The avifaunal specialist removed in both reports, Sheepmoor WEF and Emvelo WEF, the High Sensitivity - Turbine Exclusion Zone in Figures 33 for the aquatic buffer zones from an avifaunal perspective.
>
> It must be an unintentional mistake and request reinstatement of it.
>
> If it was deliberate we request the detailed reasoning and motivation for such a drastic decision.
>
> Thanks
>
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> >
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> >
> > The revised comment period now ends on 15 August 2025.
> >
> > All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.
> >
> > Thank you for your continued participation.
> >
> > ERM
> > Sustainability is our business
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> > **Lucien Barbeau**
> > Senior Consultant
> >
> > Cape Town [redacted] **erm.com**
> >
> > **From:** ERM Arcus Amsterdam
> > **Sent:** Tuesday, July 15, 2025 4:43 PM

To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

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Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: ERM Arcus Amsterdam
Sent on: Monday, 28 July 2025 11:48:49
To: Josua Meyer; ERM Arcus Amsterdam
CC: Stephen Burton; Lloyd Barnes; Stephanie Gopaul; Andrew Pearson; Rebecca Thomas; Johans Van Wyk
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Meyer,

Following discussions with the applicant, unfortunately it will not be possible to schedule a meeting prior to 1 August due to limited availability.

However, we would be pleased to meet with you on Monday the 4th of August 2025 at 13:00, as per your request, at your farm.

Kindly confirm whether this date and time are suitable, and please advise who will be attending the meeting from your side.

I will continue to provide you with the requested documentation ahead of the meeting.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 25, 2025 5:11 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Josua Meyer (I&AP)

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> > **Lucien Barbeau**
> > Senior Consultant
> >
> > Cape Town [redacted] **erm.com**
> >
> > **From:** ERM Arcus Amsterdam
> > **Sent:** Tuesday, July 15, 2025 4:43 PM
> > **To:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>

Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



From: Albert Froneman
Sent on: Tuesday, 29 July 2025 05:59:12
To: Lucien Barbeau; ERM Arcus Amsterdam
CC: Lloyd Barnes; Mpho Malema; Stephanie Gopaul; Marietjie Froneman; Robin Colyn
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

Thanks for your email and follow-up.

Our response to the comment raised is as follows:

In both the proposed Emvelo and Sheepmoor WEF avifaunal reports, Figure 33 refers to No-Go Zones around Yellow-breasted Pipit Habitat. However, we assume the respondent is referring to Figure 31, which addresses aquatic buffers.

Initially, as a precautionary approach, the avifaunal buffers related to aquatic features included a uniform 200m buffer area around all wetland and drainage line features. In the final avifaunal report, however, the following sensitive areas were considered:
- All wetland areas and drainage lines as identified by the aquatic specialist.
- Minor drainage lines that only facilitate runoff were not assigned an additional avifaunal buffer beyond what was already proposed by the aquatic specialist.

The rationale for this adjustment is as follows:

- Minor drainage line areas that only facilitate runoff would not hold permanent water and, therefore, would not provide suitable habitat for water and wetland-associated species.
- Extensive wetland habitat models for wetland-associated species (including spp 23) were developed for the project areas, focusing on providing comprehensive avoidance mitigation around the most expansive and sensitive wetland habitats.
- Waterbird and wetland-associated species are expected to use these extensive wetland areas in higher densities, and the avoidance mitigation would thus offer a high degree of protection.
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- Waterbird species of conservation concern will be added as SDoD trigger species as part of the Biodiversity Management Plan (BMP) to be developed and implemented prior to operation.
- The BMP will also allow for the modification and enhancement of mitigation measures if any thresholds are exceeded

Let us know if you have further questions.

Best regards / Vriendelike groete,

Albert

Albert Froneman *Pr.Sci.Nat*

AFRIAVIAN ENVIRONMENTAL

[redacted]

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 23 July 2025 14:58
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Albert Froneman <albert@afriavian.com>; Marietjie Froneman <marietjie@afriavian.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Mpho Malema <mpho.malema@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Albert,

I am just following up with the below, we require your inputs prior to responding to the I&AP.

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Thursday, July 17, 2025 10:56 AM
To: Albert Froneman <albert@afriavian.com>; Marietjie Froneman <marietjie@afriavian.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Mpho Malema <mpho.malema@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Subject: FW: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Albert,

Trusting you are well! As you know we are out for the second round of DEIAr PPP. I have an I&AP comment below regarding the figures on the avifaunal report.

I've looked at the Figure 33 in the latest report and it is labelled "No-Go Zones around Yellow-breasted Pipit Habitat"

I require your input to the comment below, are you able to provide clarity on the below? To my understanding you would not have aquatic buffer zones present for a Yellow-breasted Pipit.

I'm available to take a call should a brief discussion be needed.

Thank you

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Wednesday, July 16, 2025 4:42 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>

Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Sir

The avifaunal specialist removed in both reports, Sheepmoor WEF and Emvelo WEF, the High Sensitivity - Turbine Exclusion Zone in Figures 33 for the aquatic buffer zones from an avifaunal perspective.

It must be an unintentional mistake and request reinstatement of it.

If it was deliberate we request the detailed reasoning and motivation for such a drastic decision.

Thanks

Josua Meyer

On Wed, Jul 16, 2025 at 1:54 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Interested and Affected Party,
>
> Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.
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> The revised comment period now ends on 15 August 2025.
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> All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.
>
> Thank you for your continued participation.
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Senior Consultant
>
> Cape Town [redacted] **erm.com**
>
> **From:** ERM Arcus Amsterdam
> **Sent:** Tuesday, July 15, 2025 4:43 PM
> **To:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
> **Subject:** Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
>
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Environmental Assessment Practitioner

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



This e-mail and any attachments may contain proprietary, confidential and/or privileged information. No confidentiality or privilege is waived or lost by any transmission errors. This communication is intended solely for the intended recipient, and if you are not the intended recipient, please notify the sender immediately, delete it from your system and do not copy, distribute, disclose, or otherwise act upon any part of this email communication or its attachments. To find out how the ERM Group manages personal data please review our Privacy Policy

From: ERM Arcus Amsterdam
Sent on: Tuesday, 29 July 2025 14:24:20
To: Josua Meyer
CC: ERM Arcus Amsterdam; Stephen Burton
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Good day Mr Josua Meyer,

Kindly see below response regarding your query on the Mulilo Amsterdam, Sheepmoor and Emvelo Avifaunal Specialist Reports.

In both the proposed Emvelo and Sheepmoor WEF avifaunal reports, Figure 33 refers to No-Go Zones around Yellow-breasted Pipit Habitat. However, we assume that you are referring to Figure 31, which addresses aquatic buffers.

Initially, as a precautionary approach, the avifaunal buffers related to aquatic features included a uniform 200m buffer area around all wetland and drainage line features. In the final avifaunal report, however, the following sensitive areas were considered:
- All wetland areas and drainage lines as identified by the aquatic specialist.
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Kind Regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

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Sent: Wednesday, July 16, 2025 4:42 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM

Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



From: Nhlamulo Machume
Sent on: Tuesday, 29 July 2025 15:12:03
To: ERM Arcus Amsterdam
CC: Serah Muobeleni
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

From: Serah Muobeleni <SerahMu@nda.gov.za>
Sent: Tuesday, July 29, 2025 3:10 PM
To: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Good day

I hope all is well.

Can you kindly provide the department with a hard copy application as the link provided contain documents that are more than 800 pages and such will be impossible to print.

I hope the above is in order.

Regards
Serah

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, July 18, 2025 9:00 AM
To: Serah Muobeleni <SerahMu@nda.gov.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>; Jan V <jan.agric@gmail.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL EMAIL: This email originated outside of "DALRRD Environment". CAUTION: Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good morning, Serah,

I hope this email finds you well.

Thank you so much for your feedback. Kindly receive the attached link to access all the reports related to the project.

https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/

Please do not hesitate to reach out should you need any further information or clarity.

Kind Regards

ERM
Sustainability is our business

Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted]
erm.com



From: Serah Muobeleni <SerahMu@nda.gov.za>
Sent: Thursday, July 17, 2025 5:05 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>; Jan V <jan.agric@gmail.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

You don't often get email from serahmu@nda.gov.za. Learn why this is important
EXTERNAL MESSAGE

Good Day
May you kindly send the motivation or report regarding the proposed activity, title deed, locality plan.

Regards
Serah

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, July 17, 2025 11:57 AM
To: Serah Muobeleni <SerahMu@nda.gov.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Hi Serah, I hope this message finds you well.

We acknowledge receipt of your correspondence regarding the draft Environmental Impact Assessment (EIA) Report for the Sheepmoor and Emvelo Wind Energy Facilities in Mpumalanga Province.

We would like to kindly request clarity on the specific application you are referring to in your response. It is our understanding that as part of the EIA process, we submitted the relevant reports to your department for review and comment in your capacity as a commenting authority and Interested and Affected Party (I&AP).

To ensure we comply with all procedural requirements, we would appreciate your guidance on the nature and purpose of the formal application required under the Subdivision of Agricultural Land Act, 70 of 1970 at this stage of the process.

Your assistance and clarification in this regard will be highly appreciated.

Kind Regards

ERM
Sustainability is our business

Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted]
erm.com



From: Serah Muobeleni <SerahMu@nda.gov.za>
Sent: Wednesday, July 16, 2025 4:40 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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EXTERNAL MESSAGE

Good day

The Department has noted the letter regarding the draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province. Therefore, the department of Agriculture would request a formal application in terms of the Subdivision of Agricultural Land Act, 70 of 1970 in order to provide formal comments.

Your assistance will highly be appreciated in this regard.

Regards
Serah

From: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>
Sent: Wednesday, July 16, 2025 2:53 PM
To: Serah Muobeleni <SerahMu@nda.gov.za>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

FYA

From: Anneliza Collett <AnnelizaC@nda.gov.za>
Sent: Wednesday, July 16, 2025 12:18 PM
To: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

FYA

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Tuesday, 15 July 2025 16:43
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



From: Albert Froneman
Sent on: Tuesday, 29 July 2025 21:27:05
To: Lucien Barbeau; ERM Arcus Amsterdam; Marietjie Froneman; Robin Colyn
CC: Lloyd Barnes; Mpho Malema; Stephanie Gopaul
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Hi Lucien,

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@Lucien Barbeau would you please confirm that this is the numbering used in the report you circulated as we were never provided with a copy thereof despite several requests.

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Albert Froneman *Pr.Sci.Nat*

AFRIAVIAN
ENVIRONMENTAL
[redacted]

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Sent: Wednesday, 23 July 2025 14:58
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Lucien Barbeau
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Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



This e-mail and any attachments may contain proprietary, confidential and/or privileged information. No confidentiality or privilege is waived or lost by any transmission errors. This communication is intended solely for the intended recipient, and if you are not the intended recipient, please notify the sender immediately, delete it from your system and do not copy, distribute, disclose, or otherwise act upon any part of this email communication or its attachments. To find out how the ERM Group manages personal data please review our Privacy Policy

From: ERM Arcus Amsterdam
Sent on: Thursday, 31 July 2025 09:55:13
To: Nhlamulo Machume; ERM Arcus Amsterdam
CC: Serah Muobeleni
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Good morning, Serah,
Thank you for your request.
Kindly confirm whether we may submit a USB drive containing the full set of Draft Environmental Impact Assessment (EIA) Reports for the Sheepmoor and Emvelo Wind Energy Facilities, in lieu of printed hard copies. The USB will include all relevant documentation to assist your scientists in their review and commentary.
If possible, we would appreciate it if you could get back to us today, so that we can arrange for delivery as soon as possible. Kindly include address and contact (Cell no.) that should be used for delivery notification.

Kind Regards

ERM
Sustainability is our business

Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted] **erm.com**



From: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>
Sent: Tuesday, July 29, 2025 3:12 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Serah Muobeleni <SerahMu@nda.gov.za>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

From: Serah Muobeleni <SerahMu@nda.gov.za>
Sent: Tuesday, July 29, 2025 3:10 PM
To: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Good day

I hope all is well.

Can you kindly provide the department with a hard copy application as the link provided contain documents that are more than 800 pages and such will be impossible to print.

I hope the above is in order.

Regards
Serah

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
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Cc: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>; Jan V <jan.agric@gmail.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Good morning, Serah,

I hope this email finds you well.

Thank you so much for your feedback. Kindly receive the attached link to access all the reports related to the project.

https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/

Please do not hesitate to reach out should you need any further information or clarity.

Kind Regards

ERM
Sustainability is our business

Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted] **erm.com**



From: Serah Muobeleni <SerahMu@nda.gov.za>
Sent: Thursday, July 17, 2025 5:05 PM
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Cc: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>; Jan V <jan.agric@gmail.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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EXTERNAL MESSAGE

Good Day
May you kindly send the motivation or report regarding the proposed activity, title deed, locality plan.

Regards
Serah

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, July 17, 2025 11:57 AM
To: Serah Muobeleni <SerahMu@nda.gov.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>

Cc: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Hi Serah, I hope this message finds you well.

We acknowledge receipt of your correspondence regarding the draft Environmental Impact Assessment (EIA) Report for the Sheepmoor and Emvelo Wind Energy Facilities in Mpumalanga Province.

We would like to kindly request clarity on the specific application you are referring to in your response. It is our understanding that as part of the EIA process, we submitted the relevant reports to your department for review and comment in your capacity as a commenting authority and Interested and Affected Party (I&AP).

To ensure we comply with all procedural requirements, we would appreciate your guidance on the nature and purpose of the formal application required under the Subdivision of Agricultural Land Act, 70 of 1970 at this stage of the process.

Your assistance and clarification in this regard will be highly appreciated.

Kind Regards

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Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted] **erm.com**



From: Serah Muobeleni <SerahMu@nda.gov.za>
Sent: Wednesday, July 16, 2025 4:40 PM
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Cc: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Good day

The Department has noted the letter regarding the draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province. Therefore, the department of Agriculture would request a formal application in terms of the Subdivision of Agricultural Land Act, 70 of 1970 in order to provide formal comments.

Your assistance will highly be appreciated in this regard.

Regards
Serah

From: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>
Sent: Wednesday, July 16, 2025 2:53 PM

To: Serah Muobeleni <SerahMu@nda.gov.za>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

FYA

From: Anneliza Collett <AnnelizaC@nda.gov.za>
Sent: Wednesday, July 16, 2025 12:18 PM
To: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

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Lucien Barbeau
Senior Consultant

Cape Town [redacted]

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From: Nhlamulo Machume
Sent on: Thursday, 31 July 2025 10:55:14
To: ERM Arcus Amsterdam
CC: Serah Muobeleni
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Attachments: SALA TARIFFS.pdf (82.01 KB)

EXTERNAL MESSAGE

Good day

The application should not exceed our printing limit of 100 pages even if it's submitted in form of a USB, if its more than 100 pages, you are required to hand deliver hard copies, accompanied by proof of payment of a R1000 (see banking details on the attached) address below on my signature.

Regards

Mr Nhlamulo Machume
Customer Care Operator
Directorate: Land and Soil Management
Department of Agriculture
[redacted]za
Agriculture Place, Office M-GF-01
20 Steve Biko Street, Arcadia, Pretoria, 0001

agriculture
Department:
Agriculture
REPUBLIC OF SOUTH AFRICA

From: Serah Muobeleni <SerahMu@nda.gov.za>
Sent: Thursday, July 31, 2025 10:16 AM
To: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Good day Nhlamulo

Kindly assist the applicant below.

Regards
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Environmental Assessment Practitioner

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Lucien Barbeau
Senior Consultant

Cape Town [redacted]

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DEPARTMENT OF AGRICULTURE, LAND REFORM AND RURAL DEVELOPMENT

NO. R. 5876 **21 February 2025**

REVISED TARIFFS, RATES AND SCALES FOR THE GOODS AND SERVICES PROVIDED BY THE DEPARTMENT IN TERMS OF THE CONSERVATION OF AGRICULTURAL RESOURCES ACT (CARA), ACT NO. 43 OF 1983 AND SUBDIVISION OF AGRICULTURAL LAND ACT (SALA), ACT NO. 70 OF 1970

NOTICE FOR PUBLIC

I, John Henry Steenhuisen, Minister for Agriculture hereby give notice to all interested institutions, organizations, and individuals on the revised tariffs for services rendered in terms of the Conservation of Agricultural Resources Act (CARA), Act No. 43 of 1983 and Subdivision of Agricultural Land Act (SALA), Act No. 70 of 1970.

Key revision includes:

Updating and new tariffs for the goods, services or supplies rendered under the Conservation of Agricultural Resources Act (CARA), Act No. 43 of 1983 and Subdivision of Agricultural Land Act (SALA), Act No. 70 of 1970 legislations.

1. Conservation of Agricultural Resources Act (CARA), Act No. 43 of 1983

1.1 Appeal tariff applicable from 1 April 2025 is R 1 564.00 per appeal.

1.2 50% of average cost of herbicide for control of listed species of the genus and Nasella by farmers

1.3 Application fee for all the application lodged in terms of Conservation of Agricultural Resources Act (CARA), Act No. 43 of 1983 effective from 1 April 2025 is R500.00.

1.4 Penalties for unauthorized/ unlawful activities for all CARA, Act No. 43 of 1983 Regulations effective from 1 April 2025, the land user or offender will be liable for a fine of 100 000.00 for a first contravention of the Act and its Regulations. For a second or subsequent contraventions of the Act and its Regulations will be liable for a fine of R200 000.

2. Subdivision of Agricultural Land Act (SALA), Act No. 70 of 1970

2.1 Appeal tariff applicable from 1 April 2025 is R 20 000.00 per appeal.

2.2 Application fee for all the application lodged in terms of Subdivision of Agricultural Land Act, Act 70 of 1970 effective from 1 April 2025 is R1 000.00.

2.3 Non-compliance to conditions of approval in terms of the Subdivision of Agricultural Land Act, Act 70 of 1970 effective from 1 April 2025 is R50 000.00.

For more information, please contact the Executive Officer for the Conservation of Agricultural Resources Act (CARA), Act No. 43 of 1983 and Subdivision of Agricultural Land Act (SALA), Act No. 70 of 1970, using the details below:

Attention: The Acting Director: Land and Soil Management, Attention Mr R.K. Mampholo.

Post to: Private Bag X 120, Pretoria, 0001; or

Deliver To: 20 Steve Biko Street, Acadia, PRETORIA.

or Enquiries in relation to Conservation of Agricultural Resources Act (CARA), Act No. 43 of 1983, may be emailed to: MpumeN@dalrrd.gov.za or alternatively (012) 319 7567.

or Enquiries in relation to Subdivision of Agricultural Land Act (SALA), Act No. 70 of 1970, may be emailed to: SydneyS@dalrrd.gov.za or alternatively (012) 319 7563.

REVISED TARIFFS, RATES AND SCALES FOR THE GOODS AND SERVICES PROVIDED BY THE DEPARTMENT IN TERMS OF CONSERVATION OF AGRICULTURAL RESOURCES ACT (CARA), ACT NO. 43 OF 1983 AND SUBDIVISION OF AGRICULTURAL LAND ACT (SALA), ACT NO. 70 OF 1970 TARIFF STRUCTURE (2025/26)

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	NATURE OF SERVICE, GOODS OR SUPPLIES PROVIDED	TARIFF APPLICABLE FROM 01 APRIL 2024	TARIFF APPLICABLE FROM 01 APRIL 2025
	LAND AND SOIL MANAGEMENT		
1	Conservation of Agricultural Resources Act (CARA), Act No. 43 of 1983 appeal tariff	R 1 487.00 per appeal	R 1 564.00 per appeal
2	Subsidy on weed control in terms of Weed Control Scheme.	50% of average cost of herbicide for control of listed species of the genus opuntia and Nasella by farmers Nasella tenuissima (Tin.) Barworth (=Stipa tenuissima (Trin.) Nasella trichotoma ((Nees) Arech. (=stipa trichotoma nees) Opuntia exaltata A Berger (=Austrocylindroputia exatata (A Berger) Backeb.) Opuntia fulgida Engelm. O. rosea misapplied in South Africa.) Opuntia imbricata (Haw.) DC. (=Cylindropucata (Haw.) Knuth) Opunia lindheimeri.Engelm (= O.tradospina Griffiths) Opuntia spinulifera Salm-Dyck	50% of average cost of herbicide for control of listed species of the genus opuntia and Nasella by farmers Nasella tenuissima (Tin.) Barworth (=Stipa tenuissima (Trin.) Nasella trichotoma ((Nees) Arech. (=stipa trichotoma nees) Opuntia exaltata A Berger (=Austrocylindroputia exatata (A Berger) Backeb.) Opuntia fulgida Engelm. O. rosea misapplied in South Africa.) Opuntia imbricata (Haw.) DC. (=Cylindropucata (Haw.) Knuth) Opunia lindheimeri.Engelm (= O.tradospina Griffiths) Opuntia spinulifera Salm-Dyck
3	Application fee for all the application for permits and authorizations lodged in terms Penalties for unauthorized/ unlawful activities for all CARA, Act No. 43 of 1983 Regulations.	R0.00 per application	R500.00 per application

4	Penalties for unauthorized/ unlawful activities for all CARA, Act No. 43 of 1983 Regulations	R0.00 per non-compliance	R100 000.00 fine for a first contravention R200 000.00 fine for a second or subsequent contraventions
5	Subdivision of Agricultural Land Act, Act 70 of 1970 appeal tariff	R 7 971.00 per appeal	R 20 000.00 per appeal
6	Application fee for all the application lodged in terms of Subdivision of Agricultural Land Act 70 of 1970	R0.00 per application	R1 000.00 per application
7	Non-compliance to conditions of approval in terms of the Subdivision of Agricultural Land Act, Act 70 of 1970	R0.00 per non-compliance	R50 000.00 per non-compliance

Account Holder: DALRRD: FARMER SETTLEMENT
Account No:011202270
Bank: STANDARD BANK
Branch:TSHWANE MID CITY
Reference: FARM NAME OR PROPERTY DISCREPTION

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From: Lucien Barbeau
Sent on: Thursday, 31 July 2025 14:22:23
To: ERM Arcus Amsterdam; Josua Meyer
CC: Stephen Burton; Lloyd Barnes; Stephanie Gopaul; Andrew Pearson; Rebecca Thomas; Johans Van Wyk
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Meyer,

I hope this message finds you well.

I'm writing to kindly follow up on our proposed meeting scheduled for Monday, 4 August at 13:00 at your farm. We would appreciate it if you could please confirm whether you are still available to meet on that date.

Should you require any additional information or documentation ahead of the meeting, beyond what you have already requested, please don't hesitate to let me know, I'd be happy to assist.

Looking forward to your confirmation.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Monday, July 28, 2025 11:49 AM
To: Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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From: Lloyd Barnes
Sent on: Friday, 01 August 2025 11:14:36
To: Lucien Barbeau
CC: ERM Arcus Amsterdam; Stephen Burton; Stephanie Gopaul; Andrew Pearson; Rebecca Thomas; Johans Van Wyk
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Good day Lucien,

Please me you respond to Mr Meyer with something along the following lines:

Good Morning Mr Meyer,

Thank you for your response. If you feel Monday is too short availability, please do not feel rushed. We would be happy to accommodate you later in the week. We will await your feedback and move accordingly from there.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
www.mulilo.com
21st Floor, Portside, 5 Buitengracht Street, Cape Town, 8001

mulilo

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From: ERM Arcus Amsterdam
Sent on: Friday, 01 August 2025 11:41:24
To: Lloyd Barnes; Lucien Barbeau
CC: ERM Arcus Amsterdam; Stephen Burton; Stephanie Gopaul; Andrew Pearson; Rebecca Thomas; Johans Van Wyk
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Thanks Lloyd – sharing your response with J Meyer now

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Lloyd Barnes <Lloyd@mulilo.com>
Sent: Friday, August 1, 2025 11:15 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <Andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Good day Lucien,

Please me you respond to Mr Meyer with something along the following lines:

Good Morning Mr Meyer,

Thank you for your response. If you feel Monday is too short availability, please do not feel rushed. We would be happy to accommodate you later in the week. We will await your feedback and move accordingly from there.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]

mulilo

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Thursday, 31 July 2025 18:13
To: Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <Lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <Andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Some people who received this message don't often get email from meyerjosua55@gmail.com. Learn why this is important

Goodday

Will confirm tomorrow before 12h00
Thanks

On Thu, Jul 31, 2025 at 2:22 PM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Dear Mr Meyer,
>
> I hope this message finds you well.
>
> I'm writing to kindly follow up on our proposed meeting scheduled for Monday, 4 August at 13:00 at your farm. We would appreciate it if you could please confirm whether you are still available to meet on that date.
>
> Should you require any additional information or documentation ahead of the meeting, beyond what you have already requested, please don't hesitate to let me know, I'd be happy to assist.
>
> Looking forward to your confirmation.
>
> Kind regards,
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Senior Consultant
>
> Cape Town [redacted] **erm.com**
>
> ---
>
> **From:** ERM Arcus Amsterdam
> **Sent:** Monday, July 28, 2025 11:49 AM
> **To:** Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
> **Cc:** Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
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> Sustainability is our business
>
> **Lucien Barbeau**
> Senior Consultant
>
> Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 25, 2025 5:11 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

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Can you arrange the meeting for us before 1/07/2025.

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- AfriAvian motivation for altering Figure 33 in both avifaunal reports

Above info are urgently required and no reason to wait for the meeting

Regards

Josua

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> Hi Lucien
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> There might be a mistake in your day or date ..... 7 August 2025 is a Thursday.
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> > We look forward to your response.

Kind Regards,

Lucien Barbeau
Senior Consultant

Sustainability is our business

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 18, 2025 4:51 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Johans Van Wyk <Piwy@mulilo.com>; Lloyd@mulilo.com
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday mr Lucien Barbeau,

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Another urgent item which also must be discussed is the tagging of the two martial eagles. According to the MTPA report in my possession, the martial eagles were tagged by Mulilo without a permit. Copy of the report can be provided at the meeting.

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Therefore the data being used in the specialist report is illegally obtained and all sections, models and references where data has been used must be removed from the report.

Looking forward to your urgent response.

Regards

Josua Meyer (I&AP)

On Wed, Jul 16, 2025 at 4:41 PM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Goodday Sir
>
> The avifaunal specialist removed in both reports, Sheepmoor WEF and Emvelo WEF, the High Sensitivity - Turbine Exclusion Zone in Figures 33 for the aquatic buffer zones from an avifaunal perspective.
>
> It must be an unintentional mistake and request reinstatement of it.
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> If it was deliberate we request the detailed reasoning and motivation for such a drastic decision.
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> Thanks
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> Josua Meyer

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> All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.
>
> Thank you for your continued participation.

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: ERM Arcus Amsterdam
Sent on: Friday, 01 August 2025 11:42:22
To: Josua Meyer; Lucien Barbeau
CC: ERM Arcus Amsterdam; Stephen Burton; Lloyd Barnes; Stephanie Gopaul; Andrew Pearson; Rebecca Thomas; Johans Van Wyk
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Good Morning Mr Meyer,

Thank you for your response. If you feel Monday is too short availability, please do not feel rushed. We would be happy to accommodate you later in the week. We will await your feedback and move accordingly from there.

Kind Regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Thursday, July 31, 2025 6:13 PM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Some people who received this message don't often get email from meyerjosua55@gmail.com. Learn why this is important
EXTERNAL MESSAGE

Goodday
Will confirm tomorrow before 12h00
Thanks

On Thu, Jul 31, 2025 at 2:22 PM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Dear Mr Meyer,
>
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>
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Senior Consultant

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Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Monday, July 28, 2025 11:49 AM
To: Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
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Kind regards,

Lucien Barbeau
Senior Consultant

Sustainability is our business

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 25, 2025 5:11 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

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- AfriAvian motivation for altering Figure 33 in both avifaunal reports

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Regards

Josua

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> > Sustainability is our business
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> > **Lucien Barbeau**
> > Senior Consultant
> >
> > Cape Town [redacted] **erm.com**
> >
> > **From:** Josua Meyer <meyerjosua55@gmail.com>
> > **Sent:** Friday, July 18, 2025 4:51 AM
> > **To:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
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Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Senior Consultant

Sustainability is our business

Cape Town [redacted] **erm.com**

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Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Lucien Barbeau
Senior Consultant

Sustainability is our business

Cape Town [redacted] **erm.com**



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From: Johans Van Wyk
Sent on: Friday, 01 August 2025 11:44:10
To: Lucien Barbeau; ERM Arcus Amsterdam
CC: Stephen Burton; Lloyd Barnes; Stephanie Gopaul; Andrew Pearson; Rebecca Thomas; Annitta Attieh; Anton Lohse
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

Ive been travelling and are on leave today, hence delayed responses.

However, Mr Meyer indicated yesterday evening that Monday does not suit them.

They will revert in due time with a new proposed date.

Mr Meyer will most likely inform me and I will then relay the message and liaise.

Johans

Get Outlook for iOS

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Thursday, July 31, 2025 2:22:23 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Josua Meyer <meyerjosua55@gmail.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <Lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <Andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
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> **Lucien Barbeau**
> Senior Consultant
>
> Cape Town [redacted] **erm.com**
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> **Sent:** Friday, July 18, 2025 4:51 AM
> **To:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
> **Cc:** Johans Van Wyk <Piwy@mulilo.com>; Lloyd@mulilo.com
> **Subject:** Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
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To: Lucien Barbeau
CC: ERM Arcus Amsterdam; Stephen Burton; Lloyd Barnes; Stephanie Gopaul; Andrew Pearson; Rebecca Thomas
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Guys, I just received a voice note from Mr Meyer at 11h47.

Monday 12h00 is on in Ermelo!

Meeting is Monday at 12h00

Get Outlook for iOS

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Some people who received this message don't often get email from meyerjosua55@gmail.com. Learn why this is important

Goodday
Will confirm tomorrow before 12h00
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Sustainability is our business

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From: Andrew Pearson
Sent on: Friday, 01 August 2025 12:43:10
To: Johans Van Wyk; Lucien Barbeau
CC: ERM Arcus Amsterdam; Stephen Burton; Lloyd Barnes; Stephanie Gopaul; Rebecca Thomas
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi All

Not to throw a spanner in the works, but do you think its possible to do the meeting at a neutral venue, in Ermelo?
Furthermore, who is attending on his side? Is it correct that there are now various landowners/neighbours attending?

Kind regards,

Andrew Pearson *Pr.Sci.Nat* (400423/11)
Senior Manager: Head of Environmental
[redacted]
mulilo

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Lloyd Barnes
Sent on: Friday, 01 August 2025 12:59:32
To: Andrew Pearson; Johans Van Wyk; Lucien Barbeau
CC: ERM Arcus Amsterdam; Stephen Burton; Stephanie Gopaul; Rebecca Thomas
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Andrew,

This is something I considered and proposed, but Josua would like the meeting to be held at his farm premises.

From what I have been informed, the following people will be attending:

- Josua Meyer
- Pikkie Voster
- Jan Roberts
- Braam Moodie.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
mulilo

From: Andrew Pearson <Andrew@mulilo.com>
Sent: Friday, 01 August 2025 12:43
To: Johans Van Wyk <piwy@mulilo.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <Lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Rebecca Thomas <reth@mulilo.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi All

Not to throw a spanner in the works, but do you think its possible to do the meeting at a neutral venue, in Ermelo?
Furthermore, who is attending on his side? Is it correct that there are now various landowners/neighbours attending?

Kind regards,

Andrew Pearson *Pr.Sci.Nat* (400423/11)
Senior Manager: Head of Environmental
[redacted]
mulilo

From: Johans Van Wyk <piwy@mulilo.com>
Sent: Friday, August 1, 2025 11:51 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <Lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <Andrew@mulilo.com>; Rebecca

Thomas <reth@mulilo.com>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Guys, I just received a voice note from Mr Meyer at 11h47.

Monday 12h00 is on in Ermelo!

Meeting is Monday at 12h00

Get Outlook for iOS

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Thursday, July 31, 2025 6:13:04 PM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <Lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <Andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Some people who received this message don't often get email from meyerjosua55@gmail.com. Learn why this is important

Goodday
Will confirm tomorrow before 12h00
Thanks

On Thu, Jul 31, 2025 at 2:22 PM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Dear Mr Meyer,
>
> I hope this message finds you well.
>
> I'm writing to kindly follow up on our proposed meeting scheduled for Monday, 4 August at 13:00 at your farm. We would appreciate it if you could please confirm whether you are still available to meet on that date.
>
> Should you require any additional information or documentation ahead of the meeting, beyond what you have already requested, please don't hesitate to let me know, I'd be happy to assist.
>
> Looking forward to your confirmation.
>
> Kind regards,
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Monday, July 28, 2025 11:49 AM
To: Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Meyer,

Following discussions with the applicant, unfortunately it will not be possible to schedule a meeting prior to 1 August due to limited availability.

However, we would be pleased to meet with you on Monday the 4th of August 2025 at 13:00, as per your request, at your farm.

Kindly confirm whether this date and time are suitable, and please advise who will be attending the meeting from your side.

I will continue to provide you with the requested documentation ahead of the meeting.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 25, 2025 5:11 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

Proposed date for the meeting seems to be too close to submission of comments which is already 9/08/25.

Can you arrange the meeting for us before 1/07/2025.

Can you in the meantime forward the detail previously requested

- All the documentation with Department concerning the 3 months extension granted even after time lapps to submit final report

- Mulilo's permits to fit telemetry device on the two martial eagles

- AfriAvian motivation for altering Figure 33 in both avifaunal reports

Above info are urgently required and no reason to wait for the meeting

Regards

Josua

On Tue, Jul 22, 2025 at 10:30 AM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Hi Lucien
>
> There might be a mistake in your day or date ..... 7 August 2025 is a Thursday.

Nevertheless the 6 or 7 th August 2025 is fine with us.

Will appreciate it if we can meet on my farm.

We intend to be three (3) I&AP

Regards

Josua Meyer

On Mon, Jul 21, 2025 at 11:36 AM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Mr. Meyer,
>
> Good day, and thank you for your recent correspondence regarding the Draft EIA Reports.
>
> We acknowledge your request for a meeting to discuss the concerns raised. In consultation with the applicant, Mulilo, we are proposing a provisional date of Wednesday, 7 August 2025, with the meeting to be held at a venue in Ermelo. Kindly confirm whether this date is suitable for you and whether you will be attending alone or accompanied by others.
>
> As a registered I&AP, your comments form an important part of the formal public participation process and will be incorporated into the Final EIA Reports. We also acknowledge the concerns raised regarding the tagging of the Martial Eagles. Relevant documentation, including permits, will be made available where appropriate to support transparency and clarity during the engagement.
>
> We look forward to your response.
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> Kind Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

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To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
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Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday mr Lucien Barbeau,

Referring to your email dated 7/04/2025 it will be appreciated if you can arrange such a meeting urgently before the 9/08/2025 with the applicant, Mulilo, on site.

Concerns as previously raised with Mulilo in an email dated 19/02/2025 will be on the agenda. That request for a meeting was refused by Mulilo.

Another urgent item which also must be discussed is the tagging of the two martial eagles. According to the MTPA report in my possession, the martial eagles were tagged by Mulilo without a permit. Copy of the report can be provided at the meeting.

That leaves the tagging of the martial eagles illegally, if not criminal.

Therefore the data being used in the specialist report is illegally obtained and all sections, models and references where data has been used must be removed from the report.

Looking forward to your urgent response.

Regards

Josua Meyer (I&AP)

On Wed, Jul 16, 2025 at 4:41 PM Josua Meyer <meyerjosua55@gmail.com> wrote:

Goodday Sir

The avifaunal specialist removed in both reports, Sheepmoor WEF and Emvelo WEF, the High Sensitivity - Turbine Exclusion Zone in Figures 33 for the aquatic buffer zones from an avifaunal perspective.

It must be an unintentional mistake and request reinstatement of it.

If it was deliberate we request the detailed reasoning and motivation for such a drastic decision.

Thanks

Josua Meyer

On Wed, Jul 16, 2025 at 1:54 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Interested and Affected Party,
>
> Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.
>
> The revised comment period now ends on 15 August 2025.
>
> All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.
>
> Thank you for your continued participation.

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Lucien Barbeau
Senior Consultant

Cape Town [redacted]

erm.com

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Lucien Barbeau
Senior Consultant

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Cape Town [redacted]

erm.com



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From: Josua Meyer
Sent on: Friday, 01 August 2025 13:29:00
To: ERM Arcus Amsterdam
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Good day
Monday is fine with me
I did inform Johans also
Will 12h00 be convenient for you?
How may people?
Regards

On Fri, 01 Aug 2025, 11:42 ERM Arcus Amsterdam, <ERM.ArcusAmsterdam@erm.com> wrote:

> Good Morning Mr Meyer,
>
> Thank you for your response. If you feel Monday is too short availability, please do not feel rushed. We would be happy to accommodate you later in the week. We will await your feedback and move accordingly from there.
>
> Kind Regards,
>
> ERM
>
> **Lucien Barbeau**
> Senior Consultant
> Cape Town [redacted] **erm.com**
>
> **From:** Josua Meyer <meyerjosua55@gmail.com>
> **Sent:** Thursday, July 31, 2025 6:13 PM
> **To:** Lucien Barbeau <Lucien.Barbeau@erm.com>
> **Cc:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
> **Subject:** Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
>
> Some people who received this message don't often get email from meyerjosua55@gmail.com. Learn why this is important
> **EXTERNAL MESSAGE**

Goodday

Will confirm tomorrow before 12h00

Thanks

On Thu, Jul 31, 2025 at 2:22 PM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Dear Mr Meyer,
>
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> **Lucien Barbeau**
> Senior Consultant
>
> Cape Town [redacted] **erm.com**
>
> ---
>
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> Josua Meyer
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ERM

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Senior Consultant

Cape Town [redacted] **erm.com**

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Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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>
> **Lucien Barbeau**
> Senior Consultant
>
> Cape Town [redacted] **erm.com**

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Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM

Lucien Barbeau
Senior Consultant

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From: ERM Arcus Amsterdam
Sent on: Sunday, 03 August 2025 12:36:11
To: Josua Meyer; ERM Arcus Amsterdam
CC: Lloyd Barnes
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Meyer,

Thank you for confirming the meeting for 12h00 tomorrow, 4 August, at your farm. That time works perfectly, and we look forward to meeting with you.

If you would kindly share the physical address or GPS coordinates for the entrance to your farm, it would be greatly appreciated to ensure we arrive without any difficulty.

There will be five people attending the meeting, including myself.

Should there be anything further you would like us to prepare or bring along for the meeting, please don't hesitate to let us know, we'll be happy to assist in any way we can.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, August 1, 2025 1:29 PM
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Senior Consultant

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To: Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Some people who received this message don't often get email from meyerjosua55@gmail.com. Learn why this is important
EXTERNAL MESSAGE

Goodday
Will confirm tomorrow before 12h00
Thanks

On Thu, Jul 31, 2025 at 2:22 PM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Dear Mr Meyer,
>
> I hope this message finds you well.
>
> I'm writing to kindly follow up on our proposed meeting scheduled for Monday, 4 August at 13:00 at your farm. We would appreciate it if you could please confirm whether you are still available to meet on that date.
>
> Should you require any additional information or documentation ahead of the meeting, beyond what you have already requested, please don't hesitate to let me know, I'd be happy to assist.
>
> Looking forward to your confirmation.
>
> Kind regards,

Lucien Barbeau
Senior Consultant

Sustainability is our business

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Monday, July 28, 2025 11:49 AM
To: Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Meyer,

Following discussions with the applicant, unfortunately it will not be possible to schedule a meeting prior to 1 August due to limited availability.

However, we would be pleased to meet with you on Monday the 4th of August 2025 at 13:00, as per your request, at your farm.

Kindly confirm whether this date and time are suitable, and please advise who will be attending the meeting from your side.

I will continue to provide you with the requested documentation ahead of the meeting.

Kind regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 25, 2025 5:11 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

Proposed date for the meeting seems to be too close to submission of comments which is already 9/08/25.

Can you arrange the meeting for us before 1/07/2025.

Can you in the meantime forward the detail previously requested

- All the documentation with Department concerning the 3 months extension granted even after time lapps to submit final report

- Mulilo's permits to fit telemetry device on the two martial eagles

- AfriAvian motivation for altering Figure 33 in both avifaunal reports

Above info are urgently required and no reason to wait for the meeting

Regards

Josua

On Tue, Jul 22, 2025 at 10:30 AM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Hi Lucien
>
> There might be a mistake in your day or date ..... 7 August 2025 is a Thursday.
>
> Nevertheless the 6 or 7 th August 2025 is fine with us.

Will appreciate it if we can meet on my farm.

We intend to be three (3) I&AP

Regards

Josua Meyer

On Mon, Jul 21, 2025 at 11:36 AM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Mr. Meyer,
>
> Good day, and thank you for your recent correspondence regarding the Draft EIA Reports.
>
> We acknowledge your request for a meeting to discuss the concerns raised. In consultation with the applicant, Mulilo, we are proposing a provisional date of Wednesday, 7 August 2025, with the meeting to be held at a venue in Ermelo. Kindly confirm whether this date is suitable for you and whether you will be attending alone or accompanied by others.
>
> As a registered I&AP, your comments form an important part of the formal public participation process and will be incorporated into the Final EIA Reports. We also acknowledge the concerns raised regarding the tagging of the Martial Eagles. Relevant documentation, including permits, will be made available where appropriate to support transparency and clarity during the engagement.
>
> We look forward to your response.
>
> Kind Regards,
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Senior Consultant
>
> Cape Town [redacted] **erm.com**
>
> **From:** Josua Meyer <meyerjosua55@gmail.com>
> **Sent:** Friday, July 18, 2025 4:51 AM
> **To:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
> **Cc:** Johans Van Wyk <Piwy@mulilo.com>; Lloyd@mulilo.com
> **Subject:** Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
>
> **EXTERNAL MESSAGE**
>
> Goodday mr Lucien Barbeau,
>
> Referring to your email dated 7/04/2025 it will be appreciated if you can arrange such a meeting urgently before the 9/08/2025 with the applicant, Mulilo, on site.
>
> Concerns as previously raised with Mulilo in an email dated 19/02/2025 will be on the agenda. That request for a meeting was refused by Mulilo.
>
> **Another urgent item which also must be discussed is the tagging of the two martial eagles. According to the MTPA report in my possession, the martial eagles were tagged by Mulilo without a permit. Copy of the report can be provided at the meeting.**
>
> **That leaves the tagging of the martial eagles illegally, if not criminal.**

Therefore the data being used in the specialist report is illegally obtained and all sections, models and references where data has been used must be removed from the report.

Looking forward to your urgent response.

Regards

Josua Meyer (I&AP)

On Wed, Jul 16, 2025 at 4:41 PM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Goodday Sir
>
> The avifaunal specialist removed in both reports, Sheepmoor WEF and Emvelo WEF, the High Sensitivity - Turbine Exclusion Zone in Figures 33 for the aquatic buffer zones from an avifaunal perspective.
>
> It must be an unintentional mistake and request reinstatement of it.
>
> If it was deliberate we request the detailed reasoning and motivation for such a drastic decision.
>
> Thanks
>
> Josua Meyer
>
> On Wed, Jul 16, 2025 at 1:54 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:
>
> > Dear Interested and Affected Party,
> >
> > Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.
> >
> > The revised comment period now ends on 15 August 2025.
> >
> > All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.
> >
> > Thank you for your continued participation.
> >
> > ERM
> > Sustainability is our business
> >
> > **Lucien Barbeau**
> > Senior Consultant
> >
> > Cape Town [redacted] **erm.com**
> >
> > **From:** ERM Arcus Amsterdam
> > **Sent:** Tuesday, July 15, 2025 4:43 PM
> > **To:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
> > **Subject:** Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
> >
> > SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER
> >
> > Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted]

erm.com



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From: Lucien Barbeau
Sent on: Monday, 04 August 2025 21:08:35
To: ERM Arcus Amsterdam
Subject: Automatic reply: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Good day, I am currently out of office. For urgent queries please contact the Office on 021 681 5400. I will be able to respond upon my return. Many Thanks!

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From: Lucien Barbeau
Sent on: Tuesday, 05 August 2025 10:58:25
To: ERM Arcus Amsterdam; Stephanie Gopaul; Stephen Burton
CC: Mpho Malema
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Steve – this department is expecting us to have reports that are less than 100 pages, and are not interested in us sending them a USB file for their ease of comment on the reports. We have already exhausted our printing budgets. Additionally, they are requesting R1000.00?

Lucien Barbeau
Senior Consultant

Cape Town
+27105963488

erm.com

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Monday, August 4, 2025 9:08 PM
To: Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Cc: Lucien Barbeau <Lucien.Barbeau@erm.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi all, I hope you are all well.

I figured I should bring this to your attention and flag it, please let me know how I should respond further.

Kind Regards

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Mpho Bridget Malema
Consulting Associate

Johannesburg
[redacted]

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From: Stephen Burton
Sent on: Tuesday, 05 August 2025 12:20:05
To: Lloyd Barnes
CC: Lucien Barbeau; Stephanie Gopaul; Rebecca Thomas; Andrew Pearson; ERM Arcus Amsterdam
Subject: FW: Notification of Submission: Draft EIA Report Comments - DALRRD
Attachments: RE Notification of Submission Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province.msg (989.5 KB)

Dear Lloyd,

We have received a communication from the Department of Agriculture, Land Reform and Rural Development (DALRRD) regarding the circulation of the Draft EIA Report for public review. The department has stated that a formal application in terms of the Subdivision of Agricultural Land Act, 70 of 1970 (SALA) is necessary to provide comments on the application. Specifically, if the report exceeds 100 pages, hard copies must be delivered to their offices, along with an application fee of R1000.00.

Could you please confirm whether Mulilo has already submitted an application under SALA?

Please be aware that, as per our contractual agreement, the submission and processing of SALA or related applications are outside the current scope of our engagement. We would appreciate your guidance on how you wish to proceed.

Do not hesitate to reach out if you need any clarification.

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Stephen Burton
Principal Consultant: Africa Biodiversity Lead Pr. Sci.Nat.
He/Him/His

Ground Floor, Building 27, The woodlands Office Park, Woodlands Drive, Woodmead, 2148, Johannesburg, South Africa
erm.com
[redacted]

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From: Mpho Malema
Sent on: Tuesday, 05 August 2025 13:07:32
To: ERM Arcus Amsterdam
Subject: FW: Reminder: Draft EIA Reports Available for Comment – Sheepmoor and Emvelo Wind Energy Facilities

To add to comments.

Kind Regards

ERM
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Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted] **erm.com**



From: Evelyn Shogole <ShogoleE@caa.co.za>
Sent: Tuesday, August 5, 2025 10:32 AM
To: Mpho Malema <mpho.malema@erm.com>
Cc: Pamela Madondo <MadondoP@caa.co.za>; Mary Motete <motetem@caa.co.za>
Subject: RE: Reminder: Draft EIA Reports Available for Comment – Sheepmoor and Emvelo Wind Energy Facilities

You don't often get email from shogolee@caa.co.za. Learn why this is important
EXTERNAL MESSAGE

Dear Mpho,

I hope you are well.

Following our telephone conversation, the below comments will not affect or impact the current final impact report.

Please note the below comments should be considered before project construction phase upon receipt of an Environmental Authorisation.
Due to the nature of this project, a formal obstacle assessment will be required to determine whether the proposal could impact flight safety.

Kindly lodge an application as published on the SACAA website: www.caa.co.za/industryinformation/obstacles/ .The list and contact details of the approved obstacles assessment services providers can be obtained from the CAA website: www.caa.co.za .

Regards,

Evelyn Shogole
Aviation Environmental Compliance Specialist
Aviation Environmental Protection
[redacted]

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https://www.caa.co.za/paia-and-privacy/

From: Mpho Malema <mpho.malema@erm.com>
Sent: Wednesday, April 9, 2025 12:13 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Reminder: Draft EIA Reports Available for Comment – Sheepmoor and Emvelo Wind Energy Facilities

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Dear Interested and Affected Party,

This is a reminder regarding the submission of the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities in the Mpumalanga Province.

The Public Participation Process (PPP) is being conducted in accordance with Section 24(5) and Chapter 6 (Regulations 41–44) of GN R. 326 of the NEMA EIA Regulations, 2014 (as amended), as well as the Western Cape Department of Environmental Affairs and Development Planning (DEA&DP) Guideline on Public Participation (2011). The Draft EIA Reports have been made available for a 30-day comment period, which will close on 10 April 2025 **(Tomorrow).**

Following comprehensive input from Interested and Affected Parties (I&APs) in the scoping phase, the applicant has conducted several additional studies to address all identified sensitivities. In response to these sensitivities, the applicant has optimized the arrangement of the wind turbines and related infrastructure. This significant reduction in the number of turbines has prompted the applicant to consolidate the projects from three to two. The applicant has merged the previous Rochdale application site with the Emvelo application and will be withdrawing the separate Rochdale application. We anticipate no issues arising from this change, as all feedback, scoping findings, sensitivities, and specialist contributions related to Rochdale will be integrated into the Emvelo application. The updated layouts also feature extensive conservation zones, as the applicant recognizes a unique opportunity to implement strategies that enhance the biodiversity value of the project area.

Should you wish to have your comments included in the submission of the Final EIA Report, please ensure they are submitted on or before 10 April 2025. Further information on how to participate in this process is available in the documentation provided. Kindly indicate whether your comment refers to the Sheepmoor or Emvelo application.

Thank you for your continued participation and interest in this project.

Kind Regards

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Mpho Bridget Malema

Johannesburg [redacted]

erm.com



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From: Lloyd Barnes
Sent on: Tuesday, 05 August 2025 14:22:02
To: Stephen Burton
CC: Lucien Barbeau; Stephanie Gopaul; Rebecca Thomas; Andrew Pearson; ERM Arcus Amsterdam
Subject: RE: Notification of Submission: Draft EIA Report Comments - DALRRD

EXTERNAL MESSAGE

Good day Stephen,

Thank you for raising this.

We will not be applying for SALA as we intend on registering leases over each project property, and not lease areas for each WTG. Therefor SALA is not triggered.

Please may you communicate this with the I&AP. DALRRD are welcome to comment on the EIA process.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
mulilo

From: Stephen Burton <Stephen.Burton@erm.com>
Sent: Tuesday, 05 August 2025 12:20
To: Lloyd Barnes <Lloyd@mulilo.com>
Cc: Lucien Barbeau <Lucien.Barbeau@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Rebecca Thomas <reth@mulilo.com>; Andrew Pearson <Andrew@mulilo.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Comments - DALRRD

Dear Lloyd,

We have received a communication from the Department of Agriculture, Land Reform and Rural Development (DALRRD) regarding the circulation of the Draft EIA Report for public review. The department has stated that a formal application in terms of the Subdivision of Agricultural Land Act, 70 of 1970 (SALA) is necessary to provide comments on the application. Specifically, if the report exceeds 100 pages, hard copies must be delivered to their offices, along with an application fee of R1000.00.

Could you please confirm whether Mulilo has already submitted an application under SALA?

Please be aware that, as per our contractual agreement, the submission and processing of SALA or related applications are outside the current scope of our engagement. We would appreciate your guidance on how you wish to proceed.

Do not hesitate to reach out if you need any clarification.

ERM
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Stephen Burton
Principal Consultant: Africa Biodiversity Lead Pr. Sci.Nat.
He/Him/His

Ground Floor, Building 27, The woodlands Office Park, Woodlands Drive, Woodmead, 2148, Johannesburg, South Africa
erm.com

[redacted]

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From: Mpho Malema
Sent on: Wednesday, 06 August 2025 07:44:11
To: ERM Arcus Amsterdam
Subject: Automatic reply: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Thanks for reaching out, kindly note I am currently on site from 04/08/2025 till 08/08/2025. My replies will be a bit delayed.

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From: ERM Arcus Amsterdam
Sent on: Wednesday, 06 August 2025 07:44:06
To: Nhlamulo Machume; ERM Arcus Amsterdam
CC: Serah Muobeleni; Mpho Malema; Stephen Burton
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Nhlamulo,

Thank you for your correspondence regarding the below-mentioned Amsterdam WEFs.

Kindly be advised that the applicant has confirmed that a SALA application will not be submitted, as the intention is to register leases over the entire project properties, rather than leasing portions of land for individual wind turbine generators. As such, the requirements of the Subdivision of Agricultural Land Act, 70 of 1970 (SALA) are not triggered in this instance.

Nonetheless, the applicant welcomes any comments that the Department may wish to provide on the Draft Environmental Impact Assessment Report (https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/) as part of the environmental authorisation process.

Please do not hesitate to contact us should you require any further information or clarification.

Kind regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>
Sent: Thursday, July 31, 2025 10:55 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Serah Muobeleni <SerahMu@nda.gov.za>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Good day

The application should not exceed our printing limit of 100 pages even if it's submitted in form of a USB, if its more than 100 pages, you are required to hand deliver hard copies, accompanied by proof of payment of a R1000 (see banking details on the attached) address below on my signature.

Regards

Mr Nhlamulo Machume
Customer Care Operator
Directorate: Land and Soil Management
Department of Agriculture
[redacted]
Agriculture Place, Office M-GF-01
20 Steve Biko Street, Arcadia, Pretoria, 0001

agriculture

Department:
Agriculture
REPUBLIC OF SOUTH AFRICA

From: Serah Muobeleni <SerahMu@nda.gov.za>
Sent: Thursday, July 31, 2025 10:16 AM
To: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Good day Nhlamulo

Kindly assist the applicant below.

Regards
Serah

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, July 31, 2025 9:55 AM
To: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Serah Muobeleni <SerahMu@nda.gov.za>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL EMAIL: This email originated outside of "DALRRD Environment". CAUTION: Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good morning, Serah,

Thank you for your request.

Kindly confirm whether we may submit a USB drive containing the full set of Draft Environmental Impact Assessment (EIA) Reports for the Sheepmoor and Emvelo Wind Energy Facilities, in lieu of printed hard copies. The USB will include all relevant documentation to assist your scientists in their review and commentary.

If possible, we would appreciate it if you could get back to us today, so that we can arrange for delivery as soon as possible. Kindly include address and contact (Cell no.) that should be used for delivery notification.

Kind Regards

ERM
Sustainability is our business

Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted] **erm.com**



From: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>
Sent: Tuesday, July 29, 2025 3:12 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Serah Muobeleni <SerahMu@nda.gov.za>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

From: Serah Muobeleni <SerahMu@nda.gov.za>
Sent: Tuesday, July 29, 2025 3:10 PM
To: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Good day

I hope all is well.

Can you kindly provide the department with a hard copy application as the link provided contain documents that are more than 800 pages and such will be impossible to print.

I hope the above is in order.

Regards
Serah

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, July 18, 2025 9:00 AM
To: Serah Muobeleni <SerahMu@nda.gov.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>; Jan V <jan.agric@gmail.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL EMAIL: This email originated outside of "DALRRD Environment". CAUTION: Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good morning, Serah,

I hope this email finds you well.

Thank you so much for your feedback. Kindly receive the attached link to access all the reports related to the project.

https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/

Please do not hesitate to reach out should you need any further information or clarity.

Kind Regards

ERM
Sustainability is our business

Mpho Bridget Malema
Consulting Associate

Johannesburg **erm.com**



From: Serah Muobeleni <SerahMu@nda.gov.za>
Sent: Thursday, July 17, 2025 5:05 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>; Jan V <jan.agric@gmail.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

You don't often get email from serahmu@nda.gov.za. Learn why this is important
EXTERNAL MESSAGE

Good Day
May you kindly send the motivation or report regarding the proposed activity, title deed, locality plan.

Regards
Serah

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, July 17, 2025 11:57 AM
To: Serah Muobeleni <SerahMu@nda.gov.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL EMAIL: This email originated outside of "DALRRD Environment". CAUTION: Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hi Serah, I hope this message finds you well.

We acknowledge receipt of your correspondence regarding the draft Environmental Impact Assessment (EIA) Report for the Sheepmoor and Emvelo Wind Energy Facilities in Mpumalanga Province.

We would like to kindly request clarity on the specific application you are referring to in your response. It is our understanding that as part of the EIA process, we submitted the relevant reports to your department for review and comment in your capacity as a commenting authority and Interested and Affected Party (I&AP).

To ensure we comply with all procedural requirements, we would appreciate your guidance on the nature and purpose of the formal application required under the Subdivision of Agricultural Land Act, 70 of 1970 at this stage of the process.

Your assistance and clarification in this regard will be highly appreciated.

Kind Regards

ERM
Sustainability is our business

Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted] **erm.com**



From: Serah Muobeleni <SerahMu@nda.gov.za>
Sent: Wednesday, July 16, 2025 4:40 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

You don't often get email from serahmu@nda.gov.za. Learn why this is important
EXTERNAL MESSAGE

Good day

The Department has noted the letter regarding the draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province. Therefore, the department of Agriculture would request a formal application in terms of the Subdivision of Agricultural Land Act, 70 of 1970 in order to provide formal comments.

Your assistance will highly be appreciated in this regard.

Regards
Serah

From: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>
Sent: Wednesday, July 16, 2025 2:53 PM
To: Serah Muobeleni <SerahMu@nda.gov.za>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

FYA

From: Anneliza Collett <AnnelizaC@nda.gov.za>
Sent: Wednesday, July 16, 2025 12:18 PM
To: Nhlamulo Machume <NhlamuloMa@dalrrd.gov.za>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

FYA

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Tuesday, 15 July 2025 16:43
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL EMAIL: This email originated outside of "DALRRD Environment". CAUTION: Do not click on links or open attachments unless you recognize the sender and know the content is safe.

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as

amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



From: Khululwa Matshoba
Sent on: Wednesday, 06 August 2025 08:53:20
To: ERM Arcus Amsterdam
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Attachments: Eskom requirements for work in or near Eskom servitudes.doc (30 KB)

You don't often get email from stuurmkv@ntcsa.co.za. Learn why this is important

EXTERNAL MESSAGE

Kindly share the kmz files, Please find attached Eskom/NTCSA requirements for work in or near Eskom/NTCSA servitudes and infrastructure.

Thank you.

Warm regards
Khululwa

Disclaimer
NB: This Email and its contents are subject to the NTCSA EMAIL LEGAL NOTICE which can be viewed here.

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Tuesday, July 15, 2025 16:42
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM

Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted]

erm.com



TO WHOM IT MAY CONCERN

Eskom requirements for work in or near Eskom servitudes.

1. Eskom's rights and services must be acknowledged and respected at all times.

2. Eskom shall at all times retain unobstructed access to and egress from its servitudes.

3. Eskom's consent does not relieve the developer from obtaining the necessary statutory, land owner or municipal approvals.

4. Any cost incurred by Eskom as a result of non-compliance to any relevant environmental legislation will be charged to the developer.

5. If Eskom has to incur any expenditure in order to comply with statutory clearances or other regulations as a result of the developer's activities or because of the presence of his equipment or installation within the servitude restriction area, the developer shall pay such costs to Eskom on demand.

6. The use of explosives of any type within 500 metres of Eskom's services shall only occur with Eskom's previous written permission. If such permission is granted the developer must give at least fourteen working days prior notice of the commencement of blasting. This allows time for arrangements to be made for supervision and/or precautionary instructions to be issued in terms of the blasting process. It is advisable to make application separately in this regard.

7. Changes in ground level may not infringe statutory ground to conductor clearances or statutory visibility clearances. After any changes in ground level, the surface shall be rehabilitated and stabilised so as to prevent erosion. The measures taken shall be to Eskom's satisfaction.

8. Eskom shall not be liable for the death of or injury to any person or for the loss of or damage to any property whether as a result of the encroachment or of the use of the servitude area by the developer, his/her agent, contractors, employees, successors in title, and assignees. The developer indemnifies Eskom against loss, claims or damages including claims pertaining to consequential damages by third parties and whether as a result of damage to or interruption of or interference with Eskom's services or apparatus or otherwise. Eskom will not be held responsible for damage to the developer's equipment.

9. No mechanical equipment, including mechanical excavators or high lifting machinery, shall be used in the vicinity of Eskom's apparatus and/or services, without prior written permission having been granted by Eskom. If such permission is granted the developer must give at least seven working days' notice prior to the commencement of work. This allows time for arrangements to be made for supervision and/or precautionary instructions to be issued by the relevant Eskom Manager

Note: Where and electrical outage is required, at least fourteen work days are required to arrange it.

10. Eskom's rights and duties in the servitude shall be accepted as having prior right at all times and shall not be obstructed or interfered with.

11. Under no circumstances shall rubble, earth or other material be dumped within the servitude restriction area. The developer shall maintain the area concerned to Eskom's satisfaction. The developer shall be liable to Eskom for the cost of any remedial action which has to be carried out by Eskom.

12. The clearances between Eskom's live electrical equipment and the proposed construction work shall be observed as stipulated by *Regulation 15* of the *Electrical Machinery Regulations of the Occupational Health and Safety Act, 1993 (Act 85 of 1993).*

13. Equipment shall be regarded electrically live and therefore dangerous at all times.

14. In spite of the restrictions stipulated by Regulation 15 of the Electrical Machinery Regulations of the Occupational Health and Safety Act, 1993 (Act 85 of 1993), as an additional safety precaution, Eskom will not approve the erection of houses, or structures occupied or frequented by human beings, under the power lines or within the servitude restriction area.

15. Eskom may stipulate any additional requirements to highlight any possible exposure to Customers or Public to coming into contact or be exposed to any dangers of Eskom plant.

16. It is required of the developer to familiarise himself with all safety hazards related to Electrical plant.

17. Any third party servitudes encroaching on Eskom servitudes shall be registered against Eskom's title deed at the developer's own cost. If such a servitude is brought into being, its existence should be endorsed on the Eskom servitude deed concerned, while the third party's servitude deed must also include the rights of the affected Eskom servitude.

John Geeringh (Pr Sci Nat)(EAPASA)
Senior Consultant Environmental Management
Eskom Transmission Division: Land & Rights
Megawatt Park, D1Y42, Maxwell Drive, Sunninghill, Sandton.
P O Box 1091, Johannesburg, 2000.
[redacted]

From: ERM Arcus Amsterdam
Sent on: Wednesday, 06 August 2025 09:52:18
To: Khululwa Matshoba; ERM Arcus Amsterdam
CC: Mpho Malema
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Attachments: Emvelo DEIAr.kmz (1.35 KB), Sheepmoor DEIAr.kmz (1.5 KB)

Dear Khululwa,

Kindly see attached kmz files of the proposed development.

Thank you,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Khululwa Matshoba <StuurmKV@ntcsa.co.za>
Sent: Wednesday, August 6, 2025 8:53 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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EXTERNAL MESSAGE

Kindly share the kmz files, Please find attached Eskom/NTCSA requirements for work in or near Eskom/NTCSA servitudes and infrastructure.

Thank you.

Warm regards
Khululwa

Disclaimer

NB: This Email and its contents are subject to the NTCSA EMAIL LEGAL NOTICE which can be viewed here.

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Tuesday, July 15, 2025 16:42
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

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Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



From: Khululwa Matshoba
Sent on: Wednesday, 06 August 2025 10:55:49
To: ERM Arcus Amsterdam; Mpho Malema
CC: David Tunnicliff
Subject: Fw: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Good day Lucien

Kindly note that your proposed project is affecting existing CAMDEN EDWALENI 1 line. Kindly correct and revert back .

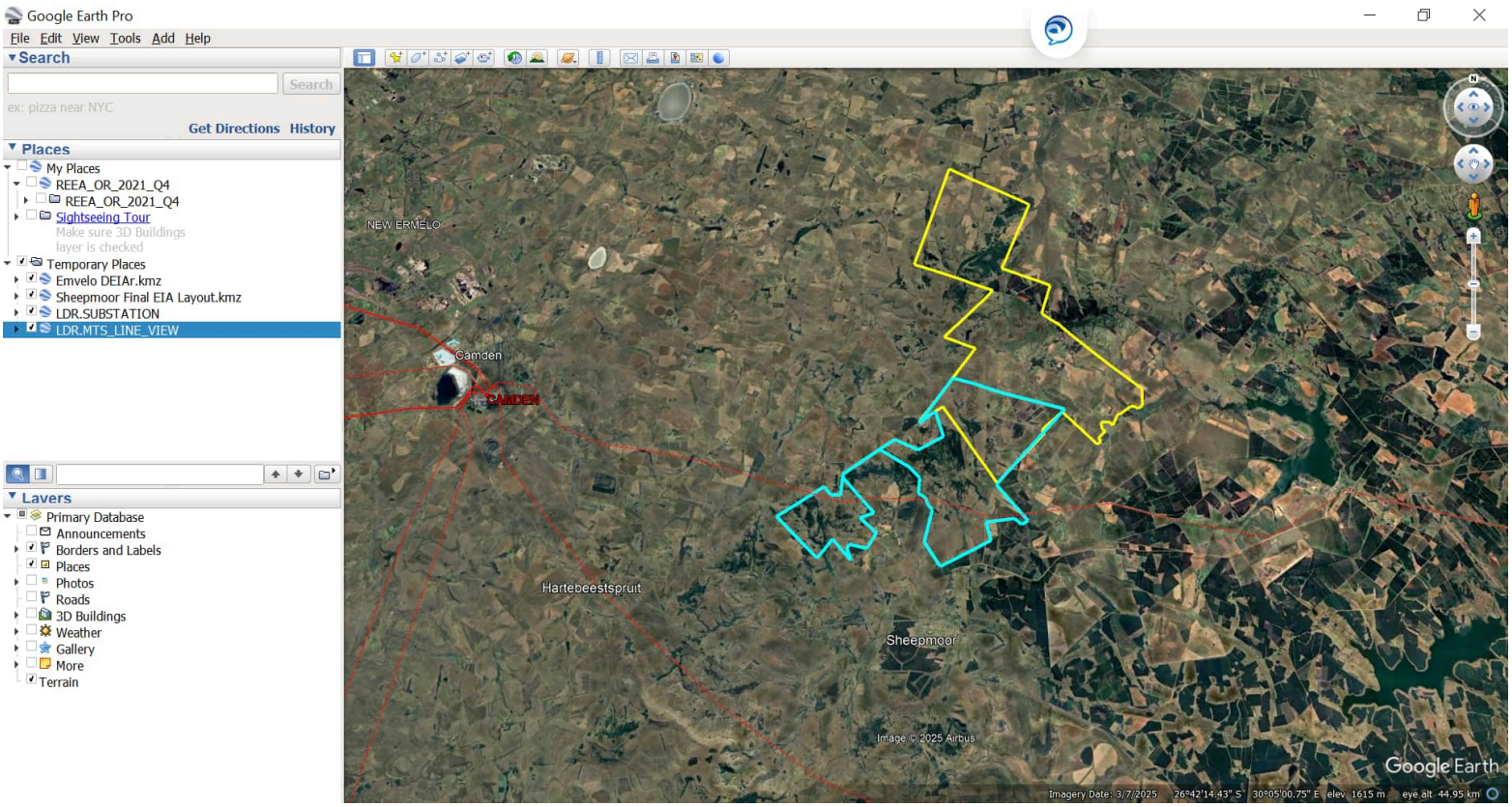
Thank you

Warm regards
Khululwa

Disclaimer
NB: This Email and its contents are subject to the NTCSA EMAIL LEGAL NOTICE which can be viewed here.

From: Christo Badenhorst <BadenhC@ntcsa.co.za>
Sent: Wednesday, August 6, 2025 10:49
To: Khululwa Matshoba <StuurmKV@ntcsa.co.za>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

FYI



From: Khululwa Matshoba <StuurmKV@ntcsa.co.za>
Sent: Wednesday, 06 August 2025 10:40

To: Christo Badenhorst <BadenhC@ntcsa.co.za>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Thanks Christo, Please share the map.

Warm regards
Khush

From: Christo Badenhorst <BadenhC@ntcsa.co.za>
Sent: Wednesday, August 6, 2025 10:39
To: Khululwa Matshoba <StuurmKV@ntcsa.co.za>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi

Does not affect my projects but does affect existing CAMDEN EDWALENI 1 line.

Regards

From: Khululwa Matshoba <StuurmKV@ntcsa.co.za>
Sent: Wednesday, 06 August 2025 10:36
To: Christo Badenhorst <BadenhC@ntcsa.co.za>; Samuel Nkoana <NkoanaLS@ntcsa.co.za>; Precious Mashiteng <MashitePR@ntcsa.co.za>; Ndivhoniswani Mutwanamba <MutwanN@ntcsa.co.za>; Phathutshedzo Kwinda <KwindaP@ntcsa.co.za>; Pumeza Mthembu <MaliwaP@ntcsa.co.za>
Subject: Fw: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Good day

Kindly check if our lines are impacted.

Warm regards
Khush

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Wednesday, August 6, 2025 09:52
To: Khululwa Matshoba <StuurmKV@ntcsa.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Mpho Malema <mpho.malema@erm.com>
Subject: [CAUTION:EXTERNAL EMAIL] RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Khululwa,

Kindly see attached kmz files of the proposed development.

Thank you,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Khululwa Matshoba <StuurmKV@ntcsa.co.za>
Sent: Wednesday, August 6, 2025 8:53 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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EXTERNAL MESSAGE

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Thank you.

Warm regards
Khululwa

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Tuesday, July 15, 2025 16:42
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

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Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Lucien Barbeau
Senior Consultant

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Cape Town [redacted]

erm.com



From: Josua Meyer
Sent on: Wednesday, 06 August 2025 13:46:47
To: ERM Arcus Amsterdam
CC: Lloyd Barnes; Johans Van Wyk; Rebecca Thomas; Richard Summers; celine@summersinc.co.za
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

The purpose of the meeting was to address concerns of the I&AP's regarding the proposed Sheepmoor and Emvelo WEF's. The applicant gives the impression that they are not interested in taking any action regarding the I&AP's concerns and attend it only to avoid negative reflection. Therefore the meeting created unfortunately more questions than answers. Your EAP's input was also disappointing.

We urgently need clarification and answers on the following

1 - The EAP is expected to participate and actively engage with the impacted community. Why has my request for a meeting since February 2025 repeatedly declined and pushed in at the 11th hour?

2 - Do you as EAP feel that the process has been credible and transparent as well as accountable in circumstances where you reach out and respond to a request for a meeting at the 11th hour? How is that considered to be meaningful and in the spirit of the constitution?

3 - Why are biodiversity related issues only being property investigated at the 11th hour although the Provincial Department requested it in the scoping phase?

4 - Why are requested documentation regarding the additional 3 months extension granted by DFFE to the applicant still outstanding?

5 - Are you as EAP confident that the data and modelling that has been undertaken to address bird related impacts and specifically the martial eagle is accurate and credible? If so, please explain why.

6 - Are you as EAP confident and can you confirm in writing that the data that is being obtained in relation to the martial eagle was correctly obtained and in accordance with all minimal standards and legal criteria?

7 - Are you as EAP comfortable that if the tagging of the martial eagle were done without a valid permit, that the tagged data can still be used in the specialist report? If so, please explain why.

8 - Are you as EAP in acceptance that the permits to tag the martial eagles, also the one at Verkykerskop, were not presented at the meeting? If so, please explain why.

9 - Are you as EAP confident that all the recommendations in the specialist reports and specifically the Social report are satisfactorily addressed? If not, please explain why.

10 - It became clear in the meeting that none of the affected landowners are prepared to allow the proposed powerline over their properties. Are AEP comfortable to support an application without a secured powerline route?

11 - The avifaunal specialist signed a NDA (non disclosure agreement) with the applicant and it was also revealed in the meeting by the applicant that they collectively determined the shaped exclusion zones for the southern bald ibis. Are you as EAP comfortable that it is not in contradiction with the declaration the avifaunal specialist signed as independant specialist? If so, please explain why.

Due to the time constraint answers required before the 11/08/2025.

Regards

On Sun, Aug 3, 2025 at 12:36 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Mr Meyer,
>
> Thank you for confirming the meeting for 12h00 tomorrow, 4 August, at your farm. That time works perfectly, and we look forward to meeting with you.
>
> If you would kindly share the physical address or GPS coordinates for the entrance to your farm, it would be greatly appreciated to ensure we arrive without any difficulty.
>
> There will be five people attending the meeting, including myself.
>
> Should there be anything further you would like us to prepare or bring along for the meeting, please don't hesitate to let us know, we'll be happy to assist in any way we can.
>
> Kind regards,
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Senior Consultant
> Cape Town [redacted] **erm.com**
>
> ---
>
> **From:** Josua Meyer <meyerjosua55@gmail.com>
> **Sent:** Friday, August 1, 2025 1:29 PM
> **To:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
> **Subject:** Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
>
> **EXTERNAL MESSAGE**
>
> Good day
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> I did inform Johans also
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> Will 12h00 be convenient for you?

How may people?

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> **Cc:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
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Sustainability is our business

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The revised comment period now ends on 15 August 2025.

All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.

Thank you for your continued participation.

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

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Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

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Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: ERM Arcus Amsterdam
Sent on: Wednesday, 06 August 2025 14:55:36
To: Josua Meyer; ERM Arcus Amsterdam
CC: Lloyd Barnes; Johans Van Wyk; Rebecca Thomas; Richard Summers; celine@summersinc.co.za
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Meyer,

Thank you for your email and for taking the time to share your reflections following our meeting on Monday.

We acknowledge receipt of your comments and the additional questions you have raised. We appreciate your continued engagement in the process and will respond to your queries as soon as possible.

Should you have any further inputs in the meantime, please feel free to share them with us.

Kind Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Wednesday, August 6, 2025 1:47 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

The purpose of the meeting was to address concerns of the I&AP's regarding the proposed Sheepmoor and Emvelo WEF's. The applicant gives the impression that they are not interested in taking any action regarding the I&AP's concerns and attend it only to avoid negative reflection. Therefore the meeting created unfortunately more questions than answers. Your EAP's input was also disappointing.

We urgently need clarification and answers on the following

1 - The EAP is expected to participate and actively engage with the impacted community. Why has my request for a meeting since February 2025 repeatedly declined and pushed in at the 11th hour?

2 - Do you as EAP feel that the process has been credible and transparent as well as accountable in circumstances where you reach out and respond to a request for a meeting at the 11th hour? How is that considered to be meaningful and in the spirit of the constitution?

3 - Why are biodiversity related issues only being property investigated at the 11th hour although the Provincial Department requested it in the scoping phase?

4 - Why are requested documentation regarding the additional 3 months extension granted by DFFE to the applicant still outstanding?

5 - Are you as EAP confident that the data and modelling that has been undertaken to address bird related impacts and specifically the martial eagle is accurate and credible? If so, please explain why.

6 - Are you as EAP confident and can you confirm in writing that the data that is being obtained in relation to the martial eagle was correctly obtained and in accordance with all minimal standards and legal criteria?

7 - Are you as EAP comfortable that if the tagging of the martial eagle were done without a valid permit, that the tagged data can still be used in the specialist report? If so, please explain why.

8 - Are you as EAP in acceptance that the permits to tag the martial eagles, also the one at Verkykerskop, were not presented at the meeting? If so, please explain why.

9 - Are you as EAP confident that all the recommendations in the specialist reports and specifically the Social report are satisfactorily addressed? If not, please explain why.

10 - It became clear in the meeting that none of the affected landowners are prepared to allow the proposed powerline over their properties. Are AEP comfortable to support an application without a secured powerline route?

11 - The avifaunal specialist signed a NDA (non disclosure agreement) with the applicant and it was also revealed in the meeting by the applicant that they collectively determined the shaped exclusion zones for the southern bald ibis. Are you as EAP comfortable that it is not in contradiction with the declaration the avifaunal specialist signed as independant specialist? If so, please explain why.

Due to the time constraint answers required before the 11/08/2025.

Regards

On Sun, Aug 3, 2025 at 12:36 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Mr Meyer,
>
> Thank you for confirming the meeting for 12h00 tomorrow, 4 August, at your farm. That time works perfectly, and we look forward to meeting with you.
>
> If you would kindly share the physical address or GPS coordinates for the entrance to your farm, it would be greatly appreciated to ensure we arrive without any difficulty.
>
> There will be five people attending the meeting, including myself.
>
> Should there be anything further you would like us to prepare or bring along for the meeting, please don't hesitate to let us know, we'll be happy to assist in any way we can.
>
> Kind regards,
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Senior Consultant
>
> Cape Town [redacted] **erm.com**
>
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From: Lloyd Barnes
Sent on: Wednesday, 06 August 2025 15:36:04
To: ERM Arcus Amsterdam
CC: Johans Van Wyk; Rebecca Thomas; Andrew Pearson; Anton Lohse
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Good day Lucien,

Thank you for the swift response to Mr Meyer.

We will provide some draft responses shortly.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
mulilo

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Wednesday, 06 August 2025 14:56
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EXTERNAL MESSAGE

Hi Lucien,

The purpose of the meeting was to address concerns of the I&AP's regarding the proposed Sheepmoor and Emvelo WEF's. The applicant gives the impression that they are not interested in taking any action regarding the I&AP's concerns and attend it only to avoid negative reflection. Therefore the meeting created unfortunately more questions than answers. Your EAP's input was also disappointing.

We urgently need clarification and answers on the following

1 - The EAP is expected to participate and actively engage with the impacted community. Why has my request for a meeting since February 2025 repeatedly declined and pushed in at the 11th hour?

2 - Do you as EAP feel that the process has been credible and transparent as well as accountable in circumstances where you reach out and respond to a request for a meeting at the 11th hour? How is that considered to be meaningful and in the spirit of the constitution?

3 - Why are biodiversity related issues only being property investigated at the 11th hour although the Provincial Department requested it in the scoping phase?

4 - Why are requested documentation regarding the additional 3 months extension granted by DFFE to the applicant still outstanding?

5 - Are you as EAP confident that the data and modelling that has been undertaken to address bird related impacts and specifically the martial eagle is accurate and credible? If so, please explain why.

6 - Are you as EAP confident and can you confirm in writing that the data that is being obtained in relation to the martial eagle was correctly obtained and in accordance with all minimal standards and legal criteria?

7 - Are you as EAP comfortable that if the tagging of the martial eagle were done without a valid permit, that the tagged data can still be used in the specialist report? If so, please explain why.

8 - Are you as EAP in acceptance that the permits to tag the martial eagles, also the one at Verkykerskop, were not presented at the meeting? If so, please explain why.

9 - Are you as EAP confident that all the recommendations in the specialist reports and specifically the Social report are satisfactorily addressed? If not, please explain why.

10 - It became clear in the meeting that none of the affected landowners are prepared to allow the proposed powerline over their properties. Are AEP comfortable to support an application without a secured powerline route?

11 - The avifaunal specialist signed a NDA (non disclosure agreement) with the applicant and it was also revealed in the meeting by the applicant that they collectively determined the shaped exclusion zones for the southern bald ibis. Are you as EAP comfortable that it is not in contradiction with the declaration the avifaunal specialist signed as independant specialist? If so, please explain why.

Due to the time constraint answers required before the 11/08/2025.

Regards

On Sun, Aug 3, 2025 at 12:36 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Mr Meyer,
>
> Thank you for confirming the meeting for 12h00 tomorrow, 4 August, at your farm. That time works perfectly, and we look forward to meeting with you.

If you would kindly share the physical address or GPS coordinates for the entrance to your farm, it would be greatly appreciated to ensure we arrive without any difficulty.

There will be five people attending the meeting, including myself.

Should there be anything further you would like us to prepare or bring along for the meeting, please don't hesitate to let us know, we'll be happy to assist in any way we can.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, August 1, 2025 1:29 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Good day
Monday is fine with me
I did inform Johans also
Will 12h00 be convenient for you?
How may people?
Regards

On Fri, 01 Aug 2025, 11:42 ERM Arcus Amsterdam, <ERM.ArcusAmsterdam@erm.com> wrote:

> Good Morning Mr Meyer,
>
> Thank you for your response. If you feel Monday is too short availability, please do not feel rushed. We would be happy to accommodate you later in the week. We will await your feedback and move accordingly from there.
>
> Kind Regards,
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Senior Consultant
>
> Cape Town [redacted] **erm.com**
>
> ---
>
> **From:** Josua Meyer <meyerjosua55@gmail.com>
> **Sent:** Thursday, July 31, 2025 6:13 PM
> **To:** Lucien Barbeau <Lucien.Barbeau@erm.com>
> **Cc:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes

<lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Some people who received this message don't often get email from meyerjosua55@gmail.com. Learn why this is important
EXTERNAL MESSAGE

Goodday
Will confirm tomorrow before 12h00
Thanks

On Thu, Jul 31, 2025 at 2:22 PM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Dear Mr Meyer,
>
> I hope this message finds you well.
>
> I'm writing to kindly follow up on our proposed meeting scheduled for Monday, 4 August at 13:00 at your farm. We would appreciate it if you could please confirm whether you are still available to meet on that date.
>
> Should you require any additional information or documentation ahead of the meeting, beyond what you have already requested, please don't hesitate to let me know, I'd be happy to assist.
>
> Looking forward to your confirmation.
>
> Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Monday, July 28, 2025 11:49 AM
To: Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Meyer,

Following discussions with the applicant, unfortunately it will not be possible to schedule a meeting prior to 1 August due to limited availability.

However, we would be pleased to meet with you on Monday the 4th of August 2025 at 13:00, as per your request, at your farm.

Kindly confirm whether this date and time are suitable, and please advise who will be attending the meeting from your side.

I will continue to provide you with the requested documentation ahead of the meeting.

Kind regards,

Lucien Barbeau
Senior Consultant

Sustainability is our business

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 25, 2025 5:11 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

Proposed date for the meeting seems to be too close to submission of comments which is already 9/08/25.

Can you arrange the meeting for us before 1/07/2025.

Can you in the meantime forward the detail previously requested

- All the documentation with Department concerning the 3 months extension granted even after time lapps to submit final report

- Mulilo's permits to fit telemetry device on the two martial eagles

- AfriAvian motivation for altering Figure 33 in both avifaunal reports

Above info are urgently required and no reason to wait for the meeting

Regards

Josua

On Tue, Jul 22, 2025 at 10:30 AM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Hi Lucien
>
> There might be a mistake in your day or date ..... 7 August 2025 is a Thursday.
>
> Nevertheless the 6 or 7 th August 2025 is fine with us.
>
> Will appreciate it if we can meet on my farm.
>
> We intend to be three (3) I&AP
>
> Regards
>
> Josua Meyer
>
> On Mon, Jul 21, 2025 at 11:36 AM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:
>
> > Dear Mr. Meyer,

Good day, and thank you for your recent correspondence regarding the Draft EIA Reports.

We acknowledge your request for a meeting to discuss the concerns raised. In consultation with the applicant, Mulilo, we are proposing a provisional date of Wednesday, 7 August 2025, with the meeting to be held at a venue in Ermelo. Kindly confirm whether this date is suitable for you and whether you will be attending alone or accompanied by others.

As a registered I&AP, your comments form an important part of the formal public participation process and will be incorporated into the Final EIA Reports. We also acknowledge the concerns raised regarding the tagging of the Martial Eagles. Relevant documentation, including permits, will be made available where appropriate to support transparency and clarity during the engagement.

We look forward to your response.

Kind Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 18, 2025 4:51 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Johans Van Wyk <Piwy@mulilo.com>; Lloyd@mulilo.com
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday mr Lucien Barbeau,

Referring to your email dated 7/04/2025 it will be appreciated if you can arrange such a meeting urgently before the 9/08/2025 with the applicant, Mulilo, on site.

Concerns as previously raised with Mulilo in an email dated 19/02/2025 will be on the agenda. That request for a meeting was refused by Mulilo.

Another urgent item which also must be discussed is the tagging of the two martial eagles. According to the MTPA report in my possession, the martial eagles were tagged by Mulilo without a permit. Copy of the report can be provided at the meeting.

That leaves the tagging of the martial eagles illegally, if not criminal.

Therefore the data being used in the specialist report is illegally obtained and all sections, models and references where data has been used must be removed from the report.

Looking forward to your urgent response.

Regards

Josua Meyer (I&AP)

On Wed, Jul 16, 2025 at 4:41 PM Josua Meyer <meyerjosua55@gmail.com> wrote:

Goodday Sir

The avifaunal specialist removed in both reports, Sheepmoor WEF and Emvelo WEF, the High Sensitivity - Turbine Exclusion Zone in Figures 33 for the aquatic buffer zones from an avifaunal perspective.

It must be an unintentional mistake and request reinstatement of it.

If it was deliberate we request the detailed reasoning and motivation for such a drastic decision.

Thanks

Josua Meyer

On Wed, Jul 16, 2025 at 1:54 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Interested and Affected Party,
>
> Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.
>
> The revised comment period now ends on 15 August 2025.
>
> All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.
>
> Thank you for your continued participation.
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Senior Consultant
>
> Cape Town [redacted]
> **erm.com**
>
> ---
>
> **From:** ERM Arcus Amsterdam
> **Sent:** Tuesday, July 15, 2025 4:43 PM
> **To:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
> **Subject:** Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
>
> SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER
>
> Dear Interested and Affected Party,
>
> This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
>
> Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Lucien Barbeau
Sent on: Wednesday, 06 August 2025 16:26:56
To: ERM Arcus Amsterdam
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]
Attachments: Sheepmoor 06-08-2025.kmz (52.58 KB), Sheepmoor Boundary.kmz (1.5 KB), Emvelo 06-08-2025.kmz (57.22 KB), Emvelo Boundary.kmz (1.35 KB)

Dear Specialist,

I trust you are well.

Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by Monday, 12 August 2025.

If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.

Kind regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Reabetswe MOKOMELE
Sent on: Thursday, 07 August 2025 10:26:03
To: Lucien Barbeau; ERM Arcus Amsterdam
CC: Victor DE ABREU
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Dear Lucian,

Your request is received but kindly note the following:

Due Dates - Due to committed site visits taking place on 11 and 12 August 2025, unfortunately it is not possible to meet the due date of 12 August 2025. The revised issue date must consider both the updating and internal reviews which would be at least one (1) week.

Variation Order - Our team will review the final layouts and determine whether the changes will require and Addendum Letter or Full Revisions to be issued. The time and effort for updating the reports (full revisions) will require a variation order which will be confirmed and communicated to you for approval.

Trust you find the above in order.

Kind regards

Reabetswe MOKOMELE
Engineer, Planning and Traffic Engineering, Infrastructure + Energy
[redacted]a

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 06 August 2025 16:27
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Specialist,

I trust you are well.

Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by Monday, 12 August 2025.

If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.

Kind regards,

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Riaan Meintjes
Sent on: Thursday, 07 August 2025 13:48:12
To: ERM Arcus Amsterdam
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Urgent: High

Attachments: Letter to ERM Arcus Amsterdam 22.04.25.pdf (259.79 KB)

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EXTERNAL MESSAGE

Dear Sir/Madam

We have briefly perused the draft EIA report and have been unable to find any reference to the comment submitted by us on the instructions of our client, a copy of which is attached to this email.

Kindly refer us to the relevant pages of the draft report which deal with our client's comments?

We further note from the draft report that a formal application has been lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted. Kindly furnish us with a copy of this application and all communications to and from ATNS relating thereto.

We look forward to hearing from you as a matter of urgency.

Regards
Riaan Meintjes
Director

BusinessDay Best Lawyers for 2025: Arbitration and Mediation; Litigation; Real Estate Law

HAYES EST H 2005 INCORPORATED

[redacted]
W: www.themislawchambers.co.za

Unit 1, Roeland Square
Corner of Roeland Street and Drury Lane
Cape Town, 8001

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---

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Date: Wednesday, 16 July 2025 at 13:55
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Interested and Affected Party,

Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.

The revised comment period now ends on 15 August 2025.

All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.

Thank you for your continued participation.

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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Prior to making any payment to our firm, please confirm the banking details telephonically with one of our directors as listed on our website. We will never send you an email advising you of a change of our banking details. Any email mentioning a change of banking details is false, and we ask that you kindly contact one of our directors immediately should you receive such an email.

ENVIRONMENTAL RESOURCES MANAGEMENT SOUTHERN AFRICA (PTY) LTD

Via email: ERM.ArcusAmsterdam@erm.com
EIAApplications@dffe.gov.za

Our Reference: RM / HR1599
Reply to Email: riaan@themis.co.za
Your Reference:

Date: 22 April 2025

Dear Sirs

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

1 We address this correspondence to you on the instructions of our clients, the Trustees for the time being of the Peter Celliers Trust ("**the Trust**").

2 The Trust is the owner of Portions 8, 19 and 28 of the Roodewal Farm (Farm number 270), Registration Division IT, Mpumalanga. It is an interested and affected party with regard to the proposed development of the Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province.

3 The Trust conducts an aerodrome and a helipad from Portion 28 of its farm. The aerodrome has been used for aircraft of the Learjet and KingAir categories and has, at all times material hereto, remained in regular use. The landing strip of the aerodrome is used in both directions.

4 The operation and safety requirements of aerodromes and helipads are governed by the provisions of the Civil Aviation Act, 13 of 2009, the Civil Aviation Regulations, 2011 (as amended) ("**the Regulations**") and Annex 14 to the Convention on International Civil Aviation, 7th Edition, July 2016.

5 The safety requirements for aerodromes and heliports are contained in Part 139 of the Regulations and Regulation 139.01.30 deals with obstacle limitation and marking outside aerodromes and heliports. Regulation 139.01.30(1) imposes an obligation on the holder of an aerodrome licence to monitor the surroundings of the aerodrome to assess permanent or temporary obstacle limitation and penetration surfaces, to establish if any obstacle has an impact on the safety of aircraft operations at such aerodrome. Sub-regulation (7) goes

on to provide that the holder of an aerodrome licence shall not allow to be erected, without the prior approval of the Director, an object higher than 45 meters above the mean level of a landing area or within 8 kilometres measured from the nearest point on a boundary of an aerodrome. Regulation 139.01.30 further incorporates the provisions of Document SA-CATS 139.

6 Document SA-CATS 139.01.30 elaborates upon the requirements for obstacle limitations and markings outside aerodromes or heliports. Paragraph 1.14 deals extensively with the requirements pertaining to wind turbine generators (wind farms) and paragraph 1.14(2), dealing with wind farm placement, states as follows:

> "*Due to the potential of wind turbine generators to interfere on* (sic) *radio navigation equipment, no Windfarm should be built closer than 35 km from an aerodrome. In addition, much care should be taken to consider visual flight rules routes, proximity of known recreational flight activity such as hang-gliders, en route navigational facilities etc.*" (our underlining)

7 In addition to the aerodrome, there is a registered nature conservancy named Nu-Scotland on the Trust's farm. The conservancy regularly hosts guests and bi-annually hosts cricket groups of between 80 to 100 people. The visual impact assessments of the proposed wind farms will need to take the use of the Trust's farm as a nature conservancy into account. The conservancy is home to a wide range of antelope, zebra and birds, including Secretary Birds, which have been classified as endangered, largely due to habitat degradation. Appropriate mitigation measures will need to be put in place to address the threats that the wind farms will pose to the fauna on the Trust's farm and surrounds.

8 The Trust is accordingly opposed to the erection of any wind turbines closer than 35 kilometres from the boundary of the Trust's aerodrome.

Yours faithfully



RIAAN MEINTJES
HAYES INCORPORATED

From: Albert Froneman
Sent on: Friday, 08 August 2025 12:08:28
To: Lucien Barbeau; ERM Arcus Amsterdam
CC: Lloyd Barnes; Tasha Oosthuizen; Lizandé Kellerman; Marietjie Froneman; Robin Colyn
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]
Urgent: High

EXTERNAL MESSAGE

Dear Lucien,

Thank you for sharing these updated layouts. We have perused them and have a few queries:

1. Why have the respective WEF boundaries changed from what was submitted in our specialist reports released for public comment on 15 July?
2. As a result of these changes, according to the KMZs, it appears there have been additions/removals re the affected properties included in each WEF site – can you please provide us with an updated list of the affected properties per project?
3. Also, the following turbines appear to be located on both Emvelo and Sheepmoor WEFs as the site boundaries include the same properties: WTGs 18, 21, 26, 27, 28, 29, 30. Can you please clarify why this is the case?

Thank you, we look forward to your soonest feedback.

Once we have your feedback and clarification regarding this, we can commence with updating the maps in the reports.

Best regards / Vriendelike groete,

Albert

Albert Froneman *Pr.Sci.Nat*

AFRIAVIAN ENVIRONMENTAL

[redacted]

Albert@AfriAvian.com

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 06 August 2025 16:26
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Specialist,

I trust you are well.

Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by Monday, 12 August 2025.

If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don’t hesitate to reach out.

Kind regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: jonathan@camissaconsulting.com
Sent on: Friday, 08 August 2025 12:48:21
To: Lucien Barbeau; ERM Arcus Amsterdam
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]
Attachments: Sheepmoor_EIA_v3-0_20250808.pdf (6.89 MB), Emvelo_EIA_v2-0_20250008.pdf (7.21 MB)

EXTERNAL MESSAGE

Hi Lucien

Thanks for reaching out.
Attached are my final reports. Please let me know if you need anything else. Note that I am unable to get the specialist declaration signed in the Netherlands. I hope you would be able to sort that out on your side?

All the best

Jonathan Aronson
Director | Biodiversity Specialist

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From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 6 August 2025 16:27
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Specialist,

I trust you are well.

Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by Monday, 12 August 2025.

If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.

Kind regards,

Lucien Barbeau
Senior Consultant

Cape Town [redacted]

erm.com



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EMVELO WIND ENERGY FACILITY AND GRID CONNECTION

MPUMALANGA, SOUTH AFRICA

BAT (CHIROPTERA) EIA REPORT

August 2025

Produced for

Emvelo Wind Energy Facility (Pty) Ltd

Produced by

Camissa Sustainability Consulting

Amsterdam, Netherlands

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NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND ENVIRONMENTAL IMPACT REGULATIONS, 2014 (AS AMENDED) - REQUIREMENTS FOR SPECIALIST REPORTS (APPENDIX 6)

Regulation GNR 326 of 4 December 2014, as amended 7 April 2017, Appendix 6	**Section of Report**
1. (1) A specialist report prepared in terms of these Regulations must contain- a) details of- i. the specialist who prepared the report; and ii. the expertise of that specialist to compile a specialist report including a curriculum vitae;	Appendix 2
b) a declaration that the specialist is independent in a form as may be specified by the competent authority;	Appendix 3
c) an indication of the scope of, and the purpose for which, the report was prepared;	Section 1.1
(cA) an indication of the quality and age of base data used for the specialist report;	Section 4
(cB) a description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change;	Section 5.1, Section 6
d) the date and season of the site investigation and the relevance of the season to the outcome of the assessment;	Section 4
e) a description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used;	Section 4
f) details of an assessment of the specific identified sensitivity of the site related to the proposed activity or activities and its associated structures and infrastructure, inclusive of a site plan identifying site alternatives;	Section 6
g) an identification of any areas to be avoided, including buffers;	Section 6, Figure 5
h) a map superimposing the activity including the associated structures and infrastructure on the environmental sensitivities of the site including areas to be avoided, including buffers;	Appendix 1 (Figure 3)
i) a description of any assumptions made and any uncertainties or gaps in knowledge;	Section 2
j) a description of the findings and potential implications of such findings on the impact of the proposed activity, (including identified alternatives on the environment) or activities;	Section 5
k) any mitigation measures for inclusion in the EMPr;	Section 6, Section 7

Regulation GNR 326 of 4 December 2014, as amended 7 April 2017, Appendix 6	**Section of Report**
l) any conditions for inclusion in the environmental authorisation;	Section 6, Section 7
m) any monitoring requirements for inclusion in the EMPr or environmental authorisation;	Section 6, Section 7
n) a reasoned opinion- i. (as to) whether the proposed activity, activities or portions thereof should be authorised; (iA) regarding the acceptability of the proposed activity or activities; and ii. if the opinion is that the proposed activity, activities or portions thereof should be authorised, any avoidance, management and mitigation measures that should be included in the EMPr, and where applicable, the closure plan;	Section 8
o) a description of any consultation process that was undertaken during the course of preparing the specialist report;	NA
p) a summary and copies of any comments received during any consultation process and where applicable all responses thereto; and	NA
q) any other information requested by the competent authority.	NA
2) Where a government notice *gazetted* by the Minister provides for any protocol or minimum information requirement to be applied to a specialist report, the requirements as indicated in such notice will apply.	Appendix 5: Site Sensitivity Verification Report

1 INTRODUCTION

Emvelo Wind Energy Facility (Pty) Ltd are proposing the development of a commercial wind energy project located near Ermelo, within the Msukaligwa Local Municipality and the Gert Sibande District Municipality, in the Mpumalanga Province. The project forms part of a development cluster that is expected to comprise two separate Wind Energy Facilities (WEFs).

This EIA report covers the Emvelo WEF which is proposed to comprise up to 25 turbines with a maximum output capacity of up to 260 MW. The WEF will have an anticipated lifespan of 25 – 30 years. In addition to the wind energy infrastructure, it is proposed that an on-site substation with a capacity up 132 kV and an up to 132 kV Overhead Powerline (OHPL) of approximately 30 km (300 m corridor) in distance, traversing eighteen (18) land parcels, be constructed to connect the proposed WEF to the proposed new Camden B substation. The proposed technical details of Emvelo WEF are presented below:

Developer / Applicant	Emvelo WEF
DFFE Reference	To be confirmed
WEF Generation Capacity	Up to 260 MW
Site Access	Locality to be confirmed. Total width up to 15 m (12 m after rehabilitation) consisting of up to 3m width for underground 33 kV reticulation.
Number of Turbines	Up to 25
Hub Height from ground level	Up to 150 m
Blade Length	Up to 110 m
Rotor Diameter	Up to 220 m
Length of internal roads	Unknown at this point.
Width of internal roads	Up to 12 m to be rehabilitated to up to 9 m.
On-site substation capacity	Up to 132 kV
Proximity to grid connection	Approximately 25 km
Grid Connection Capacity	Up to 132 kV
Temporary turbine construction laydown and storage areas.	Crane platforms and hardstand laydown area up to 40 ha (Up to 1 ha per turbine)
Permanent footprint area dimensions, including roads, turbine hardstand areas, O&M buildings and battery pad.	O&M: Up to 1 ha Hardstand areas: Up to 1 ha Total area of final footprint (including roads): up to 180 ha
Operations and maintenance buildings (O&M building) with parking area	Up to 1 ha
Height of fencing	2.8 m
Type of fencing	Where site offices are required, temporary screen fencing used to screen offices from the wider landscape.

1.1 Scope and Objectives

This EIA report presents a Bat (Chiroptera) Impact Assessment for the Emvelo WEF and associated grid connection. Collisions with wind turbine blades are a leading cause of bat mortality globally (Cryan, 2011; O'Shea et al., 2016). Given the nature, scale, and uncertainty of these impacts to bats, specialist studies are required to assess the risks of renewable energy infrastructure on bats (Rodrigues 2015, MacEwan et al. 2020b, SANBI 2020, Bennun et al. 2021).

The objectives of this assessment are to present the baseline ecological condition of the project site for bats, and to use these characterisations to predict and assess the potential impact of the project on bat species and their habitats as well as to provide actions to mitigate impacts if required.

2 ASSUMPTIONS AND LIMITATIONS

The core techniques used to assess bat activity in this study are acoustic monitoring and roost surveys, both of which have several limitations which will influence the findings and recommendations of this study.

Acoustic monitoring allows for rapid, passive collection of a large volume of bat activity data which can help identify the bat species present within a particular location and their associated spatio-temporal relative activity patterns. In the context of wind farms, acoustic monitoring is therefore a useful technique however, there are several constraints that must be acknowledged. These are discussed in detail by Voigt et al. (2021), Adams et al. (2012), and Kunz et al. (2007a) and fundamentally, include that acoustic monitoring cannot provide an indication of bat abundance or population size at a site. In addition, population demographics such as age and sex of bats cannot generally be determined from echolocation calls.

Due to the large volume of data collected by bat detectors it is impractical and prohibitively time-consuming to inspect each file for echolocation calls and to identify the associated bat species. Specialised statistical software uses bat call reference libraries to automate the identification process but developing such libraries is challenging given the variation individual species display in their echolocation call structure and overlap between species. This study used the Wildlife Acoustics library "Bats of South Africa Version 5.4.2", but this excludes reference calls for most South African species thus these may have been overlooked. However, given the duration of the monitoring and spatial coverage of the detectors, the acoustic data provides a reasonable inventory of the species present, and a good indication of the relative magnitude of bat activity. Lastly, bat activity is notably variable in response to a number of factors such as land use change, climactic variability, variations in prey abundance and meteorological conditions which can vary over different time scales. Since this study is limited to 12 months, the baseline conditions presented here may not be representative of activity over longer time frames meaning risk may be misinterpreted.

The major limitation with roost surveys is finding roosting bats. Bats use a diversity of roosting sites including trees, buildings, crevices, and underground sites (caves and mines). The presence of these features at a site can help to target roost searches but evidence of bats may not always be apparent even if bats are present. Importantly, the absence of bat evidence in these situations does not equate to evidence of bat absence (Collins 2006). Thus, this study uses a precautionary approach and will apply buffers to roosts (largely buildings and rocky crevices) even if bats were not located given their potential role in supporting roosting bats.

It is difficult to assess the risk to bats during operation of the proposed facility based on acoustic data collected during pre-construction surveys. For example, Hein et al. (2013) showed that pre-construction bat activity was not a significant indicator of collision risk. Lintott et al. (2016) argued that environmental impact assessments do not predict the risks to bats accurately. This may partly be because it is hypothesized that bats may be attracted to wind turbines (Cryan and Barclay 2009, Guest et al. 2022) which some evidence suggests may be the case (Horn et al. 2008, Richardson et al. 2021). While this report makes predications about the potential risk to bats posed by the project, these carry a degree of uncertainty and

must be verified by using post-construction surveys to ensure that the predictions are accurate and bat behaviour has not altered from pre-construction levels (Lintott et al. 2016).

Risk to bats was determined based on median bat activity per night derived from the bat activity dataset collected with acoustic monitoring. Median values were compared to those in Table 5 in MacEwan et al. (2020b) which provides height-specific fatality risk categories (high, medium, low) based on bat activity sampled in different South African terrestrial ecoregions. The Project Area of Influence (PAOI) is situated in the Highveld Grasslands ecoregion (Dinerstein et al. 2019) however reference values are not available for this ecoregion in MacEwan et al. (2020b). Instead, median values were compared to reference values for the Drakensberg Grasslands, Woodlands and Forest ecoregion. While bat activity levels differ between these two ecoregions this difference is small (MacEwan et al. 2020a). The lack of a direct reference for the Highveld Grasslands ecoregion is therefore not a major limitation and the comparison is suitable to provide an evaluation of risk.

3 LEGAL REQUIREMENTS AND GUIDELINES

The EIA processes for this project is being undertaken in terms of Government Notice (GN) No. R. 983 of 4 December 2014 (as amended to GNR 327), promulgated under the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) EIA Regulations, 2014 (as amended). In addition, there are various international, regional, and local legislation, policies, regulations, guidelines, conventions, and treaties in place for the protection of biodiversity, under which bats would also be protected or considered. These create a policy environment and impact management framework aiming to prevent excessive impacts to biodiversity and which was used to assess risk of this specific project. Specific policies include the following:

- Convention on Biological Diversity Post-2020 Global Biodiversity Framework
- United Nations Sustainable Development Goals
- Convention on the Conservation of Migratory Species of Wild Animals (1979)
- Convention on Biological Diversity (1993)
- Constitution of the Republic of South Africa, 1996 (Act No. 108 of 1996)
- National Environmental Management Act, 1998 (NEMA, Act No. 107 of 1998)
- National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004)
- Northern Cape Nature Conservation Act (Act 9 of 2009)
- The Equator Principles (2013)
- International Finance Corporation Performance Standards (PS6)
- The Red List of Mammals of South Africa, Swaziland, and Lesotho (2016)
- South Africa National Biodiversity Strategy and Action Plan (2005)
- Guidelines for the implementation of the Terrestrial Flora (3c) & Terrestrial Fauna (3d) Species Protocols for environmental impact assessments in South Africa
- Mitigating biodiversity impacts associated with solar and wind energy development. IUCN Guidelines for project developers (2021)
- South African Good Practise Guidelines for Surveying Bats in Wind Energy Facility Developments – Pre-Construction (2020)
- South African Good Practise Guidelines for Operational Monitoring for Bats at Wind Energy Facilities (2020)
- South African Bat Fatality Threshold Guidelines (2018)
- Mitigation Guidance for Bats at Operational Wind Energy Facilities in South Africa (2018)

4 SURVEY METHODOLOGY

The Project Area of Influence (PAOI) was defined as the Area of Interest (AoI) of the development cluster plus a 10 km buffer given that bats are flying mammals (Scottish Natural Heritage 2019). This area was studied at a desktop level to determine which bat species (i.e., impact receptors) are likely to occur within the PAOI, to

provide information on their natural history and conservation status, and to contextualise the project site within the larger social-ecological environment with respect to bats.

Bats were also studied through 12 months of acoustic monitoring in the AoI which began on 26 April 2022 and ended on 4 July 2023. After this, monitoring continued at one met mast location until 11 November 2023. Bat activity was sampled at 11 locations (Figure 1, Table 1) within the AoI with Wildlife Acoustics, Inc. SM4 bat detectors. At nine locations (AM4 – AM12), SMM-U2 microphones were positioned at the top of a 10 m aluminium mast. At the remaining two locations (AM1 and AM3), microphones were positioned on meteorological towers at 10 m, 50 m, and 90 mrespectively. Equipment at AM12 was stolen and therefore data from this location were not available to be assessed in this report.

The bat detectors were programmed to record activity nightly, from 30 minutes before sunset to 30 minutes after sunrise, and this report summarises 518 nights of bat activity data. This monitoring period therefore spans of all four seasons providing a representative account of temporal bat activity patterns across a year. Acoustic data retrieved from each bat detector were processed using Kaleidoscope® Pro (Version 5.4.2, Wildlife Acoustics, Inc.). Bats were automatically identified using the embedded "Bats of South Africa Version 5.4.0" reference library and verified by inspecting echolocation files. The number of acoustic files recorded was used as a measure to quantify bat activity, whereby each file was considered one bat pass of themicrophone.

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

Table 1: Summary of the Bat Acoustic Monitoring Sampling Locations and Effort

Bat Detector	Coordinates	# Sample Nights	Altitude (m)	Habitat Features
AM1 (Met mast)	-26.612298°S 30.317572°E	10m: 518 50 m: 226 90 m: 478	1,778	In Wakkerstroom Montane Grassland, 400 m west of small escarpment, 560 m north of farm dam, 440 m west of woodland patch, 560 m northeast of wetland
AM3 (Met Mast)	-26.587572°S 30.284137°E	10 m: 340 50 m: 435 90 m: 326	1,748	In Wakkerstroom Montane Grassland, 420 m west of farmstead, 420 m east of stream and seep wetland
AM4	-26.665933°S 30.321221°E	208	1,550	In Eastern Highveld Grassland, 360 m west of cultivated area, 230 m southeast of woodland, 240 m north east of stream, 430 m south east of depression wetland
AM5	-26.611025°S 30.363393°E	377	1,515	In Eastern Highveld Grassland, on border of cultivated areas and disturbed grassland, 470 m southeast of stream, wetland and woodland patch, 2.4 km northwest of farmstead
AM6	-26.562101°S 30.296970°E	242	1,732	In Wakkerstroom Montane Grassland, at edge of woodland patch, 80 m east of depression wetland, 255 m west of stream
AM7	-26.640015°S 30.306442°E	194	1,655	Within wooded valley, 60 m west of stream, 300 m east of seep wetland
AM8	-26.621551°S 30.277550°E	137	1,735	In Wakkerstroom Montane Grassland, 680 m west of woodland patch,167 m north of seep wetland
AM9	-26.549013°S 30.315353°E	51	1,667	In Eastern Highveld Grassland adjacent to wetland and surrounded by trees
AM10	-26.592367° S 30.336850°E	163	1,696	In Wakkerstroom Montane Grassland, above small escarpment in shallow wooded valley

Table 1: Summary of the Bat Acoustic Monitoring Sampling Locations and Effort				
Bat Detector	**Coordinates**	**# Sample Nights**	**Altitude (m)**	**Habitat Features**
AM11	-26.632172°S 30.265925°E	163	1,694	In Eastern Highveld Grassland adjacent to tree edge line, 220 m south east of wetland, installed at farmstead

5 SPECIALIST FINDINGS

5.1 Ecological Baseline

The Project Area of Influence (PAOI) is situated in the Grassland Biome and comprises predominantly Eastern Highveld Grassland vegetation (Figure 1). The landscape associated with this vegetation consists of slight to moderately undulating plains with small scattered rocky outcrops. The vegetation is short, dense grassland (Mucina and Rutherford 2006). Wakkerstroom Montane Grassland occurs in the middle of the PAOI, on low mountains and undulating plains. Here the vegetation comprises short montane grassland on plateaus and flat areas. On steep, east facing slopes and in drainage areas, short forest and thicket occurs. Both vegetation types are endemic, and Eastern Highveld Grassland is classified as Vulnerable while Wakkerstroom Montane Grassland is classified as Least Concern (SANBI 2018). The PAOI includes some low hills and wetland depressions and has largely been transformed by cultivation in the west, commercial forestry in the east and urban sprawl, including extensive areas of alien invasive trees. The PAOI is in a summer rainfall region and has a cool-temperate climate with dry winters, frequent occurrence of frost and large differences in both diurnal and seasonal temperature extremes (Mucina and Rutherford 2006).

Critical Biodiversity Areas (CBA), areas of high biodiversity value that must be maintained in a natural state, are located throughout the PAOI, classified as either “CBA Irreplaceable” and “CBA Optimal” (Figure 1). The former category comprises 1) areas required to meet conservation targets and those with irreplaceability values greater than 80 %, 2) areas which represent critical linkages or pinch-points in the landscape that must remain natural, and 3) Critically Endangered ecosystems (MTPA 2014). The latter category comprises areas that are not ‘irreplaceable’, but they are the most optimal land configuration to meet all biodiversity targets. Ecological Support Areas (ESA), not essential for meeting biodiversity targets but important in supporting the functioning of CBAs and delivering important ecosystem services, are also located throughout the PAOI.

Parts of the PAOI fall within a National Protected Areas Expansion Strategy (NPAES) Focus area (Moist Escarpment Grasslands), targeted for protected area expansion for improved ecosystem representation, ecological sustainability and resilience to climate change. Chrissiesmeer Protected Environment and Jericho Dam Nature Reserve overlap the north and east of the PAOI respectively (Figure 1).

Bat roosting sites in the PAOI are relatively limited and unlikely to support large congregations of bats, with no underground sites (e.g., caves, mines, sinkholes) known to be present. The closest known major bat roost is approximately 70 km north of the PAOI. Although occasional ridges and rocky outcrops are features of the landscape (Mucina and Rutherford 2006) these are not extensive. Some bat species could roost in these features. Bats are likely to roost in buildings associated with farmsteads within and bordering the AoI especially Cape Serotine and Egyptian Free-tailed Bat (Monadjem et al. 2020). Trees growing at these farmsteads and elsewhere on site where they form clumps, could also provide roosting spaces for bats, even though most are alien invasive species. Completed surveys of some buildings in the of the PAOI did not reveal the presence of roosting bats and as such were assessed as being of low relative suitability. However, these could be used by bats as night-roosts (locations used by bats to feed on captured prey, or to rest between foraging bouts) and should therefore still be considered, and avoided where possible, in the spatial planning.

Sensitive features in the PAOI at which bat foraging activity may be concentrated include farm buildings where they would forage for insects attracted to lighting (Rydell 1992, Jung and Kalko 2010), dams and wetland areas (Sirami et al. 2013), within and along the edge of woodland/tree patches, and over cultivated

areas (Bohmann et al. 2011, Noer et al. 2012). Free-tailed bats (Molossidae) will fly at high altitudes, and their foraging habitat is essentially all airspaces (McCracken et al. 2008, Nguyen et al. 2019).

Based on current taxonomic information and bat occurrence data, 23 species could occur within the PAOI (Table 2). The majority have a low likelihood of occurrence however the potential suite of species includes 10 high risk species, including fruit bats (Pteropodiae) and free-tailed bats (Molossidae) which are vulnerable to wind energy impacts in South Africa (MacEwan 2016, Aronson 2022).

Table 2: Bat Species Potentially Occurring within the PAOI

Common Name Species Name	Key Habitat Requirements*	Prob. Of Occurrence	Conservation Status		Wind Energy Risk[δ]
			IUCN[†]	RSA[‡]	
Natal Long-fingered bat *Miniopterus natalensis*	Temperate or subtropical species. Primarily in savannahs and grasslands. Roosts in caves, mines, and road culverts. Clutter- edge forager. Migratory.	**Confirmed (5,018 passes)**	LC/U	LC	**High**
Lessor Long-fingered bat *Miniopterus fraterculus*	Temperate species, associated with grasslands. Cave-dependant but also roosts in tunnels and mines. Habitat includes savannah bushveld, moister mistbelt and coastal forest habitats. Clutter-edge forager. Migratory.	Moderate	LC/U	LC	**High**
Cape Serotine *Laephotis capensis*	Arid semi-desert, montane grassland, forests, savannah and shrubland. Roosts in vegetation and human-made structures. Clutter-edge forager.	**Confirmed (50,243 passes)**	LC/S	LC	**High**
Mauritian tomb bat *Taphozous mauritianus*	Savannah woodland preferring open habitat. Roosts on rock faces, the outer bark of trees or on the outer walls of buildings under the eaves of roofs. Forages in urban areas and over cultivation. Open- air forager.	High	LC/U	LC	**High**
Little Free-tailed bat *Mops pumilus*	Semi-arid savannah, forested regions, woodland habitats. Roosts in narrow cracks in rock and trees but also in buildings. Open-air forager. Forages in urban areas and over cultivation.	**Confirmed (1,767 passes)**	LC/U	LC	**High**
Midas Free-tailed bat *Mops midas*	Hot low-lying savannah and woodland. Roosts in narrow cracks in rock and trees but also in buildings. Open-air forager.	Low	LC/D	LC	**High**
Egyptian Free-tailed bat *Tadarida aegyptiaca*	Desert, semi-arid scrub, savannah, grassland, and agricultural land. Roosts in rocky crevices, caves, vegetation, and human-made structures. Open-air forager.	**Confirmed (20,995 passes)**	LC/U	LC	**High**
Wahlberg's Epauletted fruit bat *Epomophorus wahlbergi*	Roost in dense foliage of large, leafy trees. Associated with forest and forest-edge habitats but will forage in urban environments.	Low	LC/S	LC	**High**
African Straw-coloured fruit bat *Eidolon helvum*	Non-breeding migrant in the PAOI.	Low	NT/D	LC	**High**
Egyptian Rousette *Rousettus aegyptiacus*	Distribution influenced by availability of suitable caves roosts.	Low	LC/S	LC	**High**
Temminck's Myotis *Myotis tricolor*	Montane forests, rainforests, coastal forests, savannah woodlands, arid thicket, and fynbos. Roosts communally in caves (and mines) and closely associated with mountainous terrain. Migratory. Clutter-edge forager.	Low	LC/U	LC	**Medium-High**
Welwitsch's Myotis *Myotis welwitschii*	Mainly open woodland and savannah but also high-altitude grassland, tropical dry forest, montane tropical moist forest, savannah and shrublands. Clutter-edge forager.	Low	LC/U	LC	**Medium-High**
Yellow-bellied house bat *Scotophilus dinganii*	Occurs throughout the Savannah Biome but avoids open habitats such as grasslands and Karoo scrub. Roosts in hollow trees and buildings. Clutter-edge forager.	**Confirmed (169 passes)**	LC/U	LC	**Medium-High**
Dusky Pipistrelle *Pipistrellus hesperidus*	Woody habitats, such as riparian vegetation and forest patches. Recorded roosting in narrow cracks in rocks and under the loose bark of dead trees. Clutter-edge forager.	Low	LC/U	LC	**Medium-High**
Rusty Pipistrelle	Savannah woodland and associated with open water	Low	LC/U	LC	**Medium-**

Pipistrellus rusticus	bodies. Roosts in trees and old buildings. Clutter-edge forager.				High
Long-tailed Serotine *Eptesicus hottentotus*	Montane grasslands, marshland and well- wooded riverbanks, mountainous terrain near water. Roosts in caves, mines, and rocky crevices. Clutter-edge forager.	**Confirmed (368 passes)**	LC/U	LC	**Medium**
Egyptian Slit-faced bat *Nycteris thebaica*	Savannah, desert, arid rocky areas, and riparian strips. Gregarious and roosts in caves but also in mine adits, Aardvark holes, rock crevices, road culverts, roofs, and hollow trees. Clutter forager.	Medium	LC/U	LC	**Low**
Geoffroy's Horseshoe bat *Rhinolophus clivosus*	Savannah woodland, shrubland, dry, riparian forest, open grasslands, and semi- desert. Roosts in caves, rock crevices, disused mines, hollow baobabs, and buildings. Clutter forager.	Medium	LC/U	LC	**Low**
Bushveld Horseshoe bat *Rhinolophus simulator*	Occurs in caves within areas of moist savannah, adjacent to rivers and savannah woodland, montane habitats, and coastal mosaics. Commonly associated with riparian forest and along wooded drainage lines. Roosts in caves and mines. Clutter forager.	Medium	LC/D	LC	**Low**
Blasius's Horseshoe bat *Rhinolophus blasii*	Savannah woodlands and are dependent on the availability of daylight roosting sites such as caves, mines, or boulder piles.Clutter forager.	Low	LC/D	NT	**Low**
Darling's Horseshoe bat *Rhinolophus darlingi*	Mesic woodland savannahs. Roosts in caves, boulder piles, mines, culverts, large hollow trees and disused buildings. Clutter forager.	Low	LC/U	LC	**Low**
Sundevall's Leaf-nosed bat *Hipposideros caffer*	Savannah, bushveld and/or coastal forests, near to rivers and other water sources. Roosts in caves, sinkholes, rock fissures, hollow trees, mines, and culverts. Clutter forager.	Low	LC/D	LC	**Low**
Percival's Short-eared Trident bat *Cloeotis percivali*	Savannah and woodland areas. Roosts in caves and mine tunnels. Clutter forager.	Low	LC/U	EN	**Low**

*Child et al. (2016), *Monadjem et al. (2020); [!] Child et al. (2016); [†] IUCN (2021); [δ] MacEwan et al. (2020b)

5.2 Pre-Construction Bat Monitoring Results

Six bat species were confirmed to occur in the PAOI (Table 2) including four species classified as high risk from wind energy development: Natal Long-fingered bat, Cape Serotine, Little Free-tailed bat, and Egyptian Free-tailed bat. All of these species have a conservation status of Least Concern (both globally and regionally) and no red data species with a higher conservation status were detected. Although these species are currently classified as Least Concern, Rodhouse et al. (2019), Davy et al. (2020) and Frick et al. (2017) have all shown that in North America, Least Concern bats may be experiencing impacts due to wind farms that could result in changes to their conservation status. The global population trend is unknown for Natal Long-fingered bat, Little Free-tailed bat, and Egyptian Free-tailed bat but stable for Cape serotine. Given the unknown population trends for some of these species and the evidence of impacts from wind farms, ongoing monitoring and adaptive management will be essential to ensure their conservation status does not deteriorate.

A total of 80,051[1] bat passes were recorded over 518 sample nights. Most activity was attributed to Cape serotine (63 %) and Egyptian free-tailed bat (27 %). These species comprise the majority of bat fatalities at South African wind farms (Aronson 2022). Natal long-fingered bat accounted for 6 % of total activity. The remaining three species (Little free-tailed bat, Long-tailed serotine and Yellow-bellied house bat) were seldomly recorded and the magnitude of their activity suggests they would be at low risk of impacts. As such, the remainder of this section focuses on impacts to Egyptian free-tailed bat, Cape serotine and Natal long-fingered bat.

Based on MacEwan et al. (2020b), Cape serotine activity was predominantly low but high activity was recorded at AM5, AM8, AM9 and AM11, in summer and autumn (Table 3). The latter two monitoring stations were located at a farm dam and at a farmstead respectively indicating higher activity in relation to

[1] Exclusive of an additional 1,491 bat passes unable to be identified to a species.

these landscape features. This species was also recorded at 50 m and 90 m but the magnitude of its activity was mostly low except for at AM3-50 during March and April when its activity suggests medium risk. Based on the dataset, this species is largely predicted to be at low collision risk. However, bats in the same family (Vespertilionidae) are known to be attracted to wind turbines in the United Kingdom (Richardson et al. 2021). Thus, although the data suggest a low collision risk, the installation of wind turbines in the landscape can alter bat activity patterns. Collision risk for this species will also depend on how close turbine blades reach the ground, with risk increasing the closer the blades reach the ground (Garvin et al. 2024).

Table 3: Median number of bat passes per hour per night for Cape serotine and associated risk based on MacEwan et al. (2020b).

site	jan	feb	mar	apr	may	jun	jul	aug	sep	oct	nov	dec	Risk Rating
AM1-10	0.19	0.18	1.21	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.09	0.00	
AM1-50		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00	0.00		High
AM1-90		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		Medium
AM3-10	1.35	0.56		0.08	0.00	0.00	0.00	0.00	0.00	0.09	0.00	0.49	Low
AM3-50	0.00	0.00	0.08	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	No Data
AM3-90	0.00			0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
AM4	0.29	1.20		0.39	0.08	0.00	0.00	0.08	0.93	0.74	0.00		
AM5	0.19	4.65	3.32	1.27	0.08		0.00	0.08	0.54	0.79	0.56	0.88	
AM6				1.01	0.22	0.00	0.07	0.23	0.61	0.00	0.28		
AM7				0.00	0.00	0.00	0.00	0.00	0.20		0.00		
AM8				0.08	0.00	1.11	0.81	0.08	2.18				
AM9		8.19	8.53	0.00									
AM10	0.19	0.00	0.26	0.08	0.08							0.00	
AM11	25.90	20.76	12.50	6.14	3.10							15.07	

The timeseries data indicate a clear seasonal pattern in bat activity for the Cape serotine (Table 4), with the mean number of bat passes per hour peaking significantly during summer, reaching up to 13.66 passes per hour. This is largely driven by activity at AM11 and AM9. This heightened activity in summer likely reflects optimal weather conditions and increased prey availability. In autumn, bat activity remains relatively moderate, with values between 0.02 and 3.48 passes per hour, suggesting continued but reduced presence compared to summer. In contrast, winter and spring exhibit notably lower levels of activity, with mean passes per hour not exceeding 1.17 in spring and 0.68 in winter. This seasonal trend suggests that Cape serotine bats are minimally active during colder months, likely due to reduced foraging opportunities or temperature constraints. Additionally, within each season, there is a gradual decrease in bat passes across a night. Peak activity in summer and spring is between 19:00 and 21:00, in autumn between 18:00 and 20:00, and in winter between 17:00 and 19:00.

Table 4: Heatmap showing the mean number of bat passes per hour for Cape serotine. Colour gradient is relative and not based on thresholds.

Time Period	Autumn	Spring	Summer	Winter
17:00 – 18:00	1.28	0.01	0.00	0.58
18:00 – 19:00	3.48	0.73	0.27	0.68
19:00 – 20:00	2.51	1.17	13.66	0.21
20:00 – 21:00	1.80	1.06	7.40	0.13
21:00 – 22:00	1.29	0.92	4.01	0.06
22:00 – 23:00	1.07	0.68	3.39	0.02
23:00 – 00:00	0.82	0.45	2.63	0.00
00:00 – 01:00	0.73	0.46	2.13	0.00
01:00 – 02:00	0.73	0.27	1.56	0.00
02:00 – 03:00	0.66	0.25	1.24	0.00

03:00 – 04:00	0.49	0.20	1.08	0.00
04:00 – 05:00	0.41	0.08	2.64	0.00
05:00 – 06:00	0.51	0.00	0.62	0.00
06:00 – 07:00	0.02	0.00	0.00	0.04

The data showed that at 50 m and 90 m, moderate collision risk is predicted for Egyptian free-tailed bat apart from during autumn and spring when high risk is predicted (Table 5). High risk is predicted near AM11 in autumn, and AM4 and AM5 during spring. Egyptian free-tailed bat is flexible in its foraging strategy, and it is thought that the habitat below has little influence on this species (Monadjem et al. 2020). These bats are open-air foragers based on their morphology and echolocation (Norberg and Rayner 1987) which means they tends to forage high in the air.

Table 5: Median number of bat passes per hour per night for Egyptian free-tailed bat and associated risk based on MacEwan et al. (2020b).

site	jan	feb	mar	apr	may	jun	jul	aug	sep	oct	nov	dec	Risk Rating
AM1-10	0.10	0.18	0.86	0.00	0.07	0.00	0.00	0.08	0.08	0.40	0.75	0.29	High
AM1-50		0.18	0.34	0.56	0.15		0.00	0.08	0.08	0.17	0.28		Medium
AM1-90		0.00	0.17	0.25	0.08	0.00	0.00	0.00	0.08	0.18	0.19		Low
AM3-10	0.09	0.00		0.23	0.15	0.00	0.00	0.08	0.33	0.17	0.62	0.39	No Data
AM3-50	0.10	0.04	0.51	0.62	0.08	0.00	0.00	0.08	0.16	0.45	0.52	0.20	
AM3-90	0.00			0.08	0.08	0.00	0.00	0.08	0.17	0.44	0.24	0.00	
AM4	0.00	0.00		0.39	0.23	0.00	0.07	0.39	1.95	2.57	0.55		
AM5	0.00	0.09	0.51	0.78	0.26		0.19	0.39	1.59	2.00	1.83	0.59	
AM6				0.08	0.08	0.00	0.00	0.00	0.37	0.17	0.00		
AM7				0.00	0.00	0.00	0.00	0.00	0.08		0.00		
AM8				0.15	0.08	0.07	0.00	0.08	0.57				
AM9		0.31	0.60	0.00									
AM10	0.00	0.00	0.00	0.08	0.08							0.00	
AM11	0.39	0.45	1.55	2.23	0.54							1.13	

Table 6: Heatmap showing the mean number of bat passes per hour for Egyptian free-tailed bat. Colour gradient is relative and not based on thresholds.

Time Period	Autumn	Spring	Summer	Winter
17:00 – 18:00	0.04	0.03	0.00	0.08
18:00 – 19:00	0.47	0.54	0.02	0.36
19:00 – 20:00	0.67	0.96	0.46	0.22
20:00 – 21:00	0.78	1.03	0.50	0.17
21:00 – 22:00	0.77	1.11	0.46	0.10
22:00 – 23:00	0.75	1.09	0.54	0.08
23:00 – 00:00	0.57	1.11	0.46	0.05
00:00 – 01:00	0.55	1.40	0.57	0.03
01:00 – 02:00	0.51	1.14	0.55	0.02
02:00 – 03:00	0.44	0.83	0.36	0.01
03:00 – 04:00	0.26	0.54	0.16	0.02
04:00 – 05:00	0.15	0.13	0.11	0.00
05:00 – 06:00	0.03	0.01	0.00	0.00
06:00 – 07:00	0.01	0.00	0.00	0.02

In spring, Egyptian free-tailed bat shows the highest activity levels overall, with peak passes per hour occurring around midnight (00:00 – 01:00) at 1.4 passes per hour (Table 6). This elevated activity during

spring nights aligns somewhat with the Cape serotine data, where spring showed moderate activity; however, for the Egyptian free-tailed bat, spring is a clear peak season. In summer, activity for the Egyptian free-tailed bat is relatively lower compared to spring, with values not exceeding 0.57 passes per hour and generally concentrated in the earlier hours of the night. This is a notable contrast to Cape serotine, which displayed its highest seasonal activity in summer. This suggests that while the Cape serotine is more active during summer, the Egyptian free-tailed bat is less active during this period, potentially indicating differing ecological preferences or behavioural patterns. Autumn displays a moderate level of activity for the Egyptian free-tailed bat, with values peaking around 20:00 – 21:00 at 0.78 passes per hour and then gradually decreasing through the night. This pattern is consistent with the Cape serotine, where autumn also showed moderate activity. In winter, the Egyptian free-tailed bat shows low activity levels across all hours, with peak activity reaching only 0.36 passes per hour early in the evening (18:00–19:00) and decreasing to nearly zero later at night. This aligns with the winter results for the Cape serotine bat, confirming that winter is a low-activity season for both species.

Table 7: Median number of bat passes per hour per night for Natal long-fingered bat and associated risk based on MacEwan et al. (2020b).

site	jan	feb	mar	apr	may	jun	jul	aug	sep	oct	nov	dec	Risk Rating
AM1-10	0.10	0.09	3.84	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	High
AM1-50		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00	0.00		Medium
AM1-90		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		Low
AM3-10	0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	No Data
AM3-50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
AM3-90	0.00			0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
AM4	0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
AM5	0.00	0.13	0.26	0.23	0.00		0.00	0.00	0.00	0.00	0.00	0.00	
AM6				0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
AM7				0.00	0.00	0.00	0.00	0.00	0.00		0.00		
AM8				0.00	0.00	0.00	0.04	0.08	0.24				
AM9		3.30	2.86	0.04									
AM10	0.00	0.00	0.00	0.00	0.00							0.00	
AM11	0.19	0.27	0.75	0.24	0.08							0.00	

Activity of Natal long-fingered bat was predominantly low but high activity was recorded during spring at AM1 and AM9. Medium activity was also recorded during spring at AM5 and AM11 (Table 7). As such, overall impacts to this species are anticipated to be low, especially since activity levels at 50 m and 90 m were assessed as low based on criteria in MacEwan et al (2020b). However, this species may experience high cumulative impacts (see Section 6.3).

Table 7: Heatmap showing the mean number of bat passes per hour for Natal long-fingered bat. Colour gradient is relative and not based on thresholds.

Time Period	Autumn	Spring	Summer	Winter
17:00 – 18:00	0.06	0.00	0.00	0.12
18:00 – 19:00	0.22	0.00	0.02	0.07
19:00 – 20:00	0.18	0.01	0.15	0.02
20:00 – 21:00	0.58	0.01	0.07	0.02
21:00 – 22:00	0.69	0.02	0.34	0.02
22:00 – 23:00	0.42	0.01	0.35	0.02
23:00 – 00:00	0.27	0.02	0.24	0.01
00:00 – 01:00	0.22	0.02	0.21	0.01

01:00 – 02:00	0.15	0.00	0.13	0.00
02:00 – 03:00	0.16	0.00	0.06	0.00
03:00 – 04:00	0.10	0.00	0.02	0.00
04:00 – 05:00	0.05	0.00	0.02	0.00
05:00 – 06:00	0.19	0.00	0.02	0.00
06:00 – 07:00	0.00	0.00	0.00	0.00

The timeseries data showed that this species exhibits relatively low and stable activity levels across all seasons, with a modest peak in autumn, where its activity reaches a maximum of 0.69 bat passes per hour between 21:00 and 22:00. This peak, though limited, suggests a slight preference for early evening hours in the autumn months. Throughout spring, summer, and winter, however, the Natal long-fingered bat maintains very low activity, rarely exceeding 0.35 passes per hour at any given time. The hourly distribution shows that this species activity slightly tapers off in the late evening and early morning hours, with a marked decline around midnight. This pattern suggests that the Natal long-fingered bat may have brief foraging periods early in the night, possibly returning to roost sites earlier than other nocturnal species. This species is migratory, and although difficult to show, the peak in activity in autumn could be suggestive of some bats (e.g. females) moving through the site to roosting sites north elsewhere in Mpumalanga or Limpopo after mating.

6 IDENTIFICATION AND ASSESSMENT OF IMPACTS

Impacts to bats that are likely to occur because of the construction, operation and decommissioning of the wind energy facility and grid connection are identified and assessed in the following section. The unit of analysis against which impacts were assessed is the local bat community and their associated habitats within the PAOI. Impacts considered for assessment include habitat modification and disturbance, displacement, fatality due to collisions with wind turbine blades, and light pollution since these are the major impacts likely to be associated with the project (Kunz et al. 2007b, Cryan and Barclay 2009, Bará and C. Lima 2024, Voigt et al. 2024). For each impact, the respective mitigation measures were categorised into those aimed at first avoiding impacts, then minimising impacts, and finally restoring areas impacted (Figure 2).

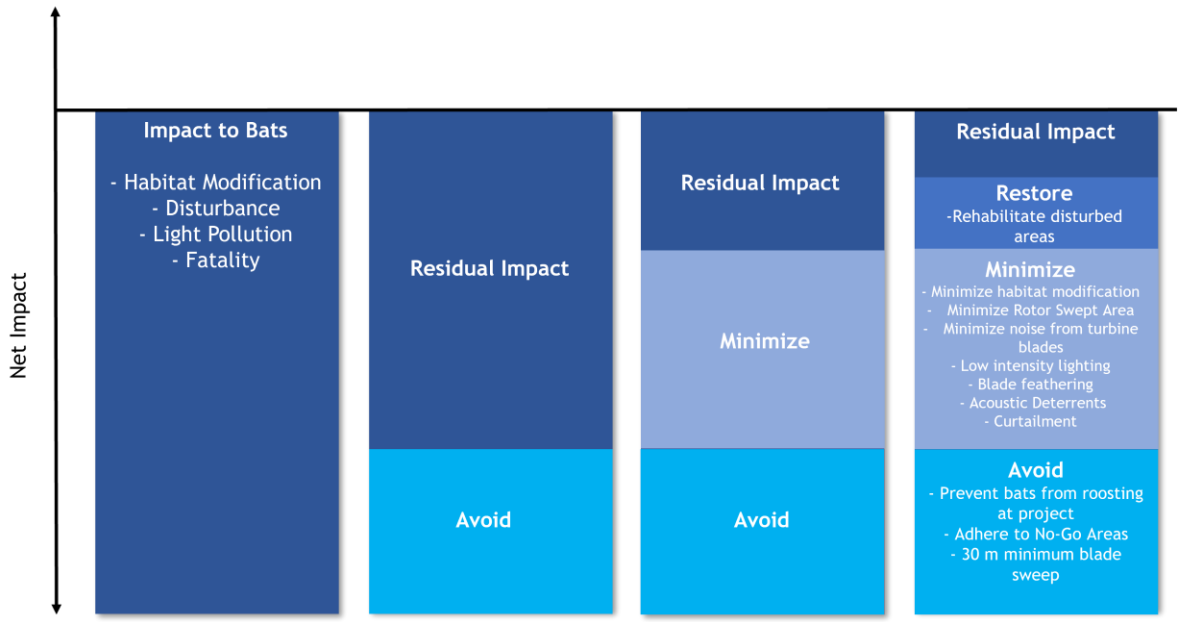


Figure 2: Mitigation Hierarchy applied to the Project with Mitigation Measures.

6.1 Wind Energy Facility

6.1.1 Construction Phase

IMPACTS

Removal of native vegetation, noise and dust generated during construction activities, and the presence of new infrastructure in the landscape, will negatively and indirectly impact bats by removing habitat used for foraging and commuting, through disturbance, and displacement (Kunz et al. 2007b, Millon et al. 2015, Millon et al. 2018, Bennun et al. 2021, Leroux et al. 2022, Tolvanen et al. 2023).

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

Mitigation (Avoid)

Habitat modification impacts can be avoided by buffering habitat and landscape features (Table 8) that bats use to spatially limit the potential for bats to interact with project infrastructure, and to avoid impacting key bat habitat (Barré et al. 2018, Leroux et al. 2022). All key habitat features were buffered by 200 m as per best practise (Rodrigues 2015, MacEwan et al. 2020b).

To align with regional conservation and integrated development planning, the Mpumalanga Biodiversity Sector Plan Handbook (MTPA 2014) was consulted to guide spatial risk in the AoI. The intention was to align biodiversity conservation policy objectives with renewable energy policy objectives, attempting to minimize trade-offs between conflicting goals (Jackson 2011, Gasparatos et al. 2017). The handbook includes a map of terrestrial areas that are important for conserving biodiversity and ecological processes – Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs) respectively.

CBA Irreplaceable Areas were categorised as No-Go (Table 8) because the conservation goals for these areas are to maintain them in a natural state with no loss of ecosystems, functionality or species, and with no flexibility in land-use options (MTPA 2014). CBA optimal and areas with Highveld grassland were classified as high risk. Although the primary objective of the CBA optimal areas is to maintain these spaces in a natural state with no loss of ecosystems, functionality or species, some flexibility in land-use options is permitted (MTPA 2014), therefore these areas must be avoid as much as possible. The remaining areas were assigned low or medium risk where all infrastructure development should be prioritized. These included modified land, areas with invasive alien trees (plantations), ESA, and other Natural Areas (Table 8). Similarly, in ecological supports areas (ESAs), the objective is to maintain habitats in a natural, or near-natural, state with limited loss of ecosystems or functionality. Hence, these areas were classified as medium risk, permitting the siting of turbines in these spaces.

All turbines will be subjected to a post-construction bat fatality monitoring program which will monitor residual impacts at turbines located in CBA optimal and ecological support areas, as well as turbines in low-risk areas. The results of this monitoring will inform management actions where needed to ensure alignment with the MTPA objectives to limit impacts to biodiversity.

Table 8: Features used to assign spatial risk categories in the AoI for bats (Chiroptera)

Risk Level			
Low	**Medium**	**High**	**No-Go**
Heavily modified land	NPAES	CBA Optimal	CBA Irreplaceable Areas
Moderately modified land	ESA Landscape corridor	Highveld Grassland	Minor Watercourses (50 m buffer)
Cleared Invaded	ESA Local corridor		Farm Dams (200 m buffer)
Transformed	Other Natural Areas		Pan depressions (200m buffer)
Plantation/Invaded	Montane Grassland		Houses (200 m buffer)
			Buildings (200 m buffer)
			Seeps (200 m)

			CVB Wetlands (200 m)
			Rivers with floodplains (200 m buffer)
			Rocky Outcrops (200 m buffer)
			Protected Areas (200m buffer)

No infrastructure (including O&M buildings) may be placed within buffered No-Go areas (Figure 3). However, road infrastructure may need to be routed through sensitive areas for practical reasons. Existing road networks should be used as much as possible in these cases to limit the creation of additional roads which have known impacts on wildlife (Perumal et al. 2021).

To avoid bats roosting in new project infrastructure, all buildings must be properly sealed to prevent bats from roosting. If bats colonize these spaces, a suitably qualified bat ecologist must be engaged to remove them.

Disturbance effects can be avoided by restricting construction activities to daylight hours (i.e., no construction at night) and avoiding blasting near rocky outcrops.

Mitigation (Minimize and Restore)

Modification and disturbance of bat habitat is likely to have species specific effects depending on species foraging guild, season, and distance to wind turbines (Barré et al. 2018, Leroux et al. 2022). For example, clutter edge species (e.g., Cape serotine) are more likely to be impacted by habitat modification given their greater association with physical habitat features compared to high-flying species (e.g., Egyptian free-tailed bat). As such, buffers may not be effective to fully remove all impacts.

Beyond avoidance, measures to minimize further impacts include minimizing the clearing of native vegetation, minimizing disturbance and destruction of rocky outcrops, and applying good construction abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste) created during construction. Where native trees, rocky outcrops or buildings need to be removed (although this must be avoided), these features must be examined by a suitably qualified bat ecologist before construction commences to search for roosting bats. Following construction, all areas disturbed must be rehabilitated through native species planting within all areas under the projects control.

IMPACT PHASE: CONSTRUCTION					
Nature of the impact: MODIFICATION & DISTURBANCE OF BAT HABITAT (ROOSTING, FORAGING, COMMUTING)					
Description of impact Removal of native vegetation, noise and dust generated during construction activities, and the presence of new infrastructure in the landscape, will negatively and indirectly impact bats by removing habitat used for foraging and commuting, through disturbance, and displacement. Construction of WEF infrastructure could result in destruction and/or disturbance to bat roosts, and inadvertently provide new roosting spaces for some bat species in risky locations.					
	Extent (E)	**Duration (D)**	**Reversibility (R)**	**Magnitude (M)**	**Probability (P)**
Without Mitigation	1	1	3	2	2
With Mitigation	1	1	2	1	1
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	**Low Negative Impact (14)**			**Low Negative Impact (5)**	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No, no comments received				
Mitigation measures to reduce residual risk or enhance opportunities: - Limit potential for bats to roost in project infrastructure (e.g., buildings, turbines) by ensuring they are properly sealed such that bats cannot gain access. - No construction activities at night. - No placement of infrastructure (except roads) in no-go areas.					

- No blasting near rocky crevices. - Minimize clearing of native vegetation - Minimize disturbance and destruction of rocky outcrops, native trees and buildings, and where this is required, these features should be examined for roosting bats. - Apply good construction abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste) created during construction. - Rehabilitate and enhance all areas disturbed during construction (including aquatic habitat).	
Residual impact	Residual impacts are likely to be minor although buffer distances have been shown to be ineffective at avoiding and minimizing risk to bats because these are two small for some species (Barré et al. 2018, Tolvanen et al. 2023).

6.1.2 Operational Phase

IMPACTS

Bat mortality (direct impact) through collisions with wind turbine blades is the principal impact of wind energy facilities on bats during operation of the facility (Cryan and Barclay 2009, Arnett et al. 2016, Voigt et al. 2024). Displacement of bats from their preferred areas may also occur due to turbine noise emissions (Ellerbrok et al. 2024, Voigt et al. 2024).

Mitigation (Avoid)

Collisions can be avoided by not placing wind turbines in the vicinity of bat habitats which for bats includes both physical landscape features themselves (near wetlands, vegetation etc.) and open airspace away from these features (Schnitzler et al. 2003). Risk of collision impact is related to bat morphology with fast flying, open-air species more likely to be impacted than low-flying species who forage closer to the ground, in edge spaces near vegetation, or in dense cluttered spaces (Schnitzler et al. 2003, Thaxter et al. 2017, Aronson 2022). Impacts to low-flying species can be further avoided by ensuring blades do not sweep close to ground level (Figure 4).

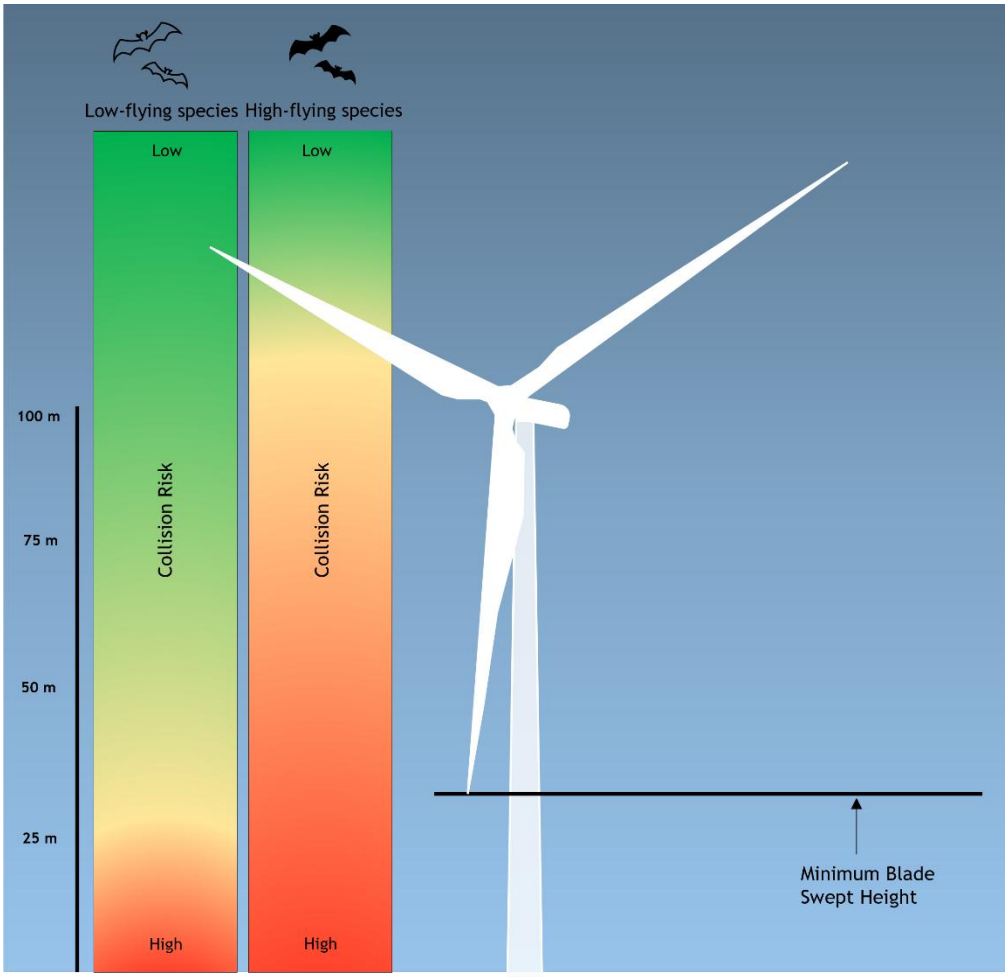


Figure 4: Conceptual Framework used to differentiate risk between low and high-flying bat species and the relationship with turbine size.

The species principally at collision risk from the proposed project are Cape serotine and Egyptian free-tailed bat since other species were recorded less often. High risk was identified for Cape serotine at ground level (represented by 10 m) at some locations (Table 3) but generally low risk at height (above 50 m). Activity is likely to decrease exponentially between these two heights (Wellig et al. 2018) meaning risk would decrease from high at 10 m to low at 50 m and above. The size of the rotor swept area should account for this because the lower the blades sweep the ground, the higher risk they will present to bats (Garvin et al. 2024). It is therefore recommended to maintain a minimum blade sweep of 30 m to avoid collision impacts as much as possible. There is limited published emperical evidence for this specific height but based on the activity of Cape serotine this is likely to be a reasonable height were risk would reduce from high to moderate or low.

Collision impacts can also be avoided by not installing wind turbines within or adjacent to key bat habitats, and adhering to the No-Go buffers (Figure 3). To ensure no parts of the wind turbines, including the blade tips, intrude into bat buffers, all 200 m buffers were adjusted (increased by 49 m) to account for the blade length and hub height of the assessed turbine in line with Mitchell-Jones and Carlin (2014) and based on the following equation:

[Eq. 1]

$$b = \sqrt{(buffer + bl)^2 - (hh - fh)^2}$$

$$b = \sqrt{(200 + 91)^2 - (150 - 0)^2}$$

$$b = 249\ m$$

Where:
b = adjusted/blade tip buffer
buffer = 200 m
bl: Turbine blade length = 91 m
hh: Hub height = 150 m
fh: Feature height = 0 m

The specific turbine height assessed in this report has a 150 m hub height and 91 m blade length, resulting in a minimum blade sweep of 59 m. Should the turbine size change, the adjusted/blade tip buffers must be updated to account for any changes in the hub height or blade length. No turbines are within buffered areas and hence the turbine layout is acceptable in its current form (Figure 3).

Mitigation (Minimize and Restore)

For some high-flying species such as Egyptian free-tailed bat, the habitat or land use below does not generally influence their activity (Monadjem et al. 2020) which makes habitat based mitigations (e.g., buffers) less effective. This species was recorded at 50 m and 90 m, where median activity levels suggest high risk during autumn and spring (Table 5). Mitigation to avoid impacts to higher-flying species should include the choice of turbine design since this has the potential to influence bat fatality (Barclay et al. 2007) but the impact of turbine size on bat fatality is poorly understood. Generally, impacts to high-flying species should be avoided by limiting the size of the rotor swept area as much as practicable since they are active across much of the rotor swept zone.

However, due to the characteristics of the species present on site, i.e., high risk, open-air foraging species, residual impacts could occur since there is still likely to be a high degree of risky airspace even with a minimized rotor swept area. In addition, some bats may be attracted to turbines (Horn et al. 2008, Cryan and Barclay 2009, Richardson et al. 2021, Guest et al. 2022, Leroux et al. 2022) once installed and operational and therefore additional mitigation measures would be needed to minimize impacts.

The first additional mitigation measure to minimize residual collision impacts is the use of **blade feathering** to prevent free-wheeling of blades below the turbine cut-in speed. This has been shown to reduce bat fatality with the benefit of not impacting on energy production (Young et al. 2011, Good et al. 2012).

During operation, bat fatality monitoring must be undertaken to search for bat carcasses beneath wind turbines to measure the residual impact of the WEF on bats for a minimum of two years (Aronson et al. 2020). Mitigation measures that are known to further minimize bat fatality if needed based on the fatality monitoring results include **curtailment** and/or **acoustic deterrents** (Arnett et al. 2013, Romano et al. 2019, Weaver et al. 2020). These techniques must be used if post-construction fatality monitoring indicates that species fatality thresholds have been exceeded (MacEwan et al. 2018) to minimize impacts, maintain the impacts to bats within acceptable limits of change and prevent declines in the impacted bat population. The bat fatality thresholds for the project were determined based on area of influence of the turbines of 2,007 hectares. This was based on a minimum convex polygon around all turbines, plus an additional buffer around this space of 110 m corresponding to the turbine blade length. Based on the bat fatality threshold for the Highveld Grasslands ecoregion (MacEwan et al. 2018), the bat fatality threshold for the Emvelo project is 16 bats per least concern species.

According to the threshold guidance (MacEwan et al. 2018), should the annual fatality threshold be exceeded, curtailment and/or acoustic deterrents must be used to reduce fatality levels to below the threshold. For frugivorous bats, conservation important or rare/range restricted bats, i.e., Species of Special Concern (SSC), the annual fatality threshold is 1 individual. The likelihood of SSC's being present on site is low (Table 2).

A Biodiversity Management Plan (BMP) for bats must be developed by a bat ecologist before commencement of operation which includes the post-construction fatality monitoring plan design, fatality thresholds calculations and rationale, and an adaptive management response plan that provides a timeous action pathway for mitigation (e.g. curtailment or deterrents) should fatality thresholds be exceeded. Smart curtailment approaches which shut down turbines based on real time bat acoustic activity data are favoured over blanket curtailment because these will be less disruptive to turbine operation.

Since displacement of bats is likely driven by turbine noise, this can be minimized by serration of the back edges of the blade, by using a low-noise blade airfoil design or with blade trailing-edge brushes (Bošnjaković et al. 2024; Ellerbrok et al. 2024).

IMPACT PHASE: OPERATION					
Nature of the impact: BAT FATALITY					
Description of impact Bat mortality (direct impact) through collisions and/or barotrauma with wind turbine blades is the principal impact of wind energy facilities on bats.					
	Extent (E)	**Duration (D)**	**Reversibility (R)**	**Magnitude (M)**	**Probability (P)**
Without Mitigation	3	4	3	4	5
With Mitigation	3	4	2	3	3
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	**High Negative Impact (70)**			**Moderate Negative Impact (36)**	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No, no comments received				
Mitigation measures to reduce residual risk or enhance opportunities: - No placement of turbines and infrastructure (apart from roads and the OHL) within no-go areas - Maintain a minimum blade sweep of 30 m to avoid impacts to lower flying bats such as clutter-edge species (e.g., Cape serotine, Natal long-fingered bat). - Minimize the rotor diameter - Feather blades to prevent free-wheeling below the turbine cut-in speed - Implement post-construction fatality monitoring and apply smart curtailment or deterrents if fatality thresholds are exceeded.					
Residual impact	Curtailment and deterrents can successfully reduce bat fatality (Arnett 2011, Arnett et al. 2016, Weaver et al. 2020), but not completely. Through the application of fatality thresholds, residual impacts should be minimized.				

IMPACT PHASE: OPERATION					
Nature of the impact: DISPLACEMENT					
Description of impact Avoidance of wind turbines by bats, in some cases over several hundred meters distance, has been observed for various species in different habitats, including farmland, resulting in displacement impacts (Tolvanen et al. 2023, Voigt et al. 2024). Displacement, likely caused by wind turbine operation (e.g., wake turbulences and noise emissions), tends to increase with the number and size of turbines.					
	Extent (E)	**Duration (D)**	**Reversibility (R)**	**Magnitude (M)**	**Probability (P)**
Without Mitigation	3	4	3	3	3
With Mitigation	3	4	2	2	2
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	**Moderate Negative Impact (39)**			**Low Negative Impact (22)**	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No, no comments received				
Mitigation measures to reduce residual risk or enhance opportunities:					

- Reduce turbine noise emissions by serration of the back edges of the blade, by using a low-noise blade airfoil design or with blade trailing-edge brushes (Bošnjaković et al. 2024; Ellerbrok et al. 2024).	
Residual impact	Residual impacts are likely to be minor although buffer distances have been shown to be ineffective at avoiding and minimizing risk to bats because these are two small for some species (Barré et al. 2018, Tolvanen et al. 2023).

6.1.3 Decommissioning Phase

IMPACTS

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

Mitigation (Avoid)

Disturbance effects can be avoided by restricting decommissioning activities to daylight hours (i.e., no works at night).

Mitigation (Minimize and Restore)

Disturbance can be minimized by applying good abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste) created during decommissioning works. All areas disturbed must be rehabilitated through native species planting within all areas under the projects control.

IMPACT PHASE: DECOMMISSIONING					
Nature of the impact: DISTURBANCE OF BATS					
Description of impact Impacts during the decommissioning phase will be indirect and involve disturbance to bats through excessive noise and dust, and damage to vegetation.					
	Extent (E)	**Duration (D)**	**Reversibility (R)**	**Magnitude (M)**	**Probability (P)**
Without Mitigation	1	1	3	3	3
With Mitigation	1	1	2	2	2
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	**Low Negative Impact (24)**			**Low Negative Impact (12)**	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No, no comments received				
Mitigation measures to reduce residual risk or enhance opportunities: - No decommissioning activities at night. - Apply good abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste) created during decommissioning activities. - Rehabilitate and enhance all areas disturbed during construction (including aquatic habitat).					
Residual impact	Residual impacts are likely to be minor since ceasing project activities on site is likely to benefit bats.				

6.2 Grid Connection

6.2.1 Construction Phase

The direct impact of grid connection infrastructure is collisions with powerlines. Insectivorous bats are unlikely to collide with powerlines since they can avoid these obstacles using echolocation but fruit bats do collide with powerlines (Tella et al. 2020). The likelihood of occurrence for fruit bats species in the AoI

is low (Table 2). Indirect impacts include loss of habitat to construct substations and OHL pylons, and ecological light pollution (Longcore and Rich 2004).

IMPACT PHASE: CONSTRUCTION					
Nature of the impact: MODIFICATION & DISTURBANCE OF BAT HABITAT (ROOSTING, FORAGING, COMMUTING)					
Description of impact Vegetation clearing for grid connection infrastructure (access roads, substation buildings, pylons), as well as noise and dust generated during the construction phase, will impact bats by removing habitat used for foraging and commuting, through disturbance, and displacement (Kunz et al. 2007b, Millon et al. 2018, Bennun et al. 2021). This impact is likely to have species specific effects; clutter edge species (e.g., Cape serotine) are more likely to be impacted by habitat modification given their greater association with physical habitat features compared to high-flying species (e.g., Egyptian free-tailed bat). Construction of grid connection infrastructure could result in destruction (direct impact) of bat roosts (trees, buildings) and disturbance (indirect impact) of bat roosts potentially resulting in roost abandonment. Bat mortality can occur if roosts which contain bats are destroyed. Installation of new infrastructure in the landscape (e.g., buildings) can inadvertently provide new roosting spaces for some bat species, attracting them to areas with wind turbines and potentially increasing the likelihood of collisions.					
	Extent (E)	**Duration (D)**	**Reversibility (R)**	**Magnitude (M)**	**Probability (P)**
Without Mitigation	1	1	3	2	2
With Mitigation	1	1	2	1	1
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	**Low Negative Impact (14)**			**Low Negative Impact (5)**	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No, no comments received				
Mitigation measures to reduce residual risk or enhance opportunities: - Limit potential for bats to roost in project infrastructure (e.g., buildings) by ensuring they are properly sealed such that bats cannot gain access. - No construction activities at night. - No placement of pylons within 200 m of key habitat features specifically including buildings, dams/wetlands, and rivers/streams. The OHL itself is permitted to cross over No-Go Areas for practical routing reasons but pylon positions must avoid No-Go Areas where feasible. Therefore the maximum possible span should be implemented to avoid the sensitive area while ensuring the technical feasibility of the development. - No blasting near rocky crevices. - The construction compounds, laydown areas, and batching plants must avoid No-Go areas. - Minimize clearing of native vegetation - Minimize disturbance and destruction of rocky outcrops, native trees and buildings, and where this is required, these features should be examined for roosting bats. - Apply good construction abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste) created during construction. - Rehabilitate and enhance all areas disturbed during construction (including aquatic habitat).					
Residual impact	Residual impacts are likely to be minor although buffer distances have been shown to be ineffective at avoiding and minimizing risk to bats because these are two small for some species (Barré et al. 2018, Tolvanen et al. 2023).				

6.2.2 Operational Phase

IMPACT PHASE: OPERATION
Nature of the impact: LIGHT POLLUTION

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

	Extent (E)	Duration (D)	Reversibility (R)	Magnitude (M)	Probability (P)
Without Mitigation	3	4	3	3	3
With Mitigation	3	4	2	2	2

Significance Calculation	Without Mitigation	With Mitigation
S=(E+D+R+M)*P	**Moderate Negative Impact (39)**	**Low Negative Impact (22)**
Was public comment received?	No	
Has public comment been included in mitigation measures?	No, no comments received	

Mitigation measures to reduce residual risk or enhance opportunities:
- No placement of substations and operational and maintenance buildings within no-go areas. - Avoid excessive lighting - Use of motion-sensor lighting, avoid sky-glow by using hoods and downward facing lighting, increase spacing between lighting units, and use low pressure sodium lights (Rydell 1992, Stone 2012).

Residual impact	Given the limited extent of light pollution currently in the region, the application of the above mitigation measures is likely to result in minor residual impacts.

6.2.3 Decommissioning Phase

IMPACT PHASE: DECOMMISSIONING
Nature of the impact: DISTURBANCE OF BATS
Description of impact Impacts during the decommissioning phase will be indirect and involve disturbance to bats through excessive noise and dust, and damage to vegetation.

	Extent (E)	Duration (D)	Reversibility (R)	Magnitude (M)	Probability (P)
Without Mitigation	1	1	3	3	3
With Mitigation	1	1	2	2	2

Significance Calculation	Without Mitigation	With Mitigation
S=(E+D+R+M)*P	**Low Negative Impact (24)**	**Low Negative Impact (12)**
Was public comment received?	No	
Has public comment been included in mitigation measures?	No, no comments received	

Mitigation measures to reduce residual risk or enhance opportunities:
- No decommissioning activities at night. - Apply good abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste) created during decommissioning activities. - Rehabilitate and enhance all areas disturbed during construction (including aquatic habitat).

Residual impact	Residual impacts are likely to be minor since ceasing project activities on site is likely to benefit bats.

6.3 Cumulative Impacts

For the purposes of the cumulative impact assessment (CIA), cumulative impacts are defined as the total impacts resulting from the successive, incremental, and/or combined effects of a project when added to other existing, planned and/or reasonably anticipated future projects, as well as background pressures (IFC 2013). The project considered here is the Emvelo Wind Energy Facility. The goal of this assessment is to evaluate the potential resulting impact to the vulnerability and/or risk to the sustainability of the bat species affected (IFC 2013).

6.3.1 Step 1: VECs and spatial-temporal boundary

Following guidance in IFC (2013), the first step in the CIA was to determine the Valued Environmental Components (VECs), the bat species most likely to be affected by cumulative impacts, and the temporal and geographic scope of the analysis.

Of the species recorded in the PAOI during the acoustic monitoring, and based on bat distribution records (ACR 2020), Cape serotine (*Laephotis capensis*), Natal long-fingered (*Miniopterus natalensis*) and Egyptian free-tailed bat (*Tadarida aegyptiaca*) are most likely to be impacted cumulatively. This is because they are the most widespread bat species in South Africa (Monadjem et al. 2020), classified as high risk species to wind energy impacts (MacEwan et al. 2020b), the most impacted by operating wind energy facilities in the country (Aronson 2022).

The temporal time frame over which cumulative impacts are considered was 25 years, the typical lifespan of a renewable energy facility. However, cumulative effects could extend beyond this timeframe if development of the cluster of three projects is phased over time.

The Ecologically Appropriate Area of Analysis (EAAA) for the assessment was determined by considering the ecology of the three VECs.

The acoustic monitoring confirmed the presence of Natal long-fingered bat in the PAOI, a migratory species which moves seasonally between winter hibernacula and summer maternity cave roosts in South Africa (van der Merwe 1975, Miller-Butterworth et al. 2003). In north-eastern South Africa, where the proposed development is planned, van der Merwe (1975) showed migration between maternity caves in Limpopo and hibernacula caves in Gauteng/North-West undertaken by pregnant females (who later return south with weaned pups), with caves separated by 150 km at least. Males typically undertake shorter movements (> 60 km) between various highveld caves (van der Merwe 1975). This migration increases the potential that these bats will encounter wind turbines or be displaced by them (Millon et al. 2018), especially if these are placed along migratory routes. Although these movements are typically north-south, Pretorius et al. (2020) suggest that movement could also occur east-west between Gauteng and a maternity cave in Sudwala, Mpumalanga, a distance of approximately 250 km. Although additional research is needed to better understand long and short distance movements of Natal long-fingered bat in South Africa more precisely, given the numerous roost sites (both caves and mines) in Mpumalanga and body of work already demonstrating or suggesting migratory behavior in the north-east of the country between these sites, it is reasonable that cumulative impacts of wind energy may impact this species at large scales and hence cumulative impacts need to be assessed accordingly. Based on van der Merwe (1975), a 150 km radius around the PAOI was therefore defined as EAAA1 (Figure 5), especially since cumulative impacts should be evaluated across scales potentially affected species are likely to occur (Voigt et al. 2012, Lehnert et al. 2014).

The remaining VECs are not migratory and hence a second, smaller EAAA was used. Data on the spatial ecology of the Egyptian free-tailed bat and Cape serotine, specifically the sizes of their foraging or community ranges, are not available. Data from European free-tailed bat, *Tadarida teniotis*, in Portugal (Marques et al. 2004) and Serotine bat, *Eptesicus serotinus*, in England (Robinson and Stebbings 1997) were used as surrogates. Feeding areas for some *T. teniotis* individuals were over 30 km from their roost while the maximum distance between *E. serotinus* feeding areas was over 41 km.

Cumulative impact assessment in South African typically consider developments within a radius of 35 km which therefore is potentially in line with the movement ecology of the two VECs. Hence the EAAA2 was a 35 km radius around the PAOI.

6.3.2 Step 2: Other Activities and External Drivers

The second step in the CIA was to identify other past, existing, or planned activities within the EAAA1 and EAAA2 and to assess the external influences and stressors on the three VECs. With reference to the Renewable Energy Application database (Q2, 2024), currently two others wind energy projects are located within the EAAA2 including the Sheepmoor WEF. Approximately 35 other development projects are located within EAAA1 (Figure 5). Given that EAAA1 also includes a Renewable Energy Development Zone (REDZ), it is reasonable to expect further development over the 25-year period considered in this assessment.

There are no documented major past threats to Egyptian free-tailed bat and Cape serotine or current threats to them other than renewable energy (Child et al. 2016). Egyptian free-tailed bats can also be threated indirectly by roost disturbance, especially caves. This CIA considers renewable energy the primary impact to these VECs. Natal long-fingered bat is locally threatened in parts of its range by habitat loss resulting from conversion of land to agricultural use, incidental poisoning with insecticides, loss of prey base, and the disturbance of roosting and maternity caves (Child et al. 2016).

6.3.3 Step 3: Baseline Status of VECs

Egyptian free-tailed bat is very widely distributed, locally common and recorded from many protected areas in South Africa however, although the population is stable, the population size is unknown (Child et al. 2016). It is classified as Least Concern nationally and globally. This species is present in the PAOI and based on its activity levels, it is at high risk of collision during autumn and spring (Table 5). It is flexible in its habitat requirements and one reason for its wide distribution is its affinity to roost in buildings or other man-made structures (Monadjem et al. 2020).

Cape serotine is also widely distributed in South Africa with a large population and hence is classified as Least Concern nationally and globally. However, it is possible that this species comprises a complex of closely related species (Monadjem et al. 2020). The population trend is stable, but the population size is unknown. Although this species is present in the PAOI its activity levels suggest low risk of collision (Table 3) although no data between 10 m and 50 m were recorded on site to verify this. This species was recorded at 50 m, so it is reasonable to assume some level of risk between 10 m and 50 m. Cape serotine is also flexible in its habitat requirements and its use of buildings and other anthropogenic structures as roosts has possibly led to its numbers increasing.

Natal long-fingered bat is a common and widespread species, classified as Least Concern nationally and globally with a stable national population, but it may be experiencing local declines (Child et al. 2016). The size of the national population is unknown but this species roosts in large colonies; De Hoop Guano cave in the Western Cape hosts approximately 200,000 individuals, and in the Highveld, some caves may contain up to 4000 individuals (Child et al. 2016). Activity levels of this species in the AoI were relatively low and this species was seldomly recorded in the rotor swept area but high activity was recorded closer to ground level in spring (Table 7).

6.3.4 Step 4: Assess Cumulative Impacts on VECs

The key potential impacts that could affect the long-term sustainability and/or viability of the three VECs in EAAA1 and EAAA2 are collisions with wind turbines. This may lead to local extinctions and fragmentation of the national population since bats have low reproductive rates (Barclay and Harder 2003). Other impacts may include displacement from foraging and commuting areas, and along migration routes, due to wind turbines (Millon et al. 2018, Leroux et al. 2022).

6.3.5 Step 5: Assess Significance of Predicted Cumulative Impacts

Rodhouse et al. (2019), Davy et al. (2020) and Frick et al. (2017) have all shown that in North America, Least Concern bats may be experiencing impacts due to wind farms that could result in changes to their conservation status. This may be a future scenario for widespread, common Least Concern bats species in South Africa. As such, the significance of cumulative impacts is assessed as High without mitigation. The application of mitigation measures is anticipated to reduce the overall cumulative impact of the project to a moderate level.

Nature of the impact: CUMULATIVE IMPACTS					
Description of impact The total impacts resulting from the successive, incremental, and/or combined effects of the project when added to other existing, planned and/or reasonably anticipated future projects, as well as background pressures.					
	Extent (E)	**Duration (D)**	**Reversibility (R)**	**Magnitude (M)**	**Probability (P)**
Without Mitigation	3	4	3	4	5
With Mitigation	3	4	2	3	3
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	**High Negative Impact (70)**			**Moderate Negative Impact (36)**	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No, no comments received				
Mitigation measures to reduce residual risk or enhance opportunities: The mitigation measures proposed in this report (buffering key habitats used by bats, use of appropriate lighting technology, blade feathering, and using smart curtailment and/or acoustic deterrents) should be applied to all future projects so that there is a collective management responsibility (IFC 2013).					
Residual impact	Curtailment and deterrents can successfully reduce bat fatality (Arnett 2011, Arnett et al. 2016, Weaver et al. 2020), but not completely. Through the application of fatality thresholds across all projects in the cumulative impact area, residual impacts should be minimized.				

6.3.6 Step 6: Management of Cumulative Impacts

Management interventions for bats at operating wind farms in South Africa are guided by fatality thresholds, which aim to mitigate population-level impacts. These thresholds are set below the rate at which populations could decline due to anthropogenic pressures (MacEwan et al. 2018). For this project, thresholds have been established, and similar measures should be applied to all future wind energy developments. In theory, if each development implements thresholds and appropriate mitigation measures when exceedances occur, the EAAA1 and EAAA2 VEC populations should not decline due to wind energy impacts.

The mitigation measures proposed in this report (buffering key habitats used by bats, use of appropriate lighting technology, blade feathering, and using smart curtailment and/or acoustic deterrents) should be applied to all future projects so that there is a collective management responsibility (IFC 2013).

7 ENVIRONMENTAL MANAGEMENT PROGRAMME

Objective: Avoid and minimize modification of bat habitats

Project component/s	All project infrastructure
Potential Impact	Vegetation clearing for project infrastructure, as well as noise, dust and pollution generated during construction activities, will impact bats by removing habitat used for foraging and commuting, through disturbance, and displacement. Construction of WEF infrastructure could result in destruction and/or disturbance to bat roosts and inadvertently provide new roosting spaces for some bat species in risky locations.
Activity/risk source	All construction activities and associated activities (e.g., driving)
Mitigation: Target/Objective	1. Avoid potential for bats to roost in project infrastructure (e.g., buildings, and turbines) 2. Minimize disturbance to bats 3. Minimize habitat loss 4. Minimize displacement of bats

Mitigation	**Responsibility**	**Timeframe**
1. Ensure all project infrastructure (e.g., buildings, and turbines) is properly sealed such that bats cannot gain access. 2. No construction activities at night, apply good construction abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste). 3. No placement of infrastructure (except roads and OHL) within No-Go areas. 4. Minimize clearing of native vegetation, minimize disturbance and destruction of farm buildings on site, minimize removal of native trees. Rehabilitate and enhance all areas disturbed during construction, (including aquatic habitat). 5. Reduce turbine noise emissions by serration of the back edges of the blade, by using a low-noise blade airfoil design or using blade trailing-edge brushes.	Project Developer Contractor	During design and planning phase and throughout construction phase

Performance Indicator	No bat roosts are destroyed No bats colonise new project infrastructure for roosting No infrastructure in No-Go areas (except roads and OHL) All areas disturbed during construction are rehabilitated
Monitoring	An appointed ECO must inspect all new project infrastructure, in conjunction with or via training from a bat ecologist, to ensure bats cannot gain access. ECO to ensure compliance with good construction abatement control practices. ECO must ensure no infrastructure is placed in No-Go areas (see Figure 3). If a bat roost is encountered during construction, the ECO must consult a bat ecologist to determine appropriate actions. ECO to ensure all disturbed areas are rehabilitated. ECO to ensure turbine blades have appropriate noise-reduction technology.

Objective: Avoid and minimize bat fatality	
Project component/s	Wind turbines
Potential Impact	Bat mortality through collisions with wind turbine blades.
Activity/risk source	Operating Wind Turbines
Mitigation: Target/Objective	1. Avoid bat fatalities through turbine layout design and turbine dimensions 2. Minimize bat fatalities using smart curtailment or deterrents during operation

Mitigation	Responsibility	Timeframe
1. No placement of turbines in No-Go Areas (Figure 3). 2. Maintain a minimum blade sweep of 30 m to avoid impacts to lower flying bats such as clutter-edge species (e.g., Cape serotine, Natal long-fingered bat). 3. Minimize the rotor diameter 4. Feather blades to prevent free-wheeling below the turbine cut-in speed 5. Implement fatality monitoring throughout the operational phase 6. Apply smart curtailment or deterrents if fatality thresholds are exceeded. Annual fatality threshold per Least Concern species = 16 individuals. Annual fatality threshold per Species of Special Concern = 1 individual for each of [African Straw-coloured fruit bat, Wahlberg's Epauletted fruit bat, Percival's Short-eared Trident bat, Blasius's Horseshoe bat, Egyptian Rousette and Lessor Long-fingered bat].	Project Developer Operator	BMP developed prior to operation. BMP active throughout operation phase.

Performance Indicator	≤ 16 individuals per Least Concern species killed annually ≤ 1 individual per Species of Special Concern killed annually
Monitoring	ECO must ensure no turbines are placed in No-Go areas, including the blade tips (Figure 3). ECO must ensure the dimensions of the final selected turbine adhere to requirements (A minimum blade sweep of 30 m). A Biodiversity Management Plan (BMP) for bats must be developed which includes the design of a post-construction fatality monitoring program (PCFM) for bats, and an adaptive management response plan that provides an escalating scale of mitigation should fatality thresholds be exceeded. ECO to ensure adherence to BMP and any mitigation measures implemented

Objective: Reduce impact of light pollution	
Project component/s	All project infrastructure
Potential Impact	Construction of project infrastructure will increase ecological light pollution from artificial lighting associated with turbines, the substation and other operational and maintenance buildings. Light pollution can alter ecological dynamics (Horváth et al. 2009, Bará and C. Lima 2024). Lighting attracts and can cause direct mortality of insects, reducing the prey base for bats, especially bat species that are light-phobic. These species may also be displaced from previous foraging areas due to lighting. Other bat species forage around lights, attracted by higher numbers of insects. This may bring these species into the vicinity of the project and indirectly increase the risk of collision with wind turbines.
Activity/risk source	Light sources from project infrastructure
Mitigation: Target/Objective	1. Avoid light pollution 2. Minimize light pollution

Mitigation	Responsibility	Timeframe

1. No placement of infrastructure within No-Go areas (Figure 3). 2. Use motion-sensor lighting, avoid sky-glow by using hoods and downward facing lighting, increase spacing between lighting units, and use low pressure sodium lights	Project Developer Operator	During design and planning phase and throughout operation phase.

Performance Indicator	Limited attraction of insects to light sources Limited foraging of bats around light sources Limited mortality at insects at light sources
Monitoring	ECO must ensure no infrastructure is in No-Go areas (Figure 3). ECO must ensure motion-sensor lighting is used. ECO must ensure all lighting fixtures have hoods and/or are downward facing, where appropriate, to prevent sky-glow. ECO must ensure minimum lighting is used and lighting is spaced to prevent excessive use of lighting. ECO must ensure low-pressure sodium lighting is used.

8 CONCLUSION

This EIA report assessed impacts to bats that could occur because of the construction, operation and decommission of the Emvelo WEF and grid connection. The assessment was based on 16 months of baseline data on bat activity recorded at the project. Based on these data, the key issue for the WEF will be managing collision impacts to Cape serotine and Egyptian free-tailed bat, and cumulative impacts.

The first mitigation measure proposed to manage risk is to adhere to the no-go buffers which aim to spatially avoid impacts by buffering key habitat features used by bats. This measure is likely to be effective for most bat species recorded at the project, but additional mitigation measures are needed to avoid impacts to free-tailed bats, which forage high in the air, and to reduce residual impacts.

Turbine design can be effective, and it is recommended to maintain a minimum blade sweep of at least 30 m. However, free-tailed bats will still collide with turbine blades above this height and as such, the rotor diameter must be limited as much as practicable to minimize the space where collisions might occur. Additionally, blade feathering must be implemented to limit the rotation of turbine blades below the turbine cut-in speed when electricity is not being generated.

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

The overall impact to bats was assessed as moderate after the application of the mitigation measures proposed to avoid and minimize impacts to bats. However, on a species level, the project presents differential risk and impacts to bats must be managed adaptively during the operational phase, particularly for those species (e.g. Egyptian free-tailed bat and Cape serotine) for which high risk is predicted during some periods.

This adaptive management will be guided by the Environmental Management Programme for bats which must include the development of a Biodiversity Management Plan (BMP) to manage impacts to bats during

the operation of the facility. The BMP for bats must be developed by a bat ecologist before the commencement of operation and must include the post-construction fatality monitoring plan design, fatality thresholds calculations and rationale (updated as required), and an adaptive management response plan that provides a timeous action pathway for mitigation, including roles and responsibilities, should fatality thresholds be exceeded. Provided these measures are adhered to, the project assessed can be approved.

9 REFERENCES

ACR. 2020. African Chiroptera Report 2020. V. Van Cakenberghe and E.C.J. Seamark (Eds). AfricanBats NPC, Pretoria. i-xv + 8542 pp.

Adams, A. M., M. K. Jantzen, R. M. Hamilton, and M. B. Fenton. 2012. Do you hear what I hear? Implications of detector selection for acoustic monitoring of bats. Methods in Ecology and Evolution **3**:992-998.

Arnett, E. B. 2011. Altering turbine speed reduces bat mortality at wind-energy facilities. Frontiers in Ecology and the Environment **9**:209-214.

Arnett, E. B., E. F. Baerwald, F. Mathews, Luisa Rodrigues, A. Rodríguez-Durán, J. Rydell, R. Villegas-Patraca, and C. C. Voigt. 2016. Impacts of Wind Energy Development on Bats: A Global Perspective. Pages 295 - 323 *in* C. C. Voigt and T. Kingston, editors. Bats in the Anthropocene: Conservation of Bats in a Changing World. Springer.

Arnett, E. B., G. D. Johnson, W. P. Erickson, and C. D. Hein. 2013. A Synthesis Of Operational Mitigation Studies To Reduce Bat Fatalities At Wind Energy Facilities In North America. A report submitted to the National Renewable Energy Laboratory. Bat Conservation International. Austin, Texas, USA.

Aronson, J. 2022. Current state of knowledge of wind energy impacts on bats in South Africa. Acta Chiropterologica **24(1)**:221-238.

Aronson, J., E. Richardson, K. MacEwan, D. Jacobs, W. Marais, P. Taylor, S. Sowler, H. C., and L. Richards. 2020. South African Good Practice Guidelines for Operational Monitoring for Bats at Wind Energy Facilities – ed 2. South African Bat Assessment Association.

Bará, S., and R. C. Lima. 2024. Quantifying the visual impact of wind farm lights on the nocturnal landscape. Journal of Quantitative Spectroscopy and Radiative Transfer **329**:109203.

Barclay, R. M. R., E. F. Baerwald, and J. C. Gruver. 2007. Variation in bat and bird fatalities at wind energy facilities: assessing the effects of rotor size and tower height. Canadian Journal of Zoology **85**:381-387.

Barclay, R. M. R., and L. D. Harder. 2003. Life histories of bats: Life in the slow lane. Pages 209-253 *in* T. H. Kunz and M. B. Fenton, editors. Bat Ecology. The University of Chicago Press, Chicago.

Barré, K., I. Le Viol, Y. Bas, R. Julliard, and C. Kerbiriou. 2018. Estimating habitat loss due to wind turbine avoidance by bats: Implications for European siting guidance. Biological Conservation **226**:205-214.

Bennun, L., J. van Bochove, C. Ng, C. Samper, H. Rainey, and H. C. Rosenbaum. 2021. Mitigating Biodiversity Impacts Associated with Solar and Wind Energy Development: Guidelines for Project Developers.

Bohmann, K., A. Monadjem, C. Lehmkuhl Noer, M. Rasmussen, M. R. K. Zeale, E. Clare, G. Jones, E. Willerslev, and M. T. P. Gilbert. 2011. Molecular Diet Analysis of Two African Free-Tailed Bats (Molossidae) Using High Throughput Sequencing. PloS one **6**:e21441.

Bošnjaković, M., Hrkać, F., Stoić, M., & Hradovi, I. (2024). Environmental Impact of Wind Farms. Environments, 11(11), 257.

Child, M. F., L. Roxburgh, E. Do Linh San, D. Raimondo, and H. T. Davies-Mostert, editors. 2016. The Red List of Mammals of South Africa, Swaziland and Lesotho. South African National Biodiversity Institute and Endangered Wildlife Trust, South Africa.

Collins, J. 2006. Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn). Bat Conservation Trust, London.

Cryan, P. M., and R. M. R. Barclay. 2009. Causes of Bat Fatalities at Wind Turbines: Hypotheses and Predictions. Journal of Mammalogy **90**:1330-1340.

Davy, C. M., K. Squires, and J. R. Zimmerling. 2020. Estimation of spatiotemporal trends in bat abundance from mortality data collected at wind turbines. Conservation Biology:12.

Dinerstein, E., C. Vynne, E. Sala, A. R. Joshi, S. Fernando, T. E. Lovejoy, J. Mayorga, D. Olson, G. P. Asner, J. E. M. Baillie, N. D. Burgess, K. Burkart, R. F. Noss, Y. P. Zhang, A. Baccini, T. Birch, N. Hahn, L. N. Joppa, and E. Wikramanayake. 2019. A Global Deal For Nature: Guiding principles, milestones, and targets. Science Advances **5**:eaaw2869.

Ellerbrok, J. S., Farwig, N., Peter, F., & Voigt, C. C. (2024). Forest bat activity declines with increasing wind speed in proximity of operating wind turbines. Global Ecology and Conservation, 49, e02782.

Frick, W. F., E. F. Baerwald, J. F. Pollock, R. M. R. Barclay, J. A. Szymanski, T. J. Weller, A. L. Russell, S. C. Loeb, R. A. Medellin, and L. P. McGuire. 2017. Fatalities at wind turbines may threaten population viability of a migratory bat. Biological Conservation **209**:172-177.

Garvin, J. C., J. L. Simonis, and J. L. Taylor. 2024. Does size matter? Investigation of the effect of wind turbine size on bird and bat mortality. Biological Conservation **291**:110474.

Gasparatos, A., C. N. H. Doll, M. Esteban, A. Ahmed, and T. A. Olang. 2017. Renewable energy and biodiversity: Implications for transitioning to a Green Economy. Renewable and Sustainable Energy Reviews **70**:161-184.

Good, R. E., W. Erickson, A. Merrill, S. Simon, K. Murray, and K. Bay. 2012. Bat monitoring studies at the Fowler Ridge Wind Energy Facility, Benton County, Indiana. Prepared for Fowler Ridge Wind Farm by Western EcoSystems Technology, Inc. (WEST), Cheyenne, Wyoming.

Guest, E. E., B. F. Stamps, N. D. Durish, A. M. Hale, C. D. Hein, B. P. Morton, S. P. Weaver, and S. R. Fritts. 2022. An Updated Review of Hypotheses Regarding Bat Attraction to Wind Turbines. Animals **12**:343.

Hein, C. D., J. Gruver, and E. B. Arnett. 2013. Relating pre-construction bat activity and post-construction bat fatality to predict risk at wind energy facilities: a synthesis. A report submitted to the National Renewable Energy Laboratory. Bat Conservation International, Austin, TX, USA.

Horn, J. W., E. B. Arnett, and T. H. Kunz. 2008. Behavioral responses of bats to operating wind turbines. The Journal of Wildlife Management **72**:123-132.

Horváth, G., G. Kriska, P. Malik, and B. Robertson. 2009. Polarized light pollution: a new kind of ecological photopollution. Frontiers in Ecology and the Environment **7**:317-325.

International Finance Corporation (IFC). 2013. Cumulative Impact Assessment and Management: Guidance for the Private Sector in Emerging Markets. Washington D.C., USA. Available at: https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/ publications_handbook_cumulativeimpactassessment.

IUCN. 2021. The IUCN Red List of Threatened Species. Version 2021-1. https://www.iucnredlist.org. Downloaded on 11 Aug 2021.

Jackson, A. L. R. 2011. Renewable energy vs. biodiversity: Policy conflicts and the future of nature conservation. Global Environmental Change **21**:1195-1208.

Jung, K., and E. K. V. Kalko. 2010. Where forest meets urbanization: foraging plasticity of aerial insectivorous bats in an anthropogenically altered environment. Journal of Mammalogy **91**:144-153.

Kunz, T. H., E. B. Arnett, B. M. Cooper, W. P. Erickson, R. P. Larkin, T. Mabee, M. L. Morrison, M. D. Strickland, and J. M. Szewczak. 2007a. Assessing impacts of wind-energy development on nocturnally active birds and bats: A guidance document. The Journal of Wildlife Management **71**:2449-2486.

Kunz, T. H., E. B. Arnett, W. P. Erickson, A. R. Hoar, G. D. Johnson, R. P. Larkin, M. D. Strickland, R. W. Thresher, and M. D. Tuttle. 2007b. Ecological impacts of wind energy development on bats: questions, research needs, and hypotheses. Frontiers in Ecology and the Environment **5**:315-324.

Lehnert, L. S., S. Kramer-Schadt, S. Schönborn, O. Lindecke, I. Niermann, and C. C. Voigt. 2014. Wind farm facilities in Germany kill noctule bats from near and far. PloS one **9**:e103106.

Leroux, C., C. Kerbiriou, I. Le Viol, N. Valet, and K. Barré. 2022. Distance to hedgerows drives local repulsion and attraction of wind turbines on bats: Implications for spatial siting. Journal of Applied Ecology **59**:2142-2153.

Lintott, P. R., S. M. Richardson, D. J. Hosken, S. A. Fensome, and F. Mathews. 2016. Ecological impact assessments fail to reduce risk of bat casualties at wind farms. Current Biology **26**:R1135-R1136.

Longcore, T., and C. Rich. 2004. Ecological light pollution. Frontiers in Ecology and the Environment **2**:191–198.

MacEwan, K. 2016. Fruit bats and wind turbine fatalities in South Africa. African Bat Conservation News **42**.

MacEwan, K., J. Aronson, E. Richardson, P. Taylor, B. Coverdale, D. Jacobs, L. Leeuwner, W. Marais, and L. Richards. 2018. South African Bat Fatality Threshold Guidelines – ed 2. South African Bat Assessment Association.

MacEwan, K., T. W. Morgan, C. A. Lötter, and A. T. Tredennick. 2020a. Bat Activity Across South Africa: Implications for Wind Energy Development. African Journal of Wildlife Research **50**.

MacEwan, K., S. Sowler, J. Aronson, and C. A. Lötter. 2020b. South African Best Practice Guidelines for Pre-construction Monitoring of Bats at Wind Energy Facilities - ed 5. South African Bat Assessment Association.

Marques, J. T., A. Rainho, M. CarapuÃ§o, P. Oliveira, and J. M. Palmeirim. 2004. Foraging Behaviour and Habitat use by the European Free-Tailed Bat Tadarida teniotis. Acta Chiropterologica **6**:99-110.

McCracken, G. F., E. H. Gillam, J. K. Westbrook, Y.-F. Lee, M. L. Jensen, and B. B. Balsley. 2008. Brazilian free-tailed bats (*Tadarida brasiliensis*: Molossidae, Chiroptera) at high altitude: links to migratory insect populations. Integrative and Comparative Biology **48**:107-118.

Miller-Butterworth, C. M., D. S. Jacobs, and E. H. Harley. 2003. Strong population substructure is correlated with morphology and ecology in a migratory bat. Nature 424:187-191.

Millon, L., C. Colin, F. Brescia, and C. Kerbiriou. 2018. Wind turbines impact bat activity, leading to high losses of habitat use in a biodiversity hotspot. Ecological Engineering **112**:51-54.

Millon, L., J.-F. Julien, R. Julliard, and C. Kerbiriou. 2015. Bat activity in intensively farmed landscapes with wind turbines and offset measures. Ecological Engineering **75**:250-257.

Mitchell-Jones, T., and C. Carlin. 2014. Bats and Onshore Wind Turbines Interim Guidance. Natural England Technical Information Note TIN051. Natural England.

Monadjem, A., P. J. Taylor, F. P. D. Cotterill, and M. C. Schoeman. 2020. Bats of Southern and Central Africa: A Biogeographic and Taxonomic Synthesis. 2nd edition.

MTPA. 2014. Mpumalanga Biodiversity Sector Plan Handbook.*in* C. Lötter M.C., M.J. and Lechmere-Oertel R.G., editor. Mpumalanga Tourism & Parks Agency, Mbombela (Nelspruit).

Mucina, L., and M. C. Rutherford. 2006. The vegetation of South Africa, Lesotho and Swaziland. *Strelitzia* 19. South African National Biodiversity Institute, Pretoria.

Nguyen, T. N., A. Ruangwiset, and S. Bumrungsri. 2019. Vertical stratification in foraging activity of Chaerephon plicatus (Molossidae, Chiroptera) in Central Thailand. Mammalian Biology **96**:1-6.

Noer, C. L., T. Dabelsteen, K. Bohmann, and A. Monadjem. 2012. Molossid bats in an African agro-ecosystem select sugarcane fields as foraging habitat. African Zoology **47**:1-11.

Pretorius, M., H. Broders, and M. Keith. 2020. Threat analysis of modelled potential migratory routes for Miniopterus natalensis in South Africa. Austral Ecology 45:1110 - 1122.

Richardson, S. M., P. R. Lintott, D. J. Hosken, T. Economou, and F. Mathews. 2021. Peaks in bat activity at turbines and the implications for mitigating the impact of wind energy developments on bats. Scientific Reports **11**:3636.

Robinson, M. F., and R. E. Stebbings. 1997. Home range and habitat use by the serotine bat, Eptesicus serotinus, in England. Journal of Zoology **243**:117-136.

Rodhouse, T. J., R. M. Rodriguez, K. M. Banner, P. C. Ormsbee, J. Barnett, and K. M. Irvine. 2019. Evidence of region-wide bat population decline from long-term monitoring and Bayesian occupancy models with empirically informed priors. Ecology and Evolution **9**:11078-11088.

Rodrigues, L. B., L.; Dubourg-Savage, M.; Karapandža, B.; Kovač, D.; Kervyn, T.; Dekker, J.; Kepel, A.; Bach, P.; Collins, J.; Harbusch, C.; Park, K.; Micevski, B.; Minderman, J. 2015. Guidelines for Consideration of Bats in Wind Farm Projects Revision 2014. EUROBATS Publication Series No. 6 (English Version). UNEP/EUROBATS Secretariat, Bonn, Germany, 133 pp.

Romano, W. B., J. R. Skalski, R. L. Townsend, K. W. Kinzie, K. D. Coppinger, and M. F. Miller. 2019. Evaluation of an acoustic deterrent to reduce bat mortalities at an Illinois wind farm. Wildlife Society Bulletin **43**:608-618.

Rydell, J. 1992. Exploitation of insects around streetlamps by bats in Sweden. Functional Ecology **6**:744-750.

Schnitzler, H.-U., C. F. Moss, and A. Denzinger. 2003. From spatial orientation to food acquisition in echolocating bats. TRENDS in Ecology and Evolution **18**:386-394.

Scottish Natural Heritage. 2019. Bats and Onshore Wind Turbines: Survey, Assessment and Mitigation.

Sirami, C. l., D. S. Jacobs, and G. S. Cumming. 2013. Artificial wetlands and surrounding habitats provide important foraging habitat for bats in agricultural landscapes in the Western Cape, South Africa. Biological Conservation **164**:30-38.

South African National Biodiversity Institute (SANBI). 2020. Species Environmental Assessment Guideline. Guidelines for the implementation of the Terrestrial Fauna and Terrestrial Flora Species Protocols for environmental impact assessments in South Africa. South African National Biodiversity Institute, Pretoria. Version 2.1 2021.

Stone, E. L. 2012. Bats and Lighting: Overview of current evidence and mitigation.

Tella, J. L., D. Hernández-Brito, G. Blanco, and F. Hiraldo. 2020. Urban Sprawl, Food Subsidies and Power Lines: An Ecological Trap for Large Frugivorous Bats in Sri Lanka? Diversity **12**:94.

Thaxter, C. B., G. M. Buchanan, J. Carr, S. H. M. Butchart, T. Newbold, R. E. Green, J. A. Tobias, W. B. Foden, S. Brien, and J. W. Pearce-Higgins. 2017. Bird and bat species' global vulnerability to collision mortality at wind farms revealed through a trait-based assessment. Proceedings of the Royal Society B: Biological Sciences **284**.

Tolvanen, A., H. Routavaara, M. Jokikokko, and P. Rana. 2023. How far are birds, bats, and terrestrial mammals displaced from onshore wind power development? – A systematic review. Biological Conservation **288**:110382.

van der Merwe, M. 1975. Preliminary study on the annual movements of the Natal clinging bat. South African Journal of Science 71:237-241.

Voigt, C. C., E. Bernard, J. C.-C. Huang, W. F. Frick, C. Kerbiriou, K. MacEwan, F. Mathews, A. Rodríguez-Durán, C. Scholz, P. W. Webala, J. Welbergen, and M. Whitby. 2024. Toward solving the global green–green dilemma between wind energy production and bat conservation. Bioscience **74**:240-252.

Voigt, C. C., A. G. Popa-Lisseanu, I. Niermann, and S. Kramer-Schadt. 2012. The catchment area of wind farms for European bats: A plea for international regulations. Biological Conservation **153**:80-86.

Voigt, C. C., D. Russo, V. Runkel, and H. R. Goerlitz. 2021. Limitations of acoustic monitoring at wind turbines to evaluate fatality risk of bats. Mammal Review **n/a**.

Weaver, S. P., C. D. Hein, T. R. Simpson, J. W. Evans, and I. Castro-Arellano. 2020. Ultrasonic acoustic deterrents significantly reduce bat fatalities at wind turbines. Global Ecology and Conservation:e01099.

Wellig, S. D., S. Nusslé, D. Miltner, O. Kohle, O. Glaizot, V. Braunisch, M. K. Obrist, and R. Arlettaz. 2018. Mitigating the negative impacts of tall wind turbines on bats: Vertical activity profiles and relationships to wind speed. PloS one **13**:e0192493.

Young, D. P., Jr, K. Bay, S. Nomani, and W. L. Tidhar. 2011. Nedpower Mount Storm Wind Energy Facility Post-Construction Avian and Bat Monitoring: July - October 2010. Prepared for NedPower Mount Storm, LLC, Houston, Texas. Prepared by Western EcoSystems Technology, Inc. (WEST), Cheyenne, Wyoming.

Appendix 1: Figures

CAMISSA
SUSTAINABILITY CONSULTING

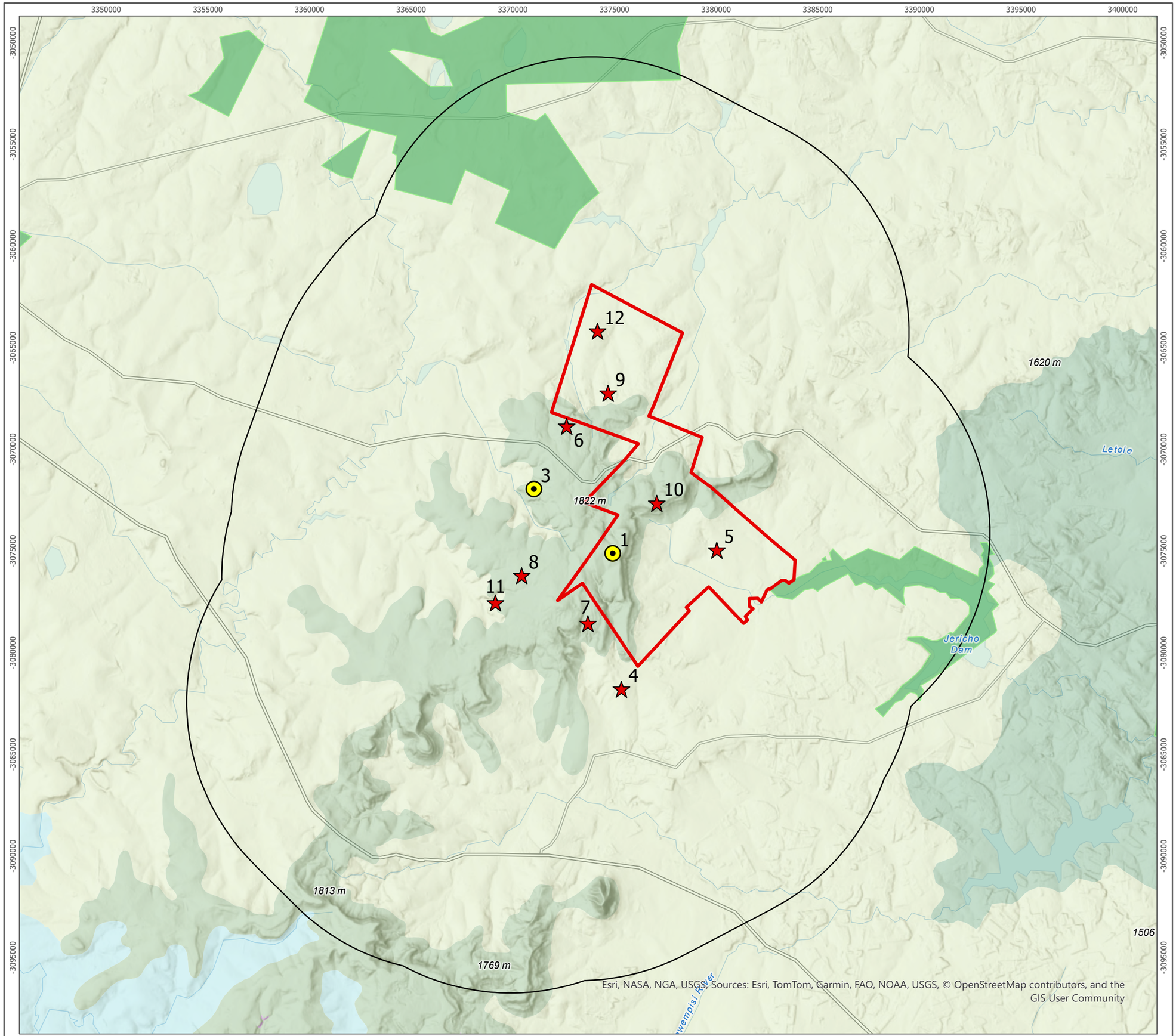
- Emvelo Site Boundary

Bat Detector Location

- Short Mast
- Met Mast
- PAOI
- Protected Areas

Vegetation Types

- Amersfoort Highveld Clay Grassland
- Eastern Highveld Grassland
- KaNgwane Montane Grassland
- Northern Afrotemperate Forest
- Wakkerstroom Montane Grassland



1:180,000

0 4 8 km

Date: 08/08/2025

Emvelo Wind Energy Facility
Bat Detector Locations
Figure 1

CAMISSA
SUSTAINABILITY CONSULTING

- Emvelo Site Boundary
- Wind Turbines
- Roads
- Eskom SwS
- IPP Substation
- MV Cable routing
- Transmission line
- Mulilo - MV Cable Routing Alt Proposed
- Construction camp areas
- O&M site facilities
- Tower Laydown areas

Bat Constraints

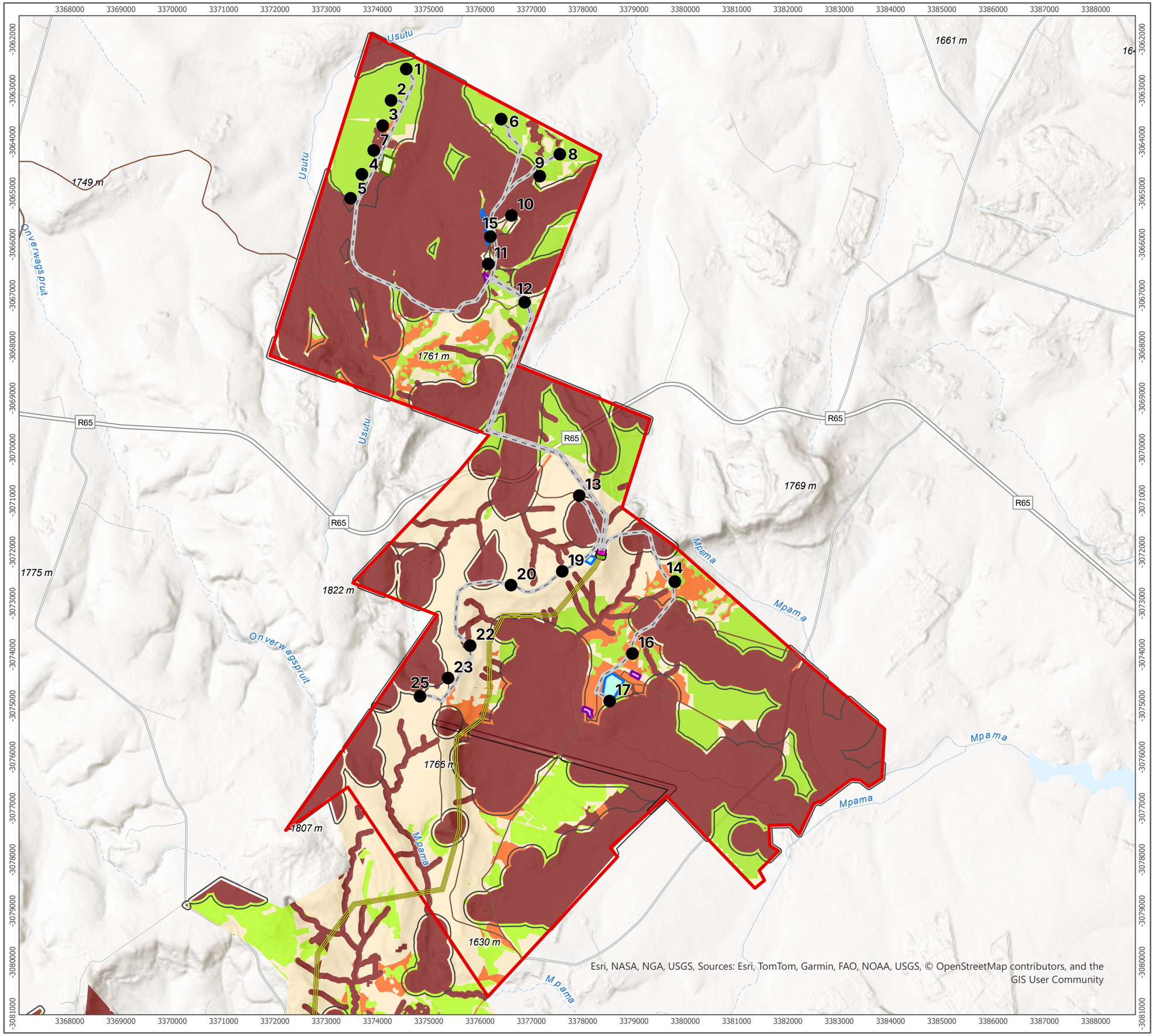
- Low
- Medium
- High
- No-Go
- Blade Tip No-Go

1:70,000

0 1.5 3 km

Date: 08/08/2025

Emvelo Wind Energy Facility
Bat Constraints Map
Figure 3



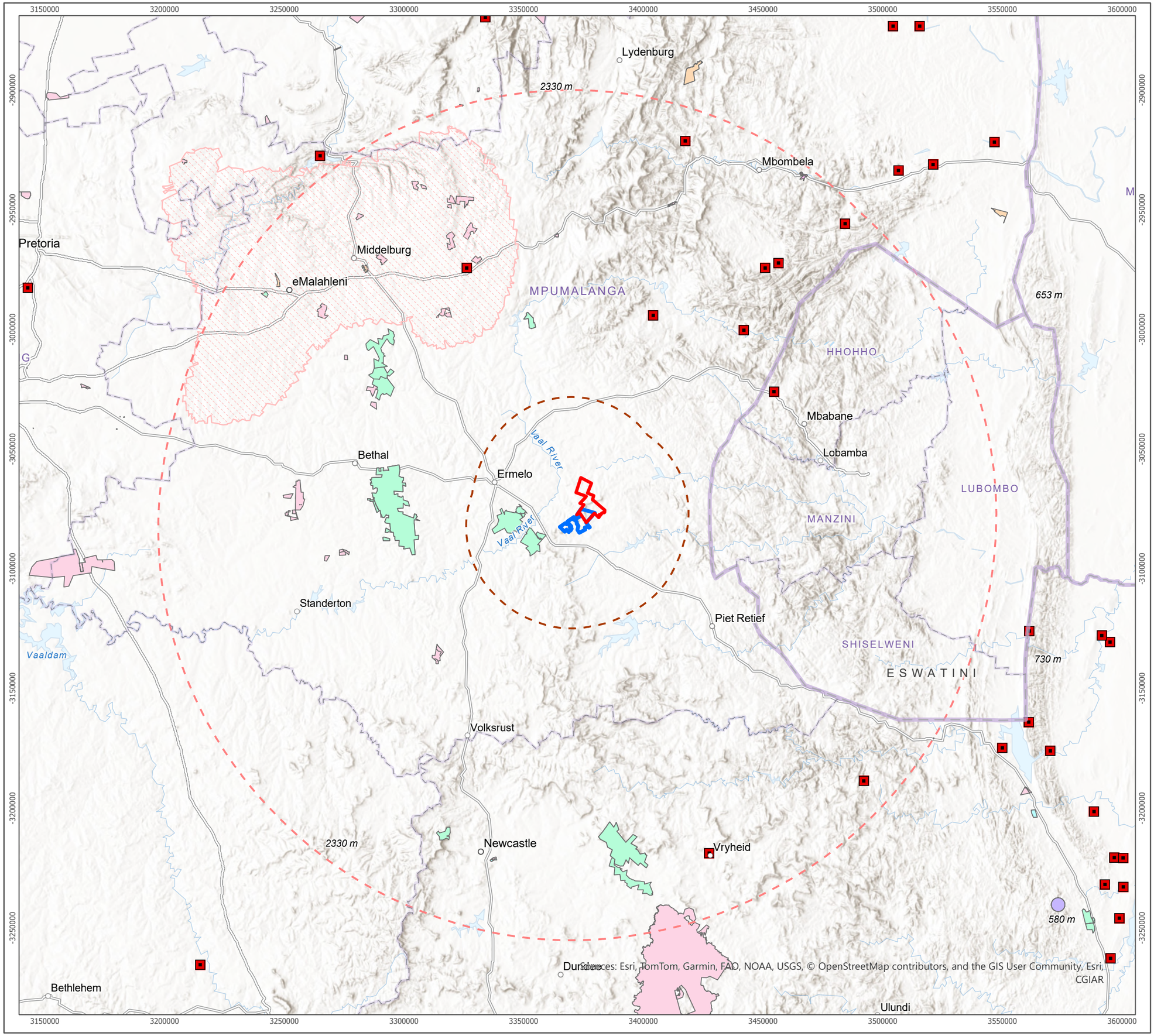
Esri, NASA, NGA, USGS, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

CAMISSA
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- Emvelo Site Boundary
- Sheepmoor Site Boundary
- EAAA1
- EAAA2
- Phase 2 REDZ

Renewable Energy Developments

- Biomass_Biofuels
- Hydro
- Petroleum
- Solar - CSP
- Solar - CSP and Solar PV
- Solar PV
- Wave
- Wind
- Wind and Solar PV



1:1,500,000

0 30 60 km

Date: 08/08/2025

Emvelo Wind Energy Facility
Cumulative Impact Assessment
Figure 5

Appendix 2: Specialist CV

Resume

Jonathan Aronson

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LinkedIn

Expertise

Biodiversity Strategy
Environmental Impact Assessment
Wildlife and Wind Energy
Systems Thinking
DFI Biodiversity Standards (IFC PS6, EBRD PR6)

Affiliations

IFC ESG department (2020 – current)

South African Bat Assessment Advisory Panel (2013 to 2020)

Professional Natural Scientist (Ecological Science) – SACNASP registration #400238/14

Languages

ENGLISH *NATIVE*

DUTCH *BASIC*

Education

MSc (Environment and Resource Management)
Specialization: Energy and Climate
Vrije Universiteit Amsterdam (2020 – 2021)

MSc (Zoology)
Specialization: Bat Ecology and Biogeography
University of Cape Town (2009 – 2011)

BSc Honours (Zoology)
Specialization: Freshwater Ecology
University of Cape Town (2007)

BSc (Zoology)
University of Cape Town (2003 - 2006)

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Experience

ADVISORY WORK

- **Scaling Wind Program (2021 - current); IFC; Ethiopia and Côte d'Ivoire**
  Technical review of a risk screening exercise to identify suitable locations for wind power projects.

- **Bash and Dzhankeldy Wind Power Projects (2021 – 2023); MIGA; Uzbekistan**
  Technical review of ESIA, Critical Habitat Assessments, Biodiversity Management Plan & Biodiversity Monitoring and Evaluation Programme, and Collision Risk Management Plan. Development of biodiversity ESAP's.

- **Zarafshan Wind Power Project (2021 – 2023); IFC; Uzbekistan**
  Technical Review of ESIA, Critical Habitat Assessments, Environmental Management plans, PCFM and Shutdown on Demand design. Development of biodiversity ESAP's.

- **Good Practices Handbook Post-Construction Monitoring of Bird and Bat Fatalities at Onshore Wind Energy Facilities (2020 - 2022); IFC**
  Served on the Stakeholder Advisory Committee, providing input, comments and guidance to support the development of this handbook.

- **Khizi and Abershon Windfarm Projects (2021); IFC; Azerbaijan**
  Technical review of IBAT summary reports and ESIA Scoping reports.

- **Kinangop Wind Park (2017); AIIM; Kenya**
  Review and design of mitigation strategies for managing impacts to bats.

POST-CONSTRUCTION FATALITY MONITORING

Msenge Wind Farm (2025 – current), EIMS, RSA
Golden Valley 1 Wind Farm (2021 – current); ENGIE; RSA
Wesley Wind Energy Facility (2022 – 2024); EDF; RSA
Super Six Wind Farms (2021 – 2024); Group of six Companies; PAK
Loi Hai 2 and Phu Lac 2 Wind Farms (2021 – 2023); IFC; VNM
Waainek, Chaba and Grassridge Wind Farms (2022 – 2023); EDF; RSA
Jeffreys Bay Wind Farm (2020 – 2021); Globeleq; RSA
Darling Wind Farm (2020); ENERTRAG; RSA
Eskom Sere Wind Farm (2019 – 2020); Endangered Wildlife Trust; RSA
West Coast One Wind Farm(2015 – 2019) Aurora Wind Power; RSA
Fazakerly Treatment Works Turbine (2017); United Utilities; UK
Beck Burn Wind Farm (2017); EDF Energy; UK
Gouda Wind Energy Facility (2017 – 2019); Blue Falcon 140; RSA

ENVIRONMENTAL IMPACT ASSESSMENTS

200 MW Elandsburg Wind Farm Cluster (current); Mulilo; RSA
900 MW Ummbila Emoyeni Wind Farm (2023 – 2024); Seriti Green; RSA
520 MW Amsterdam Wind Farm Cluster (2022 – 2023); Mulilo; RSA
960 MW Loxton Wind Farm Cluster (2022 – 2023); Atlantic REP; RSA
540 MW Taaibos Wind Farms (2021 – 2022) WKN Windcurrent; RSA
810 MW Soutrivier Wind Farms (2021 – 2022) WKN Windcurrent; RSA
720 MW Pofadder Wind Farms (2021 – 2022); Atlantic REP; RSA
2000 MW Choje Wind Energy Cluster (2021 – 2022); Wind Relic; RSA
200 MW Unika Wind Farm (2019 – 2020); SLR; ZAM
770 MW Pienaarspoort Wind Farms (2019 – 2020); ABO; RSA
120 MW Namaacha Wind Farm (2018 - 2019); Consultec; MOZ

BIODIVERSITY MANAGEMENT PLANS

BMP for Super Six Wind Farms (2024); Group of six Companies; PAK
BMP for Ummbila Emoyeni One Wind Farm (2023); Savannah; RSA
BMP for Loi Hai 2 and Phu Lac 2 Wind Farms (2021); IFC; VNM
BAP for Nuweveld Wind Farms (2021), RedCap; RSA

Publications

Aronson, J.B., (2025). Assessing the Population-Level Consequences of Wind Energy Mortality for Two African Fruit Bat Species. In Prep.

Aronson, J.B., Lewis, L., and Peek, P. (2024). Restoring Respect for Nature: Mindset Shifts to Solve the Biodiversity Crisis.

Aronson, J.B. (2022). Current State of Knowledge of Wind Energy Impacts on Bats in South Africa. Acta Chiropterologica, 24(1):221-238.

Aronson, J.B., Shackleton, S., and Sikutshwa, L. (2019). Joining the puzzle pieces: reconceptualising ecosystem-based adaptation in South Africa within the current natural resource management and adaptation context. Policy Brief, African Climate and Development Initiative.

MacEwan, K., Aronson, J.B, Richardson, E., Taylor, P., Coverdale, B., Jacobs, D., Leeuwner, L., Marais, W., Richards, L. (2018). South African Bat Fatality Threshold Guidelines for Operational Wind Energy Facilities – South African Bat Assessment Association (1st Edition).

Aronson, J.B., Sowler, S. and MacEwan, K. (2018). Mitigation Guidance for Bats at Wind Energy Faculties in South Africa.

Aronson, J.B., Richardson, E.K., MacEwan, K., Jacobs, D., Marais, W., Aiken, S., Taylor, P., Sowler,S. and Hein, C (2014). South African Good Practise Guidelines for Operational Monitoring for Bats atWind Energy Facilities (1st Edition).

Sowler, S. and S. Stoffberg (2014). South African Good Practise Guidelines for Surveying Bats in WindEnergy Facility Developments - Pre-Construction (3rd Edition). Kath Potgieter, K., MacEwan, K., Lötter,C., Marais, M., Aronson, J.B., Jordaan, S., Jacobs, D.S, Richardson, K., Taylor, P., Avni, J., Diamond,M., Cohen, L., Dippenaar, S., Pierce, M., Power, J. and Ramalho, R (eds).

Aronson, J.B., Thomas, A. and Jordaan, S. 2013. Bat fatality at a Wind Energy Facility in the Western Cape, South Africa. African Bat Conservation News 31: 9-12.

Training

15th Wind Wildlife Research Meeting, USA (online), Nov 2024.

Conference on Wildlife and Wind Energy, Croatia, Sep 2023.

Bats and Wind Energy Impact Workshop, Sep 2022, Delivered online to Rio Tinto.

Conference on Wildlife and Wind Energy, Netherlands, Apr 2022.

National Wind Coordinating Collaborative (NWCC) Wind Wildlife Research Meeting, USA (online), Dec 2020.

Conference on Wildlife and Wind Energy, Stirling, Aug 2019.

GenEst Carcass Fatality Estimator Workshop, Stirling, Aug 2019.

GenEst Carcass Fatality Estimator Workshop, Cape Town, Oct 2018.

Windaba Conference and Exhibition - Africa's Premier Wind Energy Conference; Cape Town, 2013 – 2019

Bats & Wind Energy Workshop, Durban, July 2016.

Endangered Wildlife Trust (EWT) Bats & Wind Energy Training Course, Cape Town, Oct 2013.

Endangered Wildlife Trust (EWT) Bats & Wind Energy Training Course, Greyton, Jan 2012.

Appendix 3: Specialist Declaration

forestry, fisheries & the environment
Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 399 9000, Fax: +27 86 625 1042

SPECIALIST DECLARATION FORM – AUGUST 2023

Specialist Declaration form for assessments undertaken for application for authorisation in terms of the National Environmental Management Act, Act No. 107 of 1998, as amended and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended (the Regulations)

REPORT TITLE
EMVELO WIND ENERGY FACILITY AND GRID CONNECTION MPUMALANGA, SOUTH AFRICA BAT (CHIROPTERA) SCOPING REPORT

Kindly note the following:

1. This form must always be used for assessment that are in support of applications that must be subjected to Basic Assessment or Scoping & Environmental Impact Reporting, where this Department is the Competent Authority.
2. This form is current as of August 2023. It is the responsibility of the Applicant / Environmental Assessment Practitioner (EAP) to ascertain whether subsequent versions of the form have been published or produced by the Competent Authority. The latest available Departmental templates are available at https://www.dffe.gov.za/documents/forms.
3. An electronic copy of the signed declaration form must be appended to all Draft and Final Reports submitted to the department for consideration.
4. The specialist must be aware of and comply with '*the Procedures for the assessment and minimum criteria for reporting on identified environmental themes in terms of sections 24(5)(a) and (h) and 44 of the act, when applying for environmental authorisation - GN 320/2020)'*, where applicable.

1. SPECIALIST INFORMATION

Title of Specialist Assessment	Bat Assessment
Specialist Company Name	Camissa Sustainability Consulting
Specialist Name	Jonathan Aronson
Specialist Identity Number	8408065066083
Specialist Qualifications:	MSc (Zoology), MSc (Environment and Resource Management)
Professional affiliation/registration:	SACNASP
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E-mail	Jbaronson1@gmail.com

2. DECLARATION BY THE SPECIALIST

I, Jonathan Aronson declare that –

- I act as the independent specialist in this application;
- I am aware of the procedures and requirements for the assessment and minimum criteria for reporting on identified environmental themes in terms of sections 24(5)(a) and (h) and 44 of the National Environmental Management Act (NEMA), 1998, as amended, when applying for environmental authorisation which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols") and in Government Notice No. 1150 of 30 October 2020.
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing –
    - any decision to be taken with respect to the application by the competent authority; and;
    - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- All the particulars furnished by me in this form are true and correct; and
- I realise that a false declaration is an offence in terms of Regulation 48 and is punishable in terms of section 24F of the NEMA Act.



Signature of the Specialist

Camissa Sustainability Consulting

Name of Company:

07 Feb 2025

Date

3. UNDERTAKING UNDER OATH/ AFFIRMATION

I, _ Jonathan Aronson_____, swear under oath / affirm that all the information submitted or to be submitted for the purposes of this application is true and correct.



Signature of the Specialist

Camissa Sustainability Consulting

Name of Company

07/02/2025

Date

Click or tap here to enter text.

Signature of the Commissioner of Oaths

Click or tap to enter a date.

Date

Appendix 4: SACNASP Certificate

SACNASP

South African Council for Natural Scientific Professions

herewith certifies that

Jonathan Barry Aronson

Registration Number: 400238/14

is a registered scientist

in terms of section 20(3) of the Natural Scientific Professions Act, 2003
(Act 27 of 2003)
in the following field(s) of practice (Schedule 1 of the Act)

Ecological Science (Professional Natural Scientist)

Effective **23 July 2014** Expires **31 March 2026**

Chairperson

Chief Executive Officer

To verify this certificate scan this code

SHEEPMOOR WIND ENERGY FACILITY AND GRID CONNECTION
MPUMALANGA, SOUTH AFRICA
BAT (CHIROPTERA) EIA REPORT

August 2025

Produced for

Sheepmoor Wind Energy Facility (Pty) Ltd

Produced by

Camissa Sustainability Consulting

Amsterdam, Netherlands

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NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND ENVIRONMENTAL IMPACT REGULATIONS, 2014 (AS AMENDED) - REQUIREMENTS FOR SPECIALIST REPORTS (APPENDIX 6)

Regulation GNR 326 of 4 December 2014, as amended 7 April 2017, Appendix 6	**Section of Report**
1. (1) A specialist report prepared in terms of these Regulations must contain- a) details of- i. the specialist who prepared the report; and ii. the expertise of that specialist to compile a specialist report including a curriculum vitae;	Appendix 2
b) a declaration that the specialist is independent in a form as may be specified by the competent authority;	Appendix 3
c) an indication of the scope of, and the purpose for which, the report was prepared;	Section 1.1
(cA) an indication of the quality and age of base data used for the specialist report;	Section 4
(cB) a description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change;	Section 5.1, Section 6
d) the date and season of the site investigation and the relevance of the season to the outcome of the assessment;	Section 4
e) a description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used;	Section 4
f) details of an assessment of the specific identified sensitivity of the site related to the proposed activity or activities and its associated structures and infrastructure, inclusive of a site plan identifying site alternatives;	Section 6
g) an identification of any areas to be avoided, including buffers;	Section 6, Figure 5
h) a map superimposing the activity including the associated structures and infrastructure on the environmental sensitivities of the site including areas to be avoided, including buffers;	Appendix 1 (Figure 3)
i) a description of any assumptions made and any uncertainties or gaps in knowledge;	Section 2
j) a description of the findings and potential implications of such findings on the impact of the proposed activity, (including identified alternatives on the environment) or activities;	Section 5
k) any mitigation measures for inclusion in the EMPr;	Section 6, Section 7

Regulation GNR 326 of 4 December 2014, as amended 7 April 2017, Appendix 6	**Section of Report**
l) any conditions for inclusion in the environmental authorisation;	Section 6, Section 7
m) any monitoring requirements for inclusion in the EMPr or environmental authorisation;	Section 6, Section 7
n) a reasoned opinion- i. (as to) whether the proposed activity, activities or portions thereof should be authorised; (iA) regarding the acceptability of the proposed activity or activities; and ii. if the opinion is that the proposed activity, activities or portions thereof should be authorised, any avoidance, management and mitigation measures that should be included in the EMPr, and where applicable, the closure plan;	Section 8
o) a description of any consultation process that was undertaken during the course of preparing the specialist report;	NA
p) a summary and copies of any comments received during any consultation process and where applicable all responses thereto; and	NA
q) any other information requested by the competent authority.	NA
2) Where a government notice *gazetted* by the Minister provides for any protocol or minimum information requirement to be applied to a specialist report, the requirements as indicated in such notice will apply.	Appendix 5: Site Sensitivity Verification Report

1 INTRODUCTION

Sheepmoor Wind Energy Facility (Pty) Ltd are proposing the development of a commercial wind energy project located near Ermelo, within the Msukaligwa Local Municipality and the Gert Sibande District Municipality, in the Mpumalanga Province. The project forms part of a development cluster that is expected to comprise two separate Wind Energy Facilities (WEFs).

This EIA report covers the Sheepmoor WEF which is proposed to comprise up to 25 turbines with a maximum output capacity of up to 260 MW. The WEF will have an anticipated lifespan of 25 – 30 years. In addition to the wind energy infrastructure, it is proposed that an on-site substation with a capacity up 132 kV and an up to 132 kV Overhead Powerline (OHPL) of approximately 30 km (300 m corridor) in distance, traversing eighteen (18) land parcels, be constructed to connect the proposed WEF to the proposed new Camden B substation. The proposed technical details of Sheepmoor WEF are presented below:

Developer / Applicant	Sheepmoor WEF
DFFE Reference	To be confirmed
WEF Generation Capacity	Up to 260 MW
Site Access	Locality to be confirmed. Total width up to 15 m (12 m after rehabilitation) consisting of up to 3m width for underground 33 kV reticulation.
Number of Turbines	Up to 23
Hub Height from ground level	Up to 150 m
Blade Length	Up to 110 m
Rotor Diameter	Up to 220 m
Length of internal roads	Unknown at this point.
Width of internal roads	Up to 12 m to be rehabilitated to up to 9 m.
On-site substation capacity	Up to 132 kV
Proximity to grid connection	Approximately 25 km
Grid Connection Capacity	Up to 132 kV
Temporary turbine construction laydown and storage areas.	Crane platforms and hardstand laydown area up to 40 ha (Up to 1 ha per turbine)
Permanent footprint area dimensions, including roads, turbine hardstand areas, O&M buildings and battery pad.	O&M: Up to 1 ha Hardstand areas: Up to 1 ha Total area of final footprint (including roads): up to 180 ha
Operations and maintenance buildings (O&M building) with parking area	Up to 1 ha
Height of fencing	2.8 m
Type of fencing	Where site offices are required, temporary screen fencing used to screen offices from the wider landscape.

1.1 Scope and Objectives

This EIA report presents a Bat (Chiroptera) Impact Assessment for the Sheepmoor WEF and associated grid connection. Collisions with wind turbine blades are a leading cause of bat mortality globally (Cryan, 2011; O'Shea et al., 2016). Given the nature, scale, and uncertainty of these impacts to bats, specialist studies are required to assess the risks of renewable energy infrastructure on bats (Rodrigues 2015, MacEwan et al. 2020b, SANBI 2020, Bennun et al. 2021).

The objectives of this assessment are to present the baseline ecological condition of the project site for bats, and to use these characterisations to predict and assess the potential impact of the project on bat species and their habitats as well as to provide actions to mitigate impacts if required.

2 ASSUMPTIONS AND LIMITATIONS

The core techniques used to assess bat activity in this study are acoustic monitoring and roost surveys, both of which have several limitations which will influence the findings and recommendations of this study.

Acoustic monitoring allows for rapid, passive collection of a large volume of bat activity data which can help identify the bat species present within a particular location and their associated spatio-temporal relative activity patterns. In the context of wind farms, acoustic monitoring is therefore a useful technique however, there are several constraints that must be acknowledged. These are discussed in detail by Voigt et al. (2021), Adams et al. (2012), and Kunz et al. (2007a) and fundamentally, include that acoustic monitoring cannot provide an indication of bat abundance or population size at a site. In addition, population demographics such as age and sex of bats cannot generally be determined from echolocation calls. Due to the large volume of data collected by bat detectors it is impractical and prohibitively time-consuming to inspect each file for echolocation calls and to identify the associated bat species. Specialised statistical software uses bat call reference libraries to automate the identification process but developing such libraries is challenging given the variation individual species display in their echolocation call structure and overlap between species. This study used the Wildlife Acoustics library "Bats of South Africa Version 5.4.2", but this excludes reference calls for most South African species thus these may have been overlooked. However, given the duration of the monitoring and spatial coverage of the detectors, the acoustic data provides a reasonable inventory of the species present, and a good indication of the relative magnitude of bat activity. Lastly, bat activity is notably variable in response to a number of factors such as land use change, climactic variability, variations in prey abundance and meteorological conditions which can vary over different time scales. Since this study is limited to 12 months, the baseline conditions presented here may not be representative of activity over longer time frames meaning risk may be misinterpreted.

The major limitation with roost surveys is finding roosting bats. Bats use a diversity of roosting sites including trees, buildings, crevices, and underground sites (caves and mines). The presence of these features at a site can help to target roost searches but evidence of bats may not always be apparent even if bats are present. Importantly, the absence of bat evidence in these situations does not equate to evidence of bat absence (Collins 2006). Thus, this study uses a precautionary approach and will apply buffers to roosts (largely buildings and rocky crevices) even if bats were not located given their potential role in supporting roosting bats.

It is difficult to assess the risk to bats during operation of the proposed facility based on acoustic data collected during pre-construction surveys. For example, Hein et al. (2013) showed that pre-construction bat activity was not a significant indicator of collision risk. Lintott et al. (2016) argued that environmental impact assessments do not predict the risks to bats accurately. This may partly be because it is hypothesized that bats may be attracted to wind turbines (Cryan and Barclay 2009, Guest et al. 2022) which some evidence suggests may be the case (Horn et al. 2008, Richardson et al. 2021). While this report makes predications about the potential risk to bats posed by the project, these carry a degree of uncertainty and must be verified by using post-construction surveys to ensure that the predictions are accurate and bat behaviour has not altered from pre-construction levels (Lintott et al. 2016).

Risk to bats was determined based on median bat activity per night derived from the bat activity dataset collected with acoustic monitoring. Median values were compared to those in Table 5 in MacEwan et al. (2020b) which provides height-specific fatality risk categories (high, medium, low) based on bat activity sampled in different South African terrestrial ecoregions. The Project Area of Influence (PAOI) is situated in the Highveld Grasslands ecoregion (Dinerstein et al. 2019) however reference values are not available for this ecoregion in MacEwan et al. (2020b). Instead, median values were compared to reference values for the Drakensberg Grasslands, Woodlands and Forest ecoregion. While bat activity levels differ between these two ecoregions this difference is small (MacEwan et al. 2020a). The lack of a direct reference for the Highveld Grasslands ecoregion is therefore not a major limitation and the comparison is suitable to provide an evaluation of risk.

3 LEGAL REQUIREMENTS AND GUIDELINES

The EIA processes for this project is being undertaken in terms of Government Notice (GN) No. R. 983 of 4 December 2014 (as amended to GNR 327), promulgated under the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) EIA Regulations, 2014 (as amended). In addition, there are various international, regional, and local legislation, policies, regulations, guidelines, conventions, and treaties in place for the protection of biodiversity, under which bats would also be protected or considered. These create a policy environment and impact management framework aiming to prevent excessive impacts to biodiversity and which was used to assess risk of this specific project. Specific policies include the following:

- Convention on Biological Diversity Post-2020 Global Biodiversity Framework
- United Nations Sustainable Development Goals
- Convention on the Conservation of Migratory Species of Wild Animals (1979)
- Convention on Biological Diversity (1993)
- Constitution of the Republic of South Africa, 1996 (Act No. 108 of 1996)
- National Environmental Management Act, 1998 (NEMA, Act No. 107 of 1998)
- National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004)
- Northern Cape Nature Conservation Act (Act 9 of 2009)
- The Equator Principles (2013)
- International Finance Corporation Performance Standards (PS6)
- The Red List of Mammals of South Africa, Swaziland, and Lesotho (2016)
- South Africa National Biodiversity Strategy and Action Plan (2005)
- Guidelines for the implementation of the Terrestrial Flora (3c) & Terrestrial Fauna (3d) Species Protocols for environmental impact assessments in South Africa
- Mitigating biodiversity impacts associated with solar and wind energy development. IUCN Guidelines for project developers (2021)
- South African Good Practise Guidelines for Surveying Bats in Wind Energy Facility Developments – Pre-Construction (2020)
- South African Good Practise Guidelines for Operational Monitoring for Bats at Wind Energy Facilities (2020)
- South African Bat Fatality Threshold Guidelines (2018)
- Mitigation Guidance for Bats at Operational Wind Energy Facilities in South Africa (2018)

4 SURVEY METHODOLOGY

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

Bats were also studied through 12 months of acoustic monitoring in the AoI which began on 26 April 2022 and ended on 4 July 2023. After this, monitoring continued at one met mast location until 11 November 2023. Bat activity was sampled at 11 locations (Figure 1, Table 1) within the AoI with Wildlife Acoustics, Inc. SM4 bat detectors. At nine locations (AM4 – AM12), SMM-U2 microphones were positioned at the top of a 10 m aluminium mast. At the remaining two locations (AM1 and AM3), microphones were positioned on meteorological towers at 10 m, 50 m, and 90 mrespectively. Equipment at AM12 was stolen and therefore data from this location were not available to be assessed in this report.

The bat detectors were programmed to record activity nightly, from 30 minutes before sunset to 30 minutes after sunrise, and this report summarises 518 nights of bat activity data. This monitoring period therefore spans of all four seasons providing a representative account of temporal bat activity patterns across a year. Acoustic data retrieved from each bat detector were processed using Kaleidoscope® Pro (Version 5.4.2, Wildlife Acoustics, Inc.). Bats were automatically identified using the embedded "Bats of South Africa Version 5.4.0" reference library and verified by inspecting echolocation files. The number of acoustic files recorded was used as a measure to quantify bat activity, whereby each file was considered one bat pass of themicrophone.

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

Table 1: Summary of the Bat Acoustic Monitoring Sampling Locations and Effort

Bat Detector	Coordinates	# Sample Nights	Altitude (m)	Habitat Features
AM1 (Met mast)	-26.612298°S 30.317572°E	10m: 518 50 m: 226 90 m: 478	1,778	In Wakkerstroom Montane Grassland, 400 m west of small escarpment, 560 m north of farm dam, 440 m west of woodland patch, 560 m northeast of wetland
AM3 (Met Mast)	-26.587572°S 30.284137°E	10 m: 340 50 m: 435 90 m: 326	1,748	In Wakkerstroom Montane Grassland, 420 m west of farmstead, 420 m east of stream and seep wetland
AM4	-26.665933°S 30.321221°E	208	1,550	In Eastern Highveld Grassland, 360 m west of cultivated area, 230 m southeast of woodland, 240 m north east of stream, 430 m south east of depression wetland
AM5	-26.611025°S 30.363393°E	377	1,515	In Eastern Highveld Grassland, on border of cultivated areas and disturbed grassland, 470 m southeast of stream, wetland and woodland patch, 2.4 km northwest of farmstead
AM6	-26.562101°S 30.296970°E	242	1,732	In Wakkerstroom Montane Grassland, at edge of woodland patch, 80 m east of depression wetland, 255 m west of stream
AM7	-26.640015°S 30.306442°E	194	1,655	Within wooded valley, 60 m west of stream, 300 m east of seep wetland
AM8	-26.621551°S 30.277550°E	137	1,735	In Wakkerstroom Montane Grassland, 680 m west of woodland patch,167 m north of seep wetland
AM9	-26.549013°S 30.315353°E	51	1,667	In Eastern Highveld Grassland adjacent to wetland and surrounded by trees
AM10	-26.592367° S 30.336850°E	163	1,696	In Wakkerstroom Montane Grassland, above small escarpment in shallow wooded valley
AM11	-26.632172°S 30.265925°E	163	1,694	In Eastern Highveld Grassland adjacent to tree edge line, 220 m south east of wetland, installed at farmstead

5 SPECIALIST FINDINGS

5.1 Ecological Baseline

The Project Area of Influence (PAOI) is situated in the Grassland Biome and comprises predominantly Eastern Highveld Grassland vegetation (Figure 1). The landscape associated with this vegetation consists of slight to moderately undulating plains with small scattered rocky outcrops. The vegetation is short, dense grassland (Mucina and Rutherford 2006). Wakkerstroom Montane Grassland occurs in the middle of the PAOI, on low mountains and undulating plains. Here the vegetation comprises short montane grassland on plateaus and flat areas. On steep, east facing slopes and in drainage areas, short forest and thicket occurs. Both vegetation types are endemic, and Eastern Highveld Grassland is classified as Vulnerable while Wakkerstroom Montane Grassland is classified as Least Concern (SANBI 2018). The PAOI includes some low hills and wetland depressions and has largely been transformed by cultivation in the west, commercial forestry in the east and urban sprawl, including extensive areas of alien invasive trees. The PAOI is in a summer rainfall region and has a cool-temperate climate with dry winters, frequent occurrence of frost and large differences in both diurnal and seasonal temperature extremes (Mucina and Rutherford 2006).

Critical Biodiversity Areas (CBA), areas of high biodiversity value that must be maintained in a natural state, are located throughout the PAOI, classified as either “CBA Irreplaceable” and “CBA Optimal” (Figure 1). The former category comprises 1) areas required to meet conservation targets and those with irreplaceability values greater than 80 %, 2) areas which represent critical linkages or pinch-points in the landscape that must remain natural, and 3) Critically Endangered ecosystems (MTPA 2014). The latter category comprises areas that are not ‘irreplaceable’, but they are the most optimal land configuration to meet all biodiversity targets. Ecological Support Areas (ESA), not essential for meeting biodiversity targets but important in supporting the functioning of CBAs and delivering important ecosystem services, are also located throughout the PAOI.

Parts of the PAOI fall within a National Protected Areas Expansion Strategy (NPAES) Focus area (Moist Escarpment Grasslands), targeted for protected area expansion for improved ecosystem representation, ecological sustainability and resilience to climate change. Chrissiesmeer Protected Environment and Jericho Dam Nature Reserve overlap the north and east of the PAOI respectively (Figure 1).

Bat roosting sites in the PAOI are relatively limited and unlikely to support large congregations of bats, with no underground sites (e.g., caves, mines, sinkholes) known to be present. The closest known major bat roost is approximately 70 km north of the PAOI. Although occasional ridges and rocky outcrops are features of the landscape (Mucina and Rutherford 2006) these are not extensive. Some bat species could roost in these features. Bats are likely to roost in buildings associated with farmsteads within and bordering the AoI especially Cape Serotine and Egyptian Free-tailed Bat (Monadjem et al. 2020). Trees growing at these farmsteads and elsewhere on site where they form clumps, could also provide roosting spaces for bats, even though most are alien invasive species. Completed surveys of some buildings in the of the PAOI did not reveal the presence of roosting bats and as such were assessed as being of low relative suitability. However, these could be used by bats as night-roosts (locations used by bats to feed on captured prey, or to rest between foraging bouts) and should therefore still be considered, and avoided where possible, in the spatial planning.

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

Based on current taxonomic information and bat occurrence data, 23 species could occur within the PAOI (Table 2). The majority have a low likelihood of occurrence however the potential suite of species includes 10 high risk species, including fruit bats (Pteropodiae) and free-tailed bats (Molossidae) which are vulnerable to wind energy impacts in South Africa (MacEwan 2016, Aronson 2022).

Table 2: Bat Species Potentially Occurring within the PAOI

Common Name Species Name	Key Habitat Requirements*	Prob. Of Occurrence	Conservation Status		Wind Energy Risk[δ]
			IUCN[†]	RSA[!]	
Natal Long-fingered bat *Miniopterus natalensis*	Temperate or subtropical species. Primarily in savannahs and grasslands. Roosts in caves, mines, and road culverts. Clutter- edge forager. Migratory.	**Confirmed (5,018 passes)**	LC/U	LC	**High**
Lessor Long-fingered bat *Miniopterus fraterculus*	Temperate species, associated with grasslands. Cave-dependant but also roosts in tunnels and mines. Habitat includes savannah bushveld, moister mistbelt and coastal forest habitats. Clutter-edge forager. Migratory.	Moderate	LC/U	LC	**High**
Cape Serotine *Laephotis capensis*	Arid semi-desert, montane grassland, forests, savannah and shrubland. Roosts in vegetation and human-made structures. Clutter-edge forager.	**Confirmed (50,243 passes)**	LC/S	LC	**High**
Mauritian tomb bat *Taphozous mauritianus*	Savannah woodland preferring open habitat. Roosts on rock faces, the outer bark of trees or on the outer walls of buildings under the eaves of roofs. Forages in urban areas and over cultivation. Open- air forager.	High	LC/U	LC	**High**
Little Free-tailed bat *Mops pumilus*	Semi-arid savannah, forested regions, woodland habitats. Roosts in narrow cracks in rock and trees but also in buildings. Open-air forager. Forages in urban areas and over cultivation.	**Confirmed (1,767 passes)**	LC/U	LC	**High**
Midas Free-tailed bat *Mops midas*	Hot low-lying savannah and woodland. Roosts in narrow cracks in rock and trees but also in buildings. Open-air forager.	Low	LC/D	LC	**High**
Egyptian Free-tailed bat *Tadarida aegyptiaca*	Desert, semi-arid scrub, savannah, grassland, and agricultural land. Roosts in rocky crevices, caves, vegetation, and human-made structures. Open-air forager.	**Confirmed (20,995 passes)**	LC/U	LC	**High**
Wahlberg's Epauletted fruit bat *Epomophorus wahlbergi*	Roost in dense foliage of large, leafy trees. Associated with forest and forest-edge habitats but will forage in urban environments.	Low	LC/S	LC	**High**
African Straw-coloured fruit bat *Eidolon helvum*	Non-breeding migrant in the PAOI.	Low	NT/D	LC	**High**
Egyptian Rousette *Rousettus aegyptiacus*	Distribution influenced by availability of suitable caves roosts.	Low	LC/S	LC	**High**
Temminck's Myotis *Myotis tricolor*	Montane forests, rainforests, coastal forests, savannah woodlands, arid thicket, and fynbos. Roosts communally in caves (and mines) and closely associated with mountainous terrain. Migratory. Clutter-edge forager.	Low	LC/U	LC	**Medium-High**
Welwitsch's Myotis *Myotis welwitschii*	Mainly open woodland and savannah but also high-altitude grassland, tropical dry forest, montane tropical moist forest, savannah and shrublands. Clutter-edge forager.	Low	LC/U	LC	**Medium-High**
Yellow-bellied house bat *Scotophilus dinganii*	Occurs throughout the Savannah Biome but avoids open habitats such as grasslands and Karoo scrub. Roosts in hollow trees and buildings. Clutter-edge forager.	**Confirmed (169 passes)**	LC/U	LC	**Medium-High**
Dusky Pipistrelle *Pipistrellus hesperidus*	Woody habitats, such as riparian vegetation and forest patches. Recorded roosting in narrow cracks in rocks and under the loose bark of dead trees. Clutter-edge forager.	Low	LC/U	LC	**Medium-High**
Rusty Pipistrelle *Pipistrellus rusticus*	Savannah woodland and associated with open water bodies. Roosts in trees and old buildings. Clutter-edge forager.	Low	LC/U	LC	**Medium-High**
Long-tailed Serotine *Eptesicus hottentotus*	Montane grasslands, marshland and well- wooded riverbanks, mountainous terrain near water. Roosts in caves, mines, and rocky crevices. Clutter-edge forager.	**Confirmed (368 passes)**	LC/U	LC	**Medium**
Egyptian Slit-faced bat *Nycteris thebaica*	Savannah, desert, arid rocky areas, and riparian strips. Gregarious and roosts in caves but also in mine adits, Aardvark holes, rock crevices, road	Medium	LC/U	LC	**Low**

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

*Child et al. (2016), *Monadjem et al. (2020); [!] Child et al. (2016); [†]IUCN (2021); [δ] MacEwan et al. (2020b)

5.2 Pre-Construction Bat Monitoring Results

Six bat species were confirmed to occur in the PAOI (Table 2) including four species classified as high risk from wind energy development: Natal Long-fingered bat, Cape Serotine, Little Free-tailed bat, and Egyptian Free-tailed bat. All of these species have a conservation status of Least Concern (both globally and regionally) and no red data species with a higher conservation status were detected. Although these species are currently classified as Least Concern, Rodhouse et al. (2019), Davy et al. (2020) and Frick et al. (2017) have all shown that in North America, Least Concern bats may be experiencing impacts due to wind farms that could result in changes to their conservation status. The global population trend is unknown for Natal Long-fingered bat, Little Free-tailed bat, and Egyptian Free-tailed bat but stable for Cape serotine. Given the unknown population trends for some of these species and the evidence of impacts from wind farms, ongoing monitoring and adaptive management will be essential to ensure their conservation status does not deteriorate.

A total of 80,051[1] bat passes were recorded over 518 sample nights. Most activity was attributed to Cape serotine (63 %) and Egyptian free-tailed bat (27 %). These species comprise the majority of bat fatalities at South African wind farms (Aronson 2022). Natal long-fingered bat accounted for 6 % of total activity. The remaining three species (Little free-tailed bat, Long-tailed serotine and Yellow-bellied house bat) were seldomly recorded and the magnitude of their activity suggests they would be at low risk of impacts. As such, the remainder of this section focuses on impacts to Egyptian free-tailed bat, Cape serotine and Natal long-fingered bat.

Based on MacEwan et al. (2020b), Cape serotine activity was predominantly low but high activity was recorded at AM5, AM8, AM9 and AM11, in summer and autumn (Table 3). The latter two monitoring stations were located at a farm dam and at a farmstead respectively indicating higher activity in relation to these landscape features. This species was also recorded at 50 m and 90 m but the magnitude of its activity was mostly low except for at AM3-50 during March and April when its activity suggests medium risk. Based on the dataset, this species is largely predicted to be at low collision risk. However, bats in the same family (Vespertilionidae) are known to be attracted to wind turbines in the United Kingdom (Richardson et al. 2021). Thus, although the data suggest a low collision risk, the installation of wind turbines in the landscape can alter bat activity patterns. Collision risk for this species will also depend on how close turbine blades reach the ground, with risk increasing the closer the blades reach the ground (Garvin et al. 2024).

[1] Exclusive of an additional 1,491 bat passes unable to be identified to a species.

Table 3: Median number of bat passes per hour per night for Cape serotine and associated risk based on MacEwan et al. (2020b).

site	jan	feb	mar	apr	may	jun	jul	aug	sep	oct	nov	dec	Risk Rating
AM1-10	0.19	0.18	1.21	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.09	0.00	
AM1-50		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00	0.00		High
AM1-90		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		Medium
AM3-10	1.35	0.56		0.08	0.00	0.00	0.00	0.00	0.00	0.09	0.00	0.49	Low
AM3-50	0.00	0.00	0.08	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	No Data
AM3-90	0.00			0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
AM4	0.29	1.20		0.39	0.08	0.00	0.00	0.08	0.93	0.74	0.00		
AM5	0.19	4.65	3.32	1.27	0.08		0.00	0.08	0.54	0.79	0.56	0.88	
AM6				1.01	0.22	0.00	0.07	0.23	0.61	0.00	0.28		
AM7				0.00	0.00	0.00	0.00	0.00	0.20		0.00		
AM8				0.08	0.00	1.11	0.81	0.08	2.18				
AM9		8.19	8.53	0.00									
AM10	0.19	0.00	0.26	0.08	0.08							0.00	
AM11	25.90	20.76	12.50	6.14	3.10							15.07	

The timeseries data indicate a clear seasonal pattern in bat activity for the Cape serotine (Table 4), with the mean number of bat passes per hour peaking significantly during summer, reaching up to 13.66 passes per hour. This is largely driven by activity at AM11 and AM9. This heightened activity in summer likely reflects optimal weather conditions and increased prey availability. In autumn, bat activity remains relatively moderate, with values between 0.02 and 3.48 passes per hour, suggesting continued but reduced presence compared to summer. In contrast, winter and spring exhibit notably lower levels of activity, with mean passes per hour not exceeding 1.17 in spring and 0.68 in winter. This seasonal trend suggests that Cape serotine bats are minimally active during colder months, likely due to reduced foraging opportunities or temperature constraints. Additionally, within each season, there is a gradual decrease in bat passes across a night. Peak activity in summer and spring is between 19:00 and 21:00, in autumn between 18:00 and 20:00, and in winter between 17:00 and 19:00.

Table 4: Heatmap showing the mean number of bat passes per hour for Cape serotine. Colour gradient is relative and not based on thresholds.

Time Period	Autumn	Spring	Summer	Winter
17:00 – 18:00	1.28	0.01	0.00	0.58
18:00 – 19:00	3.48	0.73	0.27	0.68
19:00 – 20:00	2.51	1.17	13.66	0.21
20:00 – 21:00	1.80	1.06	7.40	0.13
21:00 – 22:00	1.29	0.92	4.01	0.06
22:00 – 23:00	1.07	0.68	3.39	0.02
23:00 – 00:00	0.82	0.45	2.63	0.00
00:00 – 01:00	0.73	0.46	2.13	0.00
01:00 – 02:00	0.73	0.27	1.56	0.00
02:00 – 03:00	0.66	0.25	1.24	0.00
03:00 – 04:00	0.49	0.20	1.08	0.00
04:00 – 05:00	0.41	0.08	2.64	0.00
05:00 – 06:00	0.51	0.00	0.62	0.00
06:00 – 07:00	0.02	0.00	0.00	0.04

The data showed that at 50 m and 90 m, moderate collision risk is predicted for Egyptian free-tailed bat apart from during autumn and spring when high risk is predicted (Table 5). High risk is predicted near AM11 in autumn, and AM4 and AM5 during spring. Egyptian free-tailed bat is flexible in its foraging strategy, and

it is thought that the habitat below has little influence on this species (Monadjem et al. 2020). These bats are open-air foragers based on their morphology and echolocation (Norberg and Rayner 1987) which means they tends to forage high in the air.

Table 5: Median number of bat passes per hour per night for Egyptian free-tailed bat and associated risk based on MacEwan et al. (2020b).

site	jan	feb	mar	apr	may	jun	jul	aug	sep	oct	nov	dec	Risk Rating
AM1-10	0.10	0.18	0.86	0.00	0.07	0.00	0.00	0.08	0.08	0.40	0.75	0.29	
AM1-50		0.18	0.34	0.56	0.15		0.00	0.08	0.08	0.17	0.28		High
AM1-90		0.00	0.17	0.25	0.08	0.00	0.00	0.00	0.08	0.18	0.19		Medium
AM3-10	0.09	0.00		0.23	0.15	0.00	0.00	0.08	0.33	0.17	0.62	0.39	Low
AM3-50	0.10	0.04	0.51	0.62	0.08	0.00	0.00	0.08	0.16	0.45	0.52	0.20	No Data
AM3-90	0.00			0.08	0.08	0.00	0.00	0.08	0.17	0.44	0.24	0.00	
AM4	0.00	0.00		0.39	0.23	0.00	0.07	0.39	1.95	2.57	0.55		
AM5	0.00	0.09	0.51	0.78	0.26		0.19	0.39	1.59	2.00	1.83	0.59	
AM6				0.08	0.08	0.00	0.00	0.00	0.37	0.17	0.00		
AM7				0.00	0.00	0.00	0.00	0.00	0.08		0.00		
AM8				0.15	0.08	0.07	0.00	0.08	0.57				
AM9		0.31	0.60	0.00									
AM10	0.00	0.00	0.00	0.08	0.08							0.00	
AM11	0.39	0.45	1.55	2.23	0.54							1.13	

Table 6: Heatmap showing the mean number of bat passes per hour for Egyptian free-tailed bat. Colour gradient is relative and not based on thresholds.

Time Period	Autumn	Spring	Summer	Winter
17:00 – 18:00	0.04	0.03	0.00	0.08
18:00 – 19:00	0.47	0.54	0.02	0.36
19:00 – 20:00	0.67	0.96	0.46	0.22
20:00 – 21:00	0.78	1.03	0.50	0.17
21:00 – 22:00	0.77	1.11	0.46	0.10
22:00 – 23:00	0.75	1.09	0.54	0.08
23:00 – 00:00	0.57	1.11	0.46	0.05
00:00 – 01:00	0.55	1.40	0.57	0.03
01:00 – 02:00	0.51	1.14	0.55	0.02
02:00 – 03:00	0.44	0.83	0.36	0.01
03:00 – 04:00	0.26	0.54	0.16	0.02
04:00 – 05:00	0.15	0.13	0.11	0.00
05:00 – 06:00	0.03	0.01	0.00	0.00
06:00 – 07:00	0.01	0.00	0.00	0.02

In spring, Egyptian free-tailed bat shows the highest activity levels overall, with peak passes per hour occurring around midnight (00:00 – 01:00) at 1.4 passes per hour (Table 6). This elevated activity during spring nights aligns somewhat with the Cape serotine data, where spring showed moderate activity; however, for the Egyptian free-tailed bat, spring is a clear peak season. In summer, activity for the Egyptian free-tailed bat is relatively lower compared to spring, with values not exceeding 0.57 passes per hour and generally concentrated in the earlier hours of the night. This is a notable contrast to Cape serotine, which displayed its highest seasonal activity in summer. This suggests that while the Cape serotine is more active during summer, the Egyptian free-tailed bat is less active during this period, potentially indicating differing ecological preferences or behavioural patterns. Autumn displays a moderate level of activity for the

Egyptian free-tailed bat, with values peaking around 20:00 – 21:00 at 0.78 passes per hour and then gradually decreasing through the night. This pattern is consistent with the Cape serotine, where autumn also showed moderate activity. In winter, the Egyptian free-tailed bat shows low activity levels across all hours, with peak activity reaching only 0.36 passes per hour early in the evening (18:00–19:00) and decreasing to nearly zero later at night. This aligns with the winter results for the Cape serotine bat, confirming that winter is a low-activity season for both species.

Table 7: Median number of bat passes per hour per night for Natal long-fingered bat and associated risk based on MacEwan et al. (2020b).

site	jan	feb	mar	apr	may	jun	jul	aug	sep	oct	nov	dec
AM1-10	0.10	0.09	3.84	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AM1-50		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00	0.00	
AM1-90		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
AM3-10	0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AM3-50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AM3-90	0.00			0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AM4	0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
AM5	0.00	0.13	0.26	0.23	0.00		0.00	0.00	0.00	0.00	0.00	0.00
AM6				0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
AM7				0.00	0.00	0.00	0.00	0.00	0.00		0.00	
AM8				0.00	0.00	0.00	0.04	0.08	0.24			
AM9		3.30	2.86	0.04								
AM10	0.00	0.00	0.00	0.00	0.00							0.00
AM11	0.19	0.27	0.75	0.24	0.08							0.00

Risk Rating
High
Medium
Low
No Data

Activity of Natal long-fingered bat was predominantly low but high activity was recorded during spring at AM1 and AM9. Medium activity was also recorded during spring at AM5 and AM11 (Table 7). As such, overall impacts to this species are anticipated to be low, especially since activity levels at 50 m and 90 m were assessed as low based on criteria in MacEwan et al (2020b). However, this species may experience high cumulative impacts (see Section 6.3).

Table 7: Heatmap showing the mean number of bat passes per hour for Natal long-fingered bat. Colour gradient is relative and not based on thresholds.

Time Period	Autumn	Spring	Summer	Winter
17:00 – 18:00	0.06	0.00	0.00	0.12
18:00 – 19:00	0.22	0.00	0.02	0.07
19:00 – 20:00	0.18	0.01	0.15	0.02
20:00 – 21:00	0.58	0.01	0.07	0.02
21:00 – 22:00	0.69	0.02	0.34	0.02
22:00 – 23:00	0.42	0.01	0.35	0.02
23:00 – 00:00	0.27	0.02	0.24	0.01
00:00 – 01:00	0.22	0.02	0.21	0.01
01:00 – 02:00	0.15	0.00	0.13	0.00
02:00 – 03:00	0.16	0.00	0.06	0.00
03:00 – 04:00	0.10	0.00	0.02	0.00
04:00 – 05:00	0.05	0.00	0.02	0.00
05:00 – 06:00	0.19	0.00	0.02	0.00
06:00 – 07:00	0.00	0.00	0.00	0.00

The timeseries data showed that this species exhibits relatively low and stable activity levels across all seasons, with a modest peak in autumn, where its activity reaches a maximum of 0.69 bat passes per hour between 21:00 and 22:00. This peak, though limited, suggests a slight preference for early evening hours in the autumn months. Throughout spring, summer, and winter, however, the Natal long-fingered bat maintains very low activity, rarely exceeding 0.35 passes per hour at any given time. The hourly distribution shows that this species activity slightly tapers off in the late evening and early morning hours, with a marked decline around midnight. This pattern suggests that the Natal long-fingered bat may have brief foraging periods early in the night, possibly returning to roost sites earlier than other nocturnal species. This species is migratory, and although difficult to show, the peak in activity in autumn could be suggestive of some bats (e.g. females) moving through the site to roosting sites north elsewhere in Mpumalanga or Limpopo after mating.

6 IDENTIFICATION AND ASSESSMENT OF IMPACTS

Impacts to bats that are likely to occur because of the construction, operation and decommissioning of the wind energy facility and grid connection are identified and assessed in the following section. The unit of analysis against which impacts were assessed is the local bat community and their associated habitats within the PAOI. Impacts considered for assessment include habitat modification and disturbance, displacement, fatality due to collisions with wind turbine blades, and light pollution since these are the major impacts likely to be associated with the project (Kunz et al. 2007b, Cryan and Barclay 2009, Bará and C. Lima 2024, Voigt et al. 2024). For each impact, the respective mitigation measures were categorised into those aimed at first avoiding impacts, then minimising impacts, and finally restoring areas impacted (Figure 2).

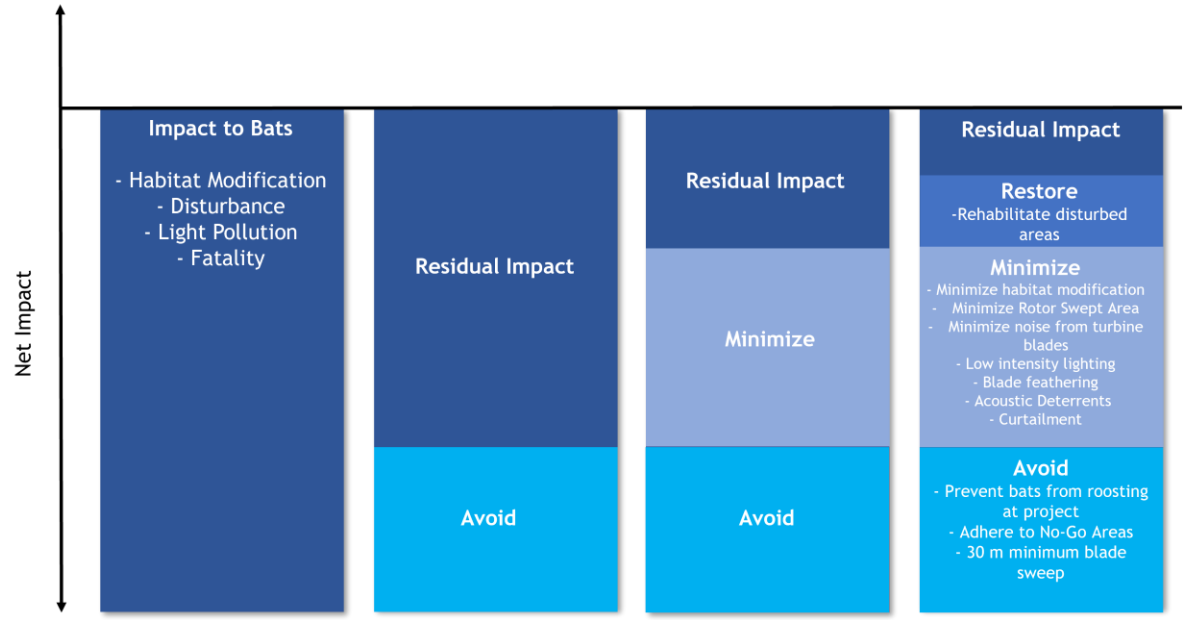


Figure 2: Mitigation Hierarchy applied to the Project with Mitigation Measures.

6.1 Wind Energy Facility

6.1.1 Construction Phase

IMPACTS

Removal of native vegetation, noise and dust generated during construction activities, and the presence of new infrastructure in the landscape, will negatively and indirectly impact bats by removing habitat used for foraging and commuting, through disturbance, and displacement (Kunz et al. 2007b, Millon et al. 2015, Millon et al. 2018, Bennun et al. 2021, Leroux et al. 2022, Tolvanen et al. 2023).

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

Mitigation (Avoid)

Habitat modification impacts can be avoided by buffering habitat and landscape features (Table 8) that bats use to spatially limit the potential for bats to interact with project infrastructure, and to avoid impacting key bat habitat (Barré et al. 2018, Leroux et al. 2022). All key habitat features were buffered by 200 m as per best practise (Rodrigues 2015, MacEwan et al. 2020b).

To align with regional conservation and integrated development planning, the Mpumalanga Biodiversity Sector Plan Handbook (MTPA 2014) was consulted to guide spatial risk in the AoI. The intention was to align biodiversity conservation policy objectives with renewable energy policy objectives, attempting to minimize trade-offs between conflicting goals (Jackson 2011, Gasparatos et al. 2017). The handbook includes a map of terrestrial areas that are important for conserving biodiversity and ecological processes – Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs) respectively.

CBA Irreplaceable Areas were categorised as No-Go (Table 8) because the conservation goals for these areas are to maintain them in a natural state with no loss of ecosystems, functionality or species, and with no flexibility in land-use options (MTPA 2014). CBA optimal and areas with Highveld grassland were classified as high risk. Although the primary objective of the CBA optimal areas is to maintain these spaces in a natural state with no loss of ecosystems, functionality or species, some flexibility in land-use options is permitted (MTPA 2014), therefore these areas must be avoid as much as possible. The remaining areas were assigned low or medium risk where all infrastructure development should be prioritized. These included modified land, areas with invasive alien trees (plantations), ESA, and other Natural Areas (Table 8). Similarly, in ecological supports areas (ESAs), the objective is to maintain habitats in a natural, or near-natural, state with limited loss of ecosystems or functionality. Hence, these areas were classified as medium risk, permitting the siting of turbines in these spaces.

All turbines will be subjected to a post-construction bat fatality monitoring program which will monitor residual impacts at turbines located in CBA optimal and ecological support areas, as well as turbines in low-risk areas. The results of this monitoring will inform management actions where needed to ensure alignment with the MTPA objectives to limit impacts to biodiversity.

Table 8: Features used to assign spatial risk categories in the AoI for bats (Chiroptera)

Risk Level			
Low	**Medium**	**High**	**No-Go**
Heavily modified land	NPAES	CBA Optimal	CBA Irreplaceable Areas
Moderately modified land	ESA Landscape corridor	Highveld Grassland	Minor Watercourses (50 m buffer)
Cleared Invaded	ESA Local corridor		Farm Dams (200 m buffer)
Transformed	Other Natural Areas		Pan depressions (200m buffer)
Plantation/Invaded	Montane Grassland		Houses (200 m buffer)
			Buildings (200 m buffer)
			Seeps (200 m)
			CVB Wetlands (200 m)
			Rivers with floodplains (200 m buffer)
			Rocky Outcrops (200 m buffer)
			Protected Area (200 m buffer)

No infrastructure (including O&M buildings) may be placed within buffered No-Go areas (Figure 3). However, road infrastructure may need to be routed through sensitive areas for practical reasons. Existing road networks should be used as much as possible in these cases to limit the creation of additional roads which have known impacts on wildlife (Perumal et al. 2021).

To avoid bats roosting in new project infrastructure, all buildings must be properly sealed. If bats colonize

these spaces, a suitably qualified bat ecologist must be engaged to remove them.

Disturbance effects can be avoided by restricting construction activities to daylight hours (i.e., no construction at night) and avoiding blasting near rocky outcrops.

Mitigation (Minimize and Restore)

Modification and disturbance of bat habitat is likely to have species specific effects depending on species foraging guild, season, and distance to wind turbines (Barré et al. 2018, Leroux et al. 2022). For example, clutter edge species (e.g., Cape serotine) are more likely to be impacted by habitat modification given their greater association with physical habitat features compared to high-flying species (e.g., Egyptian free-tailed bat). As such, buffers may not be effective to fully remove all impacts.

Beyond avoidance, measures to minimize further impacts include minimizing the clearing of vegetation, minimizing disturbance and destruction of rocky outcrops, and applying good construction abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste) created during construction. Where native trees, rocky outcrops or buildings need to be removed (although this must be avoided), these features must be examined by a suitably qualified bat ecologist before construction commences to search for roosting bats. Following construction, all areas disturbed must be rehabilitated through native species planting within all areas under the projects control.

IMPACT PHASE: CONSTRUCTION					
Nature of the impact: MODIFICATION & DISTURBANCE OF BAT HABITAT (ROOSTING, FORAGING, COMMUTING)					
Description of impact Removal of native vegetation, noise and dust generated during construction activities, and the presence of new infrastructure in the landscape, will negatively and indirectly impact bats by removing habitat used for foraging and commuting, through disturbance, and displacement. Construction of WEF infrastructure could result in destruction and/or disturbance to bat roosts, and inadvertently provide new roosting spaces for some bat species in risky locations.					
	Extent (E)	**Duration (D)**	**Reversibility (R)**	**Magnitude (M)**	**Probability (P)**
Without Mitigation	1	1	3	2	2
With Mitigation	1	1	2	1	1
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	**Low Negative Impact (14)**			**Low Negative Impact (5)**	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No, no comments received				
Mitigation measures to reduce residual risk or enhance opportunities: - Limit potential for bats to roost in project infrastructure (e.g., buildings, turbines) by ensuring they are properly sealed such that bats cannot gain access. - No construction activities at night. - No placement of infrastructure (except roads) in no-go areas. - Relocate the O&M building within a No-Go area (Figure A) or, minimize the footprint of the building, construct the building as far as possible away from the wetland within the identified footprint polygon, do not use any lighting at night. - No blasting near rocky crevices. - Minimize clearing of native vegetation - Minimize disturbance and destruction of rocky outcrops, trees and buildings, and where this is required, these features should be examined for roosting bats. - Apply good construction abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste) created during construction. - Rehabilitate and enhance all areas disturbed during construction (including aquatic habitat).					

Residual impact	Residual impacts are likely to be minor although buffer distances have been shown to be ineffective at avoiding and minimizing risk to bats because these are two small for some species (Barré et al. 2018, Tolvanen et al. 2023).

6.1.2 Operational Phase

IMPACTS

Bat mortality (direct impact) through collisions with wind turbine blades is the principal impact of wind energy facilities on bats during operation of the facility (Cryan and Barclay 2009, Arnett et al. 2016, Voigt et al. 2024). Displacement of bats from their preferred areas may also occur due to turbine noise emissions (Ellerbrok et al. 2024, Voigt et al. 2024).

Mitigation (Avoid)

Collisions can be avoided by not placing wind turbines in the vicinity of bat habitats which for bats includes both physical landscape features themselves (near wetlands, vegetation etc.) and open airspace away from these features (Schnitzler et al. 2003). Risk of collision impact is related to bat morphology with fast flying, open-air species more likely to be impacted than low-flying species who forage closer to the ground, in edge spaces near vegetation, or in dense cluttered spaces (Schnitzler et al. 2003, Thaxter et al. 2017, Aronson 2022). Impacts to low-flying species can be further avoided by ensuring blades do not sweep close to ground level (Figure 4).

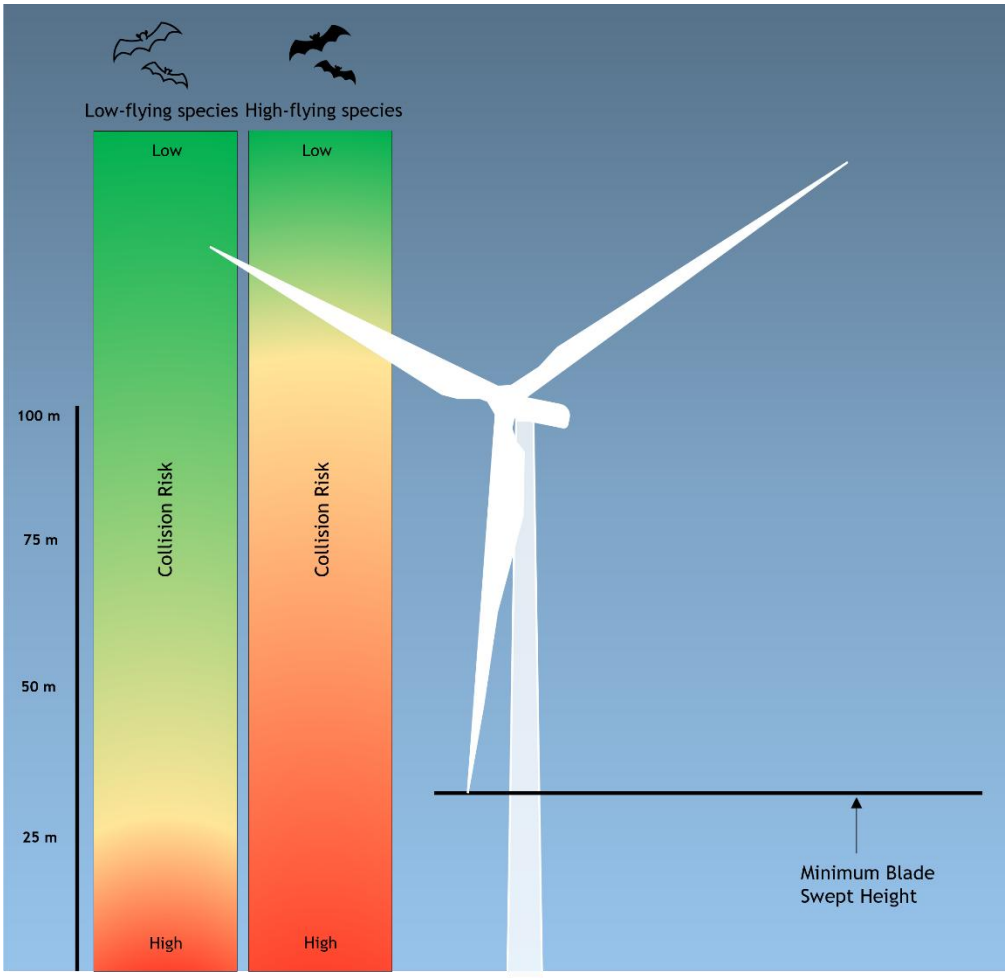


Figure 4: Conceptual Framework used to differentiate risk between low and high-flying bat species and the relationship with turbine size.

The species principally at collision risk from the proposed project are Cape serotine and Egyptian free-tailed bat since other species were recorded less often. High risk was identified for Cape serotine at ground level (represented by 10 m) at some locations (Table 3) but generally low risk at height (above 50 m). Activity is likely to decrease exponentially between these two heights (Wellig et al. 2018) meaning risk would decrease from high at 10 m to low at 50 m and above. The size of the rotor swept area should account for this because the lower the blades sweep the ground, the higher risk they will present to bats (Garvin et al. 2024). It is therefore recommended to maintain a minimum blade sweep of 30 m to avoid collision impacts as much as possible. There is limited published emperical evidence for this specific height but based on the activity of Cape serotine this is likely to be a reasonable height were risk would reduce from high to moderate or low.

Collision impacts can also be avoided by not installing wind turbines within or adjacent to key bat habitats, and adhering to the No-Go buffers (Figure 3). To ensure no parts of the wind turbines, including the blade tips, intrude into bat buffers, all 200 m buffers were adjusted (increased by 49 m) to account for the blade length and hub height of the assessed turbine in line with Mitchell-Jones and Carlin (2014) and based on the following equation:

[Eq. 1]

$$b = \sqrt{(buffer + bl)^2 - (hh - fh)^2}$$

$$b = \sqrt{(200 + 91)^2 - (150 - 0)^2}$$

$$b = 249\ m$$

Where:
b = adjusted/blade tip buffer
buffer = 200 m
bl: Turbine blade length = 91 m
hh: Hub height = 150 m
fh: Feature height = 0 m

The specific turbine height assessed in this report has a 150 m hub height and 91 m blade length, resulting in a minimum blade sweep of 59 m. Should the turbine size change, the adjusted/blade tip buffers must be updated to account for any changes in the hub height or blade length. No turbines are within buffered areas and hence the turbine layout is acceptable in its current form (Figure 3).

Mitigation (Minimize and Restore)

For some high-flying species such as Egyptian free-tailed bat, the habitat or land use below does not generally influence their activity (Monadjem et al. 2020) which makes habitat based mitigations (e.g., buffers) less effective. This species was recorded at 50 m and 90 m, where median activity levels suggest high risk during autumn and spring (Table 5). Mitigation to avoid impacts to higher-flying species should include the choice of turbine design since this has the potential to influence bat fatality (Barclay et al. 2007) but the impact of turbine size on bat fatality is poorly understood. Generally, impacts to high-flying species should be avoided by limiting the size of the rotor swept area as much as practicable since they are active across much of the rotor swept zone.

However, due to the characteristics of the species present on site, i.e., high risk, open-air foraging species, residual impacts could occur since there is still likely to be a high degree of risky airspace even with a minimized rotor swept area. In addition, some bats may be attracted to turbines (Horn et al. 2008, Cryan and Barclay 2009, Richardson et al. 2021, Guest et al. 2022, Leroux et al. 2022) once installed and operational and therefore additional mitigation measures would be needed to minimize impacts.

The first additional mitigation measure to minimize residual collision impacts is the use of **blade feathering** to prevent free-wheeling of blades below the turbine cut-in speed. This has been shown to reduce bat fatality with the benefit of not impacting on energy production (Young et al. 2011, Good et al. 2012).

During operation, bat fatality monitoring must be undertaken to search for bat carcasses beneath wind turbines to measure the residual impact of the WEF on bats for a minimum of two years (Aronson et al.

2020). Mitigation measures that are known to further minimize bat fatality if needed based on the fatality monitoring results include **curtailment** and/or **acoustic deterrents** (Arnett et al. 2013, Romano et al. 2019, Weaver et al. 2020). These techniques must be used if post-construction fatality monitoring indicates that species fatality thresholds have been exceeded (MacEwan et al. 2018) to minimize impacts, maintain the impacts to bats within acceptable limits of change and prevent declines in the impacted bat population. The bat fatality thresholds for the project were determined based on area of influence of the turbines of 4,774 hectares. This was based on a minimum convex polygon around all turbines, plus an additional buffer around this space of 110 m corresponding to the turbine blade length. Based on the bat fatality threshold for the Highveld Grasslands ecoregion (MacEwan et al. 2018), the bat fatality threshold for the Sheepmoor project is 38 bats per least concern species.

According to the threshold guidance (MacEwan et al. 2018), should the annual fatality threshold be exceeded, curtailment and/or acoustic deterrents must be used to reduce fatality levels to below the threshold. For frugivorous bats, conservation important or rare/range restricted bats, i.e., Species of Special Concern (SSC), the annual fatality threshold is 1 individual. The likelihood of SSC's being present on site is low (Table 2).

A Biodiversity Management Plan (BMP) for bats must be developed by a bat ecologist before commencement of operation which includes the post-construction fatality monitoring plan design, fatality thresholds calculations and rationale, and an adaptive management response plan that provides a timeous action pathway for mitigation (e.g. curtailment or deterrents) should fatality thresholds be exceeded. Smart curtailment approaches which shut down turbines based on real time bat acoustic activity data are favoured over blanket curtailment because these will be less disruptive to turbine operation.

Since displacement of bats is likely driven by turbine noise, this can be minimized by serration of the back edges of the blade, by using a low-noise blade airfoil design or with blade trailing-edge brushes (Bošnjaković et al. 2024; Ellerbrok et al. 2024).

IMPACT PHASE: OPERATION					
Nature of the impact: BAT FATALITY					
Description of impact Bat mortality (direct impact) through collisions and/or barotrauma with wind turbine blades is the principal impact of wind energy facilities on bats.					
	Extent (E)	**Duration (D)**	**Reversibility (R)**	**Magnitude (M)**	**Probability (P)**
Without Mitigation	3	4	3	4	5
With Mitigation	3	4	2	3	3
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	**High Negative Impact (70)**			**Moderate Negative Impact (36)**	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No, no comments received				
Mitigation measures to reduce residual risk or enhance opportunities: - No placement of turbines and infrastructure (apart from roads and the OHL) within no-go areas - Maintain a minimum blade sweep of 30 m to avoid impacts to lower flying bats such as clutter-edge species (e.g., Cape serotine, Natal long-fingered bat). - Minimize the rotor diameter - Feather blades to prevent free-wheeling below the turbine cut-in speed - Implement post-construction fatality monitoring and apply smart curtailment or deterrents if fatality thresholds are exceeded.					
Residual impact	Curtailment and deterrents can successfully reduce bat fatality (Arnett 2011, Arnett et al. 2016, Weaver et al. 2020), but not completely. Through the application of fatality thresholds, residual impacts should be minimized.				

IMPACT PHASE: OPERATION					
Nature of the impact: DISPLACEMENT					
Description of impact Avoidance of wind turbines by bats, in some cases over several hundred meters distance, has been observed for various species in different habitats, including farmland, resulting in displacement impacts (Tolvanen et al. 2023, Voigt et al. 2024). Displacement, likely caused by wind turbine operation (e.g., wake turbulences and noise emissions), tends to increase with the number and size of turbines.					
	Extent (E)	**Duration (D)**	**Reversibility (R)**	**Magnitude (M)**	**Probability (P)**
Without Mitigation	3	4	3	3	3
With Mitigation	3	4	2	2	2
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	**Moderate Negative Impact (39)**			**Low Negative Impact (22)**	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No, no comments received				
Mitigation measures to reduce residual risk or enhance opportunities: - Reduce turbine noise emissions by serration of the back edges of the blade, by using a low-noise blade airfoil design or with blade trailing-edge brushes (Bošnjaković et al. 2024; Ellerbrok et al. 2024).					
Residual impact	Residual impacts are likely to be minor although buffer distances have been shown to be ineffective at avoiding and minimizing risk to bats because these are two small for some species (Barré et al. 2018, Tolvanen et al. 2023).				

6.1.3 Decommissioning Phase

IMPACTS

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

Mitigation (Avoid)

Disturbance effects can be avoided by restricting decommissioning activities to daylight hours (i.e., no works at night).

Mitigation (Minimize and Restore)

Disturbance can be minimized by applying good abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste) created during decommissioning works. All areas disturbed must be rehabilitated through native species planting within all areas under the projects control.

IMPACT PHASE: DECOMMISSIONING					
Nature of the impact: DISTURBANCE OF BATS					
Description of impact Impacts during the decommissioning phase will be indirect and involve disturbance to bats through excessive noise and dust, and damage to vegetation.					
	Extent (E)	**Duration (D)**	**Reversibility (R)**	**Magnitude (M)**	**Probability (P)**
Without Mitigation	1	1	3	3	3
With Mitigation	1	1	2	2	2

Significance Calculation	Without Mitigation	With Mitigation
S=(E+D+R+M)*P	**Low Negative Impact (24)**	**Low Negative Impact (12)**
Was public comment received?	No	
Has public comment been included in mitigation measures?	No, no comments received	
Mitigation measures to reduce residual risk or enhance opportunities: - No decommissioning activities at night. - Apply good abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste) created during decommissioning activities. - Rehabilitate and enhance all areas disturbed during construction (including aquatic habitat).		
Residual impact	Residual impacts are likely to be minor since ceasing project activities on site is likely to benefit bats.	

6.2 Grid Connection

6.2.1 Construction Phase

The direct impact of grid connection infrastructure is collisions with powerlines. Insectivorous bats are unlikely to collide with powerlines since they can avoid these obstacles using echolocation but fruit bats do collide with powerlines (Tella et al. 2020). The likelihood of occurrence for fruit bats species in the AoI is low (Table 2). Indirect impacts include loss of habitat to construct substations and OHL pylons, and ecological light pollution (Longcore and Rich 2004).

IMPACT PHASE: CONSTRUCTION					
Nature of the impact: MODIFICATION & DISTURBANCE OF BAT HABITAT (ROOSTING, FORAGING, COMMUTING)					
Description of impact Vegetation clearing for grid connection infrastructure (access roads, substation buildings, pylons), as well as noise and dust generated during the construction phase, will impact bats by removing habitat used for foraging and commuting, through disturbance, and displacement (Kunz et al. 2007b, Millon et al. 2018, Bennun et al. 2021). This impact is likely to have species specific effects; clutter edge species (e.g., Cape serotine) are more likely to be impacted by habitat modification given their greater association with physical habitat features compared to high-flying species (e.g., Egyptian free-tailed bat). Construction of grid connection infrastructure could result in destruction (direct impact) of bat roosts (trees, buildings) and disturbance (indirect impact) of bat roosts potentially resulting in roost abandonment. Bat mortality can occur if roosts which contain bats are destroyed. Installation of new infrastructure in the landscape (e.g., buildings) can inadvertently provide new roosting spaces for some bat species, attracting them to areas with wind turbines and potentially increasing the likelihood of collisions.					
	Extent (E)	**Duration (D)**	**Reversibility (R)**	**Magnitude (M)**	**Probability (P)**
Without Mitigation	1	1	3	2	2
With Mitigation	1	1	2	1	1
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	**Low Negative Impact (14)**			**Low Negative Impact (5)**	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No, no comments received				
Mitigation measures to reduce residual risk or enhance opportunities:					

- Limit potential for bats to roost in project infrastructure (e.g., buildings) by ensuring they are properly sealed such that bats cannot gain access. - No construction activities at night. - No placement of pylons within 200 m of key habitat features specifically including buildings, dams/wetlands, and rivers/streams. The OHL itself is permitted to cross over No-Go Areas for practical routing reasons but pylon positions must avoid No-Go Areas where feasible. Therefore the maximum possible span should be implemented to avoid the sensitive area while ensuring the technical feasibility of the development. - No blasting near rocky crevices. - The construction compounds, laydown areas, and batching plants must avoid No-Go areas. - Minimize clearing of native vegetation - Minimize disturbance and destruction of rocky outcrops, native trees and buildings, and where this is required, these features should be examined for roosting bats. - Apply good construction abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste) created during construction. - Rehabilitate and enhance all areas disturbed during construction (including aquatic habitat).	
Residual impact	Residual impacts are likely to be minor although buffer distances have been shown to be ineffective at avoiding and minimizing risk to bats because these are two small for some species (Barré et al. 2018, Tolvanen et al. 2023).

6.2.2 Operational Phase

IMPACT PHASE: OPERATION					
Nature of the impact: LIGHT POLLUTION					
Description of impact Construction of grid infrastructure will increase ecological light pollution from artificial lighting associated with the substation and other operational and maintenance buildings. Light pollution can alter ecological dynamics (Horváth et al. 2009). Lighting attracts and can cause direct mortality of insects, reducing the prey base for bats, especially bat species that are light-phobic. These species may also be displaced from previous foraging areas due to lighting. Other bat species forage around lights, attracted by higher numbers of insects. This may bring these species into the vicinity of the project and indirectly increase the risk of collision with wind turbines.					
	Extent (E)	**Duration (D)**	**Reversibility (R)**	**Magnitude (M)**	**Probability (P)**
Without Mitigation	3	4	3	3	3
With Mitigation	3	4	2	2	2
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	**Moderate Negative Impact (39)**			**Low Negative Impact (22)**	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No, no comments received				
Mitigation measures to reduce residual risk or enhance opportunities: - No placement of substations and operational and maintenance buildings within no-go areas. - Avoid excessive lighting - Use of motion-sensor lighting, avoid sky-glow by using hoods and downward facing lighting, increase spacing between lighting units, and use low pressure sodium lights (Rydell 1992, Stone 2012).					
Residual impact	Given the limited extent of light pollution currently in the region, the application of the above mitigation measures is likely to result in minor residual impacts.				

6.2.3 Decommissioning Phase

IMPACT PHASE: DECOMMISSIONING
Nature of the impact: DISTURBANCE OF BATS
Description of impact

Impacts during the decommissioning phase will be indirect and involve disturbance to bats through excessive noise and dust, and damage to vegetation.					
	Extent (E)	**Duration (D)**	**Reversibility (R)**	**Magnitude (M)**	**Probability (P)**
Without Mitigation	1	1	3	3	3
With Mitigation	1	1	2	2	2

Significance Calculation	Without Mitigation	With Mitigation
S=(E+D+R+M)*P	**Low Negative Impact (24)**	**Low Negative Impact (12)**
Was public comment received?	No	
Has public comment been included in mitigation measures?	No, no comments received	
Mitigation measures to reduce residual risk or enhance opportunities: - No decommissioning activities at night. - Apply good abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste) created during decommissioning activities. - Rehabilitate and enhance all areas disturbed during construction (including aquatic habitat).		
Residual impact	Residual impacts are likely to be minor since ceasing project activities on site is likely to benefit bats.	

6.3 Cumulative Impacts

For the purposes of the cumulative impact assessment (CIA), cumulative impacts are defined as the total impacts resulting from the successive, incremental, and/or combined effects of a project when added to other existing, planned and/or reasonably anticipated future projects, as well as background pressures (IFC 2013). The project considered here is the Sheepmoor Wind Energy Facility. The goal of this assessment is to evaluate the potential resulting impact to the vulnerability and/or risk to the sustainability of the bat species affected (IFC 2013).

6.3.1 Step 1: VECs and spatial-temporal boundary

Following guidance in IFC (2013), the first step in the CIA was to determine the Valued Environmental Components (VECs), the bat species most likely to be affected by cumulative impacts, and the temporal and geographic scope of the analysis.

Of the species recorded in the PAOI during the acoustic monitoring, and based on bat distribution records (ACR 2020), Cape serotine (*Laephotis capensis*), Natal long-fingered (*Miniopterus natalensis*) and Egyptian free-tailed bat (*Tadarida aegyptiaca*) are most likely to be impacted cumulatively. This is because they are the most widespread bat species in South Africa (Monadjem et al. 2020), classified as high risk species to wind energy impacts (MacEwan et al. 2020b), the most impacted by operating wind energy facilities in the country (Aronson 2022).

The temporal time frame over which cumulative impacts are considered was 25 years, the typical lifespan of a renewable energy facility. However, cumulative effects could extend beyond this timeframe if development of the cluster of three projects is phased over time.

The Ecologically Appropriate Area of Analysis (EAAA) for the assessment was determined by considering the ecology of the three VECs.

The acoustic monitoring confirmed the presence of Natal long-fingered bat in the PAOI, a migratory species which moves seasonally between winter hibernacula and summer maternity cave roosts in South Africa (van der Merwe 1975, Miller-Butterworth et al. 2003). In north-eastern South Africa, where the proposed development is planned, van der Merwe (1975) showed migration between maternity caves in Limpopo and hibernacula caves in Gauteng/North-West undertaken by pregnant females (who later return south with weaned pups), with caves separated by 150 km at least. Males typically undertake shorter movements

(> 60 km) between various highveld caves (van der Merwe 1975). This migration increases the potential that these bats will encounter wind turbines or be displaced by them (Millon et al. 2018), especially if these are placed along migratory routes. Although these movements are typically north-south, Pretorius et al. (2020) suggest that movement could also occur east-west between Gauteng and a maternity cave in Sudwala, Mpumalanga, a distance of approximately 250 km. Although additional research is needed to better understand long and short distance movements of Natal long-fingered bat in South Africa more precisely, given the numerous roost sites (both caves and mines) in Mpumalanga and body of work already demonstrating or suggesting migratory behavior in the north-east of the country between these sites, it is reasonable that cumulative impacts of wind energy may impact this species at large scales and hence cumulative impacts need to be assessed accordingly. Based on van der Merwe (1975), a 150 km radius around the PAOI was therefore defined as EAAA1 (Figure 5), especially since cumulative impacts should be evaluated across scales potentially affected species are likely to occur (Voigt et al. 2012, Lehnert et al. 2014).

The remaining VECs are not migratory and hence a second, smaller EAAA was used. Data on the spatial ecology of the Egyptian free-tailed bat and Cape serotine, specifically the sizes of their foraging or community ranges, are not available. Data from European free-tailed bat, *Tadarida teniotis*, in Portugal (Marques et al. 2004) and Serotine bat, *Eptesicus serotinus*, in England (Robinson and Stebbings 1997) were used as surrogates. Feeding areas for some *T. teniotis* individuals were over 30 km from their roost while the maximum distance between *E. serotinus* feeding areas was over 41 km.

Cumulative impact assessment in South African typically consider developments within a radius of 35 km which therefore is potentially in line with the movement ecology of the two VECs. Hence the EAAA2 was a 35 km radius around the PAOI.

6.3.2 Step 2: Other Activities and External Drivers

The second step in the CIA was to identify other past, existing, or planned activities within the EAAA1 and EAAA2 and to assess the external influences and stressors on the three VECs. With reference to the Renewable Energy Application database (Q2, 2024), currently one other wind energy project is located within the EAAA2, namely the Emvelo WEF. Approximately 35 other development projects are located within EAAA1 (Figure 5). Given that EAAA1 also includes a Renewable Energy Development Zone (REDZ), it is reasonable to expect further development over the 25-year period considered in this assessment.

There are no documented major past threats to Egyptian free-tailed bat and Cape serotine or current threats to them other than renewable energy (Child et al. 2016). Egyptian free-tailed bats can also be threated indirectly by roost disturbance, especially caves. This CIA considers renewable energy the primary impact to these VECs. Natal long-fingered bat is locally threatened in parts of its range by habitat loss resulting from conversion of land to agricultural use, incidental poisoning with insecticides, loss of prey base, and the disturbance of roosting and maternity caves (Child et al. 2016).

6.3.3 Step 3: Baseline Status of VECs

Egyptian free-tailed bat is very widely distributed, locally common and recorded from many protected areas in South Africa however, although the population is stable, the population size is unknown (Child et al. 2016). It is classified as Least Concern nationally and globally. This species is present in the PAOI and based on its activity levels, it is at high risk of collision during autumn and spring (Table 5). It is flexible in its habitat requirements and one reason for its wide distribution is its affinity to roost in buildings or other man-made structures (Monadjem et al. 2020).

Cape serotine is also widely distributed in South Africa with a large population and hence is classified as Least Concern nationally and globally. However, it is possible that this species comprises a complex of closely related species (Monadjem et al. 2020). The population trend is stable, but the population size is unknown. Although this species is present in the PAOI its activity levels suggest low risk of collision (Table 3) although no data between 10 m and 50 m were recorded on site to verify this. This species was recorded at 50 m, so it is reasonable to assume some level of risk between 10 m and 50 m. Cape serotine is also

flexible in its habitat requirements and its use of buildings and other anthropogenic structures as roosts has possibly led to its numbers increasing.

Natal long-fingered bat is a common and widespread species, classified as Least Concern nationally and globally with a stable national population, but it may be experiencing local declines (Child et al. 2016). The size of the national population is unknown but this species roosts in large colonies; De Hoop Guano cave in the Western Cape hosts approximately 200,000 individuals, and in the Highveld, some caves may contain up to 4000 individuals (Child et al. 2016). Activity levels of this species in the AoI were relatively low and this species was seldomly recorded in the rotor swept area but high activity was recorded closer to ground level in spring (Table 7).

6.3.4 Step 4: Assess Cumulative Impacts on VECs

The key potential impacts that could affect the long-term sustainability and/or viability of the three VECs in EAAA1 and EAAA2 are collisions with wind turbines. This may lead to local extinctions and fragmentation of the national population since bats have low reproductive rates (Barclay and Harder 2003). Other impacts may include displacement from foraging and commuting areas, and along migration routes, due to wind turbines (Millon et al. 2018, Leroux et al. 2022).

6.3.5 Step 5: Assess Significance of Predicted Cumulative Impacts

Rodhouse et al. (2019), Davy et al. (2020) and Frick et al. (2017) have all shown that in North America, Least Concern bats may be experiencing impacts due to wind farms that could result in changes to their conservation status. This may be a future scenario for widespread, common Least Concern bats species in South Africa. As such, the significance of cumulative impacts is assessed as High without mitigation. The application of mitigation measures is anticipated to reduce the overall cumulative impact of the project to a moderate level.

Nature of the impact: CUMULATIVE IMPACTS					
Description of impact The total impacts resulting from the successive, incremental, and/or combined effects of the project when added to other existing, planned and/or reasonably anticipated future projects, as well as background pressures.					
	Extent (E)	**Duration (D)**	**Reversibility (R)**	**Magnitude (M)**	**Probability (P)**
Without Mitigation	3	4	3	4	5
With Mitigation	3	4	2	3	3
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	**High Negative Impact (70)**			**Moderate Negative Impact (36)**	
Was public comment received?	No				
Has public comment been included in mitigation measures?	No, no comments received				
Mitigation measures to reduce residual risk or enhance opportunities: The mitigation measures proposed in this report (buffering key habitats used by bats, use of appropriate lighting technology, blade feathering, and using smart curtailment and/or acoustic deterrents) should be applied to all future projects so that there is a collective management responsibility (IFC 2013).					
Residual impact	Curtailment and deterrents can successfully reduce bat fatality (Arnett 2011, Arnett et al. 2016, Weaver et al. 2020), but not completely. Through the application of fatality thresholds across all projects in the cumulative impact area, residual impacts should be minimized.				

6.3.6 Step 6: Management of Cumulative Impacts

Management interventions for bats at operating wind farms in South Africa are guided by fatality thresholds, which aim to mitigate population-level impacts. These thresholds are set below the rate at which populations could decline due to anthropogenic pressures (MacEwan et al. 2018). For this project, thresholds have been established, and similar measures should be applied to all future wind energy developments. In theory, if each development implements thresholds and appropriate mitigation measures when exceedances occur, the EAAA1 and EAAA2 VEC populations should not decline due to wind energy impacts.

The mitigation measures proposed in this report (buffering key habitats used by bats, use of appropriate lighting technology, blade feathering, and using smart curtailment and/or acoustic deterrents) should be applied to all future projects so that there is a collective management responsibility (IFC 2013).

7 ENVIRONMENTAL MANAGEMENT PROGRAMME

Objective: Avoid and minimize modification of bat habitats			
Project component/s	All project infrastructure		
Potential Impact	Vegetation clearing for project infrastructure, as well as noise, dust and pollution generated during construction activities, will impact bats by removing habitat used for foraging and commuting, through disturbance, and displacement. Construction of WEF infrastructure could result in destruction and/or disturbance to bat roosts and inadvertently provide new roosting spaces for some bat species in risky locations.		
Activity/risk source	All construction activities and associated activities (e.g., driving)		
Mitigation: Target/Objective	1. Avoid potential for bats to roost in project infrastructure (e.g., buildings, and turbines) 2. Minimize disturbance to bats 3. Minimize habitat loss 4. Minimize displacement of bats		
Mitigation		**Responsibility**	**Timeframe**
1. Ensure all project infrastructure (e.g., buildings, and turbines) is properly sealed such that bats cannot gain access. 2. No construction activities at night, apply good construction abatement control practices to reduce emissions and pollutants (e.g., noise, erosion, waste). 3. No placement of infrastructure (except roads and OHL) within No-Go areas. 4. Minimize clearing of native vegetation, minimize disturbance and destruction of farm buildings on site, minimize removal of native trees. Rehabilitate and enhance all areas disturbed during construction, (including aquatic habitat). 5. Reduce turbine noise emissions by serration of the back edges of the blade, by using a low-noise blade airfoil design or using blade trailing-edge brushes.		Project Developer Contractor	During design and planning phase and throughout construction phase
Performance Indicator	No bat roosts are destroyed No bats colonise new project infrastructure for roosting No infrastructure in No-Go areas (except roads and OHL) All areas disturbed during construction are rehabilitated		
Monitoring	An appointed ECO must inspect all new project infrastructure, in conjunction with or via training from a bat ecologist, to ensure bats cannot gain access. ECO to ensure compliance with good construction abatement control practices. ECO must ensure no infrastructure is placed in No-Go areas (see Figure 3).		

	If a bat roost is encountered during construction, the ECO must consult a bat ecologist to determine appropriate actions. ECO to ensure all disturbed areas are rehabilitated. ECO to ensure turbine blades have appropriate noise-reduction technology.

Objective: Avoid and minimize bat fatality			
Project component/s	Wind turbines		
Potential Impact	Bat mortality through collisions with wind turbine blades.		
Activity/risk source	Operating Wind Turbines		
Mitigation: Target/Objective	1. Avoid bat fatalities through turbine layout design and turbine dimensions 2. Minimize bat fatalities using smart curtailment or deterrents during operation		
Mitigation		**Responsibility**	**Timeframe**
1. No placement of turbines in No-Go Areas (Figure 3). 2. Maintain a minimum blade sweep of 30 m to avoid impacts to lower flying bats such as clutter-edge species (e.g., Cape serotine, Natal long-fingered bat). 3. Minimize the rotor diameter 4. Feather blades to prevent free-wheeling below the turbine cut-in speed 5. Implement fatality monitoring throughout the operational phase 6. Apply smart curtailment or deterrents if fatality thresholds are exceeded. Annual fatality threshold per Least Concern species = 38 individuals. Annual fatality threshold per Species of Special Concern = 1 individual for each of [African Straw-coloured fruit bat, Wahlberg's Epauletted fruit bat, Percival's Short-eared Trident bat, Blasius's Horseshoe bat, Egyptian Rousette and Lessor Long-fingered bat].		Project Developer Operator	BMP developed prior to operation. BMP active throughout operation phase.
Performance Indicator	≤ 38 individuals per Least Concern species killed annually ≤ 1 individual per Species of Special Concern killed annually		
Monitoring	ECO must ensure no turbines are placed in No-Go areas, including the blade tips (Figure 3). ECO must ensure the dimensions of the final selected turbine adhere to requirements (A minimum blade sweep of 30 m). A Biodiversity Management Plan (BMP) for bats must be developed which includes the design of a post-construction fatality monitoring program (PCFM) for bats, and an adaptive management response plan that provides an escalating scale of mitigation should fatality thresholds be exceeded. ECO to ensure adherence to BMP and any mitigation measures implemented		

Objective: Reduce impact of light pollution	
Project component/s	All project infrastructure

Potential Impact	Construction of project infrastructure will increase ecological light pollution from artificial lighting associated with turbines, the substation and other operational and maintenance buildings. Light pollution can alter ecological dynamics (Horváth et al. 2009, Bará and C. Lima 2024). Lighting attracts and can cause direct mortality of insects, reducing the prey base for bats, especially bat species that are light-phobic. These species may also be displaced from previous foraging areas due to lighting. Other bat species forage around lights, attracted by higher numbers of insects. This may bring these species into the vicinity of the project and indirectly increase the risk of collision with wind turbines.		
Activity/risk source	Light sources from project infrastructure		
Mitigation: Target/Objective	1. Avoid light pollution 2. Minimize light pollution		
Mitigation		**Responsibility**	**Timeframe**
1. No placement of infrastructure within No-Go areas (Figure 3). 2. Use motion-sensor lighting, avoid sky-glow by using hoods and downward facing lighting, increase spacing between lighting units, and use low pressure sodium lights		Project Developer Operator	During design and planning phase and throughout operation phase.
Performance Indicator	Limited attraction of insects to light sources Limited foraging of bats around light sources Limited mortality at insects at light sources		
Monitoring	ECO must ensure no infrastructure is in No-Go areas (Figure 3). ECO must ensure motion-sensor lighting is used. ECO must ensure all lighting fixtures have hoods and/or are downward facing, where appropriate, to prevent sky-glow. ECO must ensure minimum lighting is used and lighting is spaced to prevent excessive use of lighting. ECO must ensure low-pressure sodium lighting is used.		

8 CONCLUSION

This EIA report assessed impacts to bats that could occur because of the construction, operation and decommission of the Sheepmoor WEF and grid connection. The assessment was based on 16 months of baseline data on bat activity recorded at the project. Based on these data, the key issue for the WEF will be managing collision impacts to Cape serotine and Egyptian free-tailed bat, and cumulative impacts.

The first mitigation measure proposed to manage risk is to adhere to the no-go buffers which aim to spatially avoid impacts by buffering key habitat features used by bats. This measure is likely to be effective for most bat species recorded at the project, but additional mitigation measures are needed to avoid impacts to free-tailed bats, which forage high in the air, and to reduce residual impacts.

Turbine design can be effective, and it is recommended to maintain a minimum blade sweep of at least 30 m. However, free-tailed bats will still collide with turbine blades above this height and as such, the rotor diameter must be limited as much as practicable to minimize the space where collisions might occur. Additionally, blade feathering must be implemented to limit the rotation of turbine blades below the turbine cut-in speed when electricity is not being generated.

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

The overall impact to bats was assessed as moderate after the application of the mitigation measures proposed to avoid and minimize impacts to bats. However, on a species level, the project presents differential risk and impacts to bats must be managed adaptively during the operational phase, particularly for those species (e.g. Egyptian free-tailed bat and Cape serotine) for which high risk is predicted during some periods.

This adaptive management will be guided by the Environmental Management Programme for bats which must include the development of a Biodiversity Management Plan (BMP) to manage impacts to bats during the operation of the facility. The BMP for bats must be developed by a bat ecologist before the commencement of operation and must include the post-construction fatality monitoring plan design, fatality thresholds calculations and rationale (updated as required), and an adaptive management response plan that provides a timeous action pathway for mitigation, including roles and responsibilities, should fatality thresholds be exceeded. Provided these measures are adhered to, the project assessed can be approved.

9 REFERENCES

ACR. 2020. African Chiroptera Report 2020. V. Van Cakenberghe and E.C.J. Seamark (Eds). AfricanBats NPC, Pretoria. i-xv + 8542 pp.

Adams, A. M., M. K. Jantzen, R. M. Hamilton, and M. B. Fenton. 2012. Do you hear what I hear? Implications of detector selection for acoustic monitoring of bats. Methods in Ecology and Evolution **3**:992-998.

Arnett, E. B. 2011. Altering turbine speed reduces bat mortality at wind-energy facilities. Frontiers in Ecology and the Environment **9**:209-214.

Arnett, E. B., E. F. Baerwald, F. Mathews, Luisa Rodrigues, A. Rodríguez-Durán, J. Rydell, R. Villegas-Patraca, and C. C. Voigt. 2016. Impacts of Wind Energy Development on Bats: A Global Perspective. Pages 295 - 323 *in* C. C. Voigt and T. Kingston, editors. Bats in the Anthropocene: Conservation of Bats in a Changing World. Springer.

Arnett, E. B., G. D. Johnson, W. P. Erickson, and C. D. Hein. 2013. A Synthesis Of Operational Mitigation Studies To Reduce Bat Fatalities At Wind Energy Facilities In North America. A report submitted to the National Renewable Energy Laboratory. Bat Conservation International. Austin, Texas, USA.

Aronson, J. 2022. Current state of knowledge of wind energy impacts on bats in South Africa. Acta Chiropterologica **24(1)**:221-238.

Aronson, J., E. Richardson, K. MacEwan, D. Jacobs, W. Marais, P. Taylor, S. Sowler, H. C., and L. Richards. 2020. South African Good Practice Guidelines for Operational Monitoring for Bats at Wind Energy Facilities – ed 2. South African Bat Assessment Association.

Bará, S., and R. C. Lima. 2024. Quantifying the visual impact of wind farm lights on the nocturnal landscape. Journal of Quantitative Spectroscopy and Radiative Transfer **329**:109203.

Barclay, R. M. R., E. F. Baerwald, and J. C. Gruver. 2007. Variation in bat and bird fatalities at wind energy facilities: assessing the effects of rotor size and tower height. Canadian Journal of Zoology **85**:381-387.

Barclay, R. M. R., and L. D. Harder. 2003. Life histories of bats: Life in the slow lane. Pages 209-253 *in* T. H. Kunz and M. B. Fenton, editors. Bat Ecology. The University of Chicago Press, Chicago.

Barré, K., I. Le Viol, Y. Bas, R. Julliard, and C. Kerbiriou. 2018. Estimating habitat loss due to wind turbine avoidance by bats: Implications for European siting guidance. Biological Conservation **226**:205-214.

Bennun, L., J. van Bochove, C. Ng, C. Samper, H. Rainey, and H. C. Rosenbaum. 2021. Mitigating Biodiversity Impacts Associated with Solar and Wind Energy Development: Guidelines for Project Developers.

Bohmann, K., A. Monadjem, C. Lehmkuhl Noer, M. Rasmussen, M. R. K. Zeale, E. Clare, G. Jones, E. Willerslev, and M. T. P. Gilbert. 2011. Molecular Diet Analysis of Two African Free-Tailed Bats (Molossidae) Using High Throughput Sequencing. PloS one **6**:e21441.

Bošnjaković, M., Hrkać, F., Stoić, M., & Hradovi, I. (2024). Environmental Impact of Wind Farms. Environments, 11(11), 257.

Child, M. F., L. Roxburgh, E. Do Linh San, D. Raimondo, and H. T. Davies-Mostert, editors. 2016. The Red List of Mammals of South Africa, Swaziland and Lesotho. South African National Biodiversity Institute and Endangered Wildlife Trust, South Africa.

Collins, J. 2006. Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn). Bat Conservation Trust, London.

Cryan, P. M., and R. M. R. Barclay. 2009. Causes of Bat Fatalities at Wind Turbines: Hypotheses and Predictions. Journal of Mammalogy **90**:1330-1340.

Davy, C. M., K. Squires, and J. R. Zimmerling. 2020. Estimation of spatiotemporal trends in bat abundance from mortality data collected at wind turbines. Conservation Biology:12.

Dinerstein, E., C. Vynne, E. Sala, A. R. Joshi, S. Fernando, T. E. Lovejoy, J. Mayorga, D. Olson, G. P. Asner, J. E. M. Baillie, N. D. Burgess, K. Burkart, R. F. Noss, Y. P. Zhang, A. Baccini, T. Birch, N. Hahn, L. N. Joppa, and E. Wikramanayake. 2019. A Global Deal For Nature: Guiding principles, milestones, and targets. Science Advances **5**:eaaw2869.

Ellerbrok, J. S., Farwig, N., Peter, F., & Voigt, C. C. (2024). Forest bat activity declines with increasing wind speed in proximity of operating wind turbines. Global Ecology and Conservation, 49, e02782.

Frick, W. F., E. F. Baerwald, J. F. Pollock, R. M. R. Barclay, J. A. Szymanski, T. J. Weller, A. L. Russell, S. C. Loeb, R. A. Medellin, and L. P. McGuire. 2017. Fatalities at wind turbines may threaten population viability of a migratory bat. Biological Conservation **209**:172-177.

Garvin, J. C., J. L. Simonis, and J. L. Taylor. 2024. Does size matter? Investigation of the effect of wind turbine size on bird and bat mortality. Biological Conservation **291**:110474.

Gasparatos, A., C. N. H. Doll, M. Esteban, A. Ahmed, and T. A. Olang. 2017. Renewable energy and biodiversity: Implications for transitioning to a Green Economy. Renewable and Sustainable Energy Reviews **70**:161-184.

Good, R. E., W. Erickson, A. Merrill, S. Simon, K. Murray, and K. Bay. 2012. Bat monitoring studies at the Fowler Ridge Wind Energy Facility, Benton County, Indiana. Prepared for Fowler Ridge Wind Farm by Western EcoSystems Technology, Inc. (WEST), Cheyenne, Wyoming.

Guest, E. E., B. F. Stamps, N. D. Durish, A. M. Hale, C. D. Hein, B. P. Morton, S. P. Weaver, and S. R. Fritts. 2022. An Updated Review of Hypotheses Regarding Bat Attraction to Wind Turbines. Animals **12**:343.

Hein, C. D., J. Gruver, and E. B. Arnett. 2013. Relating pre-construction bat activity and post-construction bat fatality to predict risk at wind energy facilities: a synthesis. A report submitted to the National Renewable Energy Laboratory. Bat Conservation International, Austin, TX, USA.

Horn, J. W., E. B. Arnett, and T. H. Kunz. 2008. Behavioral responses of bats to operating wind turbines. The Journal of Wildlife Management **72**:123-132.

Horváth, G., G. Kriska, P. Malik, and B. Robertson. 2009. Polarized light pollution: a new kind of ecological photopollution. Frontiers in Ecology and the Environment **7**:317-325.

International Finance Corporation (IFC). 2013. Cumulative Impact Assessment and Management: Guidance for the Private Sector in Emerging Markets. Washington D.C., USA. Available at: https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/ publications_handbook_cumulativeimpactassessment.

IUCN. 2021. The IUCN Red List of Threatened Species. Version 2021-1. https://www.iucnredlist.org. Downloaded on 11 Aug 2021.

Jackson, A. L. R. 2011. Renewable energy vs. biodiversity: Policy conflicts and the future of nature conservation. Global Environmental Change **21**:1195-1208.

Jung, K., and E. K. V. Kalko. 2010. Where forest meets urbanization: foraging plasticity of aerial insectivorous bats in an anthropogenically altered environment. Journal of Mammalogy **91**:144-153.

Kunz, T. H., E. B. Arnett, B. M. Cooper, W. P. Erickson, R. P. Larkin, T. Mabee, M. L. Morrison, M. D. Strickland, and J. M. Szewczak. 2007a. Assessing impacts of wind-energy development on nocturnally active birds and bats: A guidance document. The Journal of Wildlife Management **71**:2449-2486.

Kunz, T. H., E. B. Arnett, W. P. Erickson, A. R. Hoar, G. D. Johnson, R. P. Larkin, M. D. Strickland, R. W. Thresher, and M. D. Tuttle. 2007b. Ecological impacts of wind energy development on bats: questions, research needs, and hypotheses. Frontiers in Ecology and the Environment **5**:315-324.

Lehnert, L. S., S. Kramer-Schadt, S. Schönborn, O. Lindecke, I. Niermann, and C. C. Voigt. 2014. Wind farm facilities in Germany kill noctule bats from near and far. PloS one **9**:e103106.

Leroux, C., C. Kerbiriou, I. Le Viol, N. Valet, and K. Barré. 2022. Distance to hedgerows drives local repulsion and attraction of wind turbines on bats: Implications for spatial siting. Journal of Applied Ecology **59**:2142-2153.

Lintott, P. R., S. M. Richardson, D. J. Hosken, S. A. Fensome, and F. Mathews. 2016. Ecological impact assessments fail to reduce risk of bat casualties at wind farms. Current Biology **26**:R1135-R1136.

Longcore, T., and C. Rich. 2004. Ecological light pollution. Frontiers in Ecology and the Environment **2**:191–198.

MacEwan, K. 2016. Fruit bats and wind turbine fatalities in South Africa. African Bat Conservation News **42**.

MacEwan, K., J. Aronson, E. Richardson, P. Taylor, B. Coverdale, D. Jacobs, L. Leeuwner, W. Marais, and L. Richards. 2018. South African Bat Fatality Threshold Guidelines – ed 2. South African Bat Assessment Association.

MacEwan, K., T. W. Morgan, C. A. Lötter, and A. T. Tredennick. 2020a. Bat Activity Across South Africa: Implications for Wind Energy Development. African Journal of Wildlife Research **50**.

MacEwan, K., S. Sowler, J. Aronson, and C. A. Lötter. 2020b. South African Best Practice Guidelines for Pre-construction Monitoring of Bats at Wind Energy Facilities - ed 5. South African Bat Assessment Association.

Marques, J. T., A. Rainho, M. CarapuÃ§o, P. Oliveira, and J. M. Palmeirim. 2004. Foraging Behaviour and Habitat use by the European Free-Tailed Bat Tadarida teniotis. Acta Chiropterologica **6**:99-110.

McCracken, G. F., E. H. Gillam, J. K. Westbrook, Y.-F. Lee, M. L. Jensen, and B. B. Balsley. 2008. Brazilian free-tailed bats (*Tadarida brasiliensis*: Molossidae, Chiroptera) at high altitude: links to migratory insect populations. Integrative and Comparative Biology **48**:107-118.

Miller-Butterworth, C. M., D. S. Jacobs, and E. H. Harley. 2003. Strong population substructure is correlated with morphology and ecology in a migratory bat. Nature 424:187-191.

Millon, L., C. Colin, F. Brescia, and C. Kerbiriou. 2018. Wind turbines impact bat activity, leading to high losses of habitat use in a biodiversity hotspot. Ecological Engineering **112**:51-54.

Millon, L., J.-F. Julien, R. Julliard, and C. Kerbiriou. 2015. Bat activity in intensively farmed landscapes with wind turbines and offset measures. Ecological Engineering **75**:250-257.

Mitchell-Jones, T., and C. Carlin. 2014. Bats and Onshore Wind Turbines Interim Guidance. Natural England Technical Information Note TIN051. Natural England.

Monadjem, A., P. J. Taylor, F. P. D. Cotterill, and M. C. Schoeman. 2020. Bats of Southern and Central Africa: A Biogeographic and Taxonomic Synthesis. 2nd edition.

MTPA. 2014. Mpumalanga Biodiversity Sector Plan Handbook.*in* C. Lötter M.C., M.J. and Lechmere-Oertel R.G., editor. Mpumalanga Tourism & Parks Agency, Mbombela (Nelspruit).

Mucina, L., and M. C. Rutherford. 2006. The vegetation of South Africa, Lesotho and Swaziland. *Strelitzia* 19. South African National Biodiversity Institute, Pretoria.

Nguyen, T. N., A. Ruangwiset, and S. Bumrungsri. 2019. Vertical stratification in foraging activity of Chaerephon plicatus (Molossidae, Chiroptera) in Central Thailand. Mammalian Biology **96**:1-6.

Noer, C. L., T. Dabelsteen, K. Bohmann, and A. Monadjem. 2012. Molossid bats in an African agro-ecosystem select sugarcane fields as foraging habitat. African Zoology **47**:1-11.

Pretorius, M., H. Broders, and M. Keith. 2020. Threat analysis of modelled potential migratory routes for Miniopterus natalensis in South Africa. Austral Ecology 45:1110 - 1122.

Richardson, S. M., P. R. Lintott, D. J. Hosken, T. Economou, and F. Mathews. 2021. Peaks in bat activity at turbines and the implications for mitigating the impact of wind energy developments on bats. Scientific Reports **11**:3636.

Robinson, M. F., and R. E. Stebbings. 1997. Home range and habitat use by the serotine bat, Eptesicus serotinus, in England. Journal of Zoology **243**:117-136.

Rodhouse, T. J., R. M. Rodriguez, K. M. Banner, P. C. Ormsbee, J. Barnett, and K. M. Irvine. 2019. Evidence of region-wide bat population decline from long-term monitoring and Bayesian occupancy models with empirically informed priors. Ecology and Evolution **9**:11078-11088.

Rodrigues, L. B., L.; Dubourg-Savage, M.; Karapandža, B.; Kovač, D.; Kervyn, T.; Dekker, J.; Kepel, A.; Bach, P.; Collins, J.; Harbusch, C.; Park, K.; Micevski, B.; Minderman, J. 2015. Guidelines for Consideration of

Bats in Wind Farm Projects Revision 2014. EUROBATS Publication Series No. 6 (English Version). UNEP/EUROBATS Secretariat, Bonn, Germany, 133 pp.

Romano, W. B., J. R. Skalski, R. L. Townsend, K. W. Kinzie, K. D. Coppinger, and M. F. Miller. 2019. Evaluation of an acoustic deterrent to reduce bat mortalities at an Illinois wind farm. Wildlife Society Bulletin **43**:608-618.

Rydell, J. 1992. Exploitation of insects around streetlamps by bats in Sweden. Functional Ecology **6**:744-750.

Schnitzler, H.-U., C. F. Moss, and A. Denzinger. 2003. From spatial orientation to food acquisition in echolocating bats. TRENDS in Ecology and Evolution **18**:386-394.

Scottish Natural Heritage. 2019. Bats and Onshore Wind Turbines: Survey, Assessment and Mitigation.

Sirami, C. l., D. S. Jacobs, and G. S. Cumming. 2013. Artificial wetlands and surrounding habitats provide important foraging habitat for bats in agricultural landscapes in the Western Cape, South Africa. Biological Conservation **164**:30-38.

South African National Biodiversity Institute (SANBI). 2020. Species Environmental Assessment Guideline. Guidelines for the implementation of the Terrestrial Fauna and Terrestrial Flora Species Protocols for environmental impact assessments in South Africa. South African National Biodiversity Institute, Pretoria. Version 2.1 2021.

Stone, E. L. 2012. Bats and Lighting: Overview of current evidence and mitigation.

Tella, J. L., D. Hernández-Brito, G. Blanco, and F. Hiraldo. 2020. Urban Sprawl, Food Subsidies and Power Lines: An Ecological Trap for Large Frugivorous Bats in Sri Lanka? Diversity **12**:94.

Thaxter, C. B., G. M. Buchanan, J. Carr, S. H. M. Butchart, T. Newbold, R. E. Green, J. A. Tobias, W. B. Foden, S. Brien, and J. W. Pearce-Higgins. 2017. Bird and bat species' global vulnerability to collision mortality at wind farms revealed through a trait-based assessment. Proceedings of the Royal Society B: Biological Sciences **284**.

Tolvanen, A., H. Routavaara, M. Jokikokko, and P. Rana. 2023. How far are birds, bats, and terrestrial mammals displaced from onshore wind power development? – A systematic review. Biological Conservation **288**:110382.

van der Merwe, M. 1975. Preliminary study on the annual movements of the Natal clinging bat. South African Journal of Science 71:237-241.

Voigt, C. C., E. Bernard, J. C.-C. Huang, W. F. Frick, C. Kerbiriou, K. MacEwan, F. Mathews, A. Rodríguez-Durán, C. Scholz, P. W. Webala, J. Welbergen, and M. Whitby. 2024. Toward solving the global green–green dilemma between wind energy production and bat conservation. Bioscience **74**:240-252.

Voigt, C. C., A. G. Popa-Lisseanu, I. Niermann, and S. Kramer-Schadt. 2012. The catchment area of wind farms for European bats: A plea for international regulations. Biological Conservation **153**:80-86.

Voigt, C. C., D. Russo, V. Runkel, and H. R. Goerlitz. 2021. Limitations of acoustic monitoring at wind turbines to evaluate fatality risk of bats. Mammal Review **n/a**.

Weaver, S. P., C. D. Hein, T. R. Simpson, J. W. Evans, and I. Castro-Arellano. 2020. Ultrasonic acoustic deterrents significantly reduce bat fatalities at wind turbines. Global Ecology and Conservation:e01099.

Wellig, S. D., S. Nusslé, D. Miltner, O. Kohle, O. Glaizot, V. Braunisch, M. K. Obrist, and R. Arlettaz. 2018. Mitigating the negative impacts of tall wind turbines on bats: Vertical activity profiles and relationships to wind speed. PloS one **13**:e0192493.

Young, D. P., Jr, K. Bay, S. Nomani, and W. L. Tidhar. 2011. Nedpower Mount Storm Wind Energy Facility Post-Construction Avian and Bat Monitoring: July - October 2010. Prepared for NedPower Mount Storm, LLC, Houston, Texas. Prepared by Western EcoSystems Technology, Inc. (WEST), Cheyenne, Wyoming.

Appendix 1: Figures

CAMISSA
SUSTAINABILITY CONSULTING

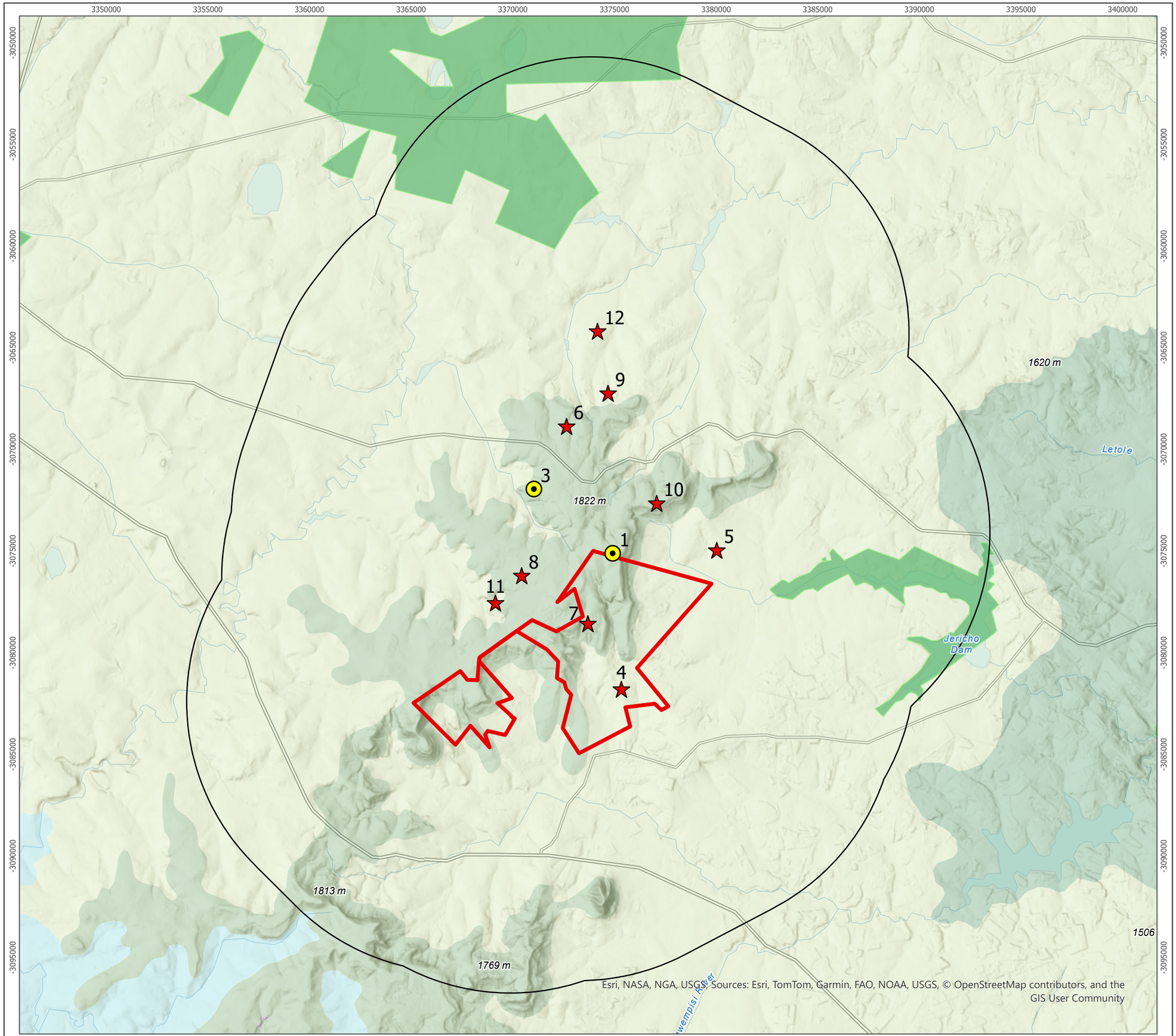
- Sheepmoor Site Boundary

Bat Detector Location

- Short Mast
- Met Mast
- PAOI
- Protected Areas

Vegetation Types

- Amersfoort Highveld Clay Grassland
- Eastern Highveld Grassland
- KaNgwane Montane Grassland
- Northern Afrotemperate Forest
- Wakkerstroom Montane Grassland



1:180,000

0 4 8 km

Date: 08/08/2025

Sheepmoor Wind Energy Facility
Bat Detector Locations
Figure 1

CAMISSA
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- Sheepmoor Site Boundary
- Wind Turbines
- Roads
- Mulilo - Eskom SwS
- Mulilo - IPP Substation
- Mulilo - MV Cable routing
- Mulilo - Transmission line
- Construction camp areas
- O&M site facilities
- Tower Laydown areas

Bat Constraints

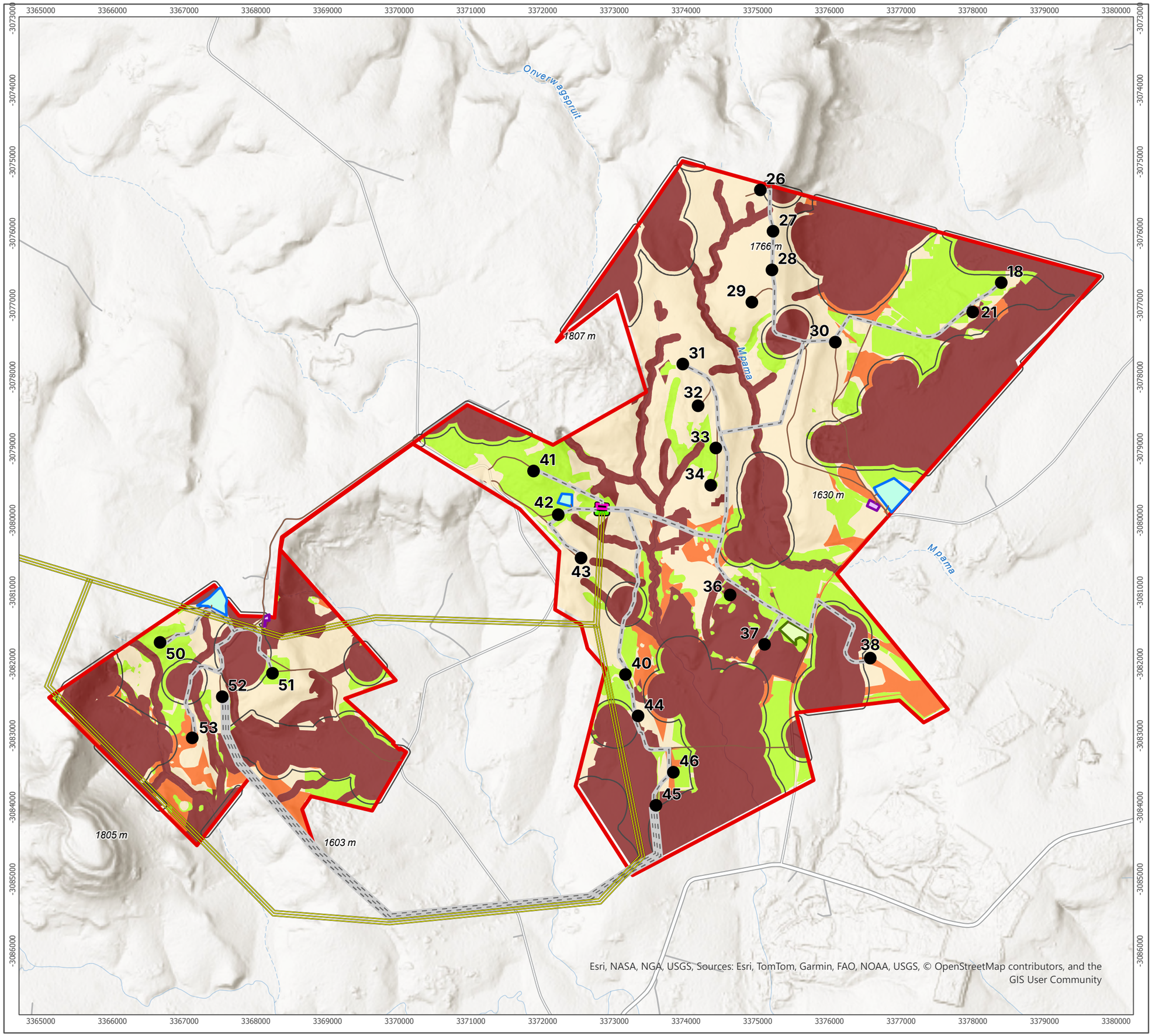
- Low
- Medium
- High
- No-Go
- Blade Tip No-Go

1:50,000

0 1 2 km

Date: 08/08/2025

Sheepmoor Wind Energy Facility
Bat Constraints Map
Figure 3



CAMISSA
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- Sheepmoor Site Boundary
- Emvelo Site Boundary
- EAAA1
- EAAA2
- Phase 2 REDZ

Renewable Energy Developments

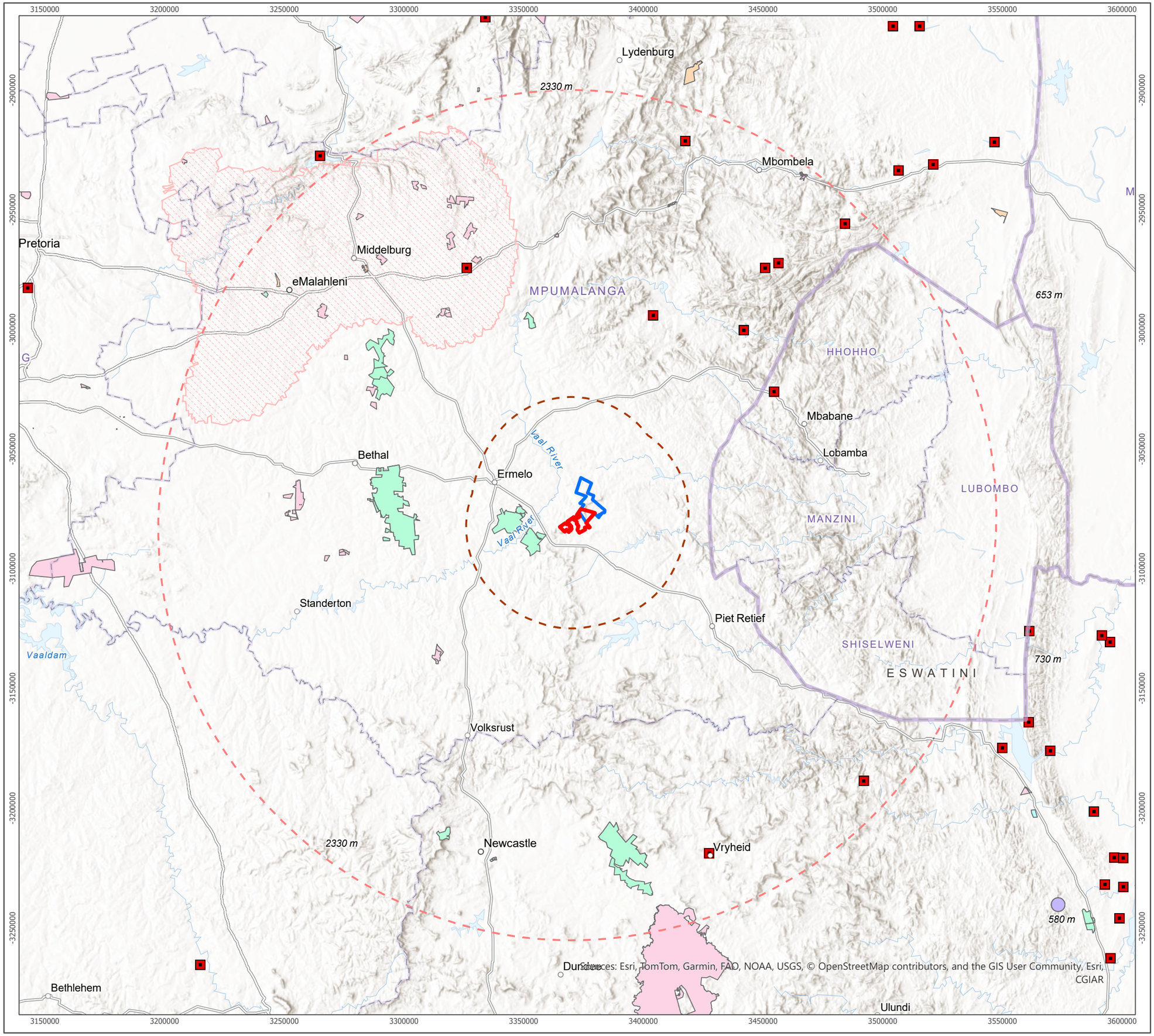
- Biomass_Biofuels
- Hydro
- Petroleum
- Solar - CSP
- Solar - CSP and Solar PV
- Solar PV
- Wave
- Wind
- Wind and Solar PV

1:1,500,000

0 30 60 km

Date: 08/08/2025

Sheepmoor Wind Energy Facility
Cumulative Impact Assessment
Figure 5



Appendix 2: Specialist CV

Resume

Jonathan Aronson

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LinkedIn

Expertise

Biodiversity Strategy
Environmental Impact Assessment
Wildlife and Wind Energy
Systems Thinking
DFI Biodiversity Standards (IFC PS6, EBRD PR6)

Affiliations

IFC ESG department (2020 – current)

South African Bat Assessment Advisory Panel (2013 to 2020)

Professional Natural Scientist (Ecological Science) – SACNASP registration #400238/14

Languages

ENGLISH *NATIVE*

DUTCH *BASIC*

Education

MSc (Environment and Resource Management)
Specialization: Energy and Climate
Vrije Universiteit Amsterdam (2020 – 2021)

MSc (Zoology)
Specialization: Bat Ecology and Biogeography
University of Cape Town (2009 – 2011)

BSc Honours (Zoology)
Specialization: Freshwater Ecology
University of Cape Town (2007)

BSc (Zoology)
University of Cape Town (2003 - 2006)

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Experience

ADVISORY WORK

- **Scaling Wind Program (2021 - current); IFC; Ethiopia and Côte d'Ivoire**
  Technical review of a risk screening exercise to identify suitable locations for wind power projects.

- **Bash and Dzhankeldy Wind Power Projects (2021 – 2023); MIGA; Uzbekistan**
  Technical review of ESIA, Critical Habitat Assessments, Biodiversity Management Plan & Biodiversity Monitoring and Evaluation Programme, and Collision Risk Management Plan. Development of biodiversity ESAP's.

- **Zarafshan Wind Power Project (2021 – 2023); IFC; Uzbekistan**
  Technical Review of ESIA, Critical Habitat Assessments, Environmental Management plans, PCFM and Shutdown on Demand design. Development of biodiversity ESAP's.

- **Good Practices Handbook Post-Construction Monitoring of Bird and Bat Fatalities at Onshore Wind Energy Facilities (2020 - 2022); IFC**
  Served on the Stakeholder Advisory Committee, providing input, comments and guidance to support the development of this handbook.

- **Khizi and Abershon Windfarm Projects (2021); IFC; Azerbaijan**
  Technical review of IBAT summary reports and ESIA Scoping reports.

- **Kinangop Wind Park (2017); AIIM; Kenya**
  Review and design of mitigation strategies for managing impacts to bats.

POST-CONSTRUCTION FATALITY MONITORING

Msenge Wind Farm (2025 – current), EIMS, RSA
Golden Valley 1 Wind Farm (2021 – current); ENGIE; RSA
Wesley Wind Energy Facility (2022 – 2024); EDF; RSA
Super Six Wind Farms (2021 – 2024); Group of six Companies; PAK
Loi Hai 2 and Phu Lac 2 Wind Farms (2021 – 2023); IFC; VNM
Waainek, Chaba and Grassridge Wind Farms (2022 – 2023); EDF; RSA
Jeffreys Bay Wind Farm (2020 – 2021); Globeleq; RSA
Darling Wind Farm (2020); ENERTRAG; RSA
Eskom Sere Wind Farm (2019 – 2020); Endangered Wildlife Trust; RSA
West Coast One Wind Farm(2015 – 2019) Aurora Wind Power; RSA
Fazakerly Treatment Works Turbine (2017); United Utilities; UK
Beck Burn Wind Farm (2017); EDF Energy; UK
Gouda Wind Energy Facility (2017 – 2019); Blue Falcon 140; RSA

ENVIRONMENTAL IMPACT ASSESSMENTS

200 MW Elandsburg Wind Farm Cluster (current); Mulilo; RSA
900 MW Ummbila Emoyeni Wind Farm (2023 – 2024); Seriti Green; RSA
520 MW Amsterdam Wind Farm Cluster (2022 – 2023); Mulilo; RSA
960 MW Loxton Wind Farm Cluster (2022 – 2023); Atlantic REP; RSA
540 MW Taaibos Wind Farms (2021 – 2022) WKN Windcurrent; RSA
810 MW Soutrivier Wind Farms (2021 – 2022) WKN Windcurrent; RSA
720 MW Pofadder Wind Farms (2021 – 2022); Atlantic REP; RSA
2000 MW Choje Wind Energy Cluster (2021 – 2022); Wind Relic; RSA
200 MW Unika Wind Farm (2019 – 2020); SLR; ZAM
770 MW Pienaarspoort Wind Farms (2019 – 2020); ABO; RSA
120 MW Namaacha Wind Farm (2018 - 2019); Consultec; MOZ

BIODIVERSITY MANAGEMENT PLANS

BMP for Super Six Wind Farms (2024); Group of six Companies; PAK
BMP for Ummbila Emoyeni One Wind Farm (2023); Savannah; RSA
BMP for Loi Hai 2 and Phu Lac 2 Wind Farms (2021); IFC; VNM
BAP for Nuweveld Wind Farms (2021), RedCap; RSA

Publications

Aronson, J.B., (2025). Assessing the Population-Level Consequences of Wind Energy Mortality for Two African Fruit Bat Species. In Prep.

Aronson, J.B., Lewis, L., and Peek, P. (2024). Restoring Respect for Nature: Mindset Shifts to Solve the Biodiversity Crisis.

Aronson, J.B. (2022). Current State of Knowledge of Wind Energy Impacts on Bats in South Africa. Acta Chiropterologica, 24(1):221-238.

Aronson, J.B., Shackleton, S., and Sikutshwa, L. (2019). Joining the puzzle pieces: reconceptualising ecosystem-based adaptation in South Africa within the current natural resource management and adaptation context. Policy Brief, African Climate and Development Initiative.

MacEwan, K., Aronson, J.B, Richardson, E., Taylor, P., Coverdale, B., Jacobs, D., Leeuwner, L., Marais, W., Richards, L. (2018). South African Bat Fatality Threshold Guidelines for Operational Wind Energy Facilities – South African Bat Assessment Association (1st Edition).

Aronson, J.B., Sowler, S. and MacEwan, K. (2018). Mitigation Guidance for Bats at Wind Energy Faculties in South Africa.

Aronson, J.B., Richardson, E.K., MacEwan, K., Jacobs, D., Marais, W., Aiken, S., Taylor, P., Sowler,S. and Hein, C (2014). South African Good Practise Guidelines for Operational Monitoring for Bats atWind Energy Facilities (1st Edition).

Sowler, S. and S. Stoffberg (2014). South African Good Practise Guidelines for Surveying Bats in WindEnergy Facility Developments - Pre-Construction (3rd Edition). Kath Potgieter, K., MacEwan, K., Lötter,C., Marais, M., Aronson, J.B., Jordaan, S., Jacobs, D.S, Richardson, K., Taylor, P., Avni, J., Diamond,M., Cohen, L., Dippenaar, S., Pierce, M., Power, J. and Ramalho, R (eds).

Aronson, J.B., Thomas, A. and Jordaan, S. 2013. Bat fatality at a Wind Energy Facility in the Western Cape, South Africa. African Bat Conservation News 31: 9-12.

Training

15th Wind Wildlife Research Meeting, USA (online), Nov 2024.

Conference on Wildlife and Wind Energy, Croatia, Sep 2023.

Bats and Wind Energy Impact Workshop, Sep 2022, Delivered online to Rio Tinto.

Conference on Wildlife and Wind Energy, Netherlands, Apr 2022.

National Wind Coordinating Collaborative (NWCC) Wind Wildlife Research Meeting, USA (online), Dec 2020.

Conference on Wildlife and Wind Energy, Stirling, Aug 2019.

GenEst Carcass Fatality Estimator Workshop, Stirling, Aug 2019.

GenEst Carcass Fatality Estimator Workshop, Cape Town, Oct 2018.

Windaba Conference and Exhibition - Africa's Premier Wind Energy Conference; Cape Town, 2013 – 2019

Bats & Wind Energy Workshop, Durban, July 2016.

Endangered Wildlife Trust (EWT) Bats & Wind Energy Training Course, Cape Town, Oct 2013.

Endangered Wildlife Trust (EWT) Bats & Wind Energy Training Course, Greyton, Jan 2012.

Appendix 3: Specialist Declaration

forestry, fisheries & the environment
Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 399 9000, Fax: +27 86 625 1042

SPECIALIST DECLARATION FORM – AUGUST 2023

Specialist Declaration form for assessments undertaken for application for authorisation in terms of the National Environmental Management Act, Act No. 107 of 1998, as amended and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended (the Regulations)

REPORT TITLE
SHEEPMOOR WIND ENERGY FACILITY AND GRID CONNECTION MPUMALANGA, SOUTH AFRICA BAT (CHIROPTERA) SCOPING REPORT

Kindly note the following:

1. This form must always be used for assessment that are in support of applications that must be subjected to Basic Assessment or Scoping & Environmental Impact Reporting, where this Department is the Competent Authority.
2. This form is current as of August 2023. It is the responsibility of the Applicant / Environmental Assessment Practitioner (EAP) to ascertain whether subsequent versions of the form have been published or produced by the Competent Authority. The latest available Departmental templates are available at https://www.dffe.gov.za/documents/forms.
3. An electronic copy of the signed declaration form must be appended to all Draft and Final Reports submitted to the department for consideration.
4. The specialist must be aware of and comply with '*the Procedures for the assessment and minimum criteria for reporting on identified environmental themes in terms of sections 24(5)(a) and (h) and 44 of the act, when applying for environmental authorisation - GN 320/2020)'*, where applicable.

1. SPECIALIST INFORMATION

Title of Specialist Assessment	Bat Assessment
Specialist Company Name	Camissa Sustainability Consulting
Specialist Name	Jonathan Aronson
Specialist Identity Number	[redacted]
Specialist Qualifications:	MSc (Zoology), MSc (Environment and Resource Management)
Professional affiliation/registration:	SACNASP
Physical address:	Bos en Lommerweg 86-3 1055EC Amsterdam, The Netherlands
Postal address:	Bos en Lommerweg 86-3 1055EC Amsterdam, The Netherlands
Postal address	Bos en Lommerweg 86-3 1055EC Amsterdam, The Netherlands
Telephone	[redacted]
Cell phone	[redacted]
E-mail	Jbaronson1@gmail.com

2. DECLARATION BY THE SPECIALIST

I, Jonathan Aronson declare that –

- I act as the independent specialist in this application;
- I am aware of the procedures and requirements for the assessment and minimum criteria for reporting on identified environmental themes in terms of sections 24(5)(a) and (h) and 44 of the National Environmental Management Act (NEMA), 1998, as amended, when applying for environmental authorisation which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols") and in Government Notice No. 1150 of 30 October 2020.
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing –
    - any decision to be taken with respect to the application by the competent authority; and;
    - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- All the particulars furnished by me in this form are true and correct; and
- I realise that a false declaration is an offence in terms of Regulation 48 and is punishable in terms of section 24F of the NEMA Act.



Signature of the Specialist

Camissa Sustainability Consulting

Name of Company:

07 Feb 2025

Date

3. UNDERTAKING UNDER OATH/ AFFIRMATION

I, _ Jonathan Aronson_____, swear under oath / affirm that all the information submitted or to be submitted for the purposes of this application is true and correct.



Signature of the Specialist

Camissa Sustainability Consulting

Name of Company

07/02/2025

Date

Click or tap here to enter text.

Signature of the Commissioner of Oaths

Click or tap to enter a date.

Date

Appendix 4: SACNASP Certificate

SACNASP

South African Council for Natural Scientific Professions

herewith certifies that

Jonathan Barry Aronson

Registration Number: 400238/14

is a registered scientist

in terms of section 20(3) of the Natural Scientific Professions Act, 2003
(Act 27 of 2003)
in the following field(s) of practice (Schedule 1 of the Act)

Ecological Science (Professional Natural Scientist)

Effective **23 July 2014** Expires **31 March 2026**

Chairperson

Chief Executive Officer

To verify this certificate scan this code

From: Albert Froneman
Sent on: Monday, 11 August 2025 05:40:13
To: Lucien Barbeau; ERM Arcus Amsterdam
CC: Lloyd Barnes; Tasha Oosthuizen; Lizandé Kellerman; Marietjie Froneman; Robin Colyn
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]
Urgent: High

EXTERNAL MESSAGE

Hi Lucien,

I hope this message finds you well.

We are still awaiting your feedback regarding the message below. We aim to adhere to your deadline, but without confirmation, we are hesitant to commence updating the reports only to potentially redo them.
Best regards / Vriendelike groete,

Albert

Albert Froneman *Pr.Sci.Nat*

AFRIAVIAN ENVIRONMENTAL

[redacted]

Albert@AfriAvian.com

From: Albert Froneman <Albert@afriavian.com>
Sent: Friday, August 08, 2025 12:08
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Tasha Oosthuizen <Tasha@afriavian.com>; Lizandé Kellerman <Lizande@afriavian.com>; Marietjie Froneman <Marietjie@afriavian.com>; Robin Colyn <Robin@afriavian.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Lucien,

Thank you for sharing these updated layouts. We have perused them and have a few queries:

1. Why have the respective WEF boundaries changed from what was submitted in our specialist reports released for public comment on 15 July?
2. As a result of these changes, according to the KMZs, it appears there have been additions/removals re the affected properties included in each WEF site – can you please provide us with an updated list of the affected properties per project?
3. Also, the following turbines appear to be located on both Emvelo and Sheepmoor WEFs as the site boundaries include the same properties: WTGs 18, 21, 26, 27, 28, 29, 30. Can you please clarify why this is the case?

Thank you, we look forward to your soonest feedback.

Once we have your feedback and clarification regarding this, we can commence with updating the maps in the reports.

Best regards / Vriendelike groete,

Albert

Albert Froneman *Pr.Sci.Nat*

AfriAvian Environmental

[redacted]

Albert@AfriAvian.com

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 06 August 2025 16:26
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Specialist,

I trust you are well.

Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by Monday, 12 August 2025.

If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Lloyd Barnes
Sent on: Monday, 11 August 2025 09:04:22
To: Albert Froneman; Lucien Barbeau; ERM Arcus Amsterdam
CC: Andrew Pearson; Rebecca Thomas
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Hi Lucien and ERM team,

I trust you are all well.

A big week ahead in the Amsterdam process. Please take note of the following:

- Please may you provide Albert with the information requested below ASAP. Please may you also follow up with all specialists to ensure that they have received the updated layout and are aware of the timelines.
- Please may you also ensure that Mr Meyer is responded to, he requested the information he requested be provided and responded to by today.
- Please ensure to circulate the transcript and Minutes to Mr Meyer for him and his peers review and approval.
- Please follow up with the DFFE, DARDLEA and MPTA, reminding them of the PP dates and dates for final submission.
- Please provide an update on the compilation of the FEIARs, Final applications and Final EMPrs.
- Lastly, Mr Meyer mentioned that he asked Schalk (Socio Economic assistant) a number of questions for which he did not receive responses from, please could you contact him and check?

Thank you.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
www.mulilo.com
21st Floor, Portside, 5 Buitengracht Street, Cape Town, 8001

mulilo

From: Albert Froneman <Albert@afriavian.com>
Sent: Monday, 11 August 2025 05:40
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <Lloyd@mulilo.com>; tasha <tasha@afriavian.com>; Lizandé Kellerman <Lizande@afriavian.com>; Marietjie <Marietjie@afriavian.com>; Robin <Robin@afriavian.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]
Importance: High

Hi Lucien,

I hope this message finds you well.

We are still awaiting your feedback regarding the message below. We aim to adhere to your deadline, but without confirmation, we are hesitant to commence updating the reports only to potentially redo them.

Best regards / Vriendelike groete,

Albert

Albert Froneman *Pr.Sci.Nat*

AFRIAVIAN
ENVIRONMENTAL

[redacted]

Albert@AfriAvian.com

From: Albert Froneman <Albert@afriavian.com>
Sent: Friday, August 08, 2025 12:08
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Tasha Oosthuizen <Tasha@afriavian.com>; Lizandé Kellerman <Lizande@afriavian.com>; Marietjie Froneman <Marietjie@afriavian.com>; Robin Colyn <Robin@afriavian.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Lucien,

Thank you for sharing these updated layouts. We have perused them and have a few queries:

1. Why have the respective WEF boundaries changed from what was submitted in our specialist reports released for public comment on 15 July?
2. As a result of these changes, according to the KMZs, it appears there have been additions/removals re the affected properties included in each WEF site – can you please provide us with an updated list of the affected properties per project?
3. Also, the following turbines appear to be located on both Emvelo and Sheepmoor WEFs as the site boundaries include the same properties: WTGs 18, 21, 26, 27, 28, 29, 30. Can you please clarify why this is the case?

Thank you, we look forward to your soonest feedback.

Once we have your feedback and clarification regarding this, we can commence with updating the maps in the reports.

Best regards / Vriendelike groete,

Albert

Albert Froneman *Pr.Sci.Nat*

AFRIAVIAN
ENVIRONMENTAL

[redacted]

Albert@AfriAvian.com

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 06 August 2025 16:26
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Specialist,

I trust you are well.

Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by Monday, 12 August 2025.

If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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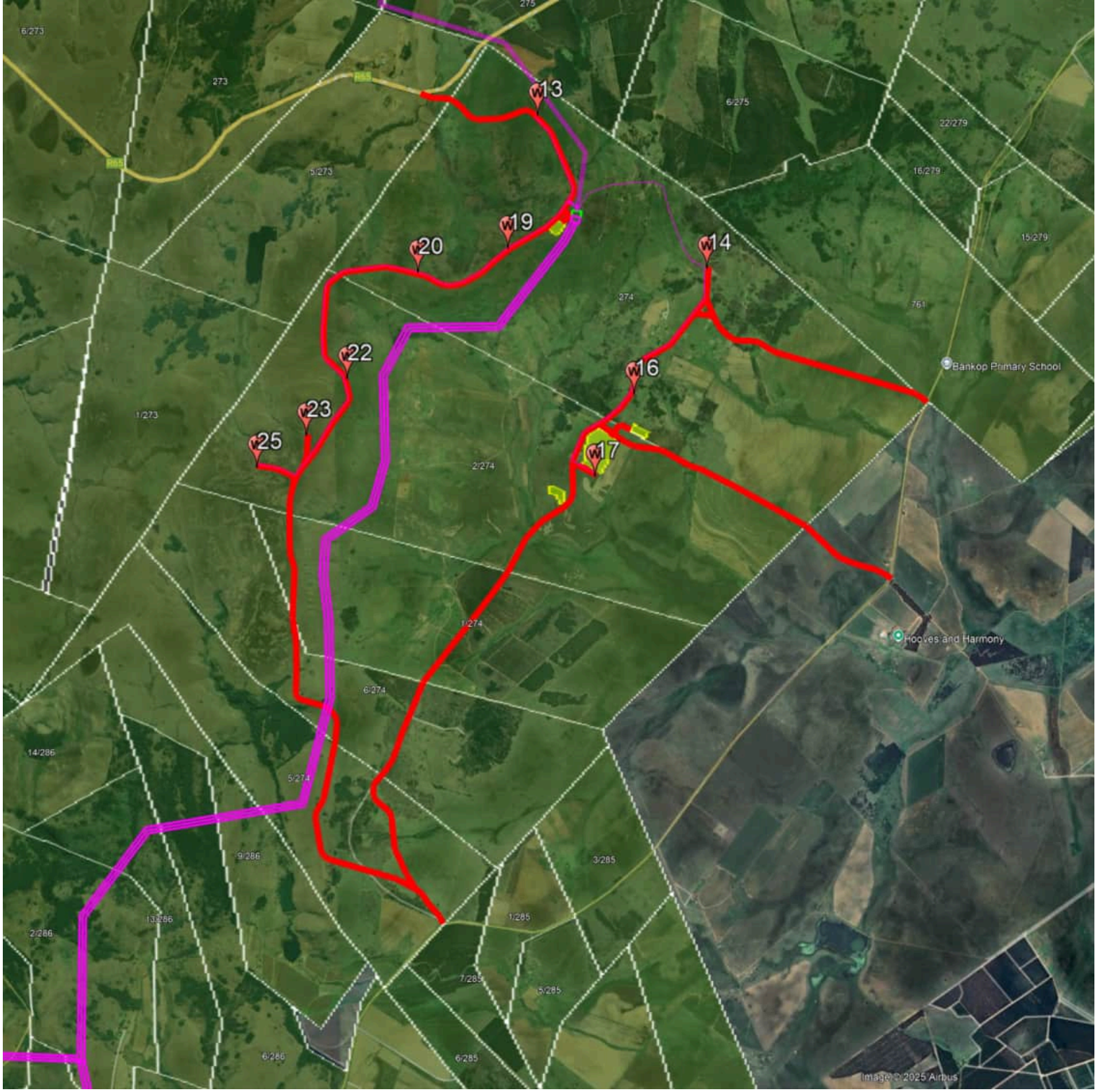
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CONFIDENTIALITY AND DATA PROTECTION. This email is intended only for the use of the intended recipient(s) and may contain information which is privileged and confidential, or personal data which is subject to data protection legislation. If you are not the intended recipient, any disclosure, copying and/or distribution of the content of this email, or reliance upon or other use of the contents of this email is strictly prohibited. If you have received this email in error, please erase all copies of it, including all attachments, do not forward it to anybody, and please also notify the sender immediately.

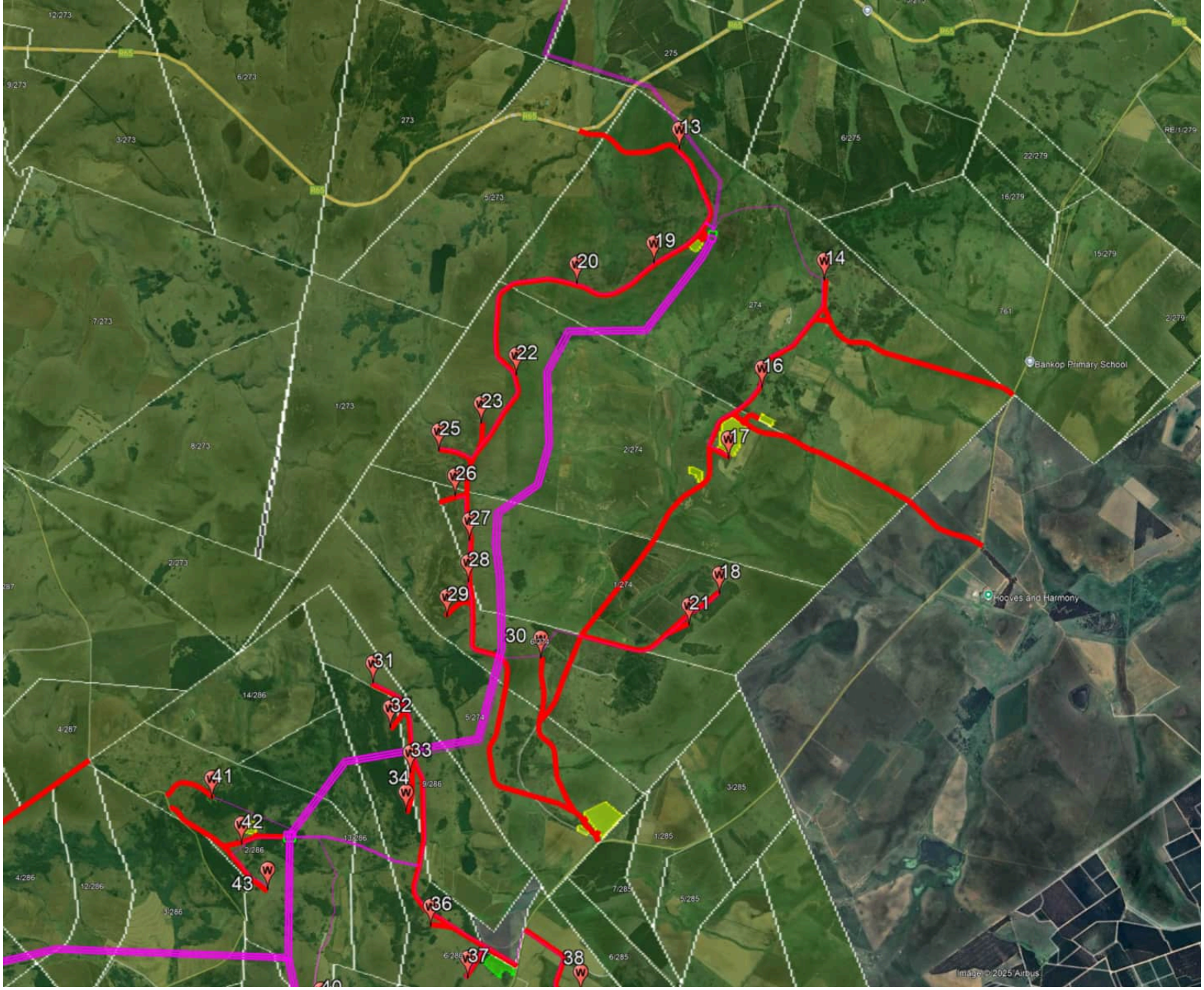
From: Lloyd Barnes
Sent on: Monday, 11 August 2025 09:10:55
To: Albert Froneman; Lucien Barbeau; ERM Arcus Amsterdam
CC: tasha; Lizandé Kellerman; Marietjie; Robin; Andrew Pearson; Rebecca Thomas
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Thank you for following up Albert.

With reference the following WTGs which are located on both Emvelo and Sheepmoor WEFs site boundaries and include the same properties: WTGs 18, 21, 26, 27, 28, 29, 30. This is the case as an access road is shared.


W13
W19
W20
W14
W22
W16
W23
W25
W17
Bankop Primary School
Hooves and Harmony
Image © 2025 Airbus



I will send you a voice note explaining the project boundaries. @Lucien Barbeau, please also respond to Albert in order to ensure that we are aligned.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
www.mulilo.com
21st Floor, Portside, 5 Buitengracht Street, Cape Town, 8001

mulilo

From: Albert Froneman <Albert@afriavian.com>
Sent: Monday, 11 August 2025 05:40
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <Lloyd@mulilo.com>; tasha <tasha@afriavian.com>; Lizandé Kellerman <Lizande@afriavian.com>; Marietjie <Marietjie@afriavian.com>; Robin <Robin@afriavian.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]
Importance: High

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Best regards / Vriendelike groete,

Albert

Albert Froneman *Pr.Sci.Nat*

AFRIAVIAN
ENVIRONMENTAL

[redacted]

Albert@AfriAvian.com

From: Albert Froneman <Albert@afriavian.com>
Sent: Friday, August 08, 2025 12:08
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Tasha Oosthuizen <Tasha@afriavian.com>; Lizandé Kellerman <Lizande@afriavian.com>; Marietjie Froneman <Marietjie@afriavian.com>; Robin Colyn <Robin@afriavian.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Lucien,

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2. As a result of these changes, according to the KMZs, it appears there have been additions/removals re the affected properties included in each WEF site – can you please provide us with an updated list of the affected properties per project?
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Thank you, we look forward to your soonest feedback.

Once we have your feedback and clarification regarding this, we can commence with updating the maps in the reports.

Best regards / Vriendelike groete,

Albert

Albert Froneman *Pr.Sci.Nat*

AfriAvian ENVIRONMENTAL

[redacted]

Albert@AfriAvian.com

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 06 August 2025 16:26
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Specialist,

I trust you are well.

Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by Monday, 12 August 2025.

If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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CONFIDENTIALITY AND DATA PROTECTION. This email is intended only for the use of the intended recipient(s) and may contain information which is privileged and confidential, or personal data which is subject to data protection legislation. If you are not the intended recipient, any disclosure, copying and/or distribution of the content of this email, or reliance upon or other use of the contents of this email is strictly prohibited. If you have received this email in error, please erase all copies of it, including all attachments, do not forward it to anybody, and please also notify the sender immediately.

From: Lucien Barbeau
Sent on: Monday, 11 August 2025 11:38:15
To: Reabetswe MOKOMELE; ERM Arcus Amsterdam
CC: Victor DE ABREU
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Reabetswe,

Understood, thanks for informing me. From my visual inspection, here has not been WTG or road changes, just minor infrastructure footprint changes. If I could please refer you to the boundary KMZs, these have been changed. I kindly bare in mind when updating any figures within reports.

Can I expect the changes to the report on Wednesday?

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Reabetswe MOKOMELE <Reabetswe.Mokomele@smec.com>
Sent: Thursday, August 7, 2025 10:26 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Victor DE ABREU <Victor.deAbreu@smec.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Dear Lucian,

Your request is received but kindly note the following:

Due Dates - Due to committed site visits taking place on 11 and 12 August 2025, unfortunately it is not possible to meet the due date of 12 August 2025. The revised issue date must consider both the updating and internal reviews which would be at least one (1) week.

Variation Order - Our team will review the final layouts and determine whether the changes will require and Addendum Letter or Full Revisions to be issued. The time and effort for updating the reports (full revisions) will require a variation order which will be confirmed and communicated to you for approval.

Trust you find the above in order.

Kind regards

Reabetswe MOKOMELE
Engineer, Planning and Traffic Engineering, Infrastructure + Energy
[redacted]
267 Kent Avenue, Ferndale, Johannesburg, 2194, South Africa

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 06 August 2025 16:27
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Specialist,

I trust you are well.

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If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Lizandé Kellerman
Sent on: Monday, 11 August 2025 15:26:44
To: Lloyd Barnes; Albert Froneman; Lucien Barbeau; ERM Arcus Amsterdam
CC: Tasha Oosthuizen; Marietjie Froneman; Robin Colyn; Andrew Pearson; Rebecca Thomas
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Some people who received this message don't often get email from lizande@afriavian.com. Learn why this is important

EXTERNAL MESSAGE

Hi Lucien,

Thank you for taking my call and the discussion. As soon as you share the updated list of affected properties, I'll effect the changes and send through our revised reports for the Emvelo and Sheepmoor WEFs.

I look forward to your response.

Thank you!

Best regards / Vriendelike groete,

Lizandé

Lizandé Kellerman *Pri.Sci.Nat*

AFRIAVIAN ENVIRONMENTAL

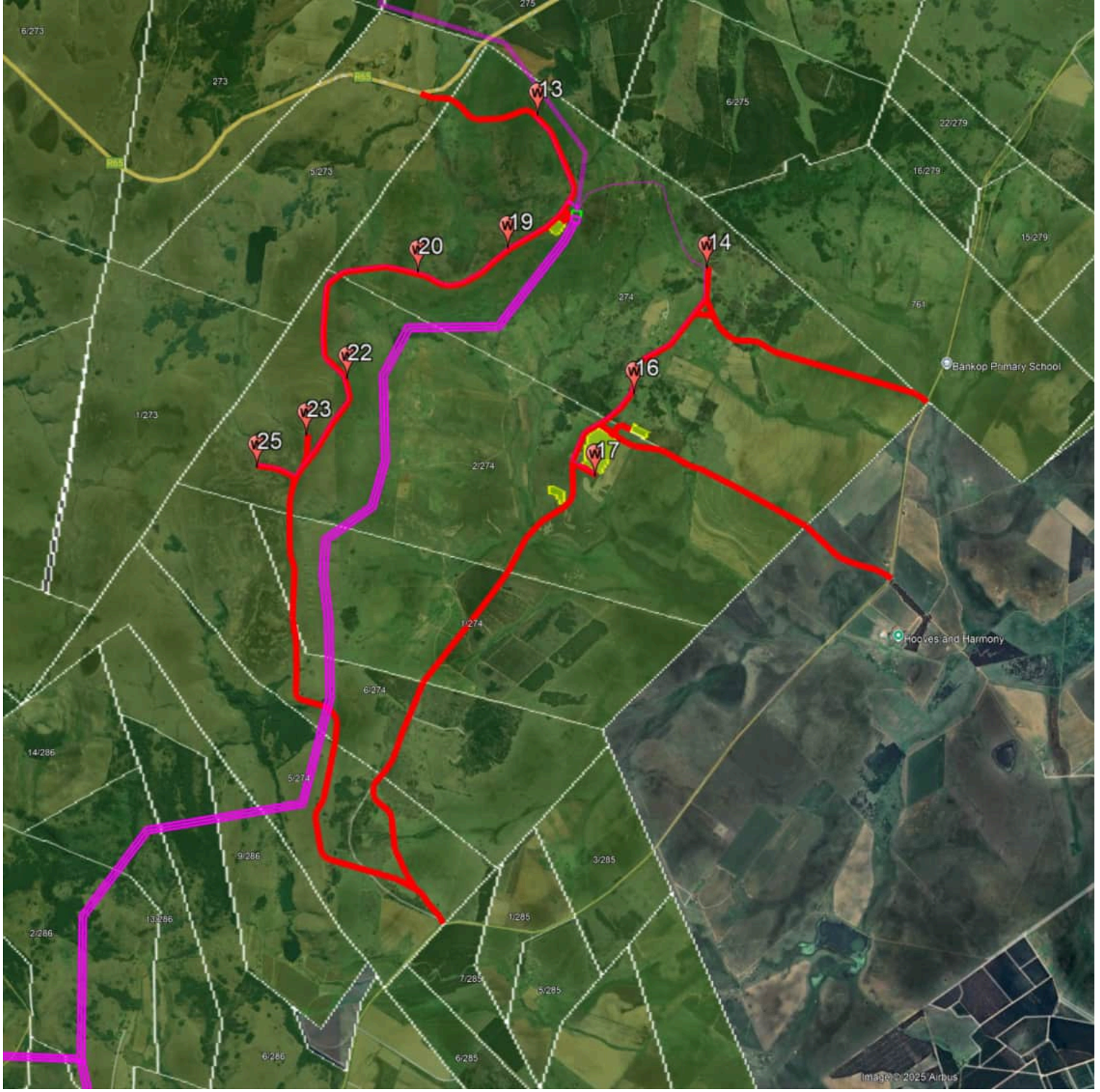
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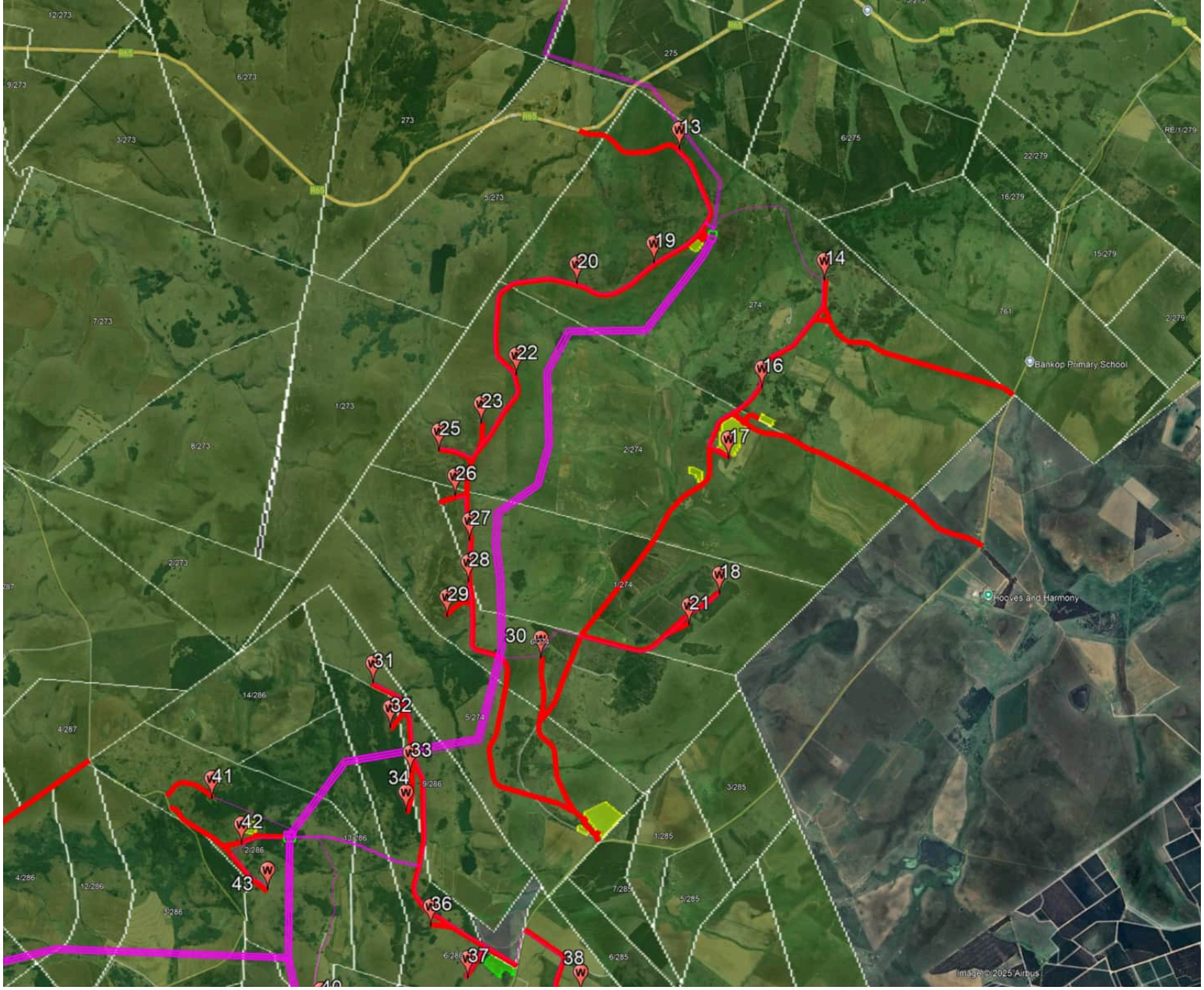
Lizande@AfriAvian.com

From: Lloyd Barnes <Lloyd@mulilo.com>
Sent: Monday, 11 August 2025 09:11
To: Albert Froneman <Albert@afriavian.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Tasha Oosthuizen <tasha@afriavian.com>; Lizandé Kellerman <Lizande@afriavian.com>; Marietjie Froneman <Marietjie@afriavian.com>; Robin Colyn <Robin@afriavian.com>; Andrew Pearson <Andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Thank you for following up Albert.

With reference the following WTGs which are located on both Emvelo and Sheepmoor WEFs site boundaries and include the same properties: WTGs 18, 21, 26, 27, 28, 29, 30. This is the case as an access road is shared.


W13
W19
W20
W14
W22
W16
W23
W25
W17
Bankop Primary School
Hooves and Harmony
Image © 2025 Airbus



I will send you a voice note explaining the project boundaries. @Lucien Barbeau, please also respond to Albert in order to ensure that we are aligned.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
www.mulilo.com
21st Floor, Portside, 5 Buitengracht Street, Cape Town, 8001

mulilo

From: Albert Froneman <Albert@afriavian.com>
Sent: Monday, 11 August 2025 05:40
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <Lloyd@mulilo.com>; tasha <tasha@afriavian.com>; Lizandé Kellerman <Lizande@afriavian.com>; Marietjie <Marietjie@afriavian.com>; Robin <Robin@afriavian.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]
Importance: High

Hi Lucien,

I hope this message finds you well.

We are still awaiting your feedback regarding the message below. We aim to adhere to your deadline, but without confirmation, we are hesitant to commence updating the reports only to potentially redo them.

Best regards / Vriendelike groete,

Albert

Albert Froneman *Pr.Sci.Nat*

AFRIAVIAN
ENVIRONMENTAL

[redacted]

Albert@AfriAvian.com

From: Albert Froneman <Albert@afriavian.com>
Sent: Friday, August 08, 2025 12:08
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Tasha Oosthuizen <Tasha@afriavian.com>; Lizandé Kellerman <Lizande@afriavian.com>; Marietjie Froneman <Marietjie@afriavian.com>; Robin Colyn <Robin@afriavian.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Lucien,

Thank you for sharing these updated layouts. We have perused them and have a few queries:

1. Why have the respective WEF boundaries changed from what was submitted in our specialist reports released for public comment on 15 July?
2. As a result of these changes, according to the KMZs, it appears there have been additions/removals re the affected properties included in each WEF site – can you please provide us with an updated list of the affected properties per project?
3. Also, the following turbines appear to be located on both Emvelo and Sheepmoor WEFs as the site boundaries include the same properties: WTGs 18, 21, 26, 27, 28, 29, 30. Can you please clarify why this is the case?

Thank you, we look forward to your soonest feedback.

Once we have your feedback and clarification regarding this, we can commence with updating the maps in the reports.

Best regards / Vriendelike groete,

Albert

Albert Froneman *Pr.Sci.Nat*

AfriAvian ENVIRONMENTAL

[redacted]

Albert@AfriAvian.com

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 06 August 2025 16:26
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Specialist,

I trust you are well.

Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by Monday, 12 August 2025.

If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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CONFIDENTIALITY AND DATA PROTECTION. This email is intended only for the use of the intended recipient(s) and may contain information which is privileged and confidential, or personal data which is subject to data protection legislation. If you are not the intended recipient, any disclosure, copying and/or distribution of the content of this email, or reliance upon or other use of the contents of this email is strictly prohibited. If you have received this email in error, please erase all copies of it, including all attachments, do not forward it to anybody, and please also notify the sender immediately.

From: Lucien Barbeau
Sent on: Monday, 11 August 2025 19:37:03
To: jonathan@camissaconsulting.com; ERM Arcus Amsterdam
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Thank you Jonathan!

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: jonathan@camissaconsulting.com <jonathan@camissaconsulting.com>
Sent: Friday, August 8, 2025 12:48 PM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

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

EXTERNAL MESSAGE

Hi Lucien

Thanks for reaching out.
Attached are my final reports. Please let me know if you need anything else. Note that I am unable to get the specialist declaration signed in the Netherlands. I hope you would be able to sort that out on your side?

All the best

Jonathan Aronson
Director | Biodiversity Specialist

CAMISSA
SUSTAINABILITY CONSULTING

[redacted]
W www.camissaconsulting.com
A 1057 CX Amsterdam, Netherlands
Camissa

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 6 August 2025 16:27

To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Specialist,

I trust you are well.

Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by Monday, 12 August 2025.

If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Lucien Barbeau
Sent on: Tuesday, 12 August 2025 08:52:29
To: Lizandé Kellerman; Lloyd Barnes; Albert Froneman; ERM Arcus Amsterdam
CC: Tasha Oosthuizen; Marietjie Froneman; Robin Colyn; Andrew Pearson; Rebecca Thomas
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Good day Lizande,

As requested, kindly see below information:

Sheepmoor	
Added Farm Portion	Removed
1/285	10/273
5/285	12/273
7/286	9/273
283	3/273
-	4/273
-	7/273
-	8/273
-	2/273
-	3/287

Emvelo
Added Farm Portion
275
5/273
3/284
6/284

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted]

erm.com

From: Lizandé Kellerman <Lizande@afriavian.com>
Sent: Monday, August 11, 2025 3:27 PM
To: Lloyd Barnes <Lloyd@mulilo.com>; Albert Froneman <Albert@afriavian.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Tasha Oosthuizen <Tasha@afriavian.com>; Marietjie Froneman <Marietjie@afriavian.com>; Robin Colyn <Robin@afriavian.com>; Andrew Pearson <Andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Some people who received this message don't often get email from lizande@afriavian.com. Learn why this is important
EXTERNAL MESSAGE

Hi Lucien,

Thank you for taking my call and the discussion. As soon as you share the updated list of affected properties, I'll effect the changes and send through our revised reports for the Emvelo and Sheepmoor WEFs.

I look forward to your response.

Thank you!

Best regards / Vriendelike groete,

Lizandé

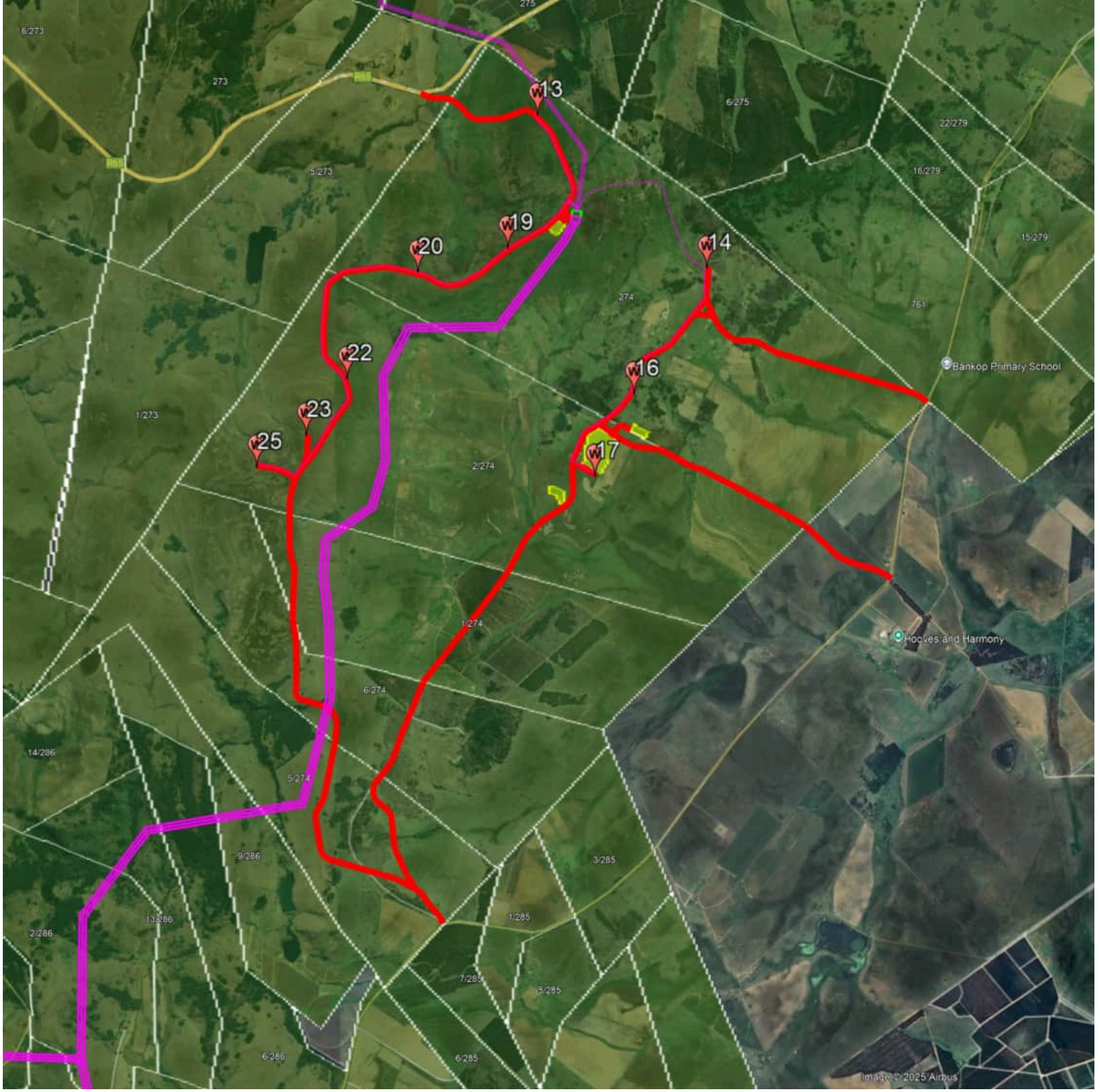
Lizandé Kellerman *Pri.Sci.Nat*

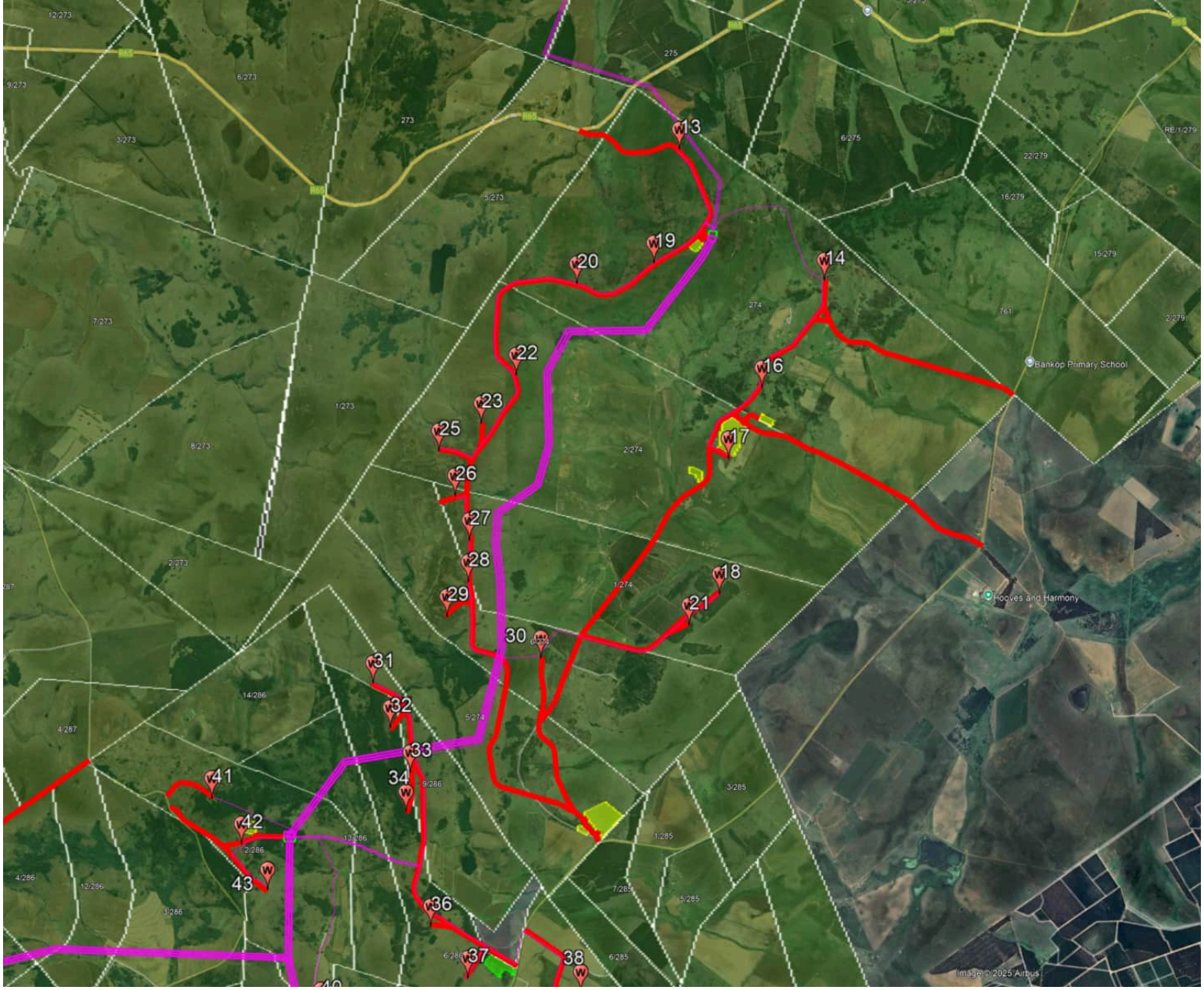
AFRIAVIAN
ENVIRONMENTAL
[redacted]
Lizande@AfriAvian.com

From: Lloyd Barnes <Lloyd@mulilo.com>
Sent: Monday, 11 August 2025 09:11
To: Albert Froneman <Albert@afriavian.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Tasha Oosthuizen <tasha@afriavian.com>; Lizandé Kellerman <Lizande@afriavian.com>; Marietjie Froneman <Marietjie@afriavian.com>; Robin Colyn <Robin@afriavian.com>; Andrew Pearson <Andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Thank you for following up Albert.

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W13
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W20
W14
W22
W16
W23
W25
W17
Bankop Primary School
Hooves and Harmony
Image © 2025 Airbus



I will send you a voice note explaining the project boundaries. @Lucien Barbeau, please also respond to Albert in order to ensure that we are aligned.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
www.mulilo.com
21st Floor, Portside, 5 Buitengracht Street, Cape Town, 8001

mulilo

From: Albert Froneman <Albert@afriavian.com>
Sent: Monday, 11 August 2025 05:40
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <Lloyd@mulilo.com>; tasha <tasha@afriavian.com>; Lizandé Kellerman <Lizande@afriavian.com>; Marietjie <Marietjie@afriavian.com>; Robin <Robin@afriavian.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]
Importance: High

Hi Lucien,

I hope this message finds you well.

We are still awaiting your feedback regarding the message below. We aim to adhere to your deadline, but without confirmation, we are hesitant to commence updating the reports only to potentially redo them.

Best regards / Vriendelike groete,

Albert

Albert Froneman *Pr.Sci.Nat*

AFRIAVIAN
ENVIRONMENTAL

[redacted]

Albert@AfriAvian.com

From: Albert Froneman <Albert@afriavian.com>
Sent: Friday, August 08, 2025 12:08
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Tasha Oosthuizen <Tasha@afriavian.com>; Lizandé Kellerman <Lizande@afriavian.com>; Marietjie Froneman <Marietjie@afriavian.com>; Robin Colyn <Robin@afriavian.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Lucien,

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1. Why have the respective WEF boundaries changed from what was submitted in our specialist reports released for public comment on 15 July?
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3. Also, the following turbines appear to be located on both Emvelo and Sheepmoor WEFs as the site boundaries include the same properties: WTGs 18, 21, 26, 27, 28, 29, 30. Can you please clarify why this is the case?

Thank you, we look forward to your soonest feedback.

Once we have your feedback and clarification regarding this, we can commence with updating the maps in the reports.

Best regards / Vriendelike groete,

Albert

Albert Froneman *Pr.Sci.Nat*

AFRIAVIAN ENVIRONMENTAL

[redacted]

Albert@AfriAvian.com

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 06 August 2025 16:26
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Specialist,

I trust you are well.

Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by Monday, 12 August 2025.

If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.

Kind regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Lucien Barbeau
Sent on: Tuesday, 12 August 2025 09:15:12
To: ERM Arcus Amsterdam; Josua Meyer
CC: Lloyd Barnes; Johans Van Wyk; Rebecca Thomas; Richard Summers; celine@summersinc.co.za; Stephanie Gopaul; Stephen Burton
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Good day Mr Meyer,

I trust that you are well. Kindly note that we will provide our responses to your comments by close of business today.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Wednesday, August 6, 2025 2:56 PM
To: Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Meyer,

Thank you for your email and for taking the time to share your reflections following our meeting on Monday.

We acknowledge receipt of your comments and the additional questions you have raised. We appreciate your continued engagement in the process and will respond to your queries as soon as possible.

Should you have any further inputs in the meantime, please feel free to share them with us.

Kind Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Wednesday, August 6, 2025 1:47 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

The purpose of the meeting was to address concerns of the I&AP's regarding the proposed Sheepmoor and Emvelo WEF's. The applicant gives the impression that they are not interested in taking any action regarding the I&AP's concerns and attend it only to avoid negative reflection. Therefore the meeting created unfortunately more questions than answers. Your EAP's input was also disappointing.

We urgently need clarification and answers on the following

1 - The EAP is expected to participate and actively engage with the impacted community. Why has my request for a meeting since February 2025 repeatedly declined and pushed in at the 11th hour?

2 - Do you as EAP feel that the process has been credible and transparent as well as accountable in circumstances where you reach out and respond to a request for a meeting at the 11th hour? How is that considered to be meaningful and in the spirit of the constitution?

3 - Why are biodiversity related issues only being property investigated at the 11th hour although the Provincial Department requested it in the scoping phase?

4 - Why are requested documentation regarding the additional 3 months extension granted by DFFE to the applicant still outstanding?

5 - Are you as EAP confident that the data and modelling that has been undertaken to address bird related impacts and specifically the martial eagle is accurate and credible? If so, please explain why.

6 - Are you as EAP confident and can you confirm in writing that the data that is being obtained in relation to the martial eagle was correctly obtained and in accordance with all minimal standards and legal criteria?

7 - Are you as EAP comfortable that if the tagging of the martial eagle were done without a valid permit, that the tagged data can still be used in the specialist report? If so, please explain why.

8 - Are you as EAP in acceptance that the permits to tag the martial eagles, also the one at Verkykerskop, were not presented at the meeting? If so, please explain why.

9 - Are you as EAP confident that all the recommendations in the specialist reports and specifically the Social report are satisfactorily addressed? If not, please explain why.

10 - It became clear in the meeting that none of the affected landowners are prepared to allow the proposed powerline over their properties. Are AEP comfortable to support an application without a secured powerline route?

11 - The avifaunal specialist signed a NDA (non disclosure agreement) with the applicant and it was also revealed in the meeting by the applicant that they collectively determined the shaped exclusion zones for the southern bald ibis. Are you as EAP comfortable that it is not in contradiction with the declaration the avifaunal specialist signed as independant specialist? If so, please explain why.

Due to the time constraint answers required before the 11/08/2025.

Regards

On Sun, Aug 3, 2025 at 12:36 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Mr Meyer,
>
> Thank you for confirming the meeting for 12h00 tomorrow, 4 August, at your farm. That time works perfectly, and we look forward to meeting with you.
>
> If you would kindly share the physical address or GPS coordinates for the entrance to your farm, it would be greatly appreciated to ensure we arrive without any difficulty.

There will be five people attending the meeting, including myself.

Should there be anything further you would like us to prepare or bring along for the meeting, please don't hesitate to let us know, we'll be happy to assist in any way we can.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, August 1, 2025 1:29 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Good day
Monday is fine with me
I did inform Johans also
Will 12h00 be convenient for you?
How may people?
Regards

On Fri, 01 Aug 2025, 11:42 ERM Arcus Amsterdam, <ERM.ArcusAmsterdam@erm.com> wrote:

> Good Morning Mr Meyer,
>
> Thank you for your response. If you feel Monday is too short availability, please do not feel rushed. We would be happy to accommodate you later in the week. We will await your feedback and move accordingly from there.
>
> Kind Regards,
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Senior Consultant
>
> Cape Town [redacted] **erm.com**
>
> ---
>
> **From:** Josua Meyer <meyerjosua55@gmail.com>
> **Sent:** Thursday, July 31, 2025 6:13 PM
> **To:** Lucien Barbeau <Lucien.Barbeau@erm.com>
> **Cc:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>

Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Some people who received this message don't often get email from meyerjosua55@gmail.com. Learn why this is important
EXTERNAL MESSAGE

Goodday
Will confirm tomorrow before 12h00
Thanks

On Thu, Jul 31, 2025 at 2:22 PM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Dear Mr Meyer,
>
> I hope this message finds you well.
>
> I'm writing to kindly follow up on our proposed meeting scheduled for Monday, 4 August at 13:00 at your farm. We would appreciate it if you could please confirm whether you are still available to meet on that date.
>
> Should you require any additional information or documentation ahead of the meeting, beyond what you have already requested, please don't hesitate to let me know, I'd be happy to assist.
>
> Looking forward to your confirmation.
>
> Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Monday, July 28, 2025 11:49 AM
To: Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Meyer,

Following discussions with the applicant, unfortunately it will not be possible to schedule a meeting prior to 1 August due to limited availability.

However, we would be pleased to meet with you on Monday the 4th of August 2025 at 13:00, as per your request, at your farm.

Kindly confirm whether this date and time are suitable, and please advise who will be attending the meeting from your side.

I will continue to provide you with the requested documentation ahead of the meeting.

Kind regards,

Lucien Barbeau
Senior Consultant

Sustainability is our business

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 25, 2025 5:11 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

Proposed date for the meeting seems to be too close to submission of comments which is already 9/08/25.

Can you arrange the meeting for us before 1/07/2025.

Can you in the meantime forward the detail previously requested

- All the documentation with Department concerning the 3 months extension granted even after time lapps to submit final report

- Mulilo's permits to fit telemetry device on the two martial eagles

- AfriAvian motivation for altering Figure 33 in both avifaunal reports

Above info are urgently required and no reason to wait for the meeting

Regards

Josua

On Tue, Jul 22, 2025 at 10:30 AM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Hi Lucien
>
> There might be a mistake in your day or date ..... 7 August 2025 is a Thursday.
>
> Nevertheless the 6 or 7 th August 2025 is fine with us.
>
> Will appreciate it if we can meet on my farm.
>
> We intend to be three (3) I&AP
>
> Regards
>
> Josua Meyer
>
> On Mon, Jul 21, 2025 at 11:36 AM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:
>
> > Dear Mr. Meyer,
> >
> > Good day, and thank you for your recent correspondence regarding the Draft EIA Reports.

We acknowledge your request for a meeting to discuss the concerns raised. In consultation with the applicant, Mulilo, we are proposing a provisional date of Wednesday, 7 August 2025, with the meeting to be held at a venue in Ermelo. Kindly confirm whether this date is suitable for you and whether you will be attending alone or accompanied by others.

As a registered I&AP, your comments form an important part of the formal public participation process and will be incorporated into the Final EIA Reports. We also acknowledge the concerns raised regarding the tagging of the Martial Eagles. Relevant documentation, including permits, will be made available where appropriate to support transparency and clarity during the engagement.

We look forward to your response.

Kind Regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 18, 2025 4:51 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Johans Van Wyk <Piwy@mulilo.com>; Lloyd@mulilo.com
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday mr Lucien Barbeau,

Referring to your email dated 7/04/2025 it will be appreciated if you can arrange such a meeting urgently before the 9/08/2025 with the applicant, Mulilo, on site.

Concerns as previously raised with Mulilo in an email dated 19/02/2025 will be on the agenda. That request for a meeting was refused by Mulilo.

Another urgent item which also must be discussed is the tagging of the two martial eagles. According to the MTPA report in my possession, the martial eagles were tagged by Mulilo without a permit. Copy of the report can be provided at the meeting.

That leaves the tagging of the martial eagles illegally, if not criminal.

Therefore the data being used in the specialist report is illegally obtained and all sections, models and references where data has been used must be removed from the report.

Looking forward to your urgent response.

Regards

Josua Meyer (I&AP)

On Wed, Jul 16, 2025 at 4:41 PM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Goodday Sir

The avifaunal specialist removed in both reports, Sheepmoor WEF and Emvelo WEF, the High Sensitivity - Turbine Exclusion Zone in Figures 33 for the aquatic buffer zones from an avifaunal perspective.

It must be an unintentional mistake and request reinstatement of it.

If it was deliberate we request the detailed reasoning and motivation for such a drastic decision.

Thanks

Josua Meyer

On Wed, Jul 16, 2025 at 1:54 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Interested and Affected Party,
>
> Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.
>
> The revised comment period now ends on 15 August 2025.
>
> All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.
>
> Thank you for your continued participation.
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Senior Consultant
>
> Cape Town [redacted] **erm.com**
>
> ---
>
> **From:** ERM Arcus Amsterdam
> **Sent:** Tuesday, July 15, 2025 4:43 PM
> **To:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
> **Subject:** Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
>
> SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER
>
> Dear Interested and Affected Party,
>
> This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
>
> Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.
>
> Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in

line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Lizandé Kellerman
Sent on: Tuesday, 12 August 2025 09:21:52
To: Lucien Barbeau; Lloyd Barnes; Albert Froneman; ERM Arcus Amsterdam
CC: Tasha Oosthuizen; Marietjie Froneman; Robin Colyn; Andrew Pearson; Rebecca Thomas
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

You don't often get email from lizande@afriavian.com. Learn why this is important

EXTERNAL MESSAGE

Good morning Lucien,

Thank you so much for sharing the requested information, much appreciated.

We'll send through our reports in due course.

Best regards / Vriendelike groete,

Lizandé

Lizandé Kellerman *Pri.Sci.Nat*

AFRIAVIAN
ENVIRONMENTAL
[redacted]
Lizande@AfriAvian.com

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Tuesday, 12 August 2025 08:52
To: Lizandé Kellerman <Lizande@afriavian.com>; Lloyd Barnes <Lloyd@mulilo.com>; Albert Froneman <Albert@afriavian.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Tasha Oosthuizen <Tasha@afriavian.com>; Marietjie Froneman <Marietjie@afriavian.com>; Robin Colyn <Robin@afriavian.com>; Andrew Pearson <Andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Good day Lizande,

As requested, kindly see below information:

Sheepmoor	
Added Farm Portion	Removed
1/285	10/273
5/285	12/273
7/286	9/273
283	3/273
-	4/273
-	7/273
-	8/273
-	2/273
-	3/287

Emvelo
Added Farm Portion
275
5/273
3/284
6/284

Kind Regards

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

Sustainability is our business

From: Lizandé Kellerman <Lizande@afriavian.com>
Sent: Monday, August 11, 2025 3:27 PM
To: Lloyd Barnes <Lloyd@mulilo.com>; Albert Froneman <Albert@afriavian.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Tasha Oosthuizen <Tasha@afriavian.com>; Marietjie Froneman <Marietjie@afriavian.com>; Robin Colyn <Robin@afriavian.com>; Andrew Pearson <Andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Some people who received this message don't often get email from lizande@afriavian.com. Learn why this is important
EXTERNAL MESSAGE

Hi Lucien,

Thank you for taking my call and the discussion. As soon as you share the updated list of affected properties, I'll effect the changes and send through our revised reports for the Emvelo and Sheepmoor WEFs.

I look forward to your response.

Thank you!

Best regards / Vriendelike groete,

Lizandé

Lizandé Kellerman *Pri.Sci.Nat*

AFRIAVIAN ENVIRONMENTAL

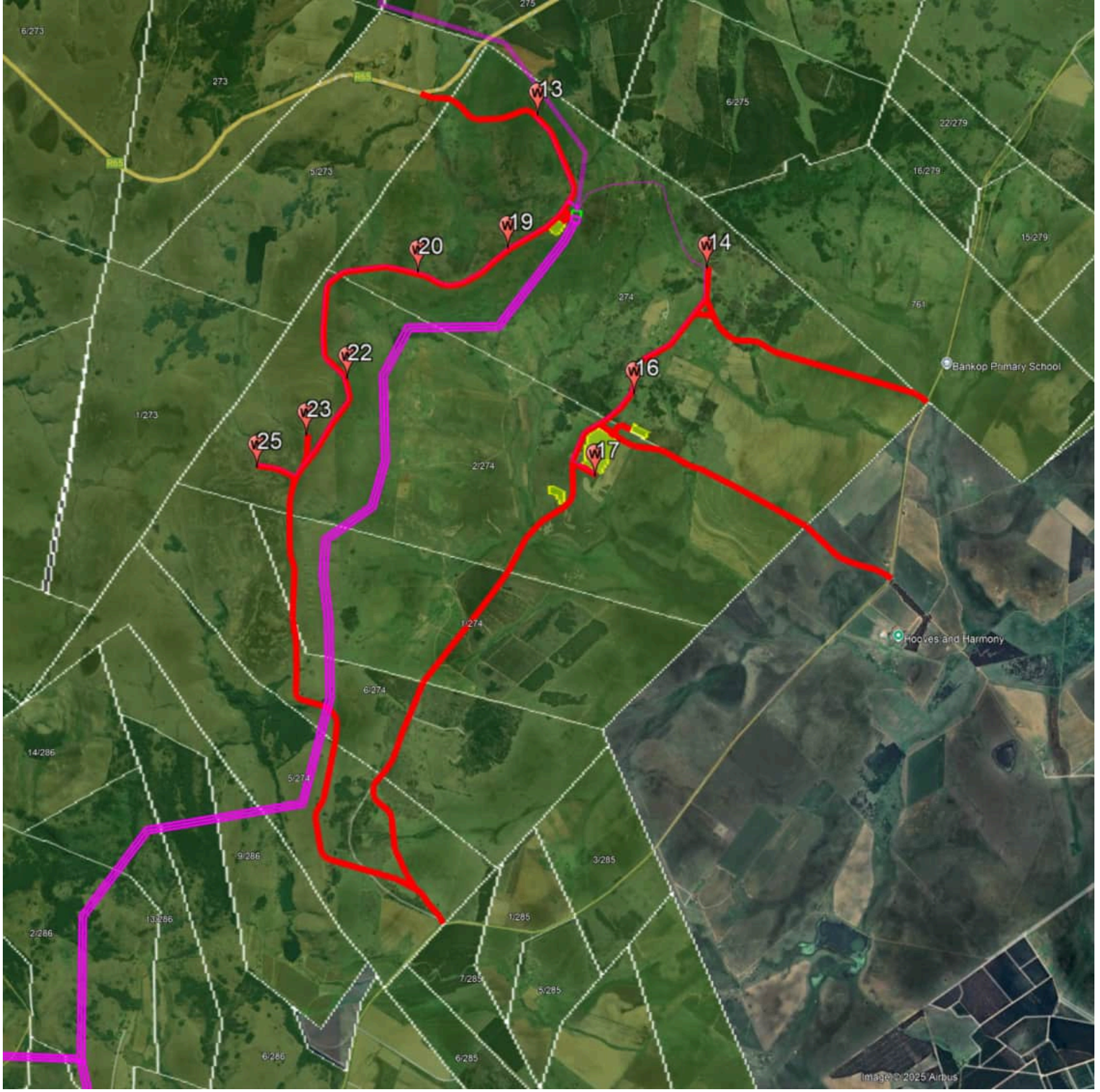
[redacted]

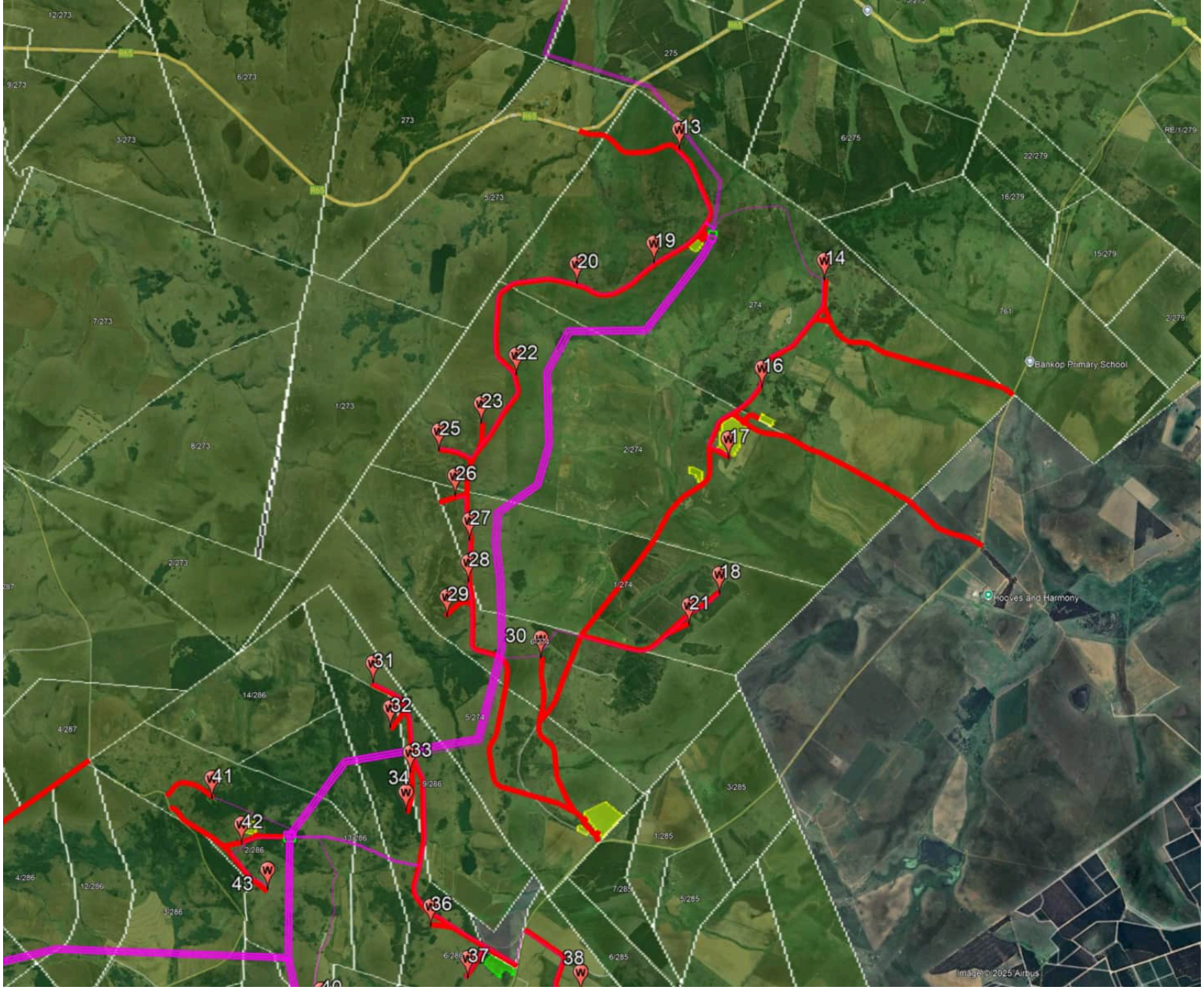
From: Lloyd Barnes <Lloyd@mulilo.com>
Sent: Monday, 11 August 2025 09:11
To: Albert Froneman <Albert@afriavian.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Tasha Oosthuizen <tasha@afriavian.com>; Lizandé Kellerman <Lizande@afriavian.com>; Marietjie Froneman

<Marietjie@afriavian.com>; Robin Colyn <Robin@afriavian.com>; Andrew Pearson <Andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Thank you for following up Albert.

With reference the following WTGs which are located on both Emvelo and Sheepmoor WEFs site boundaries and include the same properties: WTGs 18, 21, 26, 27, 28, 29, 30. This is the case as an access road is shared.


W13
W19
W20
W14
W22
W16
W23
W25
W17
Bankop Primary School
Hooves and Harmony
Image © 2025 Airbus



I will send you a voice note explaining the project boundaries. @Lucien Barbeau, please also respond to Albert in order to ensure that we are aligned.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
www.mulilo.com
21st Floor, Portside, 5 Buitengracht Street, Cape Town, 8001

mulilo

From: Albert Froneman <Albert@afriavian.com>
Sent: Monday, 11 August 2025 05:40
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <Lloyd@mulilo.com>; tasha <tasha@afriavian.com>; Lizandé Kellerman <Lizande@afriavian.com>; Marietjie <Marietjie@afriavian.com>; Robin <Robin@afriavian.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]
Importance: High

Hi Lucien,

I hope this message finds you well.

We are still awaiting your feedback regarding the message below. We aim to adhere to your deadline, but without confirmation, we are hesitant to commence updating the reports only to potentially redo them.

Best regards / Vriendelike groete,

Albert

Albert Froneman *Pr.Sci.Nat*

AFRIAVIAN
ENVIRONMENTAL

[redacted]

Albert@AfriAvian.com

From: Albert Froneman <Albert@afriavian.com>
Sent: Friday, August 08, 2025 12:08
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Tasha Oosthuizen <Tasha@afriavian.com>; Lizandé Kellerman <Lizande@afriavian.com>; Marietjie Froneman <Marietjie@afriavian.com>; Robin Colyn <Robin@afriavian.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Lucien,

Thank you for sharing these updated layouts. We have perused them and have a few queries:

1. Why have the respective WEF boundaries changed from what was submitted in our specialist reports released for public comment on 15 July?
2. As a result of these changes, according to the KMZs, it appears there have been additions/removals re the affected properties included in each WEF site – can you please provide us with an updated list of the affected properties per project?
3. Also, the following turbines appear to be located on both Emvelo and Sheepmoor WEFs as the site boundaries include the same properties: WTGs 18, 21, 26, 27, 28, 29, 30. Can you please clarify why this is the case?

Thank you, we look forward to your soonest feedback.

Once we have your feedback and clarification regarding this, we can commence with updating the maps in the reports.

Best regards / Vriendelike groete,

Albert

Albert Froneman *Pr.Sci.Nat*

AFRIAVIAN ENVIRONMENTAL

[redacted]

Albert@AfriAvian.com

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 06 August 2025 16:26
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Specialist,

I trust you are well.

Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by Monday, 12 August 2025.

If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.

Kind regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Josua Meyer
Sent on: Tuesday, 12 August 2025 11:31:36
To: Lucien Barbeau
CC: ERM Arcus Amsterdam; Lloyd Barnes; Johans Van Wyk; Rebecca Thomas; Richard Summers; celine@summersinc.co.za; Stephanie Gopaul; Stephen Burton
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

Time is running out.

Where are the minutes of the meeting as well as a copy of the recorded transcript?

Thanks

On Tue, Aug 12, 2025 at 9:15 AM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Good day Mr Meyer,
>
> I trust that you are well. Kindly note that we will provide our responses to your comments by close of business today.
>
> Kind Regards
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Senior Consultant
> Cape Town [redacted] **erm.com**
>
> ---
>
> **From:** ERM Arcus Amsterdam
> **Sent:** Wednesday, August 6, 2025 2:56 PM
> **To:** Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
> **Cc:** Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za
> **Subject:** RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
>
> Dear Mr Meyer,
>
> Thank you for your email and for taking the time to share your reflections following our meeting on Monday.

We acknowledge receipt of your comments and the additional questions you have raised. We appreciate your continued engagement in the process and will respond to your queries as soon as possible.

Should you have any further inputs in the meantime, please feel free to share them with us.

Kind Regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Wednesday, August 6, 2025 1:47 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

The purpose of the meeting was to address concerns of the I&AP's regarding the proposed Sheepmoor and Emvelo WEF's. The applicant gives the impression that they are not interested in taking any action regarding the I&AP's concerns and attend it only to avoid negative reflection. Therefore the meeting created unfortunately more questions than answers. Your EAP's input was also disappointing.

We urgently need clarification and answers on the following

1 - The EAP is expected to participate and actively engage with the impacted community. Why has my request for a meeting since February 2025 repeatedly declined and pushed in at the 11th hour?

2 - Do you as EAP feel that the process has been credible and transparent as well as accountable in circumstances where you reach out and respond to a request for a meeting at the 11th hour? How is that considered to be meaningful and in the spirit of the constitution?

3 - Why are biodiversity related issues only being property investigated at the 11th hour although the Provincial Department requested it in the scoping phase?

4 - Why are requested documentation regarding the additional 3 months extension granted by DFFE to the applicant still outstanding?

5 - Are you as EAP confident that the data and modelling that has been undertaken to address bird related impacts and specifically the martial eagle is accurate and credible? If so, please explain why.

6 - Are you as EAP confident and can you confirm in writing that the data that is being obtained in relation to the martial eagle was correctly obtained and in accordance with all minimal standards and legal criteria?

7 - Are you as EAP comfortable that if the tagging of the martial eagle were done without a valid permit, that the tagged data can still be used in the specialist report? If so, please explain why.

8 - Are you as EAP in acceptance that the permits to tag the martial eagles, also the one at Verkykerskop, were not presented at the meeting? If so, please explain why.

9 - Are you as EAP confident that all the recommendations in the specialist reports and specifically the Social report are satisfactorily addressed? If not, please explain why.

10 - It became clear in the meeting that none of the affected landowners are prepared to allow the proposed powerline over their properties. Are AEP comfortable to support an application without a secured powerline route?

11 - The avifaunal specialist signed a NDA (non disclosure agreement) with the applicant and it was also revealed in the meeting by the applicant that they collectively determined the shaped exclusion zones for the southern bald ibis. Are you as EAP comfortable that it is not in contradiction with the declaration the avifaunal specialist signed as independant specialist? If so, please explain why.

Due to the time constraint answers required before the 11/08/2025.

Regards

On Sun, Aug 3, 2025 at 12:36 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Mr Meyer,

Thank you for confirming the meeting for 12h00 tomorrow, 4 August, at your farm. That time works perfectly, and we look forward to meeting with you.

If you would kindly share the physical address or GPS coordinates for the entrance to your farm, it would be greatly appreciated to ensure we arrive without any difficulty.

There will be five people attending the meeting, including myself.

Should there be anything further you would like us to prepare or bring along for the meeting, please don't hesitate to let us know, we'll be happy to assist in any way we can.

Kind regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, August 1, 2025 1:29 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Good day

Monday is fine with me

I did inform Johans also

Will 12h00 be convenient for you?

How may people?

Regards

On Fri, 01 Aug 2025, 11:42 ERM Arcus Amsterdam, <ERM.ArcusAmsterdam@erm.com> wrote:

> Good Morning Mr Meyer,
>
> Thank you for your response. If you feel Monday is too short availability, please do not feel rushed. We would be happy to accommodate you later in the week. We will await your feedback and move accordingly from there.
>
> Kind Regards,
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Senior Consultant
>
> Cape Town [redacted]
> **erm.com**
>
> ---
>
> **From:** Josua Meyer <meyerjosua55@gmail.com>
> **Sent:** Thursday, July 31, 2025 6:13 PM
> **To:** Lucien Barbeau <Lucien.Barbeau@erm.com>
> **Cc:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
> **Subject:** Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
>
> Some people who received this message don't often get email from meyerjosua55@gmail.com. Learn why this is important
> **EXTERNAL MESSAGE**
>
> Goodday
>
> Will confirm tomorrow before 12h00
>
> Thanks

On Thu, Jul 31, 2025 at 2:22 PM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Dear Mr Meyer,
>
> I hope this message finds you well.
>
> I'm writing to kindly follow up on our proposed meeting scheduled for Monday, 4 August at 13:00 at your farm. We would appreciate it if you could please confirm whether you are still available to meet on that date.
>
> Should you require any additional information or documentation ahead of the meeting, beyond what you have already requested, please don't hesitate to let me know, I'd be happy to assist.
>
> Looking forward to your confirmation.
>
> Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Monday, July 28, 2025 11:49 AM
To: Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Meyer,

Following discussions with the applicant, unfortunately it will not be possible to schedule a meeting prior to 1 August due to limited availability.

However, we would be pleased to meet with you on Monday the 4th of August 2025 at 13:00, as per your request, at your farm.

Kindly confirm whether this date and time are suitable, and please advise who will be attending the meeting from your side.

I will continue to provide you with the requested documentation ahead of the meeting.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 25, 2025 5:11 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

Proposed date for the meeting seems to be too close to submission of comments which is already 9/08/25.

Can you arrange the meeting for us before 1/07/2025.

Can you in the meantime forward the detail previously requested

- All the documentation with Department concerning the 3 months extension granted even after time lapps to submit final report

- Mulilo's permits to fit telemetry device on the two martial eagles

- AfriAvian motivation for altering Figure 33 in both avifaunal reports

Above info are urgently required and no reason to wait for the meeting

Regards

Josua

On Tue, Jul 22, 2025 at 10:30 AM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Hi Lucien
>
> There might be a mistake in your day or date ..... 7 August 2025 is a Thursday.
>
> Nevertheless the 6 or 7 th August 2025 is fine with us.
>
> Will appreciate it if we can meet on my farm.
>
> We intend to be three (3) I&AP
>
> Regards
>
> Josua Meyer
>
> On Mon, Jul 21, 2025 at 11:36 AM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:
>
> > Dear Mr. Meyer,
> >
> > Good day, and thank you for your recent correspondence regarding the Draft EIA Reports.

We acknowledge your request for a meeting to discuss the concerns raised. In consultation with the applicant, Mulilo, we are proposing a provisional date of Wednesday, 7 August 2025, with the meeting to be held at a venue in Ermelo. Kindly confirm whether this date is suitable for you and whether you will be attending alone or accompanied by others.

As a registered I&AP, your comments form an important part of the formal public participation process and will be incorporated into the Final EIA Reports. We also acknowledge the concerns raised regarding the tagging of the Martial Eagles. Relevant documentation, including permits, will be made available where appropriate to support transparency and clarity during the engagement.

We look forward to your response.

Kind Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 18, 2025 4:51 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Johans Van Wyk <Piwy@mulilo.com>; Lloyd@mulilo.com
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday mr Lucien Barbeau,

Referring to your email dated 7/04/2025 it will be appreciated if you can arrange such a meeting urgently before the 9/08/2025 with the applicant, Mulilo, on site.

Concerns as previously raised with Mulilo in an email dated 19/02/2025 will be on the agenda. That request for a meeting was refused by Mulilo.

Another urgent item which also must be discussed is the tagging of the two martial eagles. According to the MTPA report in my possession, the martial eagles were tagged by Mulilo without a permit. Copy of the report can be provided at the meeting.

That leaves the tagging of the martial eagles illegally, if not criminal.

Therefore the data being used in the specialist report is illegally obtained and all sections, models and references where data has been used must be removed from the report.

Looking forward to your urgent response.

Regards

Josua Meyer (I&AP)

On Wed, Jul 16, 2025 at 4:41 PM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Goodday Sir
>
> The avifaunal specialist removed in both reports, Sheepmoor WEF and Emvelo WEF, the High Sensitivity - Turbine Exclusion Zone in Figures 33 for the aquatic buffer zones from an avifaunal perspective.
>
> It must be an unintentional mistake and request reinstatement of it.
>
> If it was deliberate we request the detailed reasoning and motivation for such a drastic decision.
>
> Thanks
>
> Josua Meyer
>
> On Wed, Jul 16, 2025 at 1:54 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:
>
> > Dear Interested and Affected Party,

Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.

The revised comment period now ends on 15 August 2025.

All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.

Thank you for your continued participation.

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development

Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Ephron Maradwa
Sent on: Monday, 02 June 2025 09:25:43
To: Stephanie Gopaul
CC: Lydia Kutu; Masina Morudu; Bathandwa Ncube; ERM Arcus Amsterdam; Andrew Pearson; R Luyt; mervyn.lotter@gmail.com; complaints@msukaligwa.gov.za; Portia Makitla
Subject: 14-12-16-3-3-2-2611 & 14-12-16-3-3-2-2613
Attachments: 14-12-16-3-3-2-2611 & 14-12-16-3-3-2-2613 Signed Letter.pdf (136.43 KB)

Good day.

Please find herein the attached letter for the above mentioned.

Please do not respond to this mailbox with any queries related to the decision been issued. All queries on the attached decision must be directed to official whose contact details is listed as enquiries.

I hope you find all in order.

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From: Celine Oates
Sent on: Tuesday, 12 August 2025 12:08:20
To: ERM Arcus Amsterdam
Subject: Automatic reply: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Please note that i am currently out of office until Thursday, 24 April. Should you have any urgent queries that must be dealt with prior to 24 April, please direct your correspondence to clarice@summersinc.co.za and reception@summersinc.co.za.

From: Lucien Barbeau
Sent on: Tuesday, 12 August 2025 12:18:58
To: Bathandwa Ncube; Masina Morudu
CC: Stephen Burton; Stephanie Gopaul; Lloyd Barnes; ERM Arcus Amsterdam
Subject: REMINDER: Submission of Draft Environmental Impact Assessment Report for the Proposed Emvelo WEF

Dear Bathandwa and Masina,

I hope this message finds you well.

This is a courteous reminder that the PPP period for the proposed Emvelo and Amsterdam Wind Energy Facilities will close on 15 August 2025. We would appreciate confirmation that we will receive your comments by this date.

For your information, the Mpumalanga Tourism and Parks Agency (MTPA) has been afforded until 18 August 2025 to submit their comments.

Please do not hesitate to contact me should you require any further information.

Kind Regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Lucien Barbeau
Sent: Tuesday, July 15, 2025 4:33 PM
To: EIA Applications <eiaapplications@dffe.gov.za>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Lloyd Barnes <lloyd@mulilo.com>; Rebecca Thomas <reth@mulilo.com>
Subject: Submission of Draft Environmental Impact Assessment Report for the Proposed Emvelo WEF

DFFE Reference: 14/12/16/3/3/2/2611

The Project Developer, under the Special Purpose Vehicles (SPVs), namely Emvelo Wind Energy Facility (Pty) Ltd intend to submit an application for Environmental Authorisation (EA) for the proposed Emvelo WEF including its associated infrastructure. The proposed WEF will include 22 turbines with a maximum output capacity of up to 260 MW and an anticipated lifespan of 30 years. The WEFs will all connect directly into National Eskom Grid via the Eskom Camden Substation. Each WEF will apply for authorisation of a proposed grid connection route to connect to the existing Eskom Camden Substation, via approximately 30 km long 132 kV overhead transmission lines.

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

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025.

The Draft Environmental Impact Assessment (EIA) Report for the Emvelo WEF and associated infrastructure is being subjected to a second public commenting period of 30-days, from Tuesday, 15 July 2025 until Thursday, 14 August 2025 (both days inclusive), taking into consideration Chapter 2 Regulation 3 (1); (2) and (3) of the NEMA, 1998 (Act No. 107 of 1998). Comments received during the first Draft EIA phase were incorporated, addressed and responded to in this Draft EIA report.

As per the Directions, dated 5 June 2020, all Applications must be submitted in electronic format via electronic file transfer.

Separate zipped folders have been uploaded to the DFFE electronic submission platform. The folders submitted are as below:

ZIP: Emvelo WEF Application and Draft EIA Report

- 01 Updated Application Form
- 02 Volume I: Draft EIA Report
- 03 Volume II: Specialist EIA Reports
- 04 Volume III: Public Participation Reports

Please feel free to contact the undersigned should you have any queries.

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Lucien Barbeau
Senior Consultant

Cape Town [redacted]

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From: Lloyd Barnes
Sent on: Tuesday, 12 August 2025 12:41:28
To: Lucien Barbeau
CC: Stephen Burton; Stephanie Gopaul; ERM Arcus Amsterdam; Rebecca Thomas
Subject: RE: REMINDER: Submission of Draft Environmental Impact Assessment Report for the Proposed Emvelo WEF

EXTERNAL MESSAGE

Correction below.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
www.mulilo.com
[redacted]

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Tuesday, 12 August 2025 12:19
To: Bathandwa Ncube <bncube@dffe.gov.za>; Masina Morudu <memorudu@dffe.gov.za>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Lloyd Barnes <Lloyd@mulilo.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: REMINDER: Submission of Draft Environmental Impact Assessment Report for the Proposed Emvelo WEF

Dear Bathandwa and Masina,

I hope this message finds you well.

This is a courteous reminder that the PPP period for the proposed Emvelo and Amsterdam Sheepmoor Wind Energy Facilities will close on 15 August 2025. We would appreciate confirmation that we will receive your comments by this date.

For your information, the Mpumalanga Tourism and Parks Agency (MTPA) has been afforded until 18 August 2025 to submit their comments.

Please do not hesitate to contact me should you require any further information.

Kind Regards,

Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

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Sent: Tuesday, July 15, 2025 4:33 PM
To: EIA Applications <eiaapplications@dffe.gov.za>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Lloyd Barnes <lloyd@mulilo.com>; Rebecca Thomas <reth@mulilo.com>
Subject: Submission of Draft Environmental Impact Assessment Report for the Proposed Emvelo WEF

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- 04 Volume III: Public Participation Reports

Please feel free to contact the undersigned should you have any queries.

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Mpho Malema
Sent on: Wednesday, 13 August 2025 10:17:56
To: ERM Arcus Amsterdam
CC: Lucien Barbeau; Stephen Burton; Stephanie Gopaul
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Lucien, I have looked into this, and their main concerns are:-

Aerodrome Safety:

1. The Trust is the owner of Portions 8, 19 and 28 of the Roodewal Farm (Farm number 270), On Portion 28, they operate an aerodrome and helipad that regularly accommodates aircraft such as Learjets and KingAirs. The airstrip is actively used and aircraft land and take off in both directions of the runway.
2. Civil Aviation Regulations (Part 139) and SA-CATS 139.01.30 require that no wind turbines be erected within 8 km of an aerodrome or within 35 km due to potential interference with radio navigation equipment.
3. The Trust opposes any turbines within 35 km of its aerodrome boundary.

Environmental and Visual Impact:

4. The farm also hosts the Nu-Scotland Nature Conservancy, which accommodates guests and wildlife, including endangered Secretary Birds.
5. The Trust is concerned about the visual intrusion and ecological disruption caused by the turbines.
6. They request that the visual impact assessment consider the conservancy and that mitigation measures be implemented to protect local fauna.

I believe we need the Mulilo , visual and avifaunal specialists' inputs to respond.

Kind Regards

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Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted] **erm.com**



From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Tuesday, August 12, 2025 9:06 AM
To: Mpho Malema <mpho.malema@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

Hi Mpho – Can you please look into this?

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Riaan Meintjes <riaan@themis.co.za>
Sent: Thursday, August 7, 2025 1:48 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

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EXTERNAL MESSAGE

Dear Sir/Madam

We have briefly perused the draft EIA report and have been unable to find any reference to the comment submitted by us on the instructions of our client, a copy of which is attached to this email.

Kindly refer us to the relevant pages of the draft report which deal with our client's comments?

We further note from the draft report that a formal application has been lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted. Kindly furnish us with a copy of this application and all communications to and from ATNS relating thereto.

We look forward to hearing from you as a matter of urgency.

Regards
Riaan Meintjes
Director

BusinessDay Best Lawyers for 2025: Arbitration and Mediation; Litigation; Real Estate Law

HAYES EST 2005 INCORPORATED

T [redacted]
W: www.themislawchambers.co.za

Unit 1, Roeland Square
Corner of Roeland Street and Drury Lane
Cape Town, 8001

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Date: Wednesday, 16 July 2025 at 13:55
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Interested and Affected Party,

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Thank you for your continued participation.

Lucien Barbeau
Senior Consultant

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Cape Town [redacted] **erm.com**

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Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Lucien Barbeau
Senior Consultant

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Comments made by B Moodie

1. I am the owner of the farm Windhoek 291 Portion 3 & 5 and leaser of portion 4 & 10 which are adjacent to the proposed development of the Sheepmoor Windfarm'

Acknowledged. Your ownership and leasehold details have been noted and recorded for the project.

2. No communication or notification from Mulilo concerning the development the windfarm next to my property. Neighbours informed me of it and helped me to register as I&AP in March 2025. Mulilo acting on there own and ignore all protocols and spells danger for the future.

Notification of the project was undertaken in accordance with the requirements of the Environmental Impact Assessment (EIA) Regulations, including the placement of site notices, newspaper adverts, direct notification to identified landowners, and availability of project information for registration as an Interested and Affected Party (I&AP). We acknowledge that you became aware of the project through neighbours, and we will ensure that you continue to receive all project-related updates going forward.

3. May 2025 draft report suggested power lines will be constructed over my Windhoek property. There was no prior communication nor negotiations from any party concerning the permission for the power lines. Totally unacceptable.

The draft EIA report included an alternative grid connection layout and this is not the preferred route. Your opposition to any overhead lines crossing your land has been noted.

4. No power lines will be allowed to run over my properties for various reasons.

4.1 Route as shown in report are crossing crop lands and will interfere with activities of farm machinery.

4.2 It will limit future expansions on the farm.

4.3 Increase movement of people for inspection line will increase criminal activities and risk of veld fires and therefore not acceptable.

4.4 Indications that power lines have negative influence on the reproduction of cattle. Unplanned and poorly communicated maintenance visits especially if involving helicopters and machinery can spook cattle, leading to stampedes, Injuries, or even loss of livestock not to mention damage to infrastructure like fencing.

4.5 Aesthetic and Environmental Value will be lost.

4.6 Danger due to collusion of the bird population on the farm.

The potential impacts on farming operations, farm expansion, security, livestock health, aesthetic value, and avifauna have been recorded and assessed as part of the EIA report

5. There is secretary birds present on my farm which are foddering on the grassland where 4 turbines are planned on Windhoek Portion 8. These secretary birds will be in great danger to be killed by collusion with the turbines.

Avifaunal specialist studies have identified several sensitive bird species within the project area. Turbine placements have all been mitigated, and the avifaunal specialist is confident that the data and modelling undertaken to date to address avifaunal impacts is both accurate and credible.

6. The same danger exists for the ibises which are in great numbers present on the farm. Some are roosting on the farm Waaihoek to the east and other on the farm Windhoek to the north - west. Both roosting routes will be polluted with turbines and the shredding of birds will be unavoidable, even with proposed mitigation gimmies.

Please see above response regarding avifaunal impacts.

7. I apposed the location of the 4 turbines close to the eastern border because.

7.1 Killing of the southern bald ibis which due that route to there roosting site.

7.2 Located in the secretary bird foddering area.

7.3 Combined effect will change the local microclimate of surrounding area. Report by specialist of influence on microclimate are requested.

7.4 It is visual not acceptable.

7.5 The noise pollution will increase during the dominate eastern winds.

7.6 The lights during the night as required by aviation are not acceptable.

Your concerns regarding turbine placement near the eastern border and on Portion 8 have been recorded, including potential impacts on avifauna, microclimate, noise, visual character, lighting, and shadow flicker. The microclimate aspect is outside the standard EIA scope, however, specialist studies have addressed noise, visual, and shadow flicker impacts, with recommendations and mitigations that the applicant will adhere to.

8. Also opposed the turbines on the Farm Windhoek Portion 8

8.1 Killing the southern bald ibis on their route to their breeding nest in the winter.

8.2 Turbine 51 & 52 to close to my boundary in case of collapsing when the steep slope considered

8.3 Turbine 51,52 & 53 will be to close to the farmhouse on Windhoek Por 4 and will cause unaccepted noise pollution which are likely to be more due to the topography.

8.4 There are people staying in the same farmhouse which are on chronical medication for heart and epilepsy. The shadow flickering of turbines 51, 52 and 53 will trigger the epilepsy.

Please see above response regarding the impacts associated with turbine placements.

9. It will kill the bee population in the area which are essential for pollination of the fauna. Report of effect on the bee population by specialist are requested.

At present, this aspect is not covered within the EIA specialist studies, however, your request for further investigation has been noted and will be shared with the project team.

10. Further the proposed Sheepmoor windfarm are going to negatively damage the character and scenic views of the escarpment and will change the sense of place.

Visual impact assessments have been conducted by a qualified specialist. While any large infrastructure will have some visual impact, the design and placement of turbines aims to reduce the visual impact where possible.

11. Therefore, we apposed the proposed Sheepmoor windfarm in the strongest terms.

Your overall opposition to the proposed Sheepmoor Wind Farm is noted and will be included in the Final Comments and Responses Report submitted to the competent authority for decision-making.

From: Lizandé Kellerman
Sent on: Wednesday, 13 August 2025 18:46:31
To: Lucien Barbeau; Lloyd Barnes; Albert Froneman; ERM Arcus Amsterdam
CC: Tasha Oosthuizen; Marietjie Froneman; Robin Colyn; Andrew Pearson; Rebecca Thomas
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 2025] / updated avifaunal reports ready for download

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EXTERNAL MESSAGE

Hi Lucien,

Again, thank you for sharing the revised property details. However, as per our discussions today, I have left a comment in each report for your further action, please. Also, once finalised, will you then please share the final versions of the reports with us for our records?

The updated avifaunal reports for the Emvelo and Sheepmoor WEFs are available here: https://we.tl/t-HmaZlvIdIp

Kindly please let me know should you have any queries or if you struggle to access the link.

Thank you so much!

Best regards / Vriendelike groete,

Lizandé

Lizandé Kellerman *Pri.Sci.Nat*

AFRIAVIAN ENVIRONMENTAL

[redacted]

Lizande@AfriAvian.com

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Tuesday, 12 August 2025 08:52
To: Lizandé Kellerman <Lizande@afriavian.com>; Lloyd Barnes <Lloyd@mulilo.com>; Albert Froneman <Albert@afriavian.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Tasha Oosthuizen <Tasha@afriavian.com>; Marietjie Froneman <Marietjie@afriavian.com>; Robin Colyn <Robin@afriavian.com>; Andrew Pearson <Andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Good day Lizande,

As requested, kindly see below information:

Sheepmoor	
Added Farm Portion	Removed
1/285	10/273
5/285	12/273
7/286	9/273
283	3/273
-	4/273
-	7/273

-	8/273
-	2/273
-	3/287

Emvelo
Added Farm Portion
275
5/273
3/284
6/284

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Lizandé Kellerman <Lizande@afriavian.com>
Sent: Monday, August 11, 2025 3:27 PM
To: Lloyd Barnes <Lloyd@mulilo.com>; Albert Froneman <Albert@afriavian.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Tasha Oosthuizen <Tasha@afriavian.com>; Marietjie Froneman <Marietjie@afriavian.com>; Robin Colyn <Robin@afriavian.com>; Andrew Pearson <Andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Some people who received this message don't often get email from lizande@afriavian.com. Learn why this is important
EXTERNAL MESSAGE

Hi Lucien,

Thank you for taking my call and the discussion. As soon as you share the updated list of affected properties, I'll effect the changes and send through our revised reports for the Emvelo and Sheepmoor WEFs.

I look forward to your response.

Thank you!

Best regards / Vriendelike groete,

Lizandé

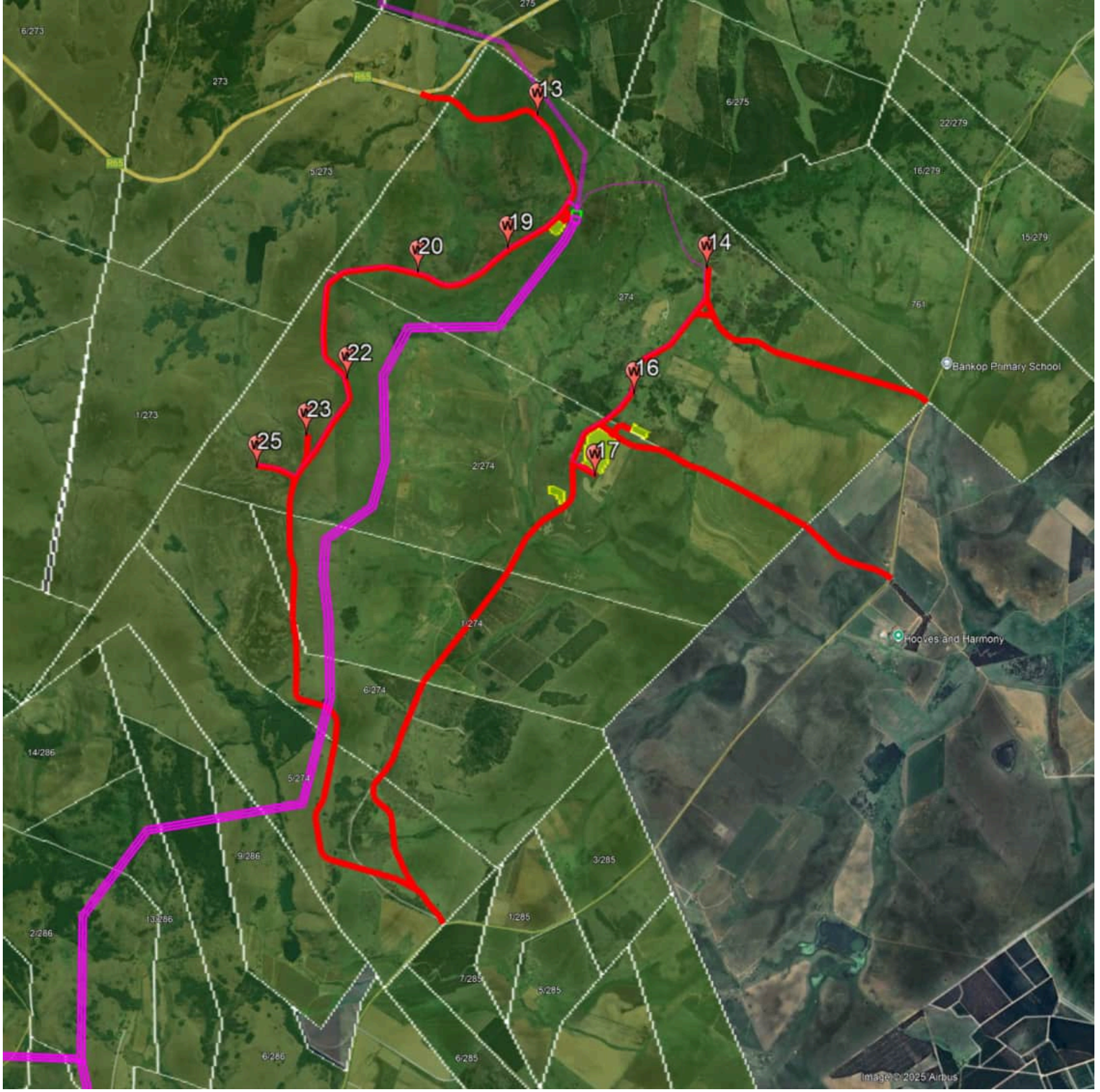
Lizandé Kellerman *Pri.Sci.Nat*

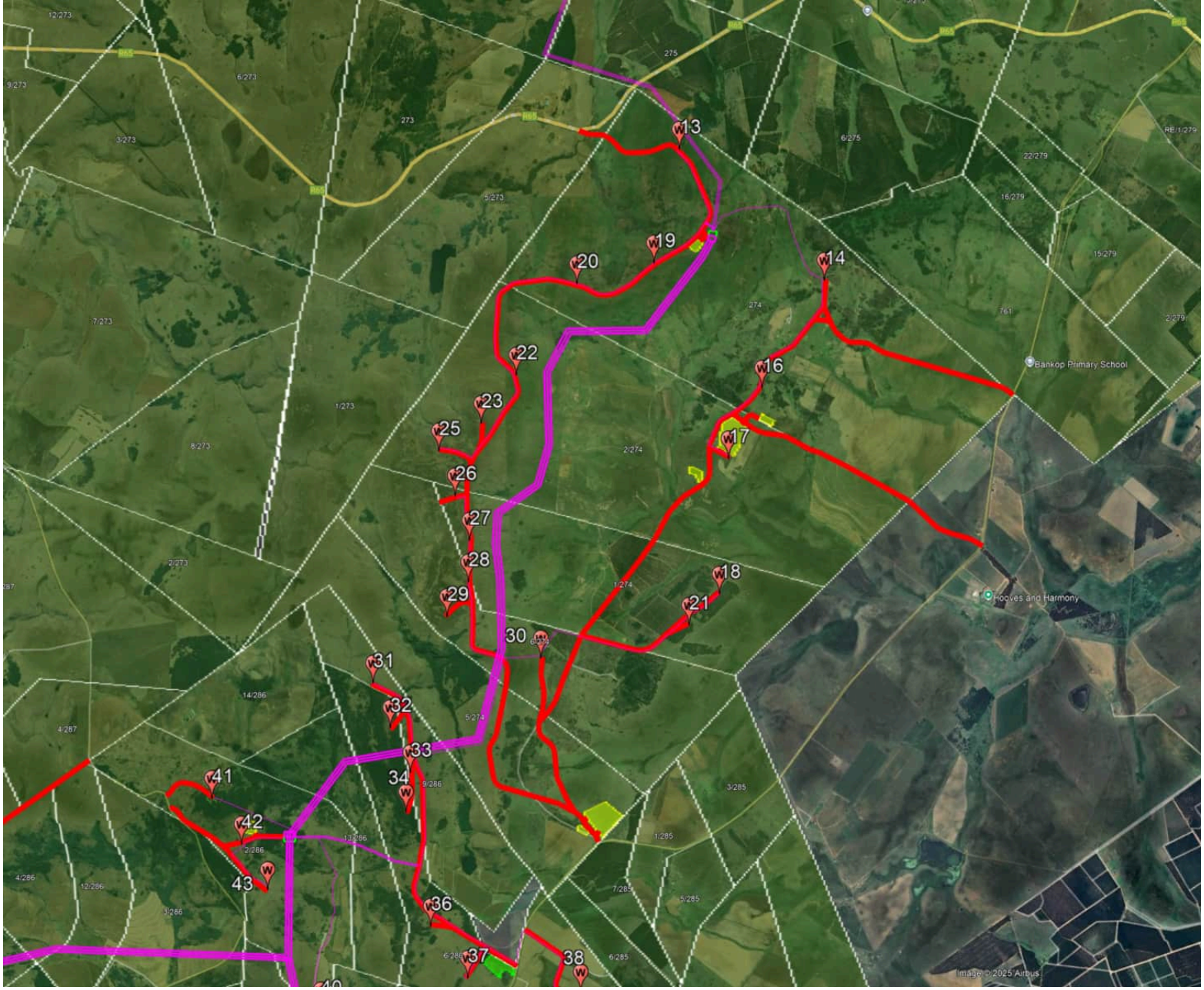
AFRIAVIAN
ENVIRONMENTAL
[redacted]
Lizande@AfriAvian.com

From: Lloyd Barnes <Lloyd@mulilo.com>
Sent: Monday, 11 August 2025 09:11
To: Albert Froneman <Albert@afriavian.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Tasha Oosthuizen <tasha@afriavian.com>; Lizandé Kellerman <Lizande@afriavian.com>; Marietjie Froneman <Marietjie@afriavian.com>; Robin Colyn <Robin@afriavian.com>; Andrew Pearson <Andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Thank you for following up Albert.

With reference the following WTGs which are located on both Emvelo and Sheepmoor WEFs site boundaries and include the same properties: WTGs 18, 21, 26, 27, 28, 29, 30. This is the case as an access road is shared.


W13
W19
W20
W14
W22
W16
W23
W25
W17
Bankop Primary School
Hooves and Harmony
Image © 2025 Airbus



I will send you a voice note explaining the project boundaries. @Lucien Barbeau, please also respond to Albert in order to ensure that we are aligned.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
O: +27 21 685 3240 C:+27 83 499 0280
www.mulilo.com
21st Floor, Portside, 5 Buitengracht Street, Cape Town, 8001

mulilo

From: Albert Froneman <Albert@afriavian.com>
Sent: Monday, 11 August 2025 05:40
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <Lloyd@mulilo.com>; tasha <tasha@afriavian.com>; Lizandé Kellerman <Lizande@afriavian.com>; Marietjie <Marietjie@afriavian.com>; Robin <Robin@afriavian.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]
Importance: High

Hi Lucien,

I hope this message finds you well.

We are still awaiting your feedback regarding the message below. We aim to adhere to your deadline, but without confirmation, we are hesitant to commence updating the reports only to potentially redo them.

Best regards / Vriendelike groete,

Albert

Albert Froneman *Pr.Sci.Nat*

AFRIAVIAN
ENVIRONMENTAL

[redacted]

Albert@AfriAvian.com

From: Albert Froneman <Albert@afriavian.com>
Sent: Friday, August 08, 2025 12:08
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Tasha Oosthuizen <Tasha@afriavian.com>; Lizandé Kellerman <Lizande@afriavian.com>; Marietjie Froneman <Marietjie@afriavian.com>; Robin Colyn <Robin@afriavian.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Lucien,

Thank you for sharing these updated layouts. We have perused them and have a few queries:

1. Why have the respective WEF boundaries changed from what was submitted in our specialist reports released for public comment on 15 July?
2. As a result of these changes, according to the KMZs, it appears there have been additions/removals re the affected properties included in each WEF site – can you please provide us with an updated list of the affected properties per project?
3. Also, the following turbines appear to be located on both Emvelo and Sheepmoor WEFs as the site boundaries include the same properties: WTGs 18, 21, 26, 27, 28, 29, 30. Can you please clarify why this is the case?

Thank you, we look forward to your soonest feedback.

Once we have your feedback and clarification regarding this, we can commence with updating the maps in the reports.

Best regards / Vriendelike groete,

Albert

Albert Froneman *Pr.Sci.Nat*

AFRIAVIAN ENVIRONMENTAL

[redacted]

Albert@AfriAvian.com

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 06 August 2025 16:26
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Specialist,

I trust you are well.

Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by Monday, 12 August 2025.

If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Lucien Barbeau
Sent on: Wednesday, 13 August 2025 19:41:21
To: Reabetswe MOKOMELE; ERM Arcus Amsterdam
CC: Victor DE ABREU
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Reabetswe, I am just following up with the report submissions, are you able to share them tomorrow?

Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, August 11, 2025 11:38 AM
To: Reabetswe MOKOMELE <Reabetswe.Mokomele@smec.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Victor DE ABREU <Victor.deAbreu@smec.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Reabetswe,

Understood, thanks for informing me. From my visual inspection, here has not been WTG or road changes, just minor infrastructure footprint changes. If I could please refer you to the boundary KMZs, these have been changed. I kindly bare in mind when updating any figures within reports.

Can I expect the changes to the report on Wednesday?

Regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Reabetswe MOKOMELE <Reabetswe.Mokomele@smec.com>
Sent: Thursday, August 7, 2025 10:26 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Victor DE ABREU <Victor.deAbreu@smec.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Dear Lucian,

Your request is received but kindly note the following:

Due Dates - Due to committed site visits taking place on 11 and 12 August 2025, unfortunately it is not possible to meet the due date of 12 August 2025. The revised issue date must consider both the updating and internal reviews which would be at least one (1) week.

Variation Order - Our team will review the final layouts and determine whether the changes will require and Addendum Letter or Full Revisions to be issued. The time and effort for updating the reports (full revisions) will require a variation order which will be confirmed and communicated to you for approval.

Trust you find the above in order.

Kind regards

Reabetswe MOKOMELE
Engineer, Planning and Traffic Engineering, Infrastructure + Energy
[redacted]
267 Kent Avenue, Ferndale, Johannesburg, 2194, South Africa

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 06 August 2025 16:27
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Specialist,

I trust you are well.

Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by Monday, 12 August 2025.

If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.

Kind regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Anton Lohse
Sent on: Thursday, 14 August 2025 09:32:47
To: ERM Arcus Amsterdam; Lloyd Barnes
CC: Stephen Burton; Stephanie Gopaul; Andrew Pearson
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Some people who received this message don't often get email from anton@mulilo.com. Learn why this is important

EXTERNAL MESSAGE

Hi Lucien,
I'm looking into this.
Can you please urgently find out from the lawyers what the name and CAA registration number is for the aerodrome.
Regards

Anton Lohse
Legal Advisor
[redacted]
www.mulilo.com
[redacted]

mulilo

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Wednesday, August 13, 2025 4:47 PM
To: Lloyd Barnes <Lloyd@mulilo.com>
Cc: Anton Lohse <Anton@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <Andrew@mulilo.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

Hi Lloyd,

Please note that we have received comments and concerns from an I&AP who operates a landing strip near the proposed development.

These comments were originally submitted on 22 April after the previous Draft EIA Phase PPP period. The I&AP has now resubmitted the same comments during the current PPP period.

Given the nature of the concerns raised, and that the submission has come via the I&AP's legal representative, we kindly request that the Mulilo legal team review the comments and provide any necessary input.

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Riaan Meintjes <riaan@themis.co.za>
Sent: Thursday, August 7, 2025 1:48 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>

Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

You don't often get email from riaan@themis.co.za. Learn why this is important
EXTERNAL MESSAGE

Dear Sir/Madam

We have briefly perused the draft EIA report and have been unable to find any reference to the comment submitted by us on the instructions of our client, a copy of which is attached to this email.

Kindly refer us to the relevant pages of the draft report which deal with our client's comments?

We further note from the draft report that a formal application has been lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted. Kindly furnish us with a copy of this application and all communications to and from ATNS relating thereto.

We look forward to hearing from you as a matter of urgency.

Regards
Riaan Meintjes
Director

BusinessDay Best Lawyers for 2025: Arbitration and Mediation; Litigation; Real Estate Law

HAYES EST H 2005 INCORPORATED

[redacted]
W: www.themislawchambers.co.za

Unit 1, Roeland Square
Corner of Roeland Street and Drury Lane
Cape Town, 8001

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---

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Date: Wednesday, 16 July 2025 at 13:55
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Interested and Affected Party,

Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.

The revised comment period now ends on 15 August 2025.

All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.

Thank you for your continued participation.

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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Disclaimer

Prior to making any payment to our firm, please confirm the banking details telephonically with one of our directors as listed on our website. We will never send you an email advising you of a change of our banking details. Any email mentioning a change of banking details is false, and we ask that you kindly contact one of our directors immediately should you receive such an email.

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From: Reabetswe MOKOMELE
Sent on: Thursday, 14 August 2025 09:42:56
To: Lucien Barbeau; ERM Arcus Amsterdam
CC: Victor DE ABREU
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Hi Lucian,

Herewith confirmation that we'll be able to issue the updated reports by midday tomorrow, 15 August.

Kind regards

Reabetswe MOKOMELE
Engineer, Planning and Traffic Engineering, Infrastructure + Energy
[redacted]E Reabetswe.Mokomele@smec.com
267 Kent Avenue, Ferndale, Johannesburg, 2194, South Africa

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 13 August 2025 19:41
To: Reabetswe MOKOMELE <Reabetswe.Mokomele@smec.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Victor DE ABREU <Victor.deAbreu@smec.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Reabetswe, I am just following up with the report submissions, are you able to share them tomorrow?

Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, August 11, 2025 11:38 AM
To: Reabetswe MOKOMELE <Reabetswe.Mokomele@smec.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Victor DE ABREU <Victor.deAbreu@smec.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Reabetswe,

Understood, thanks for informing me. From my visual inspection, here has not been WTG or road changes, just minor infrastructure footprint changes. If I could please refer you to the boundary KMZs, these have been changed. I kindly bare in mind when updating any figures within reports.

Can I expect the changes to the report on Wednesday?

Regards,

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

Sustainability is our business

From: Reabetswe MOKOMELE <Reabetswe.Mokomele@smec.com>
Sent: Thursday, August 7, 2025 10:26 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Victor DE ABREU <Victor.deAbreu@smec.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Dear Lucian,

Your request is received but kindly note the following:

Due Dates - Due to committed site visits taking place on 11 and 12 August 2025, unfortunately it is not possible to meet the due date of 12 August 2025. The revised issue date must consider both the updating and internal reviews which would be at least one (1) week.

Variation Order - Our team will review the final layouts and determine whether the changes will require and Addendum Letter or Full Revisions to be issued. The time and effort for updating the reports (full revisions) will require a variation order which will be confirmed and communicated to you for approval.

Trust you find the above in order.

Kind regards

Reabetswe MOKOMELE
Engineer, Planning and Traffic Engineering, Infrastructure + Energy
M [redacted] **E** Reabetswe.Mokomele@smec.com
267 Kent Avenue, Ferndale, Johannesburg, 2194, South Africa

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 06 August 2025 16:27
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Specialist,

I trust you are well.

Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by Monday, 12 August 2025.

If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.

Kind regards,

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

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From: Lucien Barbeau
Sent on: Thursday, 14 August 2025 10:13:24
To: Reabetswe MOKOMELE; ERM Arcus Amsterdam
CC: Victor DE ABREU
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Thank you for updating me Reabetswe,

Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Reabetswe MOKOMELE <Reabetswe.Mokomele@smec.com>
Sent: Thursday, August 14, 2025 9:43 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Victor DE ABREU <Victor.deAbreu@smec.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Hi Lucian,

Herewith confirmation that we'll be able to issue the updated reports by midday tomorrow, 15 August.

Kind regards

Reabetswe MOKOMELE
Engineer, Planning and Traffic Engineering, Infrastructure + Energy
[redacted]
267 Kent Avenue, Ferndale, Johannesburg, 2194, South Africa

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 13 August 2025 19:41
To: Reabetswe MOKOMELE <Reabetswe.Mokomele@smec.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Victor DE ABREU <Victor.deAbreu@smec.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Reabetswe, I am just following up with the report submissions, are you able to share them tomorrow?

Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, August 11, 2025 11:38 AM

To: Reabetswe MOKOMELE <Reabetswe.Mokomele@smec.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Victor DE ABREU <Victor.deAbreu@smec.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Reabetswe,

Understood, thanks for informing me. From my visual inspection, here has not been WTG or road changes, just minor infrastructure footprint changes. If I could please refer you to the boundary KMZs, these have been changed. I kindly bare in mind when updating any figures within reports.

Can I expect the changes to the report on Wednesday?

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Reabetswe MOKOMELE <Reabetswe.Mokomele@smec.com>
Sent: Thursday, August 7, 2025 10:26 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Victor DE ABREU <Victor.deAbreu@smec.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Dear Lucian,

Your request is received but kindly note the following:

Due Dates - Due to committed site visits taking place on 11 and 12 August 2025, unfortunately it is not possible to meet the due date of 12 August 2025. The revised issue date must consider both the updating and internal reviews which would be at least one (1) week.

Variation Order - Our team will review the final layouts and determine whether the changes will require and Addendum Letter or Full Revisions to be issued. The time and effort for updating the reports (full revisions) will require a variation order which will be confirmed and communicated to you for approval.

Trust you find the above in order.

Kind regards

Reabetswe MOKOMELE
Engineer, Planning and Traffic Engineering, Infrastructure + Energy
[redacted]
267 Kent Avenue, Ferndale, Johannesburg, 2194, South Africa

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 06 August 2025 16:27
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Specialist,

I trust you are well.

Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by

Monday, 12 August 2025.

If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: ERM Arcus Amsterdam
Sent on: Thursday, 14 August 2025 10:20:27
To: Riaan Meintjes; ERM Arcus Amsterdam
CC: Mpho Malema
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Riaan Meintjes,

Thank you for providing comment, we will return with responses shortly.

May I please request the name and CAA Registration number for the aerodrome in question.

Your prompt attention to this request would be greatly appreciated.

Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Riaan Meintjes <riaan@themis.co.za>
Sent: Thursday, August 7, 2025 1:48 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

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EXTERNAL MESSAGE

Dear Sir/Madam

We have briefly perused the draft EIA report and have been unable to find any reference to the comment submitted by us on the instructions of our client, a copy of which is attached to this email.

Kindly refer us to the relevant pages of the draft report which deal with our client's comments?

We further note from the draft report that a formal application has been lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted. Kindly furnish us with a copy of this application and all communications to and from ATNS relating thereto.

We look forward to hearing from you as a matter of urgency.

Regards
Riaan Meintjes
Director

BusinessDay Best Lawyers for 2025: Arbitration and Mediation; Litigation; Real Estate Law

HAYES EST 2005 INCORPORATED
[redacted]
W: www.themislawchambers.co.za
Unit 1, Roeland Square
Corner of Roeland Street and Drury Lane
Cape Town, 8001

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Date: Wednesday, 16 July 2025 at 13:55
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Interested and Affected Party,

Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.

The revised comment period now ends on 15 August 2025.

All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.

Thank you for your continued participation.

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM

Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted]

erm.com



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From: ERM Arcus Amsterdam
Sent on: Thursday, 14 August 2025 10:22:17
To: Anton Lohse; ERM Arcus Amsterdam; Lloyd Barnes
CC: Stephen Burton; Stephanie Gopaul; Andrew Pearson
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Anton,

I've request it from them, will share updates as soon as I have a response

Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Anton Lohse <Anton@mulilo.com>
Sent: Thursday, August 14, 2025 9:33 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lloyd Barnes <Lloyd@mulilo.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <Andrew@mulilo.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Some people who received this message don't often get email from anton@mulilo.com. Learn why this is important
EXTERNAL MESSAGE

Hi Lucien,
I'm looking into this.
Can you please urgently find out from the lawyers what the name and CAA registration number is for the aerodrome.
Regards

Anton Lohse
Legal Advisor
[redacted]
www.mulilo.com
21st Floor, Portside, 5 Buitengracht Street, Cape Town, 8001
mulilo

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Wednesday, August 13, 2025 4:47 PM
To: Lloyd Barnes <Lloyd@mulilo.com>
Cc: Anton Lohse <Anton@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <Andrew@mulilo.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

Hi Lloyd,

Please note that we have received comments and concerns from an I&AP who operates a landing strip near the proposed development.

These comments were originally submitted on 22 April after the previous Draft EIA Phase PPP period. The I&AP has now resubmitted the same comments during the current PPP period.

Given the nature of the concerns raised, and that the submission has come via the I&AP's legal representative, we kindly request that the Mulilo legal team review the comments and provide any necessary input.

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Riaan Meintjes <riaan@themis.co.za>
Sent: Thursday, August 7, 2025 1:48 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

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EXTERNAL MESSAGE

Dear Sir/Madam

We have briefly perused the draft EIA report and have been unable to find any reference to the comment submitted by us on the instructions of our client, a copy of which is attached to this email.

Kindly refer us to the relevant pages of the draft report which deal with our client's comments?

We further note from the draft report that a formal application has been lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted. Kindly furnish us with a copy of this application and all communications to and from ATNS relating thereto.

We look forward to hearing from you as a matter of urgency.

Regards
Riaan Meintjes
Director

BusinessDay Best Lawyers for 2025: Arbitration and Mediation; Litigation; Real Estate Law

HAYES EST 2005 INCORPORATED
[redacted]
W: www.themislawchambers.co.za
Unit 1, Roeland Square
Corner of Roeland Street and Drury Lane
Cape Town, 8001

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---

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Date: Wednesday, 16 July 2025 at 13:55
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Interested and Affected Party,

Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.

The revised comment period now ends on 15 August 2025.

All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.

Thank you for your continued participation.

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

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Lucien Barbeau
Senior Consultant

Cape Town [redacted]

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From: Lucien Barbeau
Sent on: Thursday, 14 August 2025 11:59:19
To: ERM Arcus Amsterdam; Lloyd Barnes
CC: Stephen Burton
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Lloyd,

Just following up on the below

Thank you!

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Monday, August 11, 2025 10:24 AM
To: Lloyd Barnes <lloyd@mulilo.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Lloyd,

We have received feedback from the NTCSA (below) indicating that Amsterdam affects the Camden–Edwaleni 1 line.

Could you please confirm whether any agreements or arrangements are currently in place to facilitate the connection of the existing line to Camden? If so, kindly provide any relevant details or supporting documentation that could assist in addressing this matter within the Final EIA Report.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Khululwa Matshoba <StuurmKV@ntcsa.co.za>
Sent: Wednesday, August 6, 2025 10:56 AM
To: ERM Arcus Amsterdam <erm.arcusamsterdam@erm.com>; Mpho Malema <mpho.malema@erm.com>
Cc: David Tunnicliff <TunnicDA@ntcsa.co.za>
Subject: Fw: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Good day Lucien

Kindly note that your proposed project is affecting existing CAMDEN EDWALENI 1 line. Kindly correct and revert back .

Thank you

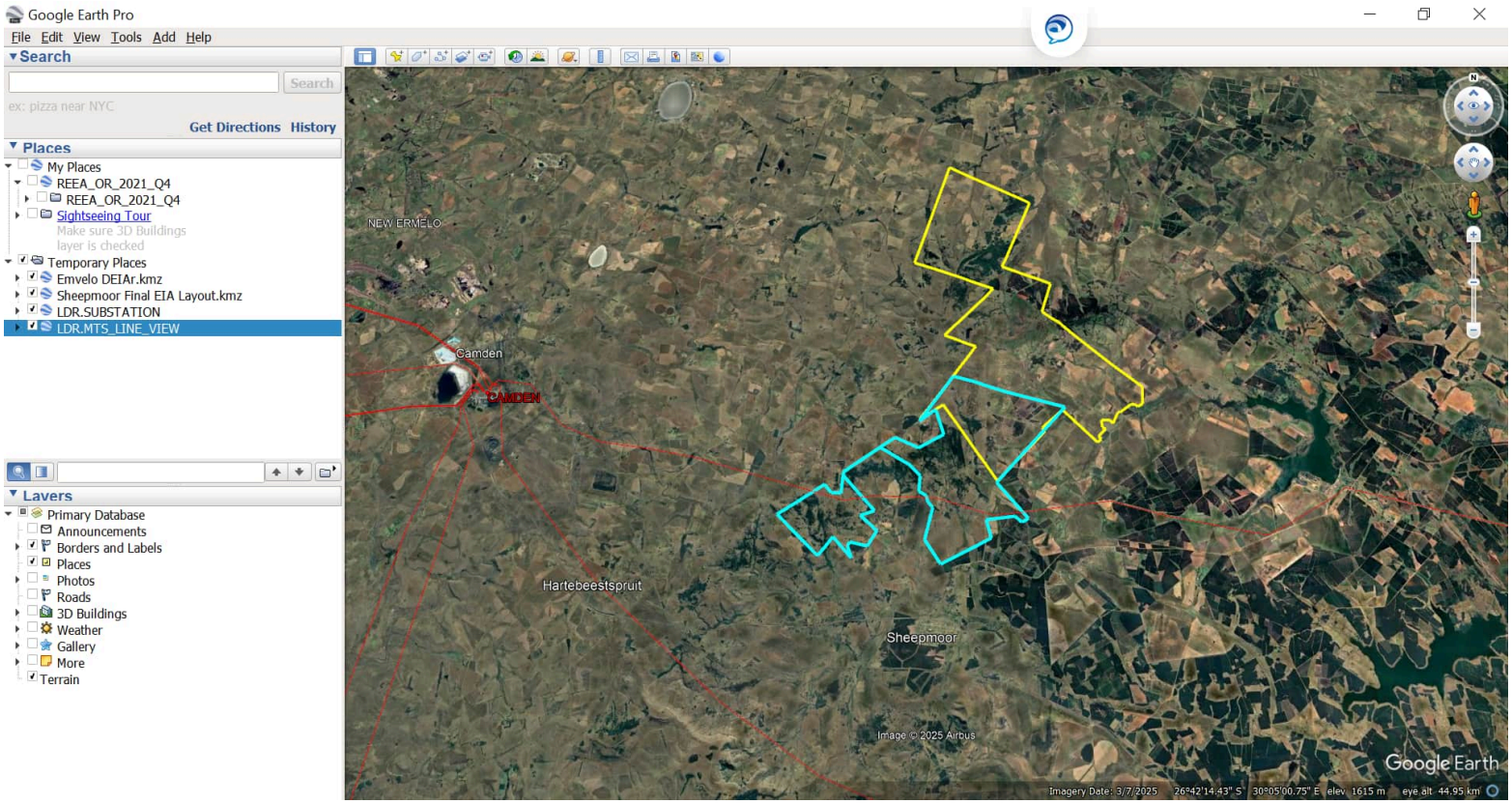
Warm regards
Khululwa

Disclaimer

NB: This Email and its contents are subject to the NTCSA EMAIL LEGAL NOTICE which can be viewed here.

From: Christo Badenhorst <BadenhC@ntcsa.co.za>
Sent: Wednesday, August 6, 2025 10:49
To: Khululwa Matshoba <StuurmKV@ntcsa.co.za>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

FYI



From: Khululwa Matshoba <StuurmKV@ntcsa.co.za>
Sent: Wednesday, 06 August 2025 10:40
To: Christo Badenhorst <BadenhC@ntcsa.co.za>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Thanks Christo, Please share the map.

Warm regards

Khush

From: Christo Badenhorst <BadenhC@ntcsa.co.za>
Sent: Wednesday, August 6, 2025 10:39
To: Khululwa Matshoba <StuurmKV@ntcsa.co.za>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi

Does not affect my projects but does affect existing CAMDEN EDWALENI 1 line.

Regards

From: Khululwa Matshoba <StuurmKV@ntcsa.co.za>
Sent: Wednesday, 06 August 2025 10:36
To: Christo Badenhorst <BadenhC@ntcsa.co.za>; Samuel Nkoana <NkoanaLS@ntcsa.co.za>; Precious Mashiteng <MashitePR@ntcsa.co.za>; Ndivhoniswani Mutwanamba <MutwanN@ntcsa.co.za>; Phathutshedzo Kwinda <KwindaP@ntcsa.co.za>; Pumeza Mthembu <MaliwaP@ntcsa.co.za>
Subject: Fw: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Good day

Kindly check if our lines are impacted.

Warm regards

Khush

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>

Sent: Wednesday, August 6, 2025 09:52
To: Khululwa Matshoba <StuurmKV@ntcsa.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>

Cc: Mpho Malema <mpho.malema@erm.com>

Subject: [CAUTION:EXTERNAL EMAIL] RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Khululwa,

Kindly see attached kmz files of the proposed development.

Thank you,

Lucien Barbeau
Senior Consultant

Sustainability is our business

Cape Town [redacted] **erm.com**

From: Khululwa Matshoba <StuurmKV@ntcsa.co.za>
Sent: Wednesday, August 6, 2025 8:53 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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EXTERNAL MESSAGE

Kindly share the kmz files, Please find attached Eskom/NTCSA requirements for work in or near Eskom/NTCSA servitudes and infrastructure.

Thank you.

Warm regards

Khululwa

Disclaimer

NB: This Email and its contents are subject to the NTCSA EMAIL LEGAL NOTICE which can be viewed here.

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Tuesday, July 15, 2025 16:42
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>

Subject: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Lloyd Barnes
Sent on: Thursday, 14 August 2025 12:06:01
To: Lucien Barbeau; ERM Arcus Amsterdam
CC: Stephen Burton
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

Thank you for following up, response provided below:

Thank you for your comment and for identifying the interaction between the proposed Amsterdam Wind Energy Facility and the existing Camden–Edwaleni 1 transmission line.

We confirm that we will follow the required Eskom processes to apply for and, where appropriate, request relaxations of relevant clearance and servitude standards. We remain committed to engaging with Eskom's technical team following the approval of the Environmental Authorisation to ensure that any infrastructure interfaces are addressed in line with your requirements.

The site selection process for the project has considered a large assessment area and evaluated various technical and environmental constraints, which provides flexibility for potential adjustments if required. We have also considered alternative configurations during the planning phase, which will assist in working collaboratively to achieve a mutually acceptable solution.

We look forward to continued engagement with Eskom to address this matter in a coordinated manner.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
www.mulilo.com
21st Floor, Portside, 5 Buitengracht Street, Cape Town, 8001

mulilo

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Thursday, 14 August 2025 11:59
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lloyd Barnes <Lloyd@mulilo.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Lloyd,

Just following up on the below

Thank you!

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Monday, August 11, 2025 10:24 AM

To: Lloyd Barnes <lloyd@mulilo.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Kind Regards

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

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Sent: Wednesday, August 6, 2025 10:56 AM
To: ERM Arcus Amsterdam <erm.arcusamsterdam@erm.com>; Mpho Malema <mpho.malema@erm.com>
Cc: David Tunnicliff <TunnicDA@ntcsa.co.za>
Subject: Fw: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Good day Lucien

Kindly note that your proposed project is affecting existing CAMDEN EDWALENI 1 line. Kindly correct and revert back .

Thank you

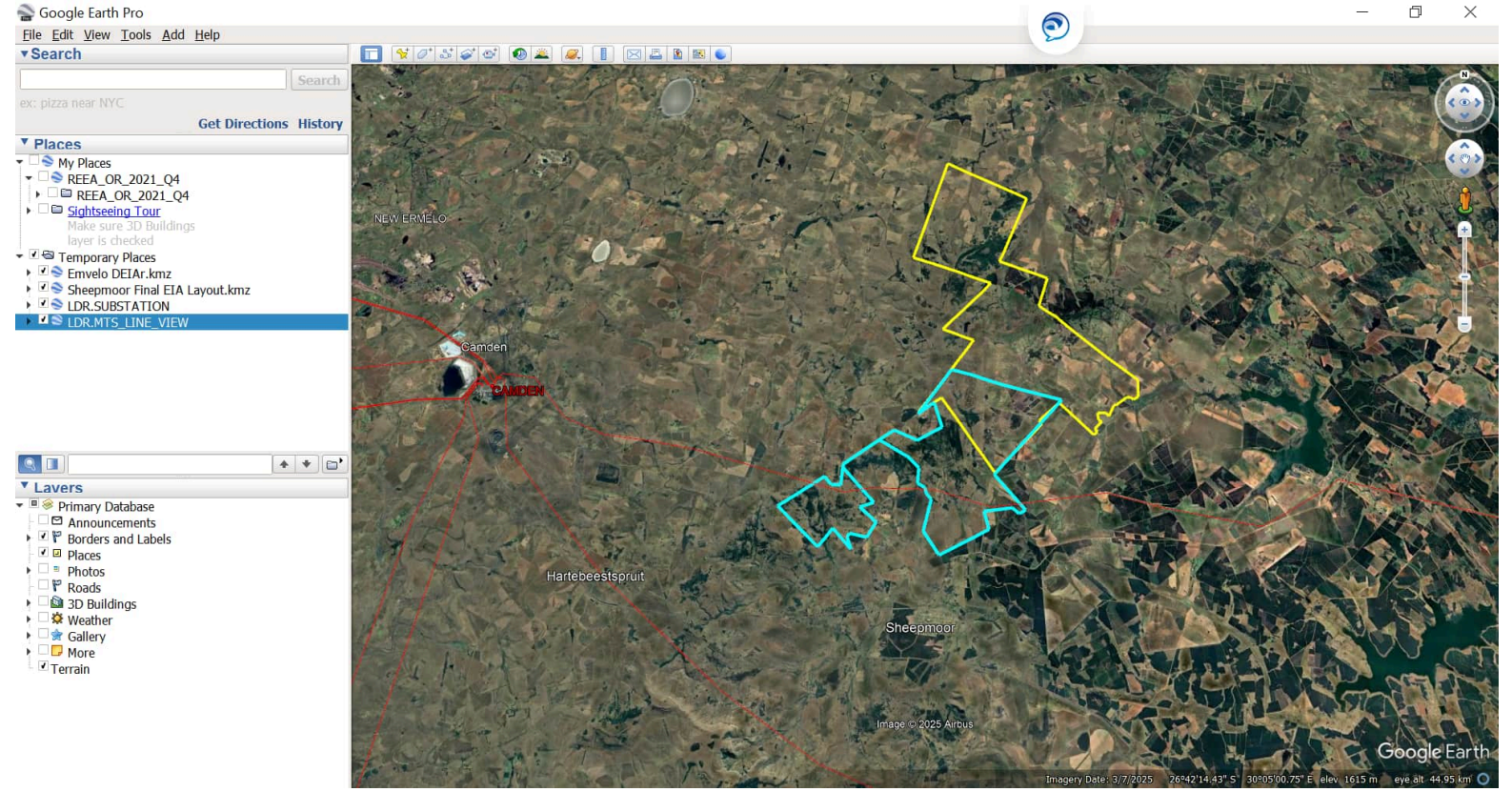
Warm regards
Khululwa

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Dear Interested and Affected Party,

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Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

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Environmental Assessment Practitioner

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Lucien Barbeau
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From: Lucien Barbeau
Sent on: Thursday, 14 August 2025 12:11:29
To: Lloyd Barnes; ERM Arcus Amsterdam
CC: Stephen Burton; Mpho Malema
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Thank you Lloyd,

Response well received – will action it shortly.

Regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Lloyd Barnes <Lloyd@mulilo.com>
Sent: Thursday, August 14, 2025 12:06 PM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

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We look forward to continued engagement with Eskom to address this matter in a coordinated manner.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted] Town, 8001

mulilo

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Thursday, 14 August 2025 11:59
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lloyd Barnes <Lloyd@mulilo.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Lloyd,

Just following up on the below

Thank you!

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Monday, August 11, 2025 10:24 AM
To: Lloyd Barnes <lloyd@mulilo.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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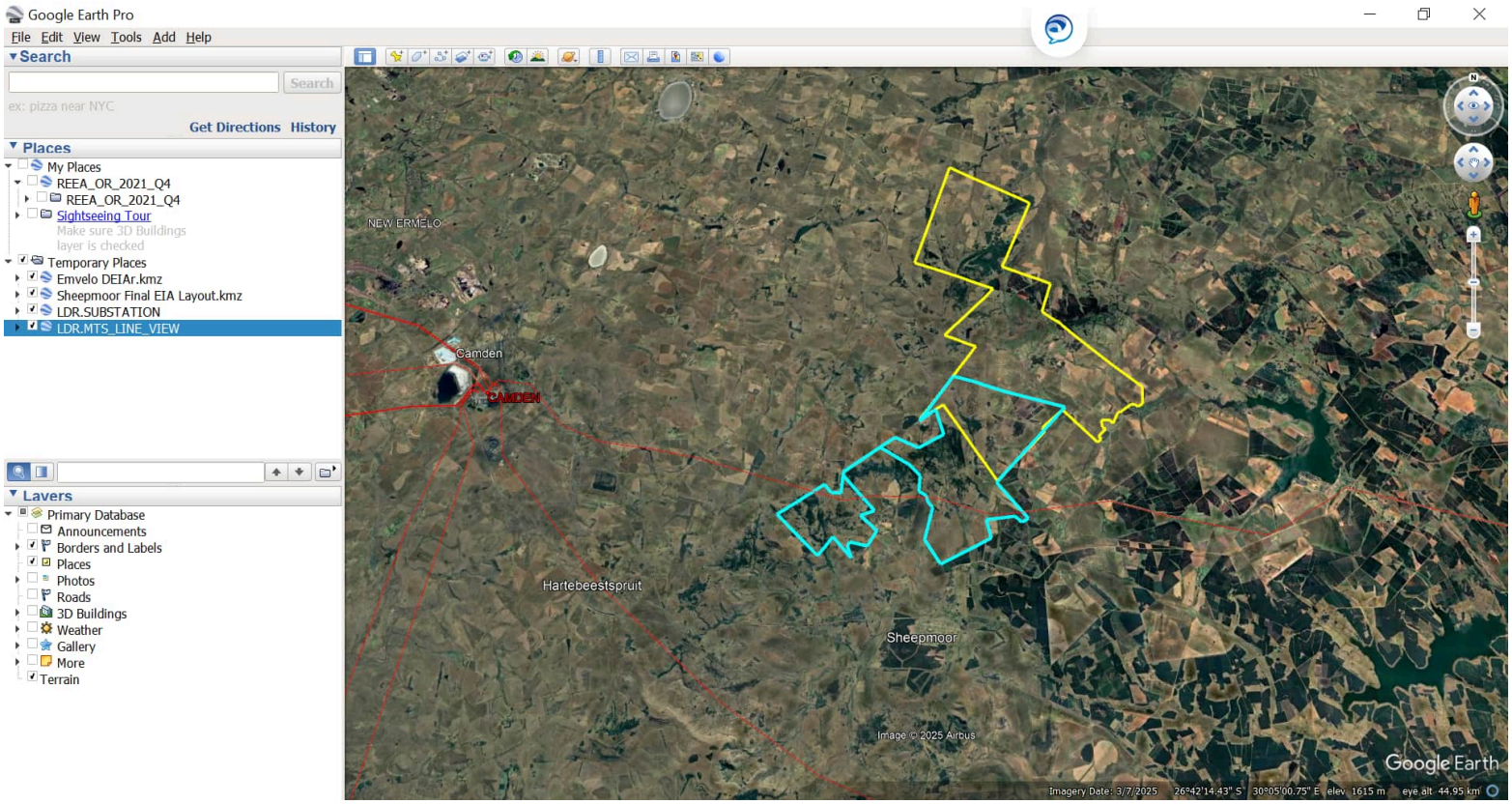
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From: ERM Arcus Amsterdam
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To: Khululwa Matshoba; ERM Arcus Amsterdam; Mpho Malema
CC: David Tunnicliff
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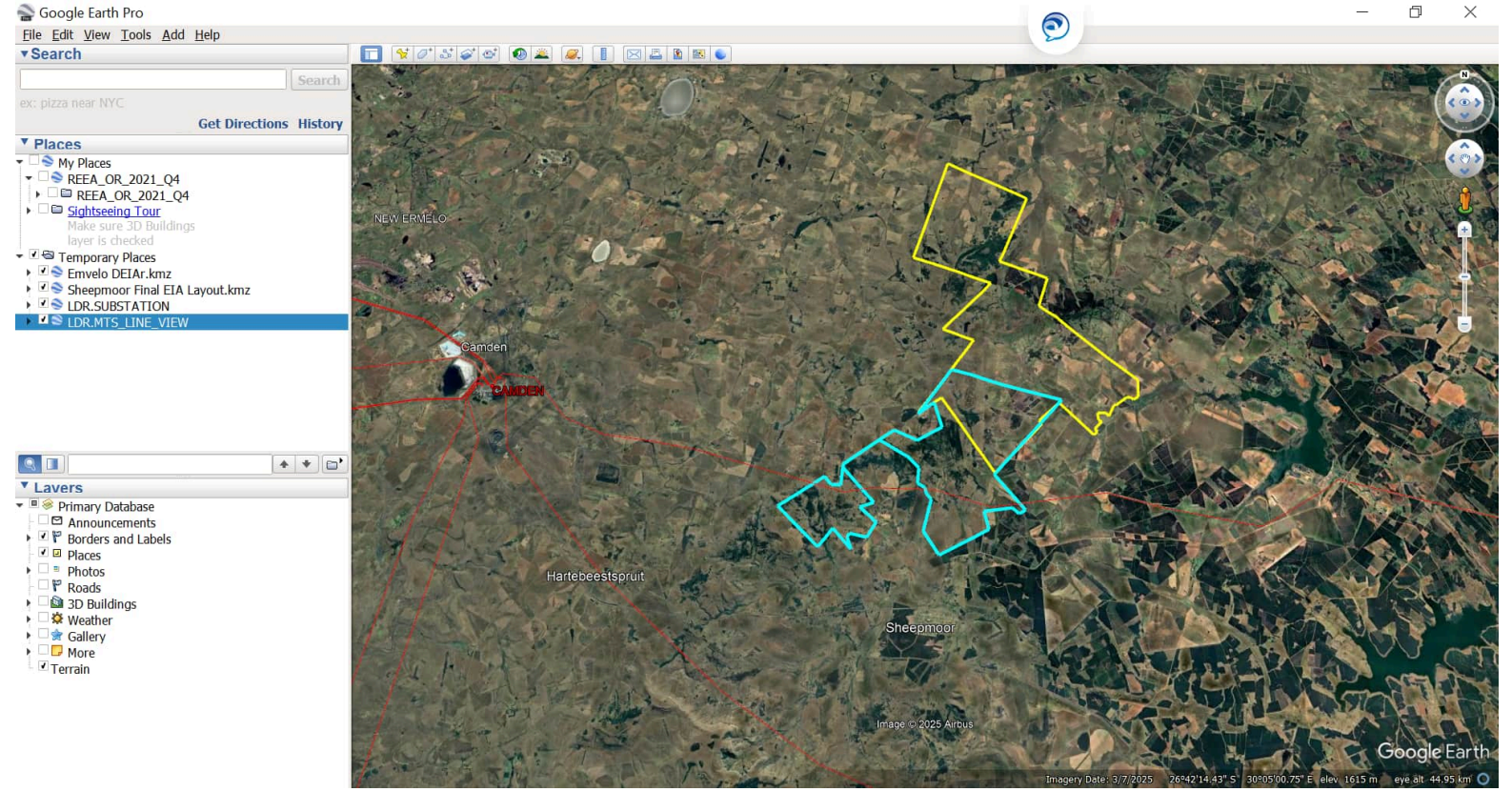
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Stephanie Gopaul

Environmental Assessment Practitioner

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



From: Riaan Meintjes
Sent on: Thursday, 14 August 2025 12:57:52
To: ERM Arcus Amsterdam
CC: Mpho Malema
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Attachments: Phumula Aerodrome Registration R 397.pdf (43.43 KB)

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EXTERNAL MESSAGE

Dear Lucien

Please see the attached.

We look forward to receiving the information requested in our email of 7 August 2025 without further delay.

Regards
Riaan Meintjes
Director

BusinessDay Best Lawyers for 2025: Arbitration and Mediation; Litigation; Real Estate Law

HAYES EST 2005 INCORPORATED

[redacted]
W: www.themislawchambers.co.za

Unit 1, Roeland Square
Corner of Roeland Street and Drury Lane
Cape Town, 8001

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---

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Date: Thursday, 14 August 2025 at 10:20
To: Riaan Meintjes <riaan@themis.co.za>, ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Mpho Malema <mpho.malema@erm.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Riaan Meintjes,

Thank you for providing comment, we will return with responses shortly.

May I please request the name and CAA Registration number for the aerodrome in question.

Your prompt attention to this request would be greatly appreciated.

Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Riaan Meintjes <riaan@themis.co.za>
Sent: Thursday, August 7, 2025 1:48 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

You don't often get email from riaan@themis.co.za. Learn why this is important
EXTERNAL MESSAGE

Dear Sir/Madam

We have briefly perused the draft EIA report and have been unable to find any reference to the comment submitted by us on the instructions of our client, a copy of which is attached to this email.

Kindly refer us to the relevant pages of the draft report which deal with our client's comments?

We further note from the draft report that a formal application has been lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted. Kindly furnish us with a copy of this application and all communications to and from ATNS relating thereto.

We look forward to hearing from you as a matter of urgency.

Regards
Riaan Meintjes
Director

BusinessDay Best Lawyers for 2025: Arbitration and Mediation; Litigation; Real Estate Law

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Date: Wednesday, 16 July 2025 at 13:55
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Interested and Affected Party,

Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.

The revised comment period now ends on 15 August 2025.

All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.

Thank you for your continued participation.

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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Aerodrome Name: Phumula

Registration Number: R 397

Type of aircraft for which the aerodrome is planned: General Aviation, up to 12 seater twin engine operations

Coordinates (WGS 84): S26° 34′ 35″ E030° 14′ 14″

Obstacles to clear: Nil

[redacted]
jacques.celliers@nav.tech

From: Mpho Malema
Sent on: Thursday, 14 August 2025 14:24:11
To: Riaan Meintjes; ERM Arcus Amsterdam
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Good day Mr Riaan Meitjies, I hope this email finds you well.

Thank you for your feedback and swift response to the matter.

Your response is almost ready it was pending the information we just requested.

Kind Regards

ERM
Sustainability is our business

Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted]
[redacted]



From: Riaan Meintjes <riaan@themis.co.za>
Sent: Thursday, August 14, 2025 12:58 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Mpho Malema <mpho.malema@erm.com>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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

EXTERNAL MESSAGE

Dear Lucien

Please see the attached.

We look forward to receiving the information requested in our email of 7 August 2025 without further delay.

Regards
Riaan Meintjes
Director

BusinessDay Best Lawyers for 2025: Arbitration and Mediation; Litigation; Real Estate Law

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Senior Consultant

Cape Town [redacted] **erm.com**

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Regards
Riaan Meintjes

Director

BusinessDay Best Lawyers for 2025: Arbitration and Mediation; Litigation; Real Estate Law

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[redacted]
W: www.themislawchambers.co.za

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Date: Wednesday, 16 July 2025 at 13:55
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Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Thank you for your continued participation.

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Robyn Luyt
Sent on: Thursday, 14 August 2025 14:53:52
To: ERM Arcus Amsterdam; Stephanie Gopaul
CC: energy@birdlife.org.za; bcadmin@dffe.gov.za; bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; PMaitla@dffe.gov.za; Gavin Cowden; Sindy Mbuyane; Okwethu Fakude; frans.krige@mtpa.co.za; mervyn@mtpa.co.za
Subject: Comments | Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities
Attachments: Sheepmoor WEF_Revised EIA 5G28_Aug2025.pdf (2.34 MB), Emvelo WEF Revised EIA 5G30_Aug2025.pdf (2.58 MB)

EXTERNAL MESSAGE

Good day ERM,

Please see attached for our comments on the revised draft EIA's for both Emvelo and Sheepmoor WEFs.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
Nelspruit, 1200
[redacted]
Email: rluyt@mpg.gov.za

>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 07/24/25 2:52 PM >>>
Dear Robyn,

We intend to submit the FEIAr on the 25th of August 2025 and we are commitment to thoroughly addressing all comments received during the Public Participation Process.

We acknowledge that this process requires both time and resources, and as such, we are limited in our ability to extend the timeline beyond 15 August 2025. That said, we fully recognise the challenges faced in accessing the Draft EIA documents. If you are unable to submit your comments by the 15th, we're willing to accept them by the 18th of August to ensure you have had a full and fair opportunity to review and engage with the Draft EIA documents.

Additionally, should the Mpumalanga Tourism and Parks Agency (MTPA) or MDARDLEA still wish to engage further on our applications, we would be happy to arrange a physical meeting at a mutually convenient time. Please feel free to let us know if such an engagement would be of interest.

Regards,

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Thursday, July 17, 2025 10:35 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>
Cc: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Gavin Cowden <GCowden@mpg.gov.za>; mervyn@mtpa.co.za
Subject: Re: RE: RE: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
EXTERNAL MESSAGE

Correction to my email below:
Public Participation reports for both WEFs and the specialist reports for Emvelo WEF were only available on 16 July 2025.

>>> Sindy Mbuyane 07/17/25 10:27 AM >>>
Dear All,

Please also note that our office has not yet received the hard copies. In the future, kindly ensure that reports are dispatched to all relevant offices at the same time so that the regulated timelines can commence and conclude on the same dates.

Kind Regards,
Sindi

>>> Robyn Luyt 07/17/25 10:23 AM >>>
Dear Lucien,

I can confirm that all documents are now on the website.

However, given that I&APs only had access to the full reports on 16 July and not 15 July (ie. Specialist Reports for Both WEFs, and the specialist reports for the Emvelo WEF were only accessible on 16 July 202), would this not mean that the regulated 30 days commences on 17 July and ends on 18 August (since 17 Aug is a Sunday) ?

Kind Regards
Robyn

>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 07/16/25 4:24 PM >>>
Hi Robyn,

The configuration for each WEF's documents is as follows:

- 02 Volume I: Draft EIA Report
- 03 Volume II: Specialist EIA Reports
- 04 Volume III: Public Participation Reports

Kind Regards

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Wednesday, July 16, 2025 3:37 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Cc: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; mervyn@mtpa.co.za
Subject: Re: RE: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
EXTERNAL MESSAGE

Hi Lucien,

The reports I was able to access for each WEF are titled "Public Participation Volume III". Does this imply that there are there are 2 more volumes for each WEF ?

Regards
Robyn

>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 07/16/25 1:54 PM >>>
Hi Robyn

Thanks for your message.

1. The full Public Participation Reports for Emvelo and Sheepmoor are available on the website now — kindly do check again. Let us know if you still can't access them.

https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/

1. We've extended the comment period by one day, so it now ends on 15 August 2025. A notice will be sent out shortly.
2. Please see the attached updated layout and shapefiles, including all turbines and infrastructure.

Let us know if you need anything else.

Regards

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Wednesday, July 16, 2025 11:15 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>

Cc: bncube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; mervyn@mtpa.co.za
Subject: Outstanding info: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High
EXTERNAL MESSAGE

Good day Stephanie and Lucien,

1. Please provide links to the full Public Participation Reports for both Emvelo and Sheepmoor. Only the cover pages for the public participation reports are available.
2. You have stated that the public comment period is from 15 July to 14 Aug. However it seems you have not accounted for the public holiday on 9 Aug, which would mean that the 30 day comment period ends on 15 Aug. However the 30 comment period should only commence when we have access to the full reports (ie. we await the public consultation reports).
3. It is our understanding - based on the meeting that was held in Nelspruit - that the layouts have changed. Please urgently provide the shapefiles, which we require to undertake our review. Shapefiles to include turbines and all infrastructure.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)

Director: Environmental Impact Management

Department of Agriculture, Rural Development, Land & Environmental Affairs

Mpumalanga Provincial Government

Riverside Office Park, Aqua Street (Cycad Building - Block 4)

Nelspruit, 1200

[redacted]

Email: rluyt@mpg.gov.za

>>> Gavin Cowden 07/16/25 9:12 AM >>>
Morning Lucien,

Please can you provide the specialist report for the Emvelo WEF as only the specialist report for Sheepmoor is provided on the weblink.

Many thanks
Kind regards
Gavin

Gavin Cowden
Environmental Policy, Planning & Coordination

Mpumalanga Department of Agriculture, Rural Development, Land & Environmental Affairs
Private Bag X11219
Nelspruit, 1200
[redacted]

>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 07/15/25 4:43 PM >>>
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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

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agriculture, rural development,
land & environmental affairs
MPUMALANGA PROVINCE
REPUBLIC OF SOUTH AFRICA

13 De Jager Street, Ermelo, 2350, Private Bag X 2777, Ermelo, 2350
Tel: +27 (013) 004 0766

LitikoLetekulima, Kutfutfukiswa KwetindzawoTasemakhaya, Temhlaba Netesimondzawo

Departement van Landbou, LandelikeOntwikkeling, GrondenOngewing Sake

umNyangoweZelimo UkuThuthukiswakweeNdawozemaKhaya, iNarhaneeNdabazeBhoduluko

Enquiries : **R. Luyt / O. Fakude**
Telephone : **(013) 004 1099**
Reference : **1/3/1/16/5G-30**

Stephanie Gopaul
ERM Southern Africa (Pty) Ltd
240 Main Road
Rondebosch
7700

Email: ERM.ArcusAmsterdam@erm.com

Dear Madam,

REVISED DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT: ACTIVITIES ASSOCIATED WITH THE EMVELO WIND ENERGY FACILITY ON PORTIONS 1, 2, 5 & RE OF THE FARM SCHIMMELHOEK 272 IT, AND PORTIONS 1, 2, 5, 6 & RE OF THE FARM SCHIEDAM 274 IT; THE ASSOCIATED GRID CONNECTION ON PORTIONS 1, 2, 5, 6 & RE OF THE FARM SCHIEDAM 274 IT, PORTIONS 2, 3, 4, 6, 9, 11, 12 & 13 OF THE FARM WAAIHOEK 286 IT, PORTION 7 OF THE FARM WITPUNT 267 IT, REMAINDER OF THE FARM ONVERWACHT 273 IT, PORTIONS 1 & 6 OF THE FARM ZWARTWATER 288 IT, PORTIONS 3, 4, 5, RE 6, 9, 10 & 11 OF THE FARM WELTEVREDEN 289 IT, THE REMAINDER, RE 1, RE 9, RE 11, RE 14 AND PORTIONS 7 & 8 OF THE FARM MOOIPLAATS 290 IT, PORTION 8 OF THE FARM BOSJESSPRUIT 291 IT, AND PORTIONS 1 & 2 OF THE FARM WELGELEGEN 322 IT; AND ASSOCIATED ACCESS ROADS ON PORTIONS 6, 7, 12, 23 & 26 OF THE FARM ROODEWAL 272 IT AND PORTIONS 1, 2, 3, 4 & 26 OF THE FARM ONVERWACHT 273 IT, MSUKALIGWA LOCAL MUNICIPALITY

The revised draft environmental impact assessment report which was submitted by you in respect of the abovementioned application and received by the Department on 16 July 2025 has reference. The Department has considered the content of the report, and has the following comments:

1. The layout provided in the initial draft EIAR included 24 turbines. It was not explicit in the revised draft EIR, which now includes 22 turbines, but after scrutinizing the layout plan and the responses provided in the comments and response report (CRR), we have been able to ascertain the following changes: The removal of WTG 24; the movement of WTG 21 out of Emvelo and into the Sheepmoor site; and slight changes to the localities of WTGs 3, 7, 12, 13, 14, 19, 20, 22, 23 and 25. None of the turbines that were moved or micro-sited have been moved into less sensitive areas. Sixteen (16) of the 22 turbines proposed in the current layout, all of which were flagged in our previous comments, are still located in sensitive areas. Given that the requirement to avoid impacts in accordance with the mitigation hierarchy has not been adequately addressed, **these comments must be read in conjunction with our comments dated 10 April 2025, which still stand.**
2. The proposed Emvelo Wind Energy Facility and associated grid infrastructure is located on a site comprising: CBA Irreplaceable and Optimal; Intact Grassland Patches; Key Biodiversity Areas; the Grasslands Important Bird Area (IBA); Ecological Support Areas; National Protected Area Expansion Strategy Areas (NPAES); Threatened Ecosystems – including Wakkerstroom Montane Grassland and Eastern Highveld Grassland; CBA: Aquatic Rivers; ESA: Strategic Water Source Area; ESA: Wetlands and ESA: Important Subcatchments.

3. Furthermore, the proposed Emvelo WEF and associated grid connection is located in an area comprising a high fauna sensitivity, a high diversity of threatened bird species, and a high number of priority species for wind energy developments and power lines, including the following confirmed on site: African Grass Owl, African Marsh Harrier, Blue Crane, Cape Vulture, Denham's Bustard, Greater Flamingo, Grey Crowned Crane, Lanner Falcon, Martial Eagle, Secretarybird, Southern Bald Ibis, Sensitive Species 23, White-bellied Bustard, and Yellow-breasted Pipit.
4. According to the Avifaunal Assessment, a total of 253 bird species could potentially occur in the Broader Area where the Emvelo WEF and associated Grid Connection Infrastructure are proposed to be located. Of the 253 species, 38 species are classified as priority species for wind energy developments, of which 32 were recorded during pre-construction monitoring. Of the 253 species, 76 are considered power line sensitive species, 57 of which were recorded during the pre-construction monitoring.
5. DARDLEA is not supportive of development of WEFs (or any non-compatible land use) within Critical Biodiversity Areas and Key Biodiversity Areas, or within intact grassland patches. In respect of Intact Grassland Patches, it is important to note that the Mpumalanga Biodiversity Sector Plan (MBSP) specifically incorporated climate change into spatial priorities through the prioritisation of the connectivity of remaining intact grassland patches in the province, as they provide habitat for species to thrive, and allow for their dispersal. Intact grasslands are crucial for supporting threatened fauna and avifauna. This is verified in the faunal assessment which states that "any remaining Oribi sub-populations and any contiguous areas of intact grassland are considered as high conservation importance" and that "cumulative impacts may become more significant if added to existing or future impacts from other activities, such as other renewable energy projects in the area". Intact Grassland Patches are important source areas in terms of metapopulation dynamics. The MBSP - adopted in 2023 (Provincial Notice 279 of 2023) - is a planning tool that has been developed to manage biodiversity resources of the province by setting strategic objectives to ensure that spatial biodiversity and climate change priorities are effectively incorporated into land-use and development planning, environmental assessments and authorisations, and natural resource management within Mpumalanga Province. The links to the various reports and shape files, including the MBSP Technical Report which details the scientific methods used to identify Intact Grassland Patches, can be accessed at https://mtpa.maps.arcgis.com/sharing/rest/content/items/fc6d8f9e7ef84d2f87f86b91e8e9f87a/data).
6. While we acknowledge efforts to acquire GPS tracking data for Martial Eagle, the modelling of the data and the datasets must be subjected to additional independent peer-reviewed analyses in order to verify accuracy and confidence levels. In the absence of this, the precautionary approach, which is the application of sector-accepted buffers, must be applied.
7. While we acknowledge the methodology applied to inform the Avifaunal Specialist's Sensitivity Zones (Very High, High and Medium) for Martial Eagle and Southern Bald Ibis, confidence in the methodology also requires testing through a broad, formal peer-reviewed analysis within the avifaunal sector, which is beyond the scope of an EIA. Until this is achieved, a precautionary approach is warranted, as follows:
    7.1. In accordance with BirdLife SA's Bird Monitoring Reports from Operational Wind Energy Facilities in South Africa (2025), a nest buffer of 6km is recommended for Martial Eagles (which report also states that that the available data suggests that this buffer will not eliminate the risk of collisions, and that it would be necessary to implement additional mitigation measures outside of this area).
    7.2. A minimum buffer of 1km from Southern Bald Ibis colonies.
8. Similarly, turbines and all associated infrastructure, including access roads as well as the upgrading of existing roads (which are currently seldom-used jeep tracks), must avoid Yellow-breasted Pipit habitat entirely, i.e. both "Very High" and "High" sensitivity zones. It is also concerning to note that in the initial draft EIA, the Avifaunal Specialist had designated the modelled Yellow-breasted Pipit habitat entirely as "Very High Sensitivity – No-go Zone", but has in the revised report, incorporated a new "High Risk – Turbine exclusion zone" into the initial no-go zone, for, what it appears, the purpose of accommodating Collector networks and road networks. The Avifaunal Specialist does recommend moving Turbine 23 as it is located in the

turbine exclusion zone, but as indicated above, infrastructure – including roads and collector networks within Yellow-breasted Pipit habitat is not supported.

9. Given the limited data available on Species 23 movements and collision risks, the curtailment strategy for turbines proposed in the "Medium Sensitivity" Zone for the species is not supported. Mitigation strategies that have no data to validate their success cannot be used to replace the requirement for avoidance. All Turbines and all associated infrastructure must avoid Species 23 habitat entirely, i.e. in "Very High", "Medium" and "High" sensitivity zones.
10. The Avifaunal Report confirms the presence of Species 23, but the location is not disclosed. The Avifaunal Assessment must confirm how the recommended sensitivity zones for Species 23 align with BirdLife SA's "Guidelines for surveying and mitigating impacts on [Species 23] in avifaunal assessments for development applications", particularly in respect of the following excerpt of the guideline that specifies a 5km buffer to be applied to suitable wetlands:

    "*Birds function at a wider ecological scale than most upper-catchment wetlands, thus requiring a larger and interconnected species buffer zone to ensure adequate impact mitigation from developments. Literature from studies on waterbirds, particularly rallids, provides several recommendations for designing and implementing buffer zones. As a general guideline for developments with collision risks, like wind turbines,* ***buffer zones of at least 5 km between the development and wetlands suitable for the [Species 23] are recommended, with buffer zones of at least 1 km for delineated wetland inputs*** *(e.g., streams and aquifers), aquatic-habitat corridors (e.g., riverine habitat), and potential movement pathways between wetlands".*

11. The number of turbines that are located in areas recommended for avoidance (at least 16 out of 22), and the location of the roads, construction camps and OHLs in sensitive areas demonstrates that the site is not compatible with the proposed land use. The areas of concern as they relate to the abovementioned comments, are outlined below:
    11.1. WTG 3 – KBA; NPAES; Terrestrial Biodiversity High (Edge of Highveld Grassland).
    11.2. WTG 4 – Within 5km Martial Eagle Buffer.
    11.3. WTG 5 – Edge of High Risk Turbine Exclusion Zone for Sp23 (Highlighted in Revised Avifaunal Assessment to be moved); Within 5km Martial Eagle Buffer; Terrestrial Biodiversity High (Edge of Highveld Grassland).
    11.4. WTG 7 - Terrestrial Biodiversity High (Edge of Highveld Grassland).
    11.5. WTG 10 – Within 5km Martial Eagle Buffer.
    11.6. WTG 11 – Within 5km Martial Eagle Buffer; Terrestrial Biodiversity High (Edge of Highveld Grassland).
    11.7. WTG 12 – Within 5km Martial Eagle Buffer; Avifaunal High Risk Turbine Exclusion Zone (Highlighted in Revised Avifaunal Assessment to be moved); KBA.
    11.8. WTG 13 – Intact Grassland, Within 5km Martial Eagle Buffer; Avifaunal High Risk Turbine Exclusion Zone (Highlighted in Revised Avifaunal Assessment to be moved); Edge of High Risk Turbine Exclusion Zone for Sp23 (Highlighted in Revised Avifaunal Assessment to be moved); Faunal High Sensitivity - escarpment (highest category); IBA; NPAES.
    11.9. WTG 14 – CBA Optimal (no evidence of "invasion"); Within 5km Martial Eagle Buffer; Avifaunal High Risk Turbine Exclusion Zone (Highlighted in Revised Avifaunal Assessment to be moved); Edge of Intact Grassland; Fauna High Sensitivity; NPAES; IBA.
    11.10. WTG 15 - Partially within an untransformed CBA Irreplaceable, Edge of High Risk Turbine Exclusion Zone for Sp23 (Highlighted in Revised Avifaunal Assessment to be moved); Within 5km Martial Eagle Buffer; NPAES; KBA; Terrestrial Biodiversity High (Edge of Highveld Grassland).
    11.11. WTG 17 – KBA; IBA; NPAES.
    11.12. WTG 19 – Intact Grassland; IBA; NPAES; Faunal High Sensitivity - escarpment (highest category); Within 5km Martial Eagle Buffer; Avifaunal High Risk Turbine Exclusion Zone (Highlighted in Revised Avifaunal Assessment to be moved); Medium Risk Zone for Sp23.
    11.13. WTG 20 - Intact Grassland; Within 5km Martial Eagle Buffer; Avifaunal High Risk Turbine Exclusion Zone (Highlighted in Revised Avifaunal Assessment to be moved);

Medium Risk Zone for Sp23; Faunal High Sensitivity - escarpment (highest category); NPAES.

11.14. WTG 22 – Intact Grassland; Faunal High Sensitivity - escarpment (highest category); NPAES; IBA; within 5km Martial Eagle Buffer.

11.15. WTG 23 – Intact Grassland; Within 5km Martial Eagle Buffer; Yellow-breasted Pipit habitat (Highlighted in Revised Avifaunal Assessment to be moved); Medium Risk Zone for Sp23; Faunal High Sensitivity - escarpment (highest category); IBA; NPAES.

11.16. WTG 25 – Intact Grassland; Faunal High Sensitivity - escarpment (highest category); Within 5km Martial Eagle Buffer; Rotor-swept area penetrates High Risk Turbine Exclusion Zone for Southern Bald Ibis (Highlighted in Revised Avifaunal Assessment to be moved); Medium Risk Zone for Sp23; NPAES; IBA.

12. The following infrastructure is located in sensitive areas:
    12.1. The entire Grid in the southern Emvelo site: Intact Grassland; Faunal High Sensitivity - escarpment (highest category); High Avifauna Sensitivity (Due to, inter alia, the large amount of wetlands/drainage lines and natural grasslands).
    12.2. Portions of the OHL and access roads in southern Emvelo site: Intact Grasslands, which is confirmed High Sensitivity for Fauna, but note that intact grassland also crucial for avifauna).
    12.3. Collector network and Roads in Southern portion of Emvelo are in Yellow-breasted Pipit habitat (noting that upgrading seldom used jeep tracks will still have substantive impacts for the species).
    12.4. The construction camp is located adjacent to WTG15, which is in the Avifaunal Medium Risk Zone for Sp23 (which was recommended for removal by the Avifaunal Specialist).
13. Turbines locations in terms of Bat Sensitivity could not be confirmed. The Figures in the Bat Specialist Report dated February 2025 were once again not provided. We have not been able to determine whether any turbines in the current layout – following the re-positioning of turbines since the bat assessment was undertaken - are located in No-Go areas for Bats.
14. The Terrestrial Assessment (inclusive of Plant Species), did not apply the Site Ecological Importance (SEI) methodology, which is a requirement of the Species Environmental Assessment Guideline. The Species Protocols specifically stipulate that assessments "must be undertaken in accordance with the *Species Environmental Assessment Guideline"* (South African National Biodiversity Institute, 2020. Species Environmental Assessment Guideline. Guidelines for the implementation of the Terrestrial Fauna and Terrestrial Flora Species Protocols for environmental impact assessments in South Africa. South African National Biodiversity Institute, Pretoria). Non-compliance with the *Species Environmental Assessment Guideline* has resulted in the following deficiencies:
    14.1. Insufficient time was allocated to surveying in the appropriate season (only 4 days for both Sheepmoor and Emvelo WEF sites, as well as the Grid sites).
    14.2. The classification of the Montane Grassland on site as "moderate sensitivity" in the absence of applying all relevant criteria, including *inter alia*, conservation importance, functional integrity, receptor resilience, as well as species of conservation concern, spatial priorities, intact grassland patches, and CBAs.
    14.1. The montane ridge (where WTGs 13, 19, 20, 22, 23 and 25, along with grid infrastructure are proposed), which also coincides with intact grassland and the highest sensitivity for Fauna (according to the Faunal Assessment), being classified as "moderate sensitivity". (Noting further that according to the Fauna Assessment, "the high sensitive escarpment area is likely of general importance for a range of faunal groups, <u>representative of a large contiguous and ecologically intact area</u> <u>of mostly good-quality montane grassland</u>". If the correct and required criteria are applied, the classification of this area is more likely to be classified as "High" or "Very High Sensitivity".
15. As a result of the deficiencies in the Terrestrial Assessment outlined above, we have low confidence in the associated impact analysis, and dispute the Specialist's "low" significance ratings.
16. The Impact Analyses in respect of Avifauna and Fauna are also disputed.
    16.1. The Avifaunal Assessment recommended that 9 turbines in high risk zones be relocated, but this has not been implemented in the layout presented as the preferred alternative.

This is misleading; the impact analysis must be based on the layout presented, which would translate to High Significance ratings for all impacts assessed with respect to Avifauna.

16.2. The Fauna Assessment recommendations included moving turbines out of High Sensitivity Areas for Fauna. The Impact Analysis was therefore not undertaken on the layout that was presented, and is accordingly disputed. The significance ratings for impacts assessed with respect to fauna should remain High.

17. While an Oribi Management Plan has been undertaken and included in this revised draft EIA (not in the initial draft EIA), it cannot be motivation to mitigate the potential impact on the species. The Oribi Management Plan clearly states that an "Oribi baseline assessment will be required to understand the current status of the subpopulation, including distribution and population estimates". The report further states that the "WEF layout needs to minimise number of turbines and infrastructure (including laydown)".
18. Biodiversity Offset Strategy:
    18.1. According to the Biodiversity Offset Guideline, "*The desired outcome of biodiversity offsets is to ensure that - the cumulative impact of an authorised activity, or activities, and land and resource use change does not: result in the loss of irreplaceable biodiversity or jeopardise the ability to meet biodiversity targets; lead to any ecosystem with a threat status of Vulnerable or Least Concern becoming Endangered; or any Endangered ecosystem becoming Critically Endangered; or cause an irreversible decline in the conservation status of species and the presence of special habitats; or cause a significant loss in ecosystem services*". A biodiversity offset cannot therefore cater for the loss of Irreplaceable CBAs or intact grasslands. As detailed in the comments above, intact grasslands are crucial for supporting threatened fauna and avifauna.
    18.2. The Biodiversity Offset Guideline specifically states that "biodiversity offsets are not appropriate when an activity, or activities, will have residual impacts on biodiversity of very high significance, including when residual negative impacts will result in loss of irreplaceable biodiversity".
    18.3. In addition to Irreplaceable CBAs, the Biodiversity Offset Guideline also categorises the following as "irreplaceable biodiversity": Biodiversity of major potential concern, where residual impacts in this category could lead to – loss of vulnerable or potentially irreplaceable biodiversity in areas of recognised importance, such as – areas evaluated as having High Ecological Site Importance. We maintain that the correct and required implementation of the Species Environmental Assessment Guideline would have resulted in the Montane Grassland being classified as having High Ecological Site Importance.
    18.4. The Intact Grassland Patches on the site must therefore be avoided, and cannot be offset. The requirement to consider biodiversity offsets is applicable only once it has been demonstrated that all measures of avoidance have been exhausted. The loss of irreplaceable biodiversity cannot be offset, and, as outlined above, "irreplaceable biodiversity" includes, key ecological corridors recognized as important for evolutionary processes and climate change adaptation where no options to safeguard these processes exist.
    18.5. Furthermore, the Biodiversity Offset Report does not meet the following minimum requirements:
        i. A portfolio of candidate biodiversity offset sites, including the likelihood of each site's availability and feasibility.
        ii. The required biodiversity outcomes on each of the candidate biodiversity offset sites.
19. Cumulative Impact Assessment:
    19.1. In our comments dated 10 April 2025 on your original draft EIA, despite bringing another 5 approved and in-process WEFs (within a 35 km radius) to your attention (i.e. Zephyr, Ujekamanzi Ntabande and Daggafoort and Emvelo), your revised cumulative impact assessment once again fails to mention or assess these. Subsequently, there are now an additional 3 WEFs within 35 km that are now in-process, i.e. Leghoya WEF 1, 2 & 3, and another one (1) within a 55 km radius (i.e. Anemoi WEF).

19.2. Furthermore, although section 4.3.3 states that "the scope of this assessment will include all operational, approved or current and planned renewable energy applications", in addition to the approved or in-process WEFs identified in 17.1. above (not included in this assessment), there are actually an additional two (2) WEFs within 35 km and a further two (2) proposed WEFs (i.e. Pre-Application) within a 55 km radius, that have not been identified. The total number of turbines within 35 km is more than double that indicated in both the Draft EIA and Revised Draft EIA reports, i.e. 435 (and not 192) and within a 55 km radius there are more than 663 turbines (approved, in-process and proposed). As a minimum, the cumulative impact of approved and in-process applications must be assessed.

19.3. The potential cumulative impact on avifauna, as indicated in our comments dated 10 April 2025, is now therefore likely to be even more substantial, due to the increased number of proposed turbines in the surrounding landscape. Of particular concern is the potential cumulative impact on Martial Eagles and Cape Vultures. The BirdLife South Africa Occasional Report Series 3: Summary of Bird Monitoring Reports from Operational Wind Energy Facilities in South Africa (February 2025), indicates that at current fatality rates due to collisions with wind turbines, "fatalities of Martial Eagles may already be exceeding the Potential Biological Removal (PBR) rate". Furthermore, "if current fatality rates at operational wind farms continue, at least 37 Cape Vultures could be lost to turbine collisions annually, representing a significant portion of the PBR. This figure is most probably an underestimate" (see limitations in the report) "and does not account for the anticipated acceleration of wind energy development. Unless other human-induced threats, such as powerline electrocutions and collisions, and poisoning, are urgently addressed, the population may not be able to withstand the added impact of turbine collisions."

19.4. Further to our comments dated 10 April 2025 and considering the additional WEFs in the surrounding landscape, we are now even more concerned about the cumulative impacts of these facilities on Oribi habitat, as expressed in the faunal assessment which states that "any remaining Oribi sub-populations and any contiguous areas of intact grassland are considered as high conservation importance" and that "cumulative impacts may become more significant if added to existing or future impacts from other activities, such as other renewable energy projects in the area".

19.5. DFFE also requires that "the cumulative impact assessment for all identified and assessed impacts must indicate the following: (a) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land". The Revised EIA Report does again not accurately quantify the size of the identified impacts, i.e. hectares of cumulatively transformed land. The overall footprint size of this, and all other similar proposed and approved renewable energy facilities within a 35 km radius is now 178 017.24 ha (Approved: 31 440.17 ha, In Progress: 89 247.96 ha, Pre-Application: 57 329.11 ha). Again, as a minimum, the cumulative impact of approved and in-process applications must be assessed.

19.6. As there has been no amendment in the revised EIA Report to the number of facilities identified surrounding this proposed facility, or a comprehensive comparative cumulative assessment undertaken, our previous comments on this matter dated 10 April 2025 remain unchanged, i.e. the cumulative impact assessment undertaken as part of this EIA does not adequately assess the cumulative impacts of this proposed facility, in relation to current and future similar renewable development facilities in the surrounding area.

20. Environmental Management Programme:

20.1. Our concerns related to the EMPr raised previously, still remain. The EMPr is unclear and vague, ambiguous, and does not provide adequate mitigation measures, timeframes, roles, responsibilities and reporting to adequately mitigate the potential impacts of this facility.

20.2. Given that we do not agree with the impact analyses undertaken in the EIA, the measures included in the EMPr as mitigation are, similarly, disputed.

20.3. The EMPr does not include a specific, measurable and timebound framework for decision-making regarding the duration of monitoring, and the specific circumstances for extension or curtailment.
20.4. The EMPr must be clear on when additional research is required.
20.5. Landowners must understand all access requirements and impacts associated with monitoring *throughout the lifespan of a project*.
20.6. Lease agreements must ensure that the effectiveness of monitoring is not compromised, and that restrictions do not compromise monitoring requirements in any way.

21. Public Participation:
21.1. In paragraph 9.3.2 (page 280) of the EIA Report, it is stated that "A comprehensive record of all comments received to date along with detailed responses from the Environmental Assessment Practitioner (EAP), specialists, and the project applicant is presented in the Comments and Responses Report (Volume II). For transparency and ease of reference, the original comments and corresponding responses are also appended to this volume". Then in the Paragraph 6 of the Public Participation Report (Volume III), it states that "During the DEIAR PPP comments were received from I&AP's. Follow-up e-mails were sent to all registered I&APs, stakeholders and authorities, and comments were received. Responses to comments received during the PP period are provided in Section 7, Table 7.1 below, with EAP / specialist / applicant responses, and the original comment and responses has been appended to the PP report which will be submitted with the FSR for DFFE decision".
21.2. However, in the copies of Emails included in the Public Participation Report, comments were submitted to you on 4, 9 and 10 April 2025 by: Megan Kim Govender; Adelma Vorster (Retsrov Boerdery); Celine Oats (Richard Summers Inc.); and Elize Robberts. *These comments have not been incorporated in your Comments and Response Report, nor have copies of the comments been appended to the Public Participation Report.*

Based on what has been outlined above, at least more than half (i.e. 16) of the 22 turbines proposed are located in unsuitable areas. Furthermore, the application of no-go buffers in accordance with BirdLife SA's Guidelines for surveying and mitigating impacts on [Species 23] referred to herein would likely increase the number of turbines that are in unsuitable areas. In light of this, and in conjunction with the location of associated roads, OHLs and cabling in CBAs, intact grasslands, and avifauna and fauna high sensitivity areas, DARDLEA cannot support the application in its current format.

Please do not hesitate to contact this office if there are any enquiries.

Sincerely,

MS. R. LUYT
DIRECTOR: ENVIRONMENTAL IMPACT MANAGEMENT
DATE: 14/08/2025

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Dear Madam,

DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT: ACTIVITIES ASSOCIATED WITH THE SHEEPMOOR WIND ENERGY FACILITY ON THE FARM KLIPFONTEIN 283 IT, PORTIONS 1, 2 & 6 OF THE FARM SCHIEDAM 274 IT, PORTIONS 2, 3, 5, 6, 7, 9, 10 & 13 OF THE FARM WAAIHOEK 286 IT, RE 1 & PORTION 5 OF THE FARM VAALBANK 285 IT, PORTION 3 OF THE FARM ONVERWACHT 287 IT, AND PORTIONS 1 & 8 OF THE FARM WINDHOEK 291 JT; THE ASSOCIATED GRID CONNECTION ON PORTIONS 2, 3, 4 & 12 OF THE FARM WAAIHOEK 286 IT, PORTION 8 OF THE FARM WINDHOEK 291 IT, RE OF THE FARM ONVERWACHT 287 IT, PORTIONS 3, 4, 5, 6, 9, 10 & 11 OF THE FARM WELTEVREDEN 290 IT, RE, RE 1, PORTIONS 7 & 8, RE 9, RE, 11, RE 14 OF THE FARM MOOIPLAATS 290 IT, PORTION 8 OF THE FARM BOSJESSPRUIT 291 IT, PORTION 2 OF THE FARM 292 IT, PORTIONS 1 & 2 OF THE FARM WELGELEGEN 322 IT, PORTION 6 OF THE FARM ZWARTWATER 288 IT, AND PORTION 7 OF THE FARM WITPUNT 267 IT; AND ASSOCIATED ACCESS ROADS ON PORTIONS 6, 7, 12, 23 & 26 OF THE FARM ROODEWAL 272 IT, AND PORTIONS 2, 3, 4 & 7 OF THE FARM ONVERWACHT 273 IT, MSUKALIGWA LOCAL MUNICIPALITY

The revised draft environmental impact assessment report (EIAR)which was submitted by you in respect of the abovementioned application and received by the Department on 16 July 2025 has reference. The Department has considered the content of the report, and has the following comments:

1. The layout provided in the initial draft EIAR included 29 turbines. It was not explicit in the revised draft EIR, which now includes 25 turbines, but after scrutinizing the layout plan and the responses provided in the comments and response report (CRR), we have been able to ascertain the following changes: The removal of WTGs 35, 39, 47 and 49, and the addition of WTG 21 (i.e. the removal of four turbines). A total of 10 turbines have been moved, but of these, only one has been moved into an area without sensitivities. Seventeen (17) of the 25 turbines proposed in the current layout, all of which were flagged in our previous comments, are still located in sensitive areas. Given that the requirement to avoid impacts in accordance with the mitigation hierarchy has not been adequately addressed, **these comments must be read in conjunction with our comments dated 10 April 2025, which still stand.**
2. DARDLEA remains concerned that the proposed location of the Sheepmoor WEF and associated grid infrastructure is not compatible with the desired land use.

3. The proposed Sheepmoor Wind Energy Facility and associated grid infrastructure is located on a site comprising: CBA Irreplaceable and Optimal; Intact Grassland Patches; Key Biodiversity Areas; the Grasslands Important Bird Area (IBA); Ecological Support Areas; National Protected Area Expansion Strategy Areas (NPAES); Local-scale and Landscape-scale Climate Change Corridors; Threatened Ecosystems – including Wakkerstroom Montane Grassland and Eastern Highveld Grassland; CBA: Wetlands; CBA: Aquatic Rivers; ESA: Strategic Water Source Area and ESA: Important Subcatchments.
4. Furthermore, the proposed Sheepmoor WEF and associated grid connection is located in an area comprising a high fauna sensitivity, a high diversity of threatened bird species, and a high number of priority species for wind energy developments and power lines, including the following confirmed on site: African Fish Eagle, African Grass Owl, African Harrier-Hawk, African Marsh Harrier, Amur Falcon, Black Sparrowhawk, Black-winged Kite, Black-winged Lapwing, Black-winged Pratincole, Blue Crane, Cape Vulture, Common Buzzard, Denham's Bustard, Greater Flamingo, Grey Crowned Crane, Grey-winged Francolin, Jackal Buzzard, Lanner Falcon, Long-crested Eagle, Marsh Owl, Martial Eagle, Rufous-breasted Sparrowhawk, Secretarybird, Southern Bald Ibis, Sensitive Species 23, Spotted Eagle-Owl, White Stork, White-bellied Bustard, and Yellow-breasted Pipit.
5. According to the Avifaunal Assessment, a total of 253 bird species could potentially occur in the Broader Area where the Sheepmoor WEF and associated Grid Connection Infrastructure are proposed to be located. Of the 253 species, 38 species are classified as priority species for wind energy developments, of which 32 were recorded during pre-construction monitoring. Of the 253 species, 76 are considered power line sensitive species, 57 of which were recorded during the pre-construction monitoring.
6. DARDLEA is not supportive of development of WEFs (or any non-compatible land use) within Critical Biodiversity Areas and Key Biodiversity Areas, or within intact grassland patches. In respect of Intact Grassland Patches, it is important to note that the Mpumalanga Biodiversity Sector Plan (MBSP) specifically incorporated climate change into spatial priorities through the prioritisation of the connectivity of remaining intact grassland patches in the province, as they provide habitat for species to thrive, and allow for their dispersal. Intact grasslands are crucial for supporting threatened fauna and avifauna. This is verified in the faunal assessment which states that "any remaining Oribi sub-populations and any contiguous areas of intact grassland are considered as high conservation importance" and that "cumulative impacts may become more significant if added to existing or future impacts from other activities, such as other renewable energy projects in the area". Intact Grassland Patches are important source areas in terms of metapopulation dynamics. The MBSP - adopted in 2023 (Provincial Notice 279 of 2023) - is a planning tool that has been developed to manage biodiversity resources of the province by setting strategic objectives to ensure that spatial biodiversity and climate change priorities are effectively incorporated into land-use and development planning, environmental assessments and authorisations, and natural resource management within Mpumalanga Province. The links to the various reports and shape files, including the MBSP Technical Report which details the scientific methods used to identify Intact Grassland Patches, can be accessed at https://mtpa.maps.arcgis.com/sharing/rest/content/items/fc6d8f9e7ef84d2f87f86b91e8e9f87a/data).
7. While we acknowledge efforts to acquire GPS tracking data for the Martial Eagle, the modelling of the data and the datasets must be subjected to additional independent peer-reviewed analyses in order to verify accuracy and confidence levels. In the absence of this, the precautionary approach, which is the application of sector-accepted buffers, must be applied.
8. While we acknowledge the methodology applied to inform the Avifaunal Specialist's Sensitivity Zones (Very High, High and Medium) for Martial Eagle and Southern Bald Ibis, confidence in the methodology also requires testing through a broad, formal peer-reviewed analysis within the avifaunal sector, which is beyond the scope of an EIA. Until this is achieved, a precautionary approach is warranted, as follows:
    8.1. In accordance with BirdLife SA's Bird Monitoring Reports from Operational Wind Energy Facilities in South Africa (2025), a nest buffer of 6km is recommended for Martial Eagles

(which report also states that that the available data suggests that this buffer will not eliminate the risk of collisions, and that it would be necessary to implement additional mitigation measures outside of this area).

8.2. A minimum buffer of 1km from Southern Bald Ibis colonies.

9. Similarly, turbines and all associated infrastructure, including access roads as well as the upgrading of existing roads (which are currently seldom-used jeep tracks), must avoid Yellow-breasted Pipit habitat entirely, i.e. both "Very High" and "High" sensitivity zones.
10. Given the limited data available on Species 23 movements and collision risks, the curtailment strategy for turbines proposed in the "Medium Sensitivity" Zone for the species is not supported. Mitigation strategies that have no data to validate their success cannot be used to replace the requirement for avoidance. All Turbines and all associated infrastructure must avoid Species 23 habitat entirely, i.e. "Medium", "High" and "Very High" sensitivity zones.
11. The Avifaunal Report confirms the presence of Species 23, but the location is not disclosed. The Avifaunal Assessment must confirm how the recommended sensitivity zones for Species 23 align with BirdLife SA's "Guidelines for surveying and mitigating impacts on [Species 23] in avifaunal assessments for development applications", particularly in respect of the following excerpt of the guideline that specifies a 5km buffer to be applied to suitable wetlands:

    "*Birds function at a wider ecological scale than most upper-catchment wetlands, thus requiring a larger and interconnected species buffer zone to ensure adequate impact mitigation from developments. Literature from studies on waterbirds, particularly rallids, provides several recommendations for designing and implementing buffer zones. As a general guideline for developments with collision risks, like wind turbines,* ***buffer zones of at least 5 km between the development and wetlands suitable for the [Species 23] are recommended, with buffer zones of at least 1 km for delineated wetland inputs*** *(e.g., streams and aquifers), aquatic-habitat corridors (e.g., riverine habitat), and potential movement pathways between wetlands".*

12. The number of turbines that are located in areas recommended for avoidance (at least 17 out of 25), and the location of the O&M building, roads and OHLs in sensitive areas demonstrates that the site is not compatible with the proposed land use. The areas of concern as they relate to the abovementioned comments, are outlined below:
    12.1. WTG 26: Intact grassland; IBA; NPAES; Fauna High Sensitivity - escarpment (highest category); Within 5km Martial Eagle buffer; Less than 1km from Southern Bald Ibis colony; Species 23 Avifaunal Medium Zone.
    12.2. WTG 27: Intact grassland; IBA; NPAES; Fauna High Sensitivity - escarpment (highest category); Within 1km of Southern Bald Ibis colony; Species 23 Avifaunal Medium Zone.
    12.3. WTG 28: Intact grassland; IBA; NPAES; Fauna High Sensitivity - escarpment (highest category); Within 1km of Southern Bald Ibis colony; Species 23 Avifaunal Medium Zone.
    12.4. WTG 29: Intact grassland; IBA; NPAES; Fauna High Sensitivity - escarpment (highest category); Within 1km of Southern Bald Ibis colony; Species 23 Avifaunal Medium Zone.
    12.5. WTG 30: Intact grassland; Partial IBA; NPAES; Fauna High Sensitivity - escarpment (highest category).
    12.6. WTG 31: Intact grassland; NPAES; Species 23 Avifaunal Medium Zone.
    12.7. WTG 33: Intact grassland partial; NPAES.
    12.8. WTG 36: CBA Irreplaceable; NPAES.
    12.9. WTG 38: High/Very High Terrestrial Sensitivity.
    12.10. WTG 41: Within 650m of Southern Bald Ibis Colony.
    12.11. WTG 42: Within 1km of Southern Bald Ibis Colony.
    12.12. WTG 43: Climate change corridor; Intact grassland; ESA; NPAES.
    12.13. WTG 44: Climate change corridor; ESA; NPAES; Species 23 Avifaunal Medium Zone.
    12.14. WTG 46: High/Very High Terrestrial Sensitivity.
    12.15. WTG 45: CBA Irreplaceable; NPAES, Climate change corridor; Species 23 Avifaunal Medium Zone.
    12.16. WTG 52: Climate change corridor; Intact grassland; ESA; IBA; NPAES.

12.17. WTG 53: Climate change corridor; Intact grassland; ESA; IBA; NPAES; High/Very High Terrestrial Sensitivity.
12.18. The O&M Building is located in Bat No-Go area.
12.19. The road network, collector network, and transmission lines traverse the Avifaunal All Infrastructure Exclusion Zone, the High Fauna Sensitivity Zone, Intact Grasslands, CBAs and ESAs.

13. It is noted that the Noise Specialist recommended the relocation of WTGs 29 and 30, and the reduction of the number of turbines within 800m of receptors.
14. The Terrestrial Assessment (inclusive of Plant Species), did not apply the Site Ecological Importance (SEI) methodology, which is a requirement of the Species Environmental Assessment Guideline. The Species Protocols specifically stipulate that assessments "must be undertaken in accordance with the *Species Environmental Assessment Guideline"* (South African National Biodiversity Institute, 2020. Species Environmental Assessment Guideline. Guidelines for the implementation of the Terrestrial Fauna and Terrestrial Flora Species Protocols for environmental impact assessments in South Africa. South African National Biodiversity Institute, Pretoria). Non-compliance with the *Species Environmental Assessment Guideline* has resulted in the following deficiencies:
    14.1. Insufficient time was allocated to surveying in the appropriate season (only 4 days for both Sheepmoor and Emvelo WEF sites, as well as the Grid sites).
    14.2. The classification of the Montane Grassland on site as "moderate sensitivity" in the absence of applying all relevant criteria, including *inter alia*, conservation importance, functional integrity, receptor resilience, as well as species of conservation concern, spatial priorities, intact grassland patches, and CBAs.
    14.1. The montane ridge (where WTGs 26, 27, 28, 29, 30 and 33, along with grid infrastructure are proposed), which also coincides with intact grassland and the highest sensitivity for Fauna (according to the Faunal Assessment), being classified as "moderate sensitivity". (Noting further that according to the Fauna Assessment, "the high sensitive escarpment area is likely of general importance for a range of faunal groups, <u>representative of a large contiguous and ecologically intact area</u> <u>of mostly good-quality montane grassland</u>".
15. As a result of the deficiencies in the Terrestrial Assessment outlined above, we have low confidence in the associated impact analysis, and dispute the Specialist's "low" significance ratings.
16. While an Oribi Management Plan has been undertaken and included in this revised draft EIA (not in the initial draft EIA), it cannot be motivation to mitigate the potential impact on the species. The Oribi Management Plan clearly states that an "Oribi baseline assessment will be required to understand the current status of the subpopulation, including distribution and population estimates". The report further states that the "WEF layout needs to minimise number of turbines and infrastructure (including laydown)".
17. Cumulative Impact Assessment:
    17.1. In our comments dated 10 April 2025 on your original draft EIA, despite bringing another 5 approved and in-process WEFs (within a 35 km radius) to your attention (i.e. Zephyr, Ujekamanzi Ntabande and Daggafoort and Emvelo), your revised cumulative impact assessment once again fails to mention or assess these. Subsequently, there are now an additional 3 WEFs within 35 km that are now in-process, i.e. Leghoya WEF 1, 2 & 3, and another one (1) within a 55 km radius (i.e. Anemoi WEF).
    17.2. Furthermore, although section 4.3.3 states that "the scope of this assessment will include all operational, approved or current <u>and planned</u> renewable energy applications", in addition to the approved or in-process WEFs identified in 17.1. above (not included in this assessment), there are actually an additional two (2) WEFs within 35 km and a further two (2) proposed WEFs (i.e. Pre-Application) within a 55 km radius, that have not been identified. The total number of turbines within 35 km is more than double that indicated in both the Draft EIA and Revised Draft EIA reports, i.e. 435 (and not 192) and within a 55 km radius there are more than 663 turbines (approved, in-process and

proposed). As a minimum, the cumulative impact of approved and in-process applications must be assessed.

17.3. The potential cumulative impact on avifauna, as indicated in our comments dated 10 April 2025, is now therefore likely to be even more substantial, due to the increased number of proposed turbines in the surrounding landscape. Of particular concern is the potential cumulative impact on Martial Eagles and Cape Vultures. The BirdLife South Africa Occasional Report Series 3: Summary of Bird Monitoring Reports from Operational Wind Energy Facilities in South Africa (February 2025), indicates that at current fatality rates due to collisions with wind turbines, "fatalities of Martial Eagles may already be exceeding the Potential Biological Removal (PBR) rate". Furthermore, "if current fatality rates at operational wind farms continue, at least 37 Cape Vultures could be lost to turbine collisions annually, representing a significant portion of the PBR. This figure is most probably an underestimate" (see limitations in the report) "and does not account for the anticipated acceleration of wind energy development. Unless other human-induced threats, such as powerline electrocutions and collisions, and poisoning, are urgently addressed, the population may not be able to withstand the added impact of turbine collisions."

17.4. Further to our comments dated 10 April 2025 and considering the additional WEFs in the surrounding landscape, we are now even more concerned about the cumulative impacts of these facilities on Oribi habitat, as expressed in the faunal assessment which states that "any remaining Oribi sub-populations and any contiguous areas of intact grassland are considered as high conservation importance" and that "cumulative impacts may become more significant if added to existing or future impacts from other activities, such as other renewable energy projects in the area".

17.5. DFFE also requires that "the cumulative impact assessment for all identified and assessed impacts must indicate the following: (a) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land". The Revised EIA Report does again not accurately quantify the size of the identified impacts, i.e. hectares of cumulatively transformed land. The overall footprint size of this, and all other similar proposed and approved renewable energy facilities within a 35 km radius is now 178 017.24 ha (Approved: 31 440.17 ha, In Progress: 89 247.96 ha, Pre-Application: 57 329.11 ha). Again, as a minimum, the cumulative impact of approved and in-process applications must be assessed.

17.6. As there has been no amendment in the revised EIA Report to the number of facilities identified surrounding this proposed facility, or a comprehensive comparative cumulative assessment undertaken, our previous comments on this matter dated 10 April 2025 remain unchanged, i.e. the cumulative impact assessment undertaken as part of this EIA does not adequately assess the cumulative impacts of this proposed facility, in relation to current and future similar renewable development facilities in the surrounding area.

18. Environmental Management Programme:

18.1. Our concerns related to the EMPr raised previously, still remain. The EMPr is unclear and vague, ambiguous, and does not provide adequate mitigation measures, timeframes, roles, responsibilities and reporting to adequately mitigate the potential impacts of this facility.

18.2. Given that we do not agree with the impact analyses undertaken in the EIA, the measures included in the EMPr as mitigation are, similarly, disputed.

18.3. The EMPr does not include a specific, measurable and timebound framework for decision-making regarding the duration of monitoring, and the specific circumstances for extension or curtailment.

18.4. The EMPr must be clear on when additional research is required.

18.5. Landowners must understand all access requirements and impacts associated with monitoring *throughout the lifespan of a project.*

18.6. Lease agreements must ensure that the effectiveness of monitoring is not compromised, and that restrictions do not compromise monitoring requirements in any way.

19. Biodiversity Offset Strategy:

19.1. According to the Biodiversity Offset Guideline, "*The desired outcome of biodiversity offsets is to ensure that - the cumulative impact of an authorised activity, or activities, and land and resource use change does not: result in the loss of irreplaceable biodiversity or jeopardise the ability to meet biodiversity targets; lead to any ecosystem with a threat status of Vulnerable or Least Concern becoming Endangered; or any Endangered ecosystem becoming Critically Endangered; or cause an irreversible decline in the conservation status of species and the presence of special habitats; or cause a significant loss in ecosystem services*". A biodiversity offset cannot therefore cater for the loss of Irreplaceable CBAs or intact grasslands. As detailed in the comments above, intact grasslands are crucial for supporting threatened fauna and avifauna.

19.2. The Biodiversity Offset Guideline specifically states that "biodiversity offsets are not appropriate when an activity, or activities, will have residual impacts on biodiversity of very high significance, including when residual negative impacts will result in loss of irreplaceable biodiversity".

19.3. In addition to Irreplaceable CBAs, the Biodiversity Offset Guideline also categorises the following as "irreplaceable biodiversity": Biodiversity of major potential concern, where residual impacts in this category could lead to – loss of vulnerable or potentially irreplaceable biodiversity in areas of recognised importance, such as – areas evaluated as having High Ecological Site Importance. We maintain that the correct and required implementation of the Species Environmental Assessment Guideline would have resulted in the Montane Grassland being classified as having High Ecological Site Importance.

19.4. The Intact Grassland Patches on the site must therefore be avoided, and cannot be offset. The requirement to consider biodiversity offsets is applicable only once it has been demonstrated that all measures of avoidance have been exhausted. The loss of irreplaceable biodiversity cannot be offset, and, as outlined above, "irreplaceable biodiversity" includes, key ecological corridors recognized as important for evolutionary processes and climate change adaptation where no options to safeguard these processes exist.

19.5. Furthermore, the Biodiversity Offset Report does not meet the following minimum requirements:

i. A portfolio of candidate biodiversity offset sites, including the likelihood of each site's availability and feasibility.

ii. The required biodiversity outcomes on each of the candidate biodiversity offset sites.

20. Public Participation:

20.1. In paragraph 9.3.3, it is stated that a "A comprehensive record of all comments received to date along with detailed responses from the Environmental Assessment Practitioner (EAP), specialists, and the project applicant is presented in the Comments and Responses Report (Volume II). For transparency and ease of reference, the original comments and corresponding responses are also appended to this volume". In your Public Participation Report (Volume III), it states that "During the DEIAR PPP comments were received from I&AP's. Follow-up e-mails were sent to all registered I&APs, stakeholders and authorities, and comments were received. Responses to comments received during the PP period are provided in Section 7, Table 7.1 below, with EAP / specialist / applicant responses, and the original comment and responses has been appended to the PP report which will be submitted with the FSR for DFFE decision".

20.2. However, in the copies of Emails included in the Public Participation Report, comments were submitted to you on 4, 9 and 10 April 2025 by: Megan Kim Govender; Adelma Vorster (Retsrov Boerdery) and Celine Oats (Richard Summers Inc.). *These comments have not been incorporated in your Comments and Response Report, nor have copies of the comments been appended to the Public Participation Report.*

20.3. Furthermore, a copy of the comments submitted to you by MTPA on 10 April 2025 have not been appended to the Public Participation Report, and have not been captured correctly in the Comments and Response Report (refer specifically to the list of flagged turbines).

Based on what has been outlined above, at least 17 of the 25 turbines proposed are located in unsuitable areas. In light of this, and in conjunction with the location of associated roads, OHLs and cabling in CBAs and avifauna and fauna high sensitivity areas, DARDLEA cannot support the application in its current form.

Please do not hesitate to contact this office if there are any enquiries.

Sincerely,

MS. R. LUYT
DIRECTOR: ENVIRONMENTAL IMPACT MANAGEMENT
DATE: 14/08/2025

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Ms S Mbuyane mbuyanesb@mpg.gov.za

From: Sam Ralston
Sent on: Thursday, 14 August 2025 15:18:58
To: ERM Arcus Amsterdam
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Dear Lucien

Thank you for the opportunity to review the additional information. While we have not have the capacity to review the revised application in-depth, it is apparent that that many of our previously raised concerns and recommendations have not been addressed. Our previous comments dated 10 April 2025, and our objection to the proposed developments, therefore remain applicable.

We would also like to draw your attention the recently published guidelines for Special Species 23, available at the following link. We are concerned that the application is not aligned with these guidelines, which have been endorsed by the DFFE. Please consider those guidelines as additional comment on the applications.

Yours sincerely

Sam

Samantha Ralston-Paton
Birds and Renewable Energy Project Manager
Isdell House, 17 Hume Road (cnr Hume Road/Jan Smuts Drive), Dunkeld West 2196, Gauteng
Private Bag X16, Pinegowrie 2123, Johannesburg, Gauteng, South Africa
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Donations to BirdLife South Africa may contribute to your B-BBEE scorecard as we are a Level 1 B-BBEE contributor. We are also a registered Public Benefit Organisation (No. 930004518) and authorised to issue 18A tax certificates where applicable.

BirdLife South Africa's Birds and Renewable Energy Project is sponsored by the Lewis Foundation and Investec Corporate and Institutional Banking

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Date: Wednesday, 16 July 2025 at 13:54
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Interested and Affected Party,

Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.

The revised comment period now ends on 15 August 2025.

All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.

Thank you for your continued participation.

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Lucien Barbeau
Senior Consultant

Cape Town [redacted]

erm.com



From: Albert Froneman
Sent on: Thursday, 14 August 2025 21:12:18
To: ERM Arcus Amsterdam
CC: Lizandé Kellerman; Stephanie Gopaul; Stephen Burton; Marietjie Froneman; Robin Colyn; Lloyd Barnes; Rebecca Thomas
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

Would you please be so kind to share the comment letter received from BLSA so that we can prepare our response accordingly.

Thanks

Best regards / Vriendelike groete,

Albert

Albert Froneman *Pr.Sci.Nat*
AfriAvian Environmental
[redacted]
Albert@AfriAvian.com

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, August 14, 2025 8:22:01 pm
To: Albert Froneman <albert@afriavian.com>
Cc: Lizandé Kellerman <lizande@afriavian.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Albert,

We've received formal comment from BirdLife SA on the Draft EIA Report. Their submission raises concern regarding alignment with the recently published BirdLife SA Guidelines for Surveying and Mitigating Impacts on White-winged Flufftail.

Given that these guidelines were released in 2025, after the EIA process for this project commenced, we would appreciate your confirmation on whether they were considered in the preparation of your Final Avifaunal Specialist Report.

If not, please let us know, along with any relevant context or justification, so that we can respond transparently to BirdLife's concerns in the Final EIA submission.

Happy to take a call to discuss

Regards!

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

Sustainability is our business

From: Sam Ralston <energy@birdlife.org.za>
Sent: Thursday, August 14, 2025 3:19 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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We would also like to draw your attention the recently published guidelines for Special Species 23, available at the following link. We are concerned that the application is not aligned with these guidelines, which have been endorsed by the DFFE. Please consider those guidelines as additional comment on the applications.

Yours sincerely

Sam

Samantha Ralston-Paton
Birds and Renewable Energy Project Manager

BirdLife SOUTH AFRICA
Giving Conservation Wings

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Private Bag X16, Pinegowrie 2123, Johannesburg, Gauteng, South Africa
[redacted]
E-mail: energy@birdlife.org.za
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Thank you for your continued participation.

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted]

erm.com

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Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted]

erm.com



From: Josua Meyer
Sent on: Thursday, 14 August 2025 22:43:50
To: ERM Arcus Amsterdam
CC: Lloyd Barnes; Johans Van Wyk; Rebecca Thomas; Richard Summers; celine@summersinc.co.za; Stephanie Gopaul; Stephen Burton; Lucien Barbeau
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Dear Lucien

Just want to get the records straight without getting into an informal debate

1 - 4 : Correspondence

- Request info from ERM, Mr Lucien Barbeau, on 17/12/2024 at 11h04.
  Still no response ?

- First request for meeting to applicant, mr Johans van Wyk, on 19/2/2025 at 12h35.
  Applicant, mr Johans van Wyk, reject request on 19/02/2025 at 15h35
  First formal request for meeting through ERM on 16/4/2025 at 03h24. No response ?
  Request again for meeting through ERM, Mr Lucien Barbeau, on 18/07/2025 at 16h51.
  Meeting took place on 4/08/2025.
  Almost 8 months later!?

- Requested on 16/06/2025 for official documentation concerning the 3 month extension.
  Repeat request during meeting of 4/08/2025
  Received info only on 12/08/2025
  Almost 2 month later?!

- Request tagged data of two martial eagles from ERM on 11/03/2025 at 10h59
  Repeat request for tagged data from ERM on 29/03/2025 at 11h44
  Received refusal of data in email from applicant, mr Johans van Wyk, on 14/4/2025 at 20h40. ERM was also CC.
  Remind ERM, Mr Barbeau, on 15/04/2025 at 22h11 that formal answer on request for tagged data is still outstanding.
  Still no response from ERM !!

Is that what you and ERM means by **CREDIBLE, TRANSPARENT and ACCOUNTABLE?**

5 - 8 : Tagged data

Mulilo and EWT is in a partnership, confirmed in email from mr Johans van Wyk, in tagging the birds and therefore co-accountable for each other's conduct
The issue is not who did wrong but is the tagging done with a valid permit.?
If not, then it is illegal and that also implies for the data obtained by the unlawful act.
What ERM says by implication is that they are comfortable in driving a stolen vehicle as long as it is to their advantage?
Very dangerous and controversial approach..
We still insist that everything connected to the tagged data must be removed from the avifaunal report because it is illegally obtained regardless who did it.

The avifaunal specialist used the Verkykerkop tagged data in his report and on that ground we requested the permit to tagg that eagle (Bred)

9 - 11 : Specialist report and NDA

Mr Moodie strongly opposed the powerline crossing his farms and that also without consulting him.That was the main reason why Mr Moodie attended the meeting. Maybe you did not pick it up because Mr Moodie spoke Afrikaans.

Will address the rest in my comments.

Regards

Josua Meyer

On Tue, Aug 12, 2025 at 12:08 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Good day Mr Meyer,
>
> Please find below our responses to your comments.
>
> We are in the process of finalising the meeting minutes, which will be shared with you before the end of this week. Thank you
>
> **1 - The EAP is expected to participate and actively engage with the impacted community. Why has my request for a meeting since February 2025 repeatedly declined and pushed in at the 11th hour?**
>
> MULILO: The applicant regrets that the *ad hoc* meeting request sent by you to the applicant in February this year was not attended to immediately. Unfortunately, the request for a private meeting with the applicant was not seen at the time by the applicant's representatives, and the applicant sincerely apologises for any frustration this may have caused you. The applicant and EAP remain committed to engaging with I&APs, and the in-person meeting requested by yourself, and attended by me as the appointed EAP for this project, and by the applicant's representatives, on the 4th of August 2025 was welcomed and seen to constitute substantive progress in responding to your queries. Your queries, and these responses, will obviously form part of the Comments and Responses Report included together with the next draft of the EIA Report.
>
> ERM: As the EAP, we are committed to engaging meaningfully with Interested and Affected Parties (I&APs) in accordance with the requirements of the Environmental Impact Assessment (EIA) Regulations under NEMA. We have undertaken all necessary steps and where possible, gone beyond these requirements to engage with the community. This has included an additional focus group meeting with you at a mutually suitable time within the regulated timelines to address your concerns. All I&AP comments have been acknowledged, and this engagement process remains ongoing.
>
> **2 - Do you as EAP feel that the process has been credible and transparent as well as accountable in circumstances where you reach out and respond to a request for a meeting at the 11th hour? How is that considered to be meaningful and in the spirit of the constitution?**
>
> ERM take the principles of credibility, transparency, and accountability in the EIA process very seriously. In this case, we regret that your initial request for a private meeting with the applicant, sent to the applicant in February, was not seen at the time by the applicant. Had it been, ERM would have engaged with you much earlier. Please include the EAP in such requests in order to ensure this is not missed in the future. The recent outreach was made in good faith. Once ERM became aware of your request for a meeting, ERM responded promptly in an effort to engage meaningfully and ensure your views are heard.

While ERM acknowledges that earlier engagement would have been preferable, we remain fully open to meeting and engaging in a meaningful and constructive way as the EIA process continues. ERM sees this as part of our commitment to upholding the intent and spirit of public participation, as set out in the Constitution and in NEMA and the 2014 NEMA EIA Regulations.

We believe that the EIA process we are facilitating has been credible, transparent, and accountable, in line with the requirements of NEMA. While the timing of certain engagements is sometimes influenced by the availability of multiple parties, we made every effort to accommodate your request for a meeting within the regulated timeframe. The process remains open, transparent, and documented for review by the competent authority.

3 - Why are biodiversity related issues only being property investigated at the 11th hour although the Provincial Department requested it in the scoping phase?

During the scoping phase, it was noted that a biodiversity offset may be required based on final layouts proposed. However, this indication was based on preliminary findings and initial specialist inputs, which were still being refined at the time. As is typical in EIA processes, more detailed and site-specific assessments only become available during the impact assessment phase, once the full suite of specialist studies is completed and verified. It is on the basis of these completed studies that a more accurate determination of residual impacts, and thus the need for and scale of a biodiversity offset, can be made.

We understand the importance of early clarity, but it's also essential that such recommendations are based on robust, defensible data. That said, ERM has aimed to finalise and address these issues as efficiently and transparently as possible once the necessary information became available.

Biodiversity-related issues have been considered from the outset of the EIA process, beginning in the scoping phase. The assessment has been iterative, with the project layout being amended several times to address environmental sensitivities and viability concerns, including biodiversity matters. These changes are documented in the Comments and Responses Report (CRR) and specialist assessments.

4 - Why are requested documentation regarding the additional 3 months extension granted by DFFE to the applicant still outstanding?

Please see the attached correspondence as requested.

5 - Are you as EAP confident that the data and modelling that has been undertaken to address bird related impacts and specifically the martial eagle is accurate and credible? If so, please explain why.

The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise

unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible.

The appointed avifaunal specialist is an expert in the field of wind energy facility impacts on birds. Based on their expertise and experience, we have no reason to doubt the accuracy, credibility, and applicability of the data and modelling undertaken for this assessment.

6 - Are you as EAP confident and can you confirm in writing that the data that is being obtained in relation to the martial eagle was correctly obtained and in accordance with all minimal standards and legal criteria?

As illuded to in our response to Point 5 above. The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report.

This permitting process is separate from the EIA, and as the EAP we do not have direct oversight over it.

7 - Are you as EAP comfortable that if the tagging of the martial eagle were done without a valid permit, that the tagged data can still be used in the specialist report? If so, please explain why.

The legality of the data collection process is the responsibility of the avifaunal specialist and the applicant. It is our understanding that a permit for such activities is legally required, and that the data included in the specialist report was provided on the basis that the necessary permit was obtained.

The data collected from the tagged Martial Eagle is invaluable. It provides critical insight into the bird's movements and habitat use, which directly strengthens the EIA findings; informs a more effective mitigation strategy; and ultimately, enhances the likely further and better protection of the species. As explained in Point 5 above – the EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The applicant was informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible.

8 - Are you as EAP in acceptance that the permits to tag the martial eagles, also the one at Verkykerskop, were not presented at the meeting? If so, please explain why.

The proposed Verkykerskop Wind Farm cluster is not a part of the proposed Emvelo and Sheepmoor wind farms and are consequently not relevant or applicable to the current process. The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible.

As a general practice, fieldwork permits obtained by specialists are not typically presented during stakeholder engagement or I&AP meetings.

9 - Are you as EAP confident that all the recommendations in the specialist reports and specifically the Social report are satisfactorily addressed? If not, please explain why.

In the specialist reports, including the Social Impact Assessment, have been carefully considered and addressed to the extent possible within the on-going EIA process, and that will continue to be the case. Where certain recommendations require further action, these have been clearly outlined for implementation during the construction and operational phases, and will be monitored through the Environmental Management Programme (EMPr).

We have reviewed the social specialist's findings and recommendations and accept them as valid and credible, given the specialist's expertise in the field. Recommendations and mitigation measures that could reasonably be incorporated into the Environmental Management Programme (EMPr) have been included. If there are specific recommendations you believe have not been adequately addressed, please let us know so that we can review them.

10 - It became clear in the meeting that none of the affected landowners are prepared to allow the proposed powerline over their properties. Are AEP comfortable to support an application without a secured powerline route?

Thank you for raising this important point.

While the EIA process does not require landowner consent for linear infrastructure at this stage, the applicant is committed to engaging in good faith negotiations with affected landowners to secure the necessary servitudes following the achievement of the EA. The landowner in question (Mr Moodie) did not formally raise any objections. He advised that the routing could be relooked at in due course. In recognition of the risks involved, and in the context of the NEMA EIA Regulations' requirement to consider reasonable and feasible alternatives, alternative powerline routes have also been assessed as part of the EIA to reduce potential impacts and improve the likelihood of an acceptable alignment being secured. The other landowners did not formally raise any objections yet and formal discussions still need to take place with these landowners to the extent that the OHL needs to traverse their respective properties.

The routing referred to in your comment is an alternative powerline route considered, and is not the preferred route. Our role as the EAP is to independently assess the potential impacts of alternatives, identify mitigation measures to reduce impacts to acceptable levels, and provide an informed opinion on the acceptability of the project. The final decision on whether the project may proceed rests with the DFFE.

11 - The avifaunal specialist signed a NDA (non disclosure agreement) with the applicant and it was also revealed in the meeting by the applicant that they collectively determined the shaped exclusion zones for the southern bald ibis. Are you as EAP comfortable that it is not in contradiction with the declaration the avifaunal specialist signed as independant specialist? If so, please explain why.

The avifaunal exclusion zones are proposed by the appointed avifaunal specialist alone, informed by additional avifaunal studies commissioned by the applicant. The applicant has no role to play in determining the shape or size of proposed buffers. Please also see my response to your fifth question, above. It is common practice for parties to sign NDAs in order to protect confidential information, such as for instance intellectual property, specific project sites and does do not detract from or limits a specialist to act independently and impartially.

We operate on the assumption that all appointed specialists, including the avifaunal specialist, conduct their work in an ethical, independent manner, in compliance with the EIA Regulations. Both we as the EAP and all specialists have signed declarations of independence, as required under NEMA, confirming that our assessments are conducted impartially.

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Tuesday, August 12, 2025 11:32 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

Time is running out.

Where are the minutes of the meeting as well as a copy of the recorded transcript?

Thanks

On Tue, Aug 12, 2025 at 9:15 AM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Good day Mr Meyer,
>
> I trust that you are well. Kindly note that we will provide our responses to your comments by close of business today.
>
> Kind Regards
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Senior Consultant
>
> Cape Town [redacted] **erm.com**
>
> ---
>
> **From:** ERM Arcus Amsterdam
> **Sent:** Wednesday, August 6, 2025 2:56 PM
> **To:** Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
> **Cc:** Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za
> **Subject:** RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
>
> Dear Mr Meyer,
>
> Thank you for your email and for taking the time to share your reflections following our meeting on Monday.

We acknowledge receipt of your comments and the additional questions you have raised. We appreciate your continued engagement in the process and will respond to your queries as soon as possible.

Should you have any further inputs in the meantime, please feel free to share them with us.

Kind Regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Wednesday, August 6, 2025 1:47 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

The purpose of the meeting was to address concerns of the I&AP's regarding the proposed Sheepmoor and Emvelo WEF's. The applicant gives the impression that they are not interested in taking any action regarding the I&AP's concerns and attend it only to avoid negative reflection. Therefore the meeting created unfortunately more questions than answers. Your EAP's input was also disappointing.

We urgently need clarification and answers on the following

1 - The EAP is expected to participate and actively engage with the impacted community. Why has my request for a meeting since February 2025 repeatedly declined and pushed in at the 11th hour?

2 - Do you as EAP feel that the process has been credible and transparent as well as accountable in circumstances where you reach out and respond to a request for a meeting at the 11th hour? How is that considered to be meaningful and in the spirit of the constitution?

3 - Why are biodiversity related issues only being property investigated at the 11th hour although the Provincial Department requested it in the scoping phase?

4 - Why are requested documentation regarding the additional 3 months extension granted by DFFE to the applicant still outstanding?

5 - Are you as EAP confident that the data and modelling that has been undertaken to address bird related impacts and specifically the martial eagle is accurate and credible? If so, please explain why.

6 - Are you as EAP confident and can you confirm in writing that the data that is being obtained in relation to the martial eagle was correctly obtained and in accordance with all minimal standards and legal criteria?

7 - Are you as EAP comfortable that if the tagging of the martial eagle were done without a valid permit, that the tagged data can still be used in the specialist report? If so, please explain why.

8 - Are you as EAP in acceptance that the permits to tag the martial eagles, also the one at Verkykerskop, were not presented at the meeting? If so, please explain why.

9 - Are you as EAP confident that all the recommendations in the specialist reports and specifically the Social report are satisfactorily addressed? If not, please explain why.

10 - It became clear in the meeting that none of the affected landowners are prepared to allow the proposed powerline over their properties. Are AEP comfortable to support an application without a secured powerline route?

11 - The avifaunal specialist signed a NDA (non disclosure agreement) with the applicant and it was also revealed in the meeting by the applicant that they collectively determined the shaped exclusion zones for the southern bald ibis. Are you as EAP comfortable that it is not in contradiction with the declaration the avifaunal specialist signed as independant specialist? If so, please explain why.

Due to the time constraint answers required before the 11/08/2025.

Regards

On Sun, Aug 3, 2025 at 12:36 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Mr Meyer,
>
> Thank you for confirming the meeting for 12h00 tomorrow, 4 August, at your farm. That time works perfectly, and we look forward to meeting with you.
>
> If you would kindly share the physical address or GPS coordinates for the entrance to your farm, it would be greatly appreciated to ensure we arrive without any difficulty.
>
> There will be five people attending the meeting, including myself.
>
> Should there be anything further you would like us to prepare or bring along for the meeting, please don't hesitate to let us know, we'll be happy to assist in any way we can.
>
> Kind regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, August 1, 2025 1:29 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Good day

Monday is fine with me

I did inform Johans also

Will 12h00 be convenient for you?

How may people?

Regards

On Fri, 01 Aug 2025, 11:42 ERM Arcus Amsterdam, <ERM.ArcusAmsterdam@erm.com> wrote:

> Good Morning Mr Meyer,
>
> Thank you for your response. If you feel Monday is too short availability, please do not feel rushed. We would be happy to accommodate you later in the week. We will await your feedback and move accordingly from there.
>
> Kind Regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Thursday, July 31, 2025 6:13 PM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Some people who received this message don't often get email from meyerjosua55@gmail.com. Learn why this is important

EXTERNAL MESSAGE

Goodday

Will confirm tomorrow before 12h00

Thanks

On Thu, Jul 31, 2025 at 2:22 PM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Dear Mr Meyer,
>
> I hope this message finds you well.
>
> I'm writing to kindly follow up on our proposed meeting scheduled for Monday, 4 August at 13:00 at your farm. We would appreciate it if you could please confirm whether you are still available to meet on that date.
>
> Should you require any additional information or documentation ahead of the meeting, beyond what you have already requested, please don't hesitate to let me know, I'd be happy to assist.
>
> Looking forward to your confirmation.
>
> Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Monday, July 28, 2025 11:49 AM
To: Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Meyer,

Following discussions with the applicant, unfortunately it will not be possible to schedule a meeting prior to 1 August due to limited availability.

However, we would be pleased to meet with you on Monday the 4th of August 2025 at 13:00, as per your request, at your farm.

Kindly confirm whether this date and time are suitable, and please advise who will be attending the meeting from your side.

I will continue to provide you with the requested documentation ahead of the meeting.

Kind regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 25, 2025 5:11 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

Proposed date for the meeting seems to be too close to submission of comments which is already 9/08/25.

Can you arrange the meeting for us before 1/07/2025.

Can you in the meantime forward the detail previously requested

- All the documentation with Department concerning the 3 months extension granted even after time lapps to submit final report

- Mulilo's permits to fit telemetry device on the two martial eagles

- AfriAvian motivation for altering Figure 33 in both avifaunal reports

Above info are urgently required and no reason to wait for the meeting

Regards

Josua

On Tue, Jul 22, 2025 at 10:30 AM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Hi Lucien
>
> There might be a mistake in your day or date ..... 7 August 2025 is a Thursday.
>
> Nevertheless the 6 or 7 th August 2025 is fine with us.
>
> Will appreciate it if we can meet on my farm.
>
> We intend to be three (3) I&AP
>
> Regards
>
> Josua Meyer
>
> On Mon, Jul 21, 2025 at 11:36 AM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

Dear Mr. Meyer,

Good day, and thank you for your recent correspondence regarding the Draft EIA Reports.

We acknowledge your request for a meeting to discuss the concerns raised. In consultation with the applicant, Mulilo, we are proposing a provisional date of Wednesday, 7 August 2025, with the meeting to be held at a venue in Ermelo. Kindly confirm whether this date is suitable for you and whether you will be attending alone or accompanied by others.

As a registered I&AP, your comments form an important part of the formal public participation process and will be incorporated into the Final EIA Reports. We also acknowledge the concerns raised regarding the tagging of the Martial Eagles. Relevant documentation, including permits, will be made available where appropriate to support transparency and clarity during the engagement.

We look forward to your response.

Kind Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 18, 2025 4:51 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Johans Van Wyk <Piwy@mulilo.com>; Lloyd@mulilo.com
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday mr Lucien Barbeau,

Referring to your email dated 7/04/2025 it will be appreciated if you can arrange such a meeting urgently before the 9/08/2025 with the applicant, Mulilo, on site.

Concerns as previously raised with Mulilo in an email dated 19/02/2025 will be on the agenda. That request for a meeting was refused by Mulilo.

Another urgent item which also must be discussed is the tagging of the two martial eagles. According to the MTPA report in my possession, the martial eagles were tagged by Mulilo without a permit. Copy of the report can be provided at the meeting.

That leaves the tagging of the martial eagles illegally, if not criminal.

Therefore the data being used in the specialist report is illegally obtained and all sections, models and references where data has been used must be removed from the report.

Looking forward to your urgent response.

Regards

Josua Meyer (I&AP)

On Wed, Jul 16, 2025 at 4:41 PM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Goodday Sir
>
> The avifaunal specialist removed in both reports, Sheepmoor WEF and Emvelo WEF, the High Sensitivity - Turbine Exclusion Zone in Figures 33 for the aquatic buffer zones from an avifaunal perspective.
>
> It must be an unintentional mistake and request reinstatement of it.
>
> If it was deliberate we request the detailed reasoning and motivation for such a drastic decision.
>
> Thanks

Josua Meyer

On Wed, Jul 16, 2025 at 1:54 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Interested and Affected Party,
>
> Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.
>
> The revised comment period now ends on 15 August 2025.
>
> All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.
>
> Thank you for your continued participation.
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Senior Consultant
>
> Cape Town [redacted] **erm.com**
>
> ---
>
> **From:** ERM Arcus Amsterdam
> **Sent:** Tuesday, July 15, 2025 4:43 PM
> **To:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
> **Subject:** Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
>
> SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER
>
> Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner



Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Jamie Pote
Sent on: Friday, 15 August 2025 07:37:27
To: Lucien Barbeau; ERM Arcus Amsterdam
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Hi Lucien, here are the reports with the revised layouts replaced where applicable (the last few maps in the reports).

There is an overlap with the Emvelo/Sheepmoor boundary that was provided where a central area fall within both sites. I have not had time to figure out what's going on there or to scrutinise the layout to check if there are any changes that affect the outcome of the assessment.

Terr Bio Assess Report - Mulilo Emvelo WEF (Jamie Pote) 20250815) Final.docx
Terr Bio Assess Report - Mulilo Sheepmoor WEF (Jamie Pote) 20250815_Final.docx

Terr Bio Assess Report - Mulilo Sheepmoor WEF (Jamie Pote) 20250815_Final.pdf
Terr Bio Assess Report - Mulilo Emvelo WEF (Jamie Pote) 20250815) Final.pdf

Regards
Jamie

Mr Jamie Pote
Biodiversity – Environmental – GIS

BSc (Hons) Pr. Sci. Nat (115233)
Postnet Suite 57, Private [redacted]
[redacted]
jamiepote@live.co.za

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 06 August 2025 16:26
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Specialist,

I trust you are well.

Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by Monday, 12 August 2025.

If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.

Kind regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Jamie Pote
Sent on: Friday, 15 August 2025 07:37:55
To: Lucien Barbeau; ERM Arcus Amsterdam
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

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There is an overlap with the Emvelo/Sheepmoor boundary that was provided where a central area fall within both sites. I have not had time to figure out what's going on there or to scrutinise the layout to check if there are any changes that affect the outcome of the assessment.

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Regards
Jamie

Mr Jamie Pote
Biodiversity – Environmental – GIS

BSc (Hons) Pr. Sci. Nat (115233)
Postnet Suite 57, Private Bag X13130, Humewood - Port Elizabeth - South Africa
[redacted]
jamiepote@live.co.za

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 06 August 2025 16:26
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]

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Kind regards,

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From: ERM Arcus Amsterdam
Sent on: Friday, 15 August 2025 10:24:22
To: Albert Froneman; ERM Arcus Amsterdam
CC: Lizandé Kellerman; Stephanie Gopaul; Stephen Burton; Marietjie Froneman; Robin Colyn; Lloyd Barnes; Rebecca Thomas
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Attachments: BLSA comments Emvelo Sheepmoor EIA 20250410.pdf (296.48 KB)

Hi Albert,

Attached are the comments from Birdlife SA, 10 April 2025. 😊

BLSA states below that they feel their comments from 10 April have not been addressed and their comments remain applicable.

In addition, please see below in their email (highlighted), BLSA believes that the application is not aligned with the recently published guidelines for Special Species 23.

Your inputs here are appreciated.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Albert Froneman <Albert@afriavian.com>
Sent: Thursday, August 14, 2025 9:12 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lizandé Kellerman <lizande@afriavian.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Marietjie Froneman <Marietjie@afriavian.com>; Robin Colyn <Robin@afriavian.com>; Lloyd Barnes <lloyd@mulilo.com>; Rebecca Thomas <reth@mulilo.com>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

Would you please be so kind to share the comment letter received from BLSA so that we can prepare our response accordingly.

Thanks

Best regards / Vriendelike groete,

Albert

Albert Froneman *Pr.Sci.Nat*

AfriAvian ENVIRONMENTAL
[redacted]
Albert@AfriAvian.com

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, August 14, 2025 8:22:01 pm
To: Albert Froneman <albert@afriavian.com>
Cc: Lizandé Kellerman <lizande@afriavian.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Albert,

We've received formal comment from BirdLife SA on the Draft EIA Report. Their submission raises concern regarding alignment with the recently published BirdLife SA Guidelines for Surveying and Mitigating Impacts on White-winged Flufftail.

Given that these guidelines were released in 2025, after the EIA process for this project commenced, we would appreciate your confirmation on whether they were considered in the preparation of your Final Avifaunal Specialist Report.

If not, please let us know, along with any relevant context or justification, so that we can respond transparently to BirdLife's concerns in the Final EIA submission.

Happy to take a call to discuss

Regards!

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Sam Ralston <energy@birdlife.org.za>
Sent: Thursday, August 14, 2025 3:19 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Dear Lucien

Thank you for the opportunity to review the additional information. While we have not have the capacity to review the revised application in-depth, it is apparent that that many of our previously raised concerns and recommendations have not been addressed. Our previous comments dated 10 April 2025, and our objection to the proposed developments, therefore remain applicable.

We would also like to draw your attention the recently published guidelines for Special Species 23, available at the following link. We are concerned that the application is not aligned with these guidelines, which have been endorsed by the DFFE. Please consider those guidelines as additional comment on the applications.

Yours sincerely

Sam

Samantha Ralston-Paton
Birds and Renewable Energy Project Manager

BirdLife SOUTH AFRICA
Giving Conservation Wings

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http://www.birdlife.org.za

Donations to BirdLife South Africa may contribute to your B-BBEE scorecard as we are a Level 1 B-BBEE contributor. We are also a registered Public Benefit Organisation (No. 930004518) and authorised to issue 18A tax certificates where applicable.

BirdLife South Africa's Birds and Renewable Energy Project is sponsored by the Lewis Foundation and Investec Corporate and Institutional Banking

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Date: Wednesday, 16 July 2025 at 13:54
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
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Thank you for your continued participation.

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Lucien Barbeau
Senior Consultant

Cape Town [redacted]

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10 April 2025

Stephanie Gopaul
ERM Southern Africa (Pty) Ltd
240 Main Road
Rondebosch
7700

Email: ERM.ArcusAmsterdam@erm.com

Dear Ms Gopaul,

RE: Draft Environmental Impact Assessment Report: Proposed Emvelo Wind Energy Facility and Auxiliary Infrastructure, Mpumalanga (Reference: 14/12/16/3/3/2/2611)

AND

Draft Environmental Impact Assessment Report Proposed Sheepmoor Wind Energy Facility and Auxiliary Infrastructure, Mpumalanga (Reference: 0684401**)**

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment (EIA) Report for the proposed Emvelo and Sheepmoor Wind Energy Facilities and associated infrastructure. While BirdLife South Africa supports the development of wind energy, we firmly believe it should not come at the expense of biodiversity. We have significant concerns regarding both the adequacy of the EIA sand the potential impacts of the proposed developments on the receiving environment, which we summarise below.

Receiving Environment

1. The proposed developments overlaps with critical habitats, including Intact Grassland Patches, Critical Biodiversity Areas (CBAs), Climate Change Corridors, National Protected Area Expansion Strategy (NPAES) areas, and Key Biodiversity Areas (KBAs), wetlands and the escarpment (the latter is used by birds for altitudinal and north-south migrations). The area supports numerous species of conservation concern, including bird that are at risk of direct fatalities (e.g., collisions and electrocutions), habitat loss, and disturbance. We are therefore concerned that this site is not suitable for wind turbine and associated infrastructure.

Avifaunal Impact Assessment – Data Collection

2. The duration and scope of data collection for the avifaunal assessments appear inadequate given the sensitivity of the habitats and the spices they support. BirdLife South Africa and the Endangered Wildlife Trust (EWT)'s Best Practice Guidelines and our Cape

Vulture guidelines recommend increased survey effort in areas of high avifaunal sensitivity. The sites have been confirmed as such by the avifaunal specialist.

3. While the location of vantage points is provided, there is no indication of view-sheds, and it is unclear what proportion of turbines were covered by vantage point surveys.

Cumulative Impacts

4. Limiting cumulative assessment to a 35 km radius is inappropriate for wide-ranging species - i.e. most birds. A more ecologically relevant approach is needed

Species 23 (Critically Endangered)

5. We are concerned about potential degradation of wetlands associated with the developments, including habitat for Critically Endangered Species 23. We are particularly concerned where MV cabling is proposed to traverse a wetland (marked as a no-go area). It is unclear whether the cable will be buried or above ground; neither option is supported due to collision risk (above ground) and habitat degradation (below ground).
6. We acknowledge the thought and analysis that went into developing the proposed mitigation strategy for Species 23 but are concerned that the proposed avoidance and mitigation measures are **not sufficiently precautionary**.
7. In light of the to the limited data on the species of its movement patterns and collision risk, **we do not support the location of turbines in any of the medium sensitivity areas identified for the species in the avifaunal assessment**.
8. Additional comments on the proposed curtailment strategy are detailed below.

Martial Eagle (Endangered)

9. The avifaunal assessment uses various data sources to predict how Martial Eagles use the area, but the basis for the final buffer recommendations is unclear. For example, a 2.5 km no-development buffer is recommended, despite the report's own vantage point surveys suggesting 3 km may be more appropriate.
10. Tracking data from a single adult and one juvenile was used to model habitat use and define high and medium sensitivity zones (turbine collision). However, as far as we can ascertain, the model was based on less than a year's worth of data and does not account for interannual variation, seasonal use, alternative nest sites, or sex-based behavioural differences. Furthermore, the criteria used to define high, medium, and low/no sensitivity areas are not transparent. It is also unclear whether other relevant data (e.g., territory size and tracking data from other studies) were considered and how this influenced the recommendation.
11. While we support refining circular buffers with **more robust**, site-specific data, we are concerned that the proposed buffer is significantly smaller than the 5–6 km buffer recommended by BirdLife South Africa and EWT. Although available studies in this regard are limited, this buffer is based on the best available data on territory size.

Southern Bald Ibis (Vulnerable)

12. A shaped turbine exclusion zone was delineated in the avifaunal reports, based on modelled flight activity for Southern Bald Ibis. Again, we request clarity on how the

thresholds for the sensitivity zones (i.e. between high, medium, and low/no sensitivity) were defined.

Cape Vulture (Endangered)

13. We are concerned that the impact assessments underestimates the risk of Cape Vulture fatalities. Our recent review of operational monitoring reports (BirdLife South Africa 2025) shows that vulture collisions occurred even at sites where the species was rarely or never recorded during monitoring surveys. We are therefore of the opinion that the recorded observation of one vulture a week is sufficient to warrant the implementation of shutdown-on-demand (SDoD) for **all** proposed turbines.

Yellow-breasted Pipit (Vulnerable)

14. Turbines and roads have been proposed within Yellow-breasted Pipit habitat, contrary to the avifaunal specialist's recommendations. We do not support this.
15. We also suggest that there should be greater commitment to avoid and conserve the remaining habitat of this species.

Other Species at Risk

16. The ecological importance of intact grassland patches for birds (e.g. Endangered Secretarybird) is not sufficiently acknowledged in the assessment.
17. At least 32 priority bird species were recorded in the project area of influence, and more within the powerline corridor. However, sensitivity maps were only produced for a few of these species. It appears that the assumption is that the overlap in mitigation/avoidance zones for the handful of key species will cover the others. However, this is not made explicit and may give the false impression that only the mapped species are at risk.
18. Similarly, collision risk modelling was only conducted for a few species, likely due to limited data (see above regarding concerns about data limitations).

Avoidance and Layout Alternatives

19. Although avifaunal and faunal specialists made explicit recommendations for avoiding sensitive areas, these do not appear to have influenced the "preferred" development layouts. These recommendations are reflected in the EIA reports and EMPrs and they seem to influence the "post mitigation" significance ratings presented in the reports. This creates ambiguous and potentially misleading assessments – it is unclear what exactly is being proposed and what has been assessed.
20. It is also unclear on what basis the "preferred" layouts were been selected. Is it the applicant's opinion, or ERM's?
21. Table 5-1 of the EIR contains misleading claims with regards to the site and overlap with sensitive areas. For example, it states: "*There are no specific features of very high biodiversity value within the affected polygons and highly sensitive areas have been avoided for development. In addition, the site does not appear to fall on any significant gradients or corridors that are likely to be of high importance for biodiversity processes such as migration and faunal movement*". This contradicts the avifaunal assessment.

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Honorary Patrons: Mrs Gaynor Rupert, Dr Precious Moloi-Motsepe, Mr Mark Shuttleworth, Mrs Pamela Isdell

22. We strongly recommend that layout alternatives (e.g. the applicant's preferred alternative and one that implements the biodiversity specialists' recommendations for avoidance) are more transparently assessed.
23. If turbine relocations are not implemented in a layout, this should not influence the assessment of impact significance.

Mitigation Against Bird Strikes – Shutdown on Demand (SDoD)

24. SDoD is recommended for medium sensitivity areas, yet the (applicants')"preferred" alternative includes turbines within high sensitivity zones. If such turbines are approved (**which we do not support**), SDoD should be extended to those areas as well.
25. Several species recorded on site were not mapped for sensitivity but are likely to be at risk of collisions (e.g. Secretarybird and Cape Vulture). SDoD should therefore be applied to all turbines.
26. The EIA and EMPrs suggest either observer-led **or** automated (radar **or** camera) SDoD should be implemented - implying that just one of these approaches will be adequate. However, a combination of approaches, tailored to the behaviour of all priority species at risk may be required. For example, radar would benefit large night-flying species (e.g., flamingos, owls) and those that fly in misty conditions, while camera-assisted SDOD is more suited for large soaring birds (e.g., eagles) that move during the day. Observer-led SDOD on would benefit species that spend time on the ground (e.g., Secretarybird and Southern Bald Ibis), that, when they do fly, may not be detected by technology in time to shut turbines down.
27. In light of the above, we suggest that more detail is needed with regards to required approach to SDOD, including the spatial and temporal coverage, trigger species, and operational protocols for implementation.

Mitigation – Curtailment

28. With regards to reducing collision risk for Species 23 (which is too small to benefit from SDoD), the proposal to curtail operations at night based on habitat suitability monitoring **does not offer adequate protection**.
29. Movements likely occur between wetlands as conditions change—often faster than the proposed 7–14-day monitoring interval, and while it is commonly assumed that the species only moves at night, there is no data to verify this assumption yet.
30. We are further concerned that much simpler operational phase mitigation measures have failed at wind farms elsewhere in South Africa. The complexities and expertise required for this "smart" curtailment presents a risk of poor implementation and an inability of officials to ensure and, if necessary, enforce compliance.
31. Given our limited understanding of this species' movement patterns and risk of collisions we do not support turbines in any medium sensitivity areas identified for this species. Alternatively, we suggest that a risk averse, precautionary approach would be full seasonal curtailment of turbines in medium risk areas during summer.

Mitigation – Other Measures

32. The EIAa and EMPr mention adaptive management strategies should be implemented if fatality thresholds are exceeded. However, no such thresholds are defined.

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Honorary Patrons: Mrs Gaynor Rupert, Dr Precious Moloi-Motsepe, Mr Mark Shuttleworth, Mrs Pamela Isdell

33. In the absence of robust figures, we recommend a zero-fatality target for threatened and demographically sensitive species. Exceeding this should trigger further mitigation if available data suggests that further fatalities of the affected species are likely over the lifespan of the facility.
34. We are exceptionally concerned that there are currently **no proven, additional mitigation** options beyond curtailment, or stopping turbines entirely. This would have significant cost implications for the operator. This open ended recommendation introduces a significant degree of risk and uncertainly for the applicant, as well as biodiversity. There should be clear parameters defined and budget set aside accordingly.

Stewardship, Offsets, and Landowner Agreements

35. While we support recommendations for proactive conservation contained in the EIA (e.g., stewardship, alien clearing and offsets), we are concerned about feasibility of this if the applicant is not the landowner. We suggest that these recommendations and landowner agreements should carefully considered to ensure recommendations and commitments in this regard are implementable.
36. As a **condition of approval** (should this be granted), the applicant must secure landowner agreements for all required mitigation and monitoring (e.g., carcass searches, SDoD) before construction begins.

Operational Phase Monitoring

37. Given the site's sensitivity and risk to birds species of conservation concern, monitoring requitements should be more detailed and species-specific. For example:
    a. Carcass surveys should be tailored to detect fatalities for Species 23 and other small species (e.g., Yellow-breasted Pipit) in addition to large birds,
    b. Surveys should be designed to detect displacement, disturbance, and habitat alteration for priority species.
    c. Carcass surveys must continue for the facility's lifespan to evaluate SDoD and curtailment effectiveness.

Construction Phase EMPr

38. As discussed above, the construction phase EMPr is not aligned with the preferred layout (i.e. it recommends avoidance of areas where roads, turbines and cables have been proposed). Clarification is needed on how this will be resolved.

Operational Phase EMPr

39. The operational EMPr should be revised to include specific, time-bound, and measurable impact management **outcomes**, clearly defined triggers for additional action and response timeframes.
40. Fatality thresholds must be clearly defined to avoid ambiguity.
41. We suggest that the operational EMPr, specifically the mitigation **actions** included in the avifaunal management plan should be **reviewed** at least every five years. Stakeholders should be provided an opportunity to provide input into any changes.

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www.birdlife.org.za

Honorary Patrons: Mrs Gaynor Rupert, Dr Precious Moloi-Motsepe, Mr Mark Shuttleworth, Mrs Pamela Isdell

42. Operational phase EMPr compliance, including avifaunal management plan, should be **audited annually**.
43. All avifaunal monitoring and audit reports should be made publicly available and shared with BirdLife South Africa.

Conditions of authorisation

44. We are concerned that the proposed conditions of authorization relating to impacts on bird are weak, particularly with regard to monitoring and mitigating operational phase impacts. While the EMPrs play an important role, many requirements can be lost in the detail of these vast documents. Critical recommendations should be highlighted in the EA, and detailed in the EMPr.

Conclusion and Next Steps

BirdLife South Africa does not support the proposed developments in their current formant. We have significant concerns about that suitability of the area of wind farm development, and suggest that the impact assessment, layout and mitigation strategies need to be substantially strengthened and updated before the development could be considered for approval (if at all). Due to time constraints, BirdLife South Africa has not reviewed the EIA report in as much detail as we would prefer. We may have missed some issues and reserve the right to raise further concerns and questions. We also recommend that the EIAs be subjected to an independent peer review as part of the revision process.

Please do not hesitate to contact us should you require any further clarification.

Yours sincerely,



Sammantha Ralston-Paton
Birds and Renewable Energy Project Manager,
Email: enetgy@birdlife.org.za
On behalf of BirdLife South Africa

From: ERM Arcus Amsterdam
Sent on: Friday, 15 August 2025 10:50:15
To: Josua Meyer; ERM Arcus Amsterdam
CC: Lloyd Barnes; Johans Van Wyk; Rebecca Thomas; Richard Summers; celine@summersinc.co.za; Stephanie Gopaul; Stephen Burton; Lucien Barbeau
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Good day Mr Meyer,

Thank you for your email and your responses. We acknowledge receipt of your comments and confirm that they will be incorporated into the Comments and Responses Report for the proposed development.

A formal response to your comments will be provided within that report, which will form part of the Final EIA submission to the DFFE.

Kind Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Thursday, August 14, 2025 10:44 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Dear Lucien

Just want to get the records straight without getting into an informal debate

1 - 4 : Correspondence

- Request info from ERM, Mr Lucien Barbeau, on 17/12/2024 at 11h04.
  Still no response ?

- First request for meeting to applicant, mr Johans van Wyk, on 19/2/2025 at 12h35.
  Applicant, mr Johans van Wyk, reject request on 19/02/2025 at 15h35
  First formal request for meeting through ERM on 16/4/2025 at 03h24. No response ?
  Request again for meeting through ERM, Mr Lucien Barbeau, on 18/07/2025 at 16h51.
  Meeting took place on 4/08/2025.
  Almost 8 months later!?

- Requested on 16/06/2025 for official documentation concerning the 3 month extension.
  Repeat request during meeting of 4/08/2025
  Received info only on 12/08/2025
  Almost 2 month later?!

- Request tagged data of two martial eagles from ERM on 11/03/2025 at 10h59
  Repeat request for tagged data from ERM on 29/03/2025 at 11h44
  Received refusal of data in email from applicant, mr Johans van Wyk, on 14/4/2025 at 20h40. ERM was also CC.
  Remind ERM, Mr Barbeau, on 15/04/2025 at 22h11 that formal answer on request for tagged data is still outstanding.
  Still no response from ERM !!

Is that what you and ERM means by **CREDIBLE, TRANSPARENT and ACCOUNTABLE?**

5 - 8 : Tagged data

Mulilo and EWT is in a partnership, confirmed in email from mr Johans van Wyk, in tagging the birds and therefore co-accountable for each other's conduct
The issue is not who did wrong but is the tagging done with a valid permit.?
If not, then it is illegal and that also implies for the data obtained by the unlawful act.
What ERM says by implication is that they are comfortable in driving a stolen vehicle as long as it is to their advantage?
Very dangerous and controversial approach..
We still insist that everything connected to the tagged data must be removed from the avifaunal report because it is illegally obtained regardless who did it.

The avifaunal specialist used the Verkykerkop tagged data in his report and on that ground we requested the permit to tagg that eagle (Bred)

9 - 11 : Specialist report and NDA

Mr Moodie strongly opposed the powerline crossing his farms and that also without consulting him.That was the main reason why Mr Moodie attended the meeting. Maybe you did not pick it up because Mr Moodie spoke Afrikaans.

Will address the rest in my comments.

Regards

Josua Meyer

On Tue, Aug 12, 2025 at 12:08 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Good day Mr Meyer,
>
> Please find below our responses to your comments.
>
> We are in the process of finalising the meeting minutes, which will be shared with you before the end of this week. Thank you
>
> **1 - The EAP is expected to participate and actively engage with the impacted community. Why has my request for a meeting since February 2025 repeatedly declined and pushed in at the 11th hour?**
>
> MULILO: The applicant regrets that the *ad hoc* meeting request sent by you to the applicant in February this year was not attended to immediately. Unfortunately, the request for a private meeting with the applicant was not seen at the time by the applicant's representatives, and the applicant sincerely apologises for any frustration this may have caused you. The applicant and EAP remain committed to engaging with I&APs, and the in-person meeting requested by yourself, and attended by me as the appointed EAP for this project, and by the applicant's representatives, on the 4th of August 2025 was welcomed and seen to constitute substantive progress in responding to your queries. Your queries, and these responses, will obviously form part of the Comments and Responses Report included together with the next draft of the EIA Report.

ERM: As the EAP, we are committed to engaging meaningfully with Interested and Affected Parties (I&APs) in accordance with the requirements of the Environmental Impact Assessment (EIA) Regulations under NEMA. We have undertaken all necessary steps and where possible, gone beyond these requirements to engage with the community. This has included an additional focus group meeting with you at a mutually suitable time within the regulated timelines to address your concerns. All I&AP comments have been acknowledged, and this engagement process remains ongoing.

2 - Do you as EAP feel that the process has been credible and transparent as well as accountable in circumstances where you reach out and respond to a request for a meeting at the 11th hour? How is that considered to be meaningful and in the spirit of the constitution?

ERM take the principles of credibility, transparency, and accountability in the EIA process very seriously. In this case, we regret that your initial request for a private meeting with the applicant, sent to the applicant in February, was not seen at the time by the applicant. Had it been, ERM would have engaged with you much earlier. Please include the EAP in such requests in order to ensure this is not missed in the future. The recent outreach was made in good faith. Once ERM became aware of your request for a meeting, ERM responded promptly in an effort to engage meaningfully and ensure your views are heard.

While ERM acknowledges that earlier engagement would have been preferable, we remain fully open to meeting and engaging in a meaningful and constructive way as the EIA process continues. ERM sees this as part of our commitment to upholding the intent and spirit of public participation, as set out in the Constitution and in NEMA and the 2014 NEMA EIA Regulations.

We believe that the EIA process we are facilitating has been credible, transparent, and accountable, in line with the requirements of NEMA. While the timing of certain engagements is sometimes influenced by the availability of multiple parties, we made every effort to accommodate your request for a meeting within the regulated timeframe. The process remains open, transparent, and documented for review by the competent authority.

3 - Why are biodiversity related issues only being property investigated at the 11th hour although the Provincial Department requested it in the scoping phase?

During the scoping phase, it was noted that a biodiversity offset may be required based on final layouts proposed. However, this indication was based on preliminary findings and initial specialist inputs, which were still being refined at the time. As is typical in EIA processes, more detailed and site-specific assessments only become available during the impact assessment phase, once the full suite of specialist studies is completed and verified. It is on the basis of these completed studies that a more accurate determination of residual impacts, and thus the need for and scale of a biodiversity offset, can be made.

We understand the importance of early clarity, but it's also essential that such recommendations are based on robust, defensible data. That said, ERM has aimed to finalise and address these issues as efficiently and transparently as possible once the necessary information became available.

Biodiversity-related issues have been considered from the outset of the EIA process, beginning in the scoping phase. The assessment has been iterative, with the project layout being amended several times to address environmental sensitivities and viability concerns, including biodiversity matters. These changes are documented in the Comments and Responses Report (CRR) and specialist assessments.

4 - Why are requested documentation regarding the additional 3 months extension granted by DFFE to the applicant still outstanding?

Please see the attached correspondence as requested.

5 - Are you as EAP confident that the data and modelling that has been undertaken to address bird related impacts and specifically the martial eagle is accurate and credible? If so, please explain why.

The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes)

was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible.

The appointed avifaunal specialist is an expert in the field of wind energy facility impacts on birds. Based on their expertise and experience, we have no reason to doubt the accuracy, credibility, and applicability of the data and modelling undertaken for this assessment.

6 - Are you as EAP confident and can you confirm in writing that the data that is being obtained in relation to the martial eagle was correctly obtained and in accordance with all minimal standards and legal criteria?

As illuded to in our response to Point 5 above. The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report.

This permitting process is separate from the EIA, and as the EAP we do not have direct oversight over it.

7 - Are you as EAP comfortable that if the tagging of the martial eagle were done without a valid permit, that the tagged data can still be used in the specialist report? If so, please explain why.

The legality of the data collection process is the responsibility of the avifaunal specialist and the applicant. It is our understanding that a permit for such activities is legally required, and that the data included in the specialist report was provided on the basis that the necessary permit was obtained.

The data collected from the tagged Martial Eagle is invaluable. It provides critical insight into the bird's movements and habitat use, which directly strengthens the EIA findings; informs a more effective mitigation strategy; and ultimately, enhances the likely further and better protection of the species. As explained in Point 5 above – the EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The applicant was informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible.

8 - Are you as EAP in acceptance that the permits to tag the martial eagles, also the one at Verkykerskop, were not presented at the meeting? If so, please explain why.

The proposed Verkykerskop Wind Farm cluster is not a part of the proposed Emvelo and Sheepmoor wind farms and are consequently not relevant or applicable to the current process. The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might

have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible.

As a general practice, fieldwork permits obtained by specialists are not typically presented during stakeholder engagement or I&AP meetings.

9 - Are you as EAP confident that all the recommendations in the specialist reports and specifically the Social report are satisfactorily addressed? If not, please explain why.

In the specialist reports, including the Social Impact Assessment, have been carefully considered and addressed to the extent possible within the on-going EIA process, and that will continue to be the case. Where certain recommendations require further action, these have been clearly outlined for implementation during the construction and operational phases, and will be monitored through the Environmental Management Programme (EMPr).

We have reviewed the social specialist's findings and recommendations and accept them as valid and credible, given the specialist's expertise in the field. Recommendations and mitigation measures that could reasonably be incorporated into the Environmental Management Programme (EMPr) have been included. If there are specific recommendations you believe have not been adequately addressed, please let us know so that we can review them.

10 - It became clear in the meeting that none of the affected landowners are prepared to allow the proposed powerline over their properties. Are AEP comfortable to support an application without a secured powerline route?

Thank you for raising this important point.

While the EIA process does not require landowner consent for linear infrastructure at this stage, the applicant is committed to engaging in good faith negotiations with affected landowners to secure the necessary servitudes following the achievement of the EA. The landowner in question (Mr Moodie) did not formally raise any objections. He advised that the routing could be relooked at in due course. In recognition of the risks involved, and in the context of the NEMA EIA Regulations' requirement to consider reasonable and feasible alternatives, alternative powerline routes have also been assessed as part of the EIA to reduce potential impacts and improve the likelihood of an acceptable alignment being secured. The other landowners did not formally raise any objections yet and formal discussions still need to take place with these landowners to the extent that the OHL needs to traverse their respective properties.

The routing referred to in your comment is an alternative powerline route considered, and is not the preferred route. Our role as the EAP is to independently assess the potential impacts of alternatives, identify mitigation measures to reduce impacts to acceptable levels, and provide an informed opinion on the acceptability of the project. The final decision on whether the project may proceed rests with the DFFE.

11 - The avifaunal specialist signed a NDA (non disclosure agreement) with the applicant and it was also revealed in the meeting by the applicant that they collectively determined the shaped exclusion zones for the southern bald ibis. Are you as EAP comfortable that it is not in contradiction with the declaration the avifaunal specialist signed as independant specialist? If so, please explain why.

The avifaunal exclusion zones are proposed by the appointed avifaunal specialist alone, informed by additional avifaunal studies commissioned by the applicant. The applicant has no role to play in determining the shape or size of proposed buffers. Please also see my response to your fifth question, above. It is common practice for parties to sign NDAs in order to protect confidential information, such as for instance intellectual property, specific project sites and does do not detract from or limits a specialist to act independently and impartially.

We operate on the assumption that all appointed specialists, including the avifaunal specialist, conduct their work in an ethical, independent manner, in compliance with the EIA Regulations. Both we as the EAP and all specialists have signed declarations of independence, as required under NEMA, confirming that our assessments are conducted impartially.

Lucien Barbeau
Senior Consultant

Sustainability is our business

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Tuesday, August 12, 2025 11:32 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

Time is running out.

Where are the minutes of the meeting as well as a copy of the recorded transcript?

Thanks

On Tue, Aug 12, 2025 at 9:15 AM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Good day Mr Meyer,
>
> I trust that you are well. Kindly note that we will provide our responses to your comments by close of business today.
>
> Kind Regards

Lucien Barbeau
Senior Consultant

Sustainability is our business

Cape Town [redacted] **erm.com**

> **From:** ERM Arcus Amsterdam
> **Sent:** Wednesday, August 6, 2025 2:56 PM
> **To:** Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
> **Cc:** Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za
> **Subject:** RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
>
> Dear Mr Meyer,

Thank you for your email and for taking the time to share your reflections following our meeting on Monday.

We acknowledge receipt of your comments and the additional questions you have raised. We appreciate your continued engagement in the process and will respond to your queries as soon as possible.

Should you have any further inputs in the meantime, please feel free to share them with us.

Kind Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Wednesday, August 6, 2025 1:47 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

The purpose of the meeting was to address concerns of the I&AP's regarding the proposed Sheepmoor and Emvelo WEF's. The applicant gives the impression that they are not interested in taking any action regarding the I&AP's concerns and attend it only to avoid negative reflection. Therefore the meeting created unfortunately more questions than answers. Your EAP's input was also disappointing.

We urgently need clarification and answers on the following

1 - The EAP is expected to participate and actively engage with the impacted community. Why has my request for a meeting since February 2025 repeatedly declined and pushed in at the 11th hour?

2 - Do you as EAP feel that the process has been credible and transparent as well as accountable in circumstances where you reach out and respond to a request for a meeting at the 11th hour? How is that considered to be meaningful and in the spirit of the constitution?

3 - Why are biodiversity related issues only being property investigated at the 11th hour although the Provincial Department requested it in the scoping phase?

4 - Why are requested documentation regarding the additional 3 months extension granted by DFFE to the applicant still outstanding?

5 - Are you as EAP confident that the data and modelling that has been undertaken to address bird related impacts and specifically the martial eagle is accurate and credible? If so, please explain why.

6 - Are you as EAP confident and can you confirm in writing that the data that is being obtained in relation to the martial eagle was correctly obtained and in accordance with all minimal standards and legal criteria?

7 - Are you as EAP comfortable that if the tagging of the martial eagle were done without a valid permit, that the tagged data can still be used in the specialist report? If so, please explain why.

8 - Are you as EAP in acceptance that the permits to tag the martial eagles, also the one at Verkykerskop, were not presented at the meeting? If so, please explain why.

9 - Are you as EAP confident that all the recommendations in the specialist reports and specifically the Social report are satisfactorily addressed? If not, please explain why.

10 - It became clear in the meeting that none of the affected landowners are prepared to allow the proposed powerline over their properties. Are AEP comfortable to support an application without a secured powerline route?

11 - The avifaunal specialist signed a NDA (non disclosure agreement) with the applicant and it was also revealed in the meeting by the applicant that they collectively determined the shaped exclusion zones for the southern bald ibis. Are you as EAP comfortable that it is not in contradiction with the declaration the avifaunal specialist signed as independant specialist? If so, please explain why.

Due to the time constraint answers required before the 11/08/2025.

Regards

On Sun, Aug 3, 2025 at 12:36 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Mr Meyer,
>
> Thank you for confirming the meeting for 12h00 tomorrow, 4 August, at your farm. That time works perfectly, and we look forward to meeting with you.
>
> If you would kindly share the physical address or GPS coordinates for the entrance to your farm, it would be greatly appreciated to ensure we arrive without any difficulty.
>
> There will be five people attending the meeting, including myself.
>
> Should there be anything further you would like us to prepare or bring along for the meeting, please don't hesitate to let us know, we'll be happy to assist in any way we can.
>
> Kind regards,
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Senior Consultant
>
> Cape Town [redacted] **erm.com**
>
> **From:** Josua Meyer <meyerjosua55@gmail.com>
> **Sent:** Friday, August 1, 2025 1:29 PM
> **To:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
> **Subject:** Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
>
> **EXTERNAL MESSAGE**
>
> Good day
> Monday is fine with me
> I did inform Johans also
> Will 12h00 be convenient for you?

How may people?
Regards

On Fri, 01 Aug 2025, 11:42 ERM Arcus Amsterdam, <ERM.ArcusAmsterdam@erm.com> wrote:

> Good Morning Mr Meyer,
>
> Thank you for your response. If you feel Monday is too short availability, please do not feel rushed. We would be happy to accommodate you later in the week. We will await your feedback and move accordingly from there.
>
> Kind Regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Thursday, July 31, 2025 6:13 PM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Some people who received this message don't often get email from meyerjosua55@gmail.com. Learn why this is important
EXTERNAL MESSAGE

Goodday
Will confirm tomorrow before 12h00
Thanks

On Thu, Jul 31, 2025 at 2:22 PM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Dear Mr Meyer,
>
> I hope this message finds you well.
>
> I'm writing to kindly follow up on our proposed meeting scheduled for Monday, 4 August at 13:00 at your farm. We would appreciate it if you could please confirm whether you are still available to meet on that date.
>
> Should you require any additional information or documentation ahead of the meeting, beyond what you have already requested, please don't hesitate to let me know, I'd be happy to assist.
>
> Looking forward to your confirmation.
>
> Kind regards,

Lucien Barbeau
Senior Consultant

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Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Monday, July 28, 2025 11:49 AM
To: Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Meyer,

Following discussions with the applicant, unfortunately it will not be possible to schedule a meeting prior to 1 August due to limited availability.

However, we would be pleased to meet with you on Monday the 4th of August 2025 at 13:00, as per your request, at your farm.

Kindly confirm whether this date and time are suitable, and please advise who will be attending the meeting from your side.

I will continue to provide you with the requested documentation ahead of the meeting.

Kind regards,

Lucien Barbeau
Senior Consultant

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Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 25, 2025 5:11 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

Proposed date for the meeting seems to be too close to submission of comments which is already 9/08/25.

Can you arrange the meeting for us before 1/07/2025.

Can you in the meantime forward the detail previously requested

- All the documentation with Department concerning the 3 months extension granted even after time lapps to submit final report

- Mulilo's permits to fit telemetry device on the two martial eagles

- AfriAvian motivation for altering Figure 33 in both avifaunal reports

Above info are urgently required and no reason to wait for the meeting

Regards

Josua

On Tue, Jul 22, 2025 at 10:30 AM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Hi Lucien
>
> There might be a mistake in your day or date ..... 7 August 2025 is a Thursday.
>
> Nevertheless the 6 or 7 th August 2025 is fine with us.
>
> Will appreciate it if we can meet on my farm.
>
> We intend to be three (3) I&AP
>
> Regards
>
> Josua Meyer
>
> On Mon, Jul 21, 2025 at 11:36 AM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:
>
> > Dear Mr. Meyer,
> >
> > Good day, and thank you for your recent correspondence regarding the Draft EIA Reports.
> >
> > We acknowledge your request for a meeting to discuss the concerns raised. In consultation with the applicant, Mulilo, we are proposing a provisional date of Wednesday, 7 August 2025, with the meeting to be held at a venue in Ermelo. Kindly confirm whether this date is suitable for you and whether you will be attending alone or accompanied by others.
> >
> > As a registered I&AP, your comments form an important part of the formal public participation process and will be incorporated into the Final EIA Reports. We also acknowledge the concerns raised regarding the tagging of the Martial Eagles. Relevant documentation, including permits, will be made available where appropriate to support transparency and clarity during the engagement.
> >
> > We look forward to your response.
> >
> > Kind Regards,
> >
> > ERM
> > Sustainability is our business
> >
> > **Lucien Barbeau**
> > Senior Consultant
> >
> > Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 18, 2025 4:51 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Johans Van Wyk <Piwy@mulilo.com>; Lloyd@mulilo.com
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday mr Lucien Barbeau,

Referring to your email dated 7/04/2025 it will be appreciated if you can arrange such a meeting urgently before the 9/08/2025 with the applicant, Mulilo, on site.

Concerns as previously raised with Mulilo in an email dated 19/02/2025 will be on the agenda. That request for a meeting was refused by Mulilo.

Another urgent item which also must be discussed is the tagging of the two martial eagles. According to the MTPA report in my possession, the martial eagles were tagged by Mulilo without a permit. Copy of the report can be provided at the meeting.

That leaves the tagging of the martial eagles illegally, if not criminal.

Therefore the data being used in the specialist report is illegally obtained and all sections, models and references where data has been used must be removed from the report.

Looking forward to your urgent response.

Regards

Josua Meyer (I&AP)

On Wed, Jul 16, 2025 at 4:41 PM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Goodday Sir
>
> The avifaunal specialist removed in both reports, Sheepmoor WEF and Emvelo WEF, the High Sensitivity - Turbine Exclusion Zone in Figures 33 for the aquatic buffer zones from an avifaunal perspective.
>
> It must be an unintentional mistake and request reinstatement of it.
>
> If it was deliberate we request the detailed reasoning and motivation for such a drastic decision.
>
> Thanks
>
> Josua Meyer
>
> On Wed, Jul 16, 2025 at 1:54 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:
>
> > Dear Interested and Affected Party,
> >
> > Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.
> >
> > The revised comment period now ends on 15 August 2025.

All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.

Thank you for your continued participation.



Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted]

erm.com



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This e-mail and any attachments may contain proprietary, confidential and/or privileged information. No confidentiality or privilege is waived or lost by any transmission errors. This communication is intended solely for the intended recipient, and if you are not the intended recipient, please notify the sender immediately, delete it from your system and do not copy, distribute, disclose, or otherwise act upon any part of this email communication or its attachments. To find out how the ERM Group manages personal data please review our Privacy Policy

From: Andrew Pearson
Sent on: Friday, 15 August 2025 10:58:06
To: ERM Arcus Amsterdam; Lloyd Barnes
CC: Rebecca Thomas; Stephen Burton; Stephanie Gopaul
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi All

Will we, and should we, send a copy of the final CRR to Mr Meyer when we submit to DFFE?

Kind regards,

Andrew Pearson *Pr.Sci.Nat* (400423/11)
Senior Manager: Head of Environmental
[redacted]
www.mulilo.com
21st Floor, Portside, 5 Buitengracht Street, Cape Town, 8001

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, August 15, 2025 10:39 AM
To: Lloyd Barnes <Lloyd@mulilo.com>
Cc: Andrew Pearson <Andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Subject: FW: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Lloyd,

As discussed, I will reply to Mr Meyer below acknowledging his email and inform him that his comments will be added to the CRR's and our responses will be provided within the report itself.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Thursday, August 14, 2025 10:44 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Dear Lucien

Just want to get the records straight without getting into an informal debate

1 - 4 : Correspondence

- Request info from ERM, Mr Lucien Barbeau, on 17/12/2024 at 11h04.
  Still no response ?

- First request for meeting to applicant, mr Johans van Wyk, on 19/2/2025 at 12h35.
  Applicant, mr Johans van Wyk, reject request on 19/02/2025 at 15h35
  First formal request for meeting through ERM on 16/4/2025 at 03h24. No response ?
  Request again for meeting through ERM, Mr Lucien Barbeau, on 18/07/2025 at 16h51.
  Meeting took place on 4/08/2025.
  Almost 8 months later!?

- Requested on 16/06/2025 for official documentation concerning the 3 month extension.
  Repeat request during meeting of 4/08/2025
  Received info only on 12/08/2025
  Almost 2 month later?!

- Request tagged data of two martial eagles from ERM on 11/03/2025 at 10h59
  Repeat request for tagged data from ERM on 29/03/2025 at 11h44
  Received refusal of data in email from applicant, mr Johans van Wyk, on 14/4/2025 at 20h40. ERM was also CC.
  Remind ERM, Mr Barbeau, on 15/04/2025 at 22h11 that formal answer on request for tagged data is still outstanding.
  Still no response from ERM !!

Is that what you and ERM means by **CREDIBLE, TRANSPARENT and ACCOUNTABLE?**

5 - 8 : Tagged data

Mulilo and EWT is in a partnership, confirmed in email from mr Johans van Wyk, in tagging the birds and therefore co-accountable for each other's conduct
The issue is not who did wrong but is the tagging done with a valid permit.?
If not, then it is illegal and that also implies for the data obtained by the unlawful act.
What ERM says by implication is that they are comfortable in driving a stolen vehicle as long as it is to their advantage?
Very dangerous and controversial approach..
We still insist that everything connected to the tagged data must be removed from the avifaunal report because it is illegally obtained regardless who did it.

The avifaunal specialist used the Verkykerkop tagged data in his report and on that ground we requested the permit to tagg that eagle (Bred)

9 - 11 : Specialist report and NDA

Mr Moodie strongly opposed the powerline crossing his farms and that also without consulting him.That was the main reason why Mr Moodie attended the meeting. Maybe you did not pick it up because Mr Moodie spoke Afrikaans.

Will address the rest in my comments.

Regards

Josua Meyer

On Tue, Aug 12, 2025 at 12:08 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Good day Mr Meyer,

Please find below our responses to your comments.

We are in the process of finalising the meeting minutes, which will be shared with you before the end of this week. Thank you

1 - The EAP is expected to participate and actively engage with the impacted community. Why has my request for a meeting since February 2025 repeatedly declined and pushed in at the 11th hour?

MULILO: The applicant regrets that the *ad hoc* meeting request sent by you to the applicant in February this year was not attended to immediately. Unfortunately, the request for a private meeting with the applicant was not seen at the time by the applicant's representatives, and the applicant sincerely apologises for any frustration this may have caused you. The applicant and EAP remain committed to engaging with I&APs, and the in-person meeting requested by yourself, and attended by me as the appointed EAP for this project, and by the applicant's representatives, on the 4th of August 2025 was welcomed and seen to constitute substantive progress in responding to your queries. Your queries, and these responses, will obviously form part of the Comments and Responses Report included together with the next draft of the EIA Report.

ERM: As the EAP, we are committed to engaging meaningfully with Interested and Affected Parties (I&APs) in accordance with the requirements of the Environmental Impact Assessment (EIA) Regulations under NEMA. We have undertaken all necessary steps and where possible, gone beyond these requirements to engage with the community. This has included an additional focus group meeting with you at a mutually suitable time within the regulated timelines to address your concerns. All I&AP comments have been acknowledged, and this engagement process remains ongoing.

2 - Do you as EAP feel that the process has been credible and transparent as well as accountable in circumstances where you reach out and respond to a request for a meeting at the 11th hour? How is that considered to be meaningful and in the spirit of the constitution?

ERM take the principles of credibility, transparency, and accountability in the EIA process very seriously. In this case, we regret that your initial request for a private meeting with the applicant, sent to the applicant in February, was not seen at the time by the applicant. Had it been, ERM would have engaged with you much earlier. Please include the EAP in such requests in order to ensure this is not missed in the future. The recent outreach was made in good faith. Once ERM became aware of your request for a meeting, ERM responded promptly in an effort to engage meaningfully and ensure your views are heard.

While ERM acknowledges that earlier engagement would have been preferable, we remain fully open to meeting and engaging in a meaningful and constructive way as the EIA process continues. ERM sees this as part of our commitment to upholding the intent and spirit of public participation, as set out in the Constitution and in NEMA and the 2014 NEMA EIA Regulations.

We believe that the EIA process we are facilitating has been credible, transparent, and accountable, in line with the requirements of NEMA. While the timing of certain engagements is sometimes influenced by the availability of multiple parties, we made every effort to accommodate your request for a meeting within the regulated timeframe. The process remains open, transparent, and documented for review by the competent authority.

3 - Why are biodiversity related issues only being property investigated at the 11th hour although the Provincial Department requested it in the scoping phase?

During the scoping phase, it was noted that a biodiversity offset may be required based on final layouts proposed. However, this indication was based on preliminary findings and initial specialist inputs, which were still being refined at the time. As is typical in EIA processes, more detailed and site-specific assessments only become available during the impact assessment phase, once the full suite of specialist studies is completed and verified. It is on the basis of these completed studies that a more accurate determination of residual impacts, and thus the need for and scale of a biodiversity offset, can be made.

We understand the importance of early clarity, but it's also essential that such recommendations are based on robust, defensible data. That said, ERM has aimed to finalise and address these issues as efficiently and transparently as possible once the necessary information became available.

Biodiversity-related issues have been considered from the outset of the EIA process, beginning in the scoping phase. The assessment has been iterative, with the project layout being amended several times to address environmental sensitivities and viability concerns, including biodiversity matters. These changes are documented in the Comments and Responses Report (CRR) and specialist assessments.

4 - Why are requested documentation regarding the additional 3 months extension granted by DFFE to the applicant still outstanding?

Please see the attached correspondence as requested.

5 - Are you as EAP confident that the data and modelling that has been undertaken to address bird related impacts and specifically the martial eagle is accurate and credible? If so, please explain why.

The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible.

The appointed avifaunal specialist is an expert in the field of wind energy facility impacts on birds. Based on their expertise and experience, we have no reason to doubt the accuracy, credibility, and applicability of the data and modelling undertaken for this assessment.

6 - Are you as EAP confident and can you confirm in writing that the data that is being obtained in relation to the martial eagle was correctly obtained and in accordance with all minimal standards and legal criteria?

As illuded to in our response to Point 5 above. The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report.

This permitting process is separate from the EIA, and as the EAP we do not have direct oversight over it.

7 - Are you as EAP comfortable that if the tagging of the martial eagle were done without a valid permit, that the tagged data can still be used in the specialist report? If so, please explain why.

The legality of the data collection process is the responsibility of the avifaunal specialist and the applicant. It is our understanding that a permit for such activities is legally required, and that the data included in the specialist report was provided on the basis that the necessary permit was obtained.

The data collected from the tagged Martial Eagle is invaluable. It provides critical insight into the bird's movements and habitat use, which directly strengthens the EIA findings; informs a more effective mitigation strategy; and ultimately, enhances the likely further and better protection of the species. As explained in Point 5 above – the EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The applicant was informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes)

was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible.

8 - Are you as EAP in acceptance that the permits to tag the martial eagles, also the one at Verkykerskop, were not presented at the meeting? If so, please explain why.

The proposed Verkykerskop Wind Farm cluster is not a part of the proposed Emvelo and Sheepmoor wind farms and are consequently not relevant or applicable to the current process. The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible.

As a general practice, fieldwork permits obtained by specialists are not typically presented during stakeholder engagement or I&AP meetings.

9 - Are you as EAP confident that all the recommendations in the specialist reports and specifically the Social report are satisfactorily addressed? If not, please explain why.

In the specialist reports, including the Social Impact Assessment, have been carefully considered and addressed to the extent possible within the on-going EIA process, and that will continue to be the case. Where certain recommendations require further action, these have been clearly outlined for implementation during the construction and operational phases, and will be monitored through the Environmental Management Programme (EMPr).

We have reviewed the social specialist's findings and recommendations and accept them as valid and credible, given the specialist's expertise in the field. Recommendations and mitigation measures that could reasonably be incorporated into the Environmental Management Programme (EMPr) have been included. If there are specific recommendations you believe have not been adequately addressed, please let us know so that we can review them.

10 - It became clear in the meeting that none of the affected landowners are prepared to allow the proposed powerline over their properties. Are AEP comfortable to support an application without a secured powerline route?

Thank you for raising this important point.

While the EIA process does not require landowner consent for linear infrastructure at this stage, the applicant is committed to engaging in good faith negotiations with affected landowners to secure the necessary servitudes following the achievement of the EA. The landowner in question (Mr Moodie) did not formally raise any objections. He advised that the routing could be relooked at in due course. In recognition of the risks involved, and in the context of the NEMA EIA Regulations' requirement to consider reasonable and feasible alternatives, alternative powerline routes have also been assessed as part of the EIA to reduce potential impacts and improve the likelihood of an acceptable alignment being secured. The other landowners did not formally raise any objections yet and formal discussions still need to take place with these landowners to the extent that the OHL needs to traverse their respective properties.

The routing referred to in your comment is an alternative powerline route considered, and is not the preferred route. Our role as the EAP is to independently assess the potential impacts of alternatives,

identify mitigation measures to reduce impacts to acceptable levels, and provide an informed opinion on the acceptability of the project. The final decision on whether the project may proceed rests with the DFFE.

11 - The avifaunal specialist signed a NDA (non disclosure agreement) with the applicant and it was also revealed in the meeting by the applicant that they collectively determined the shaped exclusion zones for the southern bald ibis. Are you as EAP comfortable that it is not in contradiction with the declaration the avifaunal specialist signed as independant specialist? If so, please explain why.

The avifaunal exclusion zones are proposed by the appointed avifaunal specialist alone, informed by additional avifaunal studies commissioned by the applicant. The applicant has no role to play in determining the shape or size of proposed buffers. Please also see my response to your fifth question, above. It is common practice for parties to sign NDAs in order to protect confidential information, such as for instance intellectual property, specific project sites and does do not detract from or limits a specialist to act independently and impartially.

We operate on the assumption that all appointed specialists, including the avifaunal specialist, conduct their work in an ethical, independent manner, in compliance with the EIA Regulations. Both we as the EAP and all specialists have signed declarations of independence, as required under NEMA, confirming that our assessments are conducted impartially.

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Lucien Barbeau
Senior Consultant

Cape Town
+27105963488

erm.com

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Tuesday, August 12, 2025 11:32 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

Time is running out.

Where are the minutes of the meeting as well as a copy of the recorded transcript?

Thanks

On Tue, Aug 12, 2025 at 9:15 AM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Good day Mr Meyer,
>
> I trust that you are well. Kindly note that we will provide our responses to your comments by close of business today.
>
> Kind Regards

Lucien Barbeau
Senior Consultant

Sustainability is our business

Cape Town
+27105963488

erm.com

From: ERM Arcus Amsterdam
Sent: Wednesday, August 6, 2025 2:56 PM
To: Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Meyer,

Thank you for your email and for taking the time to share your reflections following our meeting on Monday.

We acknowledge receipt of your comments and the additional questions you have raised. We appreciate your continued engagement in the process and will respond to your queries as soon as possible.

Should you have any further inputs in the meantime, please feel free to share them with us.

Kind Regards,

Lucien Barbeau
Senior Consultant

Sustainability is our business

Cape Town
[redacted]

erm.com

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Wednesday, August 6, 2025 1:47 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

The purpose of the meeting was to address concerns of the I&AP's regarding the proposed Sheepmoor and Emvelo WEF's. The applicant gives the impression that they are not interested in taking any action regarding the I&AP's concerns and attend it only to avoid negative reflection. Therefore the meeting created unfortunately more questions than answers. Your EAP's input was also disappointing.

We urgently need clarification and answers on the following

1 - The EAP is expected to participate and actively engage with the impacted community. Why has my request for a meeting since February 2025 repeatedly declined and pushed in at the 11th hour?

2 - Do you as EAP feel that the process has been credible and transparent as well as accountable in circumstances where you reach out and respond to a request for a meeting at the 11th hour? How is that considered to be meaningful and in the spirit of the constitution?

3 - Why are biodiversity related issues only being property investigated at the 11th hour although the Provincial Department requested it in the scoping phase?

4 - Why are requested documentation regarding the additional 3 months extension granted by DFFE to the applicant still outstanding?

5 - Are you as EAP confident that the data and modelling that has been undertaken to address bird related impacts and specifically the martial eagle is accurate and credible? If so, please explain why.

6 - Are you as EAP confident and can you confirm in writing that the data that is being obtained in relation to the martial eagle was correctly obtained and in accordance with all minimal standards and legal criteria?

7 - Are you as EAP comfortable that if the tagging of the martial eagle were done without a valid permit, that the tagged data can still be used in the specialist report? If so, please explain why.

8 - Are you as EAP in acceptance that the permits to tag the martial eagles, also the one at Verkykerskop, were not presented at the meeting? If so, please explain why.

9 - Are you as EAP confident that all the recommendations in the specialist reports and specifically the Social report are satisfactorily addressed? If not, please explain why.

10 - It became clear in the meeting that none of the affected landowners are prepared to allow the proposed powerline over their properties. Are AEP comfortable to support an application without a secured powerline route?

11 - The avifaunal specialist signed a NDA (non disclosure agreement) with the applicant and it was also revealed in the meeting by the applicant that they collectively determined the shaped exclusion zones for the southern bald ibis. Are you as EAP comfortable that it is not in contradiction with the declaration the avifaunal specialist signed as independant specialist? If so, please explain why.

Due to the time constraint answers required before the 11/08/2025.

Regards

On Sun, Aug 3, 2025 at 12:36 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Mr Meyer,
>
> Thank you for confirming the meeting for 12h00 tomorrow, 4 August, at your farm. That time works perfectly, and we look forward to meeting with you.
>
> If you would kindly share the physical address or GPS coordinates for the entrance to your farm, it would be greatly appreciated to ensure we arrive without any difficulty.
>
> There will be five people attending the meeting, including myself.
>
> Should there be anything further you would like us to prepare or bring along for the meeting, please don’t hesitate to let us know, we’ll be happy to assist in any way we can.
>
> Kind regards,
>
> ERM
> Sustainability is our business
> **Lucien Barbeau**
> Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, August 1, 2025 1:29 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Good day
Monday is fine with me
I did inform Johans also
Will 12h00 be convenient for you?
How may people?
Regards

On Fri, 01 Aug 2025, 11:42 ERM Arcus Amsterdam, <ERM.ArcusAmsterdam@erm.com> wrote:

> Good Morning Mr Meyer,
>
> Thank you for your response. If you feel Monday is too short availability, please do not feel rushed. We would be happy to accommodate you later in the week. We will await your feedback and move accordingly from there.
>
> Kind Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town **erm.com**
+27105963488

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Thursday, July 31, 2025 6:13 PM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Some people who received this message don't often get email from meyerjosua55@gmail.com. Learn why this is important
EXTERNAL MESSAGE

Goodday
Will confirm tomorrow before 12h00
Thanks

On Thu, Jul 31, 2025 at 2:22 PM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Dear Mr Meyer,
>
> I hope this message finds you well.

I'm writing to kindly follow up on our proposed meeting scheduled for Monday, 4 August at 13:00 at your farm. We would appreciate it if you could please confirm whether you are still available to meet on that date.

Should you require any additional information or documentation ahead of the meeting, beyond what you have already requested, please don't hesitate to let me know, I'd be happy to assist.

Looking forward to your confirmation.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Monday, July 28, 2025 11:49 AM
To: Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Meyer,

Following discussions with the applicant, unfortunately it will not be possible to schedule a meeting prior to 1 August due to limited availability.

However, we would be pleased to meet with you on Monday the 4th of August 2025 at 13:00, as per your request, at your farm.

Kindly confirm whether this date and time are suitable, and please advise who will be attending the meeting from your side.

I will continue to provide you with the requested documentation ahead of the meeting.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town
+27105963488 **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 25, 2025 5:11 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

Proposed date for the meeting seems to be too close to submission of comments which is already 9/08/25.

Can you arrange the meeting for us before 1/07/2025.

Can you in the meantime forward the detail previously requested

- All the documentation with Department concerning the 3 months extension granted even after time lapps to submit final report

- Mulilo's permits to fit telemetry device on the two martial eagles

- AfriAvian motivation for altering Figure 33 in both avifaunal reports

Above info are urgently required and no reason to wait for the meeting

Regards

Josua

On Tue, Jul 22, 2025 at 10:30 AM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Hi Lucien
>
> There might be a mistake in your day or date ..... 7 August 2025 is a Thursday.
>
> Nevertheless the 6 or 7 th August 2025 is fine with us.
>
> Will appreciate it if we can meet on my farm.
>
> We intend to be three (3) I&AP
>
> Regards
>
> Josua Meyer
>
> On Mon, Jul 21, 2025 at 11:36 AM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:
>
> > Dear Mr. Meyer,
> >
> > Good day, and thank you for your recent correspondence regarding the Draft EIA Reports.
> >
> > We acknowledge your request for a meeting to discuss the concerns raised. In consultation with the applicant, Mulilo, we are proposing a provisional date of Wednesday, 7 August 2025, with the meeting to be held at a venue in Ermelo. Kindly confirm whether this date is suitable for you and whether you will be attending alone or accompanied by others.
> >
> > As a registered I&AP, your comments form an important part of the formal public participation process and will be incorporated into the Final EIA Reports. We also acknowledge the concerns raised regarding the tagging of the Martial Eagles. Relevant documentation, including permits, will be made available where appropriate to support transparency and clarity during the engagement.
> >
> > We look forward to your response.
> >
> > Kind Regards,

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 18, 2025 4:51 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Johans Van Wyk <Piwy@mulilo.com>; Lloyd@mulilo.com
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday mr Lucien Barbeau,

Referring to your email dated 7/04/2025 it will be appreciated if you can arrange such a meeting urgently before the 9/08/2025 with the applicant, Mulilo, on site.

Concerns as previously raised with Mulilo in an email dated 19/02/2025 will be on the agenda. That request for a meeting was refused by Mulilo.

Another urgent item which also must be discussed is the tagging of the two martial eagles. According to the MTPA report in my possession, the martial eagles were tagged by Mulilo without a permit. Copy of the report can be provided at the meeting.

That leaves the tagging of the martial eagles illegally, if not criminal.

Therefore the data being used in the specialist report is illegally obtained and all sections, models and references where data has been used must be removed from the report.

Looking forward to your urgent response.

Regards

Josua Meyer (I&AP)

On Wed, Jul 16, 2025 at 4:41 PM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Goodday Sir
>
> The avifaunal specialist removed in both reports, Sheepmoor WEF and Emvelo WEF, the High Sensitivity - Turbine Exclusion Zone in Figures 33 for the aquatic buffer zones from an avifaunal perspective.
>
> It must be an unintentional mistake and request reinstatement of it.
>
> If it was deliberate we request the detailed reasoning and motivation for such a drastic decision.
>
> Thanks
>
> Josua Meyer

On Wed, Jul 16, 2025 at 1:54 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Interested and Affected Party,
>
> Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.
>
> The revised comment period now ends on 15 August 2025.
>
> All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.
>
> Thank you for your continued participation.

ERM

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Stephanie Gopaul
Sent on: Friday, 15 August 2025 11:04:19
To: Andrew Pearson; ERM Arcus Amsterdam; Lloyd Barnes
CC: Rebecca Thomas; Stephen Burton
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

HI Andrew

We will make the final CRR available to all registered I&APs- the notification will contain a link for him to access the CRR.

Are you wanting to send him a hard copy or usb or something like that?

ERM
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Stephanie Gopaul
Partner
She/Her/Hers

Durban [redacted] **erm.com**

From: Andrew Pearson <Andrew@mulilo.com>
Sent: Friday, August 15, 2025 10:58 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lloyd Barnes <Lloyd@mulilo.com>
Cc: Rebecca Thomas <reth@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi All

Will we, and should we, send a copy of the final CRR to Mr Meyer when we submit to DFFE?

Kind regards,

Andrew Pearson *Pr.Sci.Nat* (400423/11)
Senior Manager: Head of Environmental
[redacted]
www.mulilo.com
[redacted]
mulilo

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, August 15, 2025 10:39 AM
To: Lloyd Barnes <Lloyd@mulilo.com>
Cc: Andrew Pearson <Andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Subject: FW: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Lloyd,

As discussed, I will reply to Mr Meyer below acknowledging his email and inform him that his comments will be added to the CRR's and our responses will be provided within the report itself.

Kind Regards

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

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From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Thursday, August 14, 2025 10:44 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Dear Lucien

Just want to get the records straight without getting into an informal debate

1 - 4 : Correspondence

- Request info from ERM, Mr Lucien Barbeau, on 17/12/2024 at 11h04.
  Still no response ?

- First request for meeting to applicant, mr Johans van Wyk, on 19/2/2025 at 12h35.
  Applicant, mr Johans van Wyk, reject request on 19/02/2025 at 15h35
  First formal request for meeting through ERM on 16/4/2025 at 03h24. No response ?
  Request again for meeting through ERM, Mr Lucien Barbeau, on 18/07/2025 at 16h51.
  Meeting took place on 4/08/2025.
  Almost 8 months later!?

- Requested on 16/06/2025 for official documentation concerning the 3 month extension.
  Repeat request during meeting of 4/08/2025
  Received info only on 12/08/2025
  Almost 2 month later?!

- Request tagged data of two martial eagles from ERM on 11/03/2025 at 10h59
  Repeat request for tagged data from ERM on 29/03/2025 at 11h44
  Received refusal of data in email from applicant, mr Johans van Wyk, on 14/4/2025 at 20h40. ERM was also CC.
  Remind ERM, Mr Barbeau, on 15/04/2025 at 22h11 that formal answer on request for tagged data is still outstanding.
  Still no response from ERM !!

Is that what you and ERM means by **CREDIBLE, TRANSPARENT and ACCOUNTABLE?**

5 - 8 : Tagged data

Mulilo and EWT is in a partnership, confirmed in email from mr Johans van Wyk, in tagging the birds and therefore co-accountable for each other's conduct
The issue is not who did wrong but is the tagging done with a valid permit.?
If not, then it is illegal and that also implies for the data obtained by the unlawful act.
What ERM says by implication is that they are comfortable in driving a stolen vehicle as long as it is to their advantage?
Very dangerous and controversial approach..

We still insist that everything connected to the tagged data must be removed from the avifaunal report because it is illegally obtained regardless who did it.

The avifaunal specialist used the Verkykerkop tagged data in his report and on that ground we requested the permit to tagg that eagle (Bred)

9 - 11 : Specialist report and NDA

Mr Moodie strongly opposed the powerline crossing his farms and that also without consulting him.That was the main reason why Mr Moodie attended the meeting. Maybe you did not pick it up because Mr Moodie spoke Afrikaans.

Will address the rest in my comments.

Regards

Josua Meyer

On Tue, Aug 12, 2025 at 12:08 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Good day Mr Meyer,
>
> Please find below our responses to your comments.
>
> We are in the process of finalising the meeting minutes, which will be shared with you before the end of this week. Thank you
>
> **1 - The EAP is expected to participate and actively engage with the impacted community. Why has my request for a meeting since February 2025 repeatedly declined and pushed in at the 11th hour?**
>
> MULILO: The applicant regrets that the *ad hoc* meeting request sent by you to the applicant in February this year was not attended to immediately. Unfortunately, the request for a private meeting with the applicant was not seen at the time by the applicant's representatives, and the applicant sincerely apologises for any frustration this may have caused you. The applicant and EAP remain committed to engaging with I&APs, and the in-person meeting requested by yourself, and attended by me as the appointed EAP for this project, and by the applicant's representatives, on the 4th of August 2025 was welcomed and seen to constitute substantive progress in responding to your queries. Your queries, and these responses, will obviously form part of the Comments and Responses Report included together with the next draft of the EIA Report.
>
> ERM: As the EAP, we are committed to engaging meaningfully with Interested and Affected Parties (I&APs) in accordance with the requirements of the Environmental Impact Assessment (EIA) Regulations under NEMA. We have undertaken all necessary steps and where possible, gone beyond these requirements to engage with the community. This has included an additional focus group meeting with you at a mutually suitable time within the regulated timelines to address your concerns. All I&AP comments have been acknowledged, and this engagement process remains ongoing.
>
> **2 - Do you as EAP feel that the process has been credible and transparent as well as accountable in circumstances where you reach out and respond to a request for a meeting at the 11th hour? How is that considered to be meaningful and in the spirit of the constitution?**
>
> ERM take the principles of credibility, transparency, and accountability in the EIA process very seriously. In this case, we regret that your initial request for a private meeting with the applicant, sent to the applicant in February, was not seen at the time by the applicant. Had it been, ERM would have engaged with you much earlier. Please include the EAP in such requests in order to ensure this is not missed in the future. The recent outreach was made in good faith. Once ERM became aware of your request for a meeting, ERM responded promptly in an effort to engage meaningfully and ensure your views are heard.
>
> While ERM acknowledges that earlier engagement would have been preferable, we remain fully open to meeting and engaging in a meaningful and constructive way as the EIA process continues. ERM sees this

as part of our commitment to upholding the intent and spirit of public participation, as set out in the Constitution and in NEMA and the 2014 NEMA EIA Regulations.

We believe that the EIA process we are facilitating has been credible, transparent, and accountable, in line with the requirements of NEMA. While the timing of certain engagements is sometimes influenced by the availability of multiple parties, we made every effort to accommodate your request for a meeting within the regulated timeframe. The process remains open, transparent, and documented for review by the competent authority.

3 - Why are biodiversity related issues only being property investigated at the 11th hour although the Provincial Department requested it in the scoping phase?

During the scoping phase, it was noted that a biodiversity offset may be required based on final layouts proposed. However, this indication was based on preliminary findings and initial specialist inputs, which were still being refined at the time. As is typical in EIA processes, more detailed and site-specific assessments only become available during the impact assessment phase, once the full suite of specialist studies is completed and verified. It is on the basis of these completed studies that a more accurate determination of residual impacts, and thus the need for and scale of a biodiversity offset, can be made.

We understand the importance of early clarity, but it's also essential that such recommendations are based on robust, defensible data. That said, ERM has aimed to finalise and address these issues as efficiently and transparently as possible once the necessary information became available.

Biodiversity-related issues have been considered from the outset of the EIA process, beginning in the scoping phase. The assessment has been iterative, with the project layout being amended several times to address environmental sensitivities and viability concerns, including biodiversity matters. These changes are documented in the Comments and Responses Report (CRR) and specialist assessments.

4 - Why are requested documentation regarding the additional 3 months extension granted by DFFE to the applicant still outstanding?

Please see the attached correspondence as requested.

5 - Are you as EAP confident that the data and modelling that has been undertaken to address bird related impacts and specifically the martial eagle is accurate and credible? If so, please explain why.

The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible.

The appointed avifaunal specialist is an expert in the field of wind energy facility impacts on birds. Based on their expertise and experience, we have no reason to doubt the accuracy, credibility, and applicability of the data and modelling undertaken for this assessment.

6 - Are you as EAP confident and can you confirm in writing that the data that is being obtained in relation to the martial eagle was correctly obtained and in accordance with all minimal standards and legal criteria?

As illuded to in our response to Point 5 above. The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of

1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report.

This permitting process is separate from the EIA, and as the EAP we do not have direct oversight over it.

7 - Are you as EAP comfortable that if the tagging of the martial eagle were done without a valid permit, that the tagged data can still be used in the specialist report? If so, please explain why.

The legality of the data collection process is the responsibility of the avifaunal specialist and the applicant. It is our understanding that a permit for such activities is legally required, and that the data included in the specialist report was provided on the basis that the necessary permit was obtained.

The data collected from the tagged Martial Eagle is invaluable. It provides critical insight into the bird's movements and habitat use, which directly strengthens the EIA findings; informs a more effective mitigation strategy; and ultimately, enhances the likely further and better protection of the species. As explained in Point 5 above – the EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The applicant was informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible.

8 - Are you as EAP in acceptance that the permits to tag the martial eagles, also the one at Verkykerskop, were not presented at the meeting? If so, please explain why.

The proposed Verkykerskop Wind Farm cluster is not a part of the proposed Emvelo and Sheepmoor wind farms and are consequently not relevant or applicable to the current process. The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible.

As a general practice, fieldwork permits obtained by specialists are not typically presented during stakeholder engagement or I&AP meetings.

9 - Are you as EAP confident that all the recommendations in the specialist reports and specifically the Social report are satisfactorily addressed? If not, please explain why.

In the specialist reports, including the Social Impact Assessment, have been carefully considered and addressed to the extent possible within the on-going EIA process, and that will continue to be the case. Where certain recommendations require further action, these have been clearly outlined for implementation during the construction and operational phases, and will be monitored through the Environmental Management Programme (EMPr).

We have reviewed the social specialist's findings and recommendations and accept them as valid and credible, given the specialist's expertise in the field. Recommendations and mitigation measures that could reasonably be incorporated into the Environmental Management Programme (EMPr) have been included. If there are specific recommendations you believe have not been adequately addressed, please let us know so that we can review them.

10 - It became clear in the meeting that none of the affected landowners are prepared to allow the proposed powerline over their properties. Are AEP comfortable to support an application without a secured powerline route?

Thank you for raising this important point.

While the EIA process does not require landowner consent for linear infrastructure at this stage, the applicant is committed to engaging in good faith negotiations with affected landowners to secure the necessary servitudes following the achievement of the EA. The landowner in question (Mr Moodie) did not formally raise any objections. He advised that the routing could be relooked at in due course. In recognition of the risks involved, and in the context of the NEMA EIA Regulations' requirement to consider reasonable and feasible alternatives, alternative powerline routes have also been assessed as part of the EIA to reduce potential impacts and improve the likelihood of an acceptable alignment being secured. The other landowners did not formally raise any objections yet and formal discussions still need to take place with these landowners to the extent that the OHL needs to traverse their respective properties.

The routing referred to in your comment is an alternative powerline route considered, and is not the preferred route. Our role as the EAP is to independently assess the potential impacts of alternatives, identify mitigation measures to reduce impacts to acceptable levels, and provide an informed opinion on the acceptability of the project. The final decision on whether the project may proceed rests with the DFFE.

11 - The avifaunal specialist signed a NDA (non disclosure agreement) with the applicant and it was also revealed in the meeting by the applicant that they collectively determined the shaped exclusion zones for the southern bald ibis. Are you as EAP comfortable that it is not in contradiction with the declaration the avifaunal specialist signed as independant specialist? If so, please explain why.

The avifaunal exclusion zones are proposed by the appointed avifaunal specialist alone, informed by additional avifaunal studies commissioned by the applicant. The applicant has no role to play in determining the shape or size of proposed buffers. Please also see my response to your fifth question, above. It is common practice for parties to sign NDAs in order to protect confidential information, such as for instance intellectual property, specific project sites and does do not detract from or limits a specialist to act independently and impartially.

We operate on the assumption that all appointed specialists, including the avifaunal specialist, conduct their work in an ethical, independent manner, in compliance with the EIA Regulations. Both we as the EAP and all specialists have signed declarations of independence, as required under NEMA, confirming that our assessments are conducted impartially.

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Lucien Barbeau
Senior Consultant

Cape Town [redacted]

erm.com

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Tuesday, August 12, 2025 11:32 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>;

celine@summersinc.co.za; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

Time is running out.

Where are the minutes of the meeting as well as a copy of the recorded transcript?

Thanks

On Tue, Aug 12, 2025 at 9:15 AM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Good day Mr Meyer,
>
> I trust that you are well. Kindly note that we will provide our responses to your comments by close of business today.
>
> Kind Regards
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Senior Consultant
>
> Cape Town [redacted] **erm.com**
>
> ---
>
> **From:** ERM Arcus Amsterdam
> **Sent:** Wednesday, August 6, 2025 2:56 PM
> **To:** Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
> **Cc:** Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za
> **Subject:** RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
>
> Dear Mr Meyer,
>
> Thank you for your email and for taking the time to share your reflections following our meeting on Monday.
>
> We acknowledge receipt of your comments and the additional questions you have raised. We appreciate your continued engagement in the process and will respond to your queries as soon as possible.
>
> Should you have any further inputs in the meantime, please feel free to share them with us.
>
> Kind Regards,
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Senior Consultant
>
> Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Wednesday, August 6, 2025 1:47 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

The purpose of the meeting was to address concerns of the I&AP's regarding the proposed Sheepmoor and Emvelo WEF's. The applicant gives the impression that they are not interested in taking any action regarding the I&AP's concerns and attend it only to avoid negative reflection. Therefore the meeting created unfortunately more questions than answers. Your EAP's input was also disappointing.

We urgently need clarification and answers on the following

1 - The EAP is expected to participate and actively engage with the impacted community. Why has my request for a meeting since February 2025 repeatedly declined and pushed in at the 11th hour?

2 - Do you as EAP feel that the process has been credible and transparent as well as accountable in circumstances where you reach out and respond to a request for a meeting at the 11th hour? How is that considered to be meaningful and in the spirit of the constitution?

3 - Why are biodiversity related issues only being property investigated at the 11th hour although the Provincial Department requested it in the scoping phase?

4 - Why are requested documentation regarding the additional 3 months extension granted by DFFE to the applicant still outstanding?

5 - Are you as EAP confident that the data and modelling that has been undertaken to address bird related impacts and specifically the martial eagle is accurate and credible? If so, please explain why.

6 - Are you as EAP confident and can you confirm in writing that the data that is being obtained in relation to the martial eagle was correctly obtained and in accordance with all minimal standards and legal criteria?

7 - Are you as EAP comfortable that if the tagging of the martial eagle were done without a valid permit, that the tagged data can still be used in the specialist report? If so, please explain why.

8 - Are you as EAP in acceptance that the permits to tag the martial eagles, also the one at Verkykerskop, were not presented at the meeting? If so, please explain why.

9 - Are you as EAP confident that all the recommendations in the specialist reports and specifically the Social report are satisfactorily addressed? If not, please explain why.

10 - It became clear in the meeting that none of the affected landowners are prepared to allow the proposed powerline over their properties. Are AEP comfortable to support an application without a secured powerline route?

11 - The avifaunal specialist signed a NDA (non disclosure agreement) with the applicant and it was also revealed in the meeting by the applicant that they collectively determined the shaped exclusion zones for the southern bald ibis. Are you as EAP comfortable that it is not in contradiction with the declaration the avifaunal specialist signed as independant specialist? If so, please explain why.

Due to the time constraint answers required before the 11/08/2025.

Regards

On Sun, Aug 3, 2025 at 12:36 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Mr Meyer,
>
> Thank you for confirming the meeting for 12h00 tomorrow, 4 August, at your farm. That time works perfectly, and we look forward to meeting with you.
>
> If you would kindly share the physical address or GPS coordinates for the entrance to your farm, it would be greatly appreciated to ensure we arrive without any difficulty.
>
> There will be five people attending the meeting, including myself.
>
> Should there be anything further you would like us to prepare or bring along for the meeting, please don't hesitate to let us know, we'll be happy to assist in any way we can.
>
> Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, August 1, 2025 1:29 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Good day
Monday is fine with me
I did inform Johans also
Will 12h00 be convenient for you?
How may people?
Regards

On Fri, 01 Aug 2025, 11:42 ERM Arcus Amsterdam, <ERM.ArcusAmsterdam@erm.com> wrote:

> Good Morning Mr Meyer,
>
> Thank you for your response. If you feel Monday is too short availability, please do not feel rushed. We would be happy to accommodate you later in the week. We will await your feedback and move accordingly from there.
>
> Kind Regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town **erm.com**

[redacted]

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Thursday, July 31, 2025 6:13 PM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Some people who received this message don't often get email from meyerjosua55@gmail.com. Learn why this is important
EXTERNAL MESSAGE

Goodday
Will confirm tomorrow before 12h00
Thanks

On Thu, Jul 31, 2025 at 2:22 PM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Dear Mr Meyer,
>
> I hope this message finds you well.
>
> I'm writing to kindly follow up on our proposed meeting scheduled for Monday, 4 August at 13:00 at your farm. We would appreciate it if you could please confirm whether you are still available to meet on that date.
>
> Should you require any additional information or documentation ahead of the meeting, beyond what you have already requested, please don't hesitate to let me know, I'd be happy to assist.
>
> Looking forward to your confirmation.
>
> Kind regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Monday, July 28, 2025 11:49 AM
To: Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Meyer,

Following discussions with the applicant, unfortunately it will not be possible to schedule a meeting prior to 1 August due to limited availability.

However, we would be pleased to meet with you on Monday the 4th of August 2025 at 13:00, as per your request, at your farm.

Kindly confirm whether this date and time are suitable, and please advise who will be attending the meeting from your side.

I will continue to provide you with the requested documentation ahead of the meeting.

Kind regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 25, 2025 5:11 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

Proposed date for the meeting seems to be too close to submission of comments which is already 9/08/25.

Can you arrange the meeting for us before 1/07/2025.

Can you in the meantime forward the detail previously requested

- All the documentation with Department concerning the 3 months extension granted even after time lapps to submit final report

- Mulilo's permits to fit telemetry device on the two martial eagles

- AfriAvian motivation for altering Figure 33 in both avifaunal reports

Above info are urgently required and no reason to wait for the meeting

Regards

Josua

On Tue, Jul 22, 2025 at 10:30 AM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Hi Lucien
>
> There might be a mistake in your day or date ..... 7 August 2025 is a Thursday.
>
> Nevertheless the 6 or 7 th August 2025 is fine with us.
>
> Will appreciate it if we can meet on my farm.
>
> We intend to be three (3) I&AP

Regards

Josua Meyer

On Mon, Jul 21, 2025 at 11:36 AM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Mr. Meyer,
>
> Good day, and thank you for your recent correspondence regarding the Draft EIA Reports.
>
> We acknowledge your request for a meeting to discuss the concerns raised. In consultation with the applicant, Mulilo, we are proposing a provisional date of Wednesday, 7 August 2025, with the meeting to be held at a venue in Ermelo. Kindly confirm whether this date is suitable for you and whether you will be attending alone or accompanied by others.
>
> As a registered I&AP, your comments form an important part of the formal public participation process and will be incorporated into the Final EIA Reports. We also acknowledge the concerns raised regarding the tagging of the Martial Eagles. Relevant documentation, including permits, will be made available where appropriate to support transparency and clarity during the engagement.
>
> We look forward to your response.
>
> Kind Regards,

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 18, 2025 4:51 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Johans Van Wyk <Piwy@mulilo.com>; Lloyd@mulilo.com
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday mr Lucien Barbeau,

Referring to your email dated 7/04/2025 it will be appreciated if you can arrange such a meeting urgently before the 9/08/2025 with the applicant, Mulilo, on site.

Concerns as previously raised with Mulilo in an email dated 19/02/2025 will be on the agenda. That request for a meeting was refused by Mulilo.

Another urgent item which also must be discussed is the tagging of the two martial eagles. According to the MTPA report in my possession, the martial eagles were tagged by Mulilo without a permit. Copy of the report can be provided at the meeting.

That leaves the tagging of the martial eagles illegally, if not criminal.

Therefore the data being used in the specialist report is illegally obtained and all sections, models and references where data has been used must be removed from the

report.

Looking forward to your urgent response.

Regards

Josua Meyer (I&AP)

On Wed, Jul 16, 2025 at 4:41 PM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Goodday Sir
>
> The avifaunal specialist removed in both reports, Sheepmoor WEF and Emvelo WEF, the High Sensitivity - Turbine Exclusion Zone in Figures 33 for the aquatic buffer zones from an avifaunal perspective.
>
> It must be an unintentional mistake and request reinstatement of it.
>
> If it was deliberate we request the detailed reasoning and motivation for such a drastic decision.
>
> Thanks
>
> Josua Meyer
>
> On Wed, Jul 16, 2025 at 1:54 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:
>
> > Dear Interested and Affected Party,
> >
> > Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.
> >
> > The revised comment period now ends on 15 August 2025.
> >
> > All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.
> >
> > Thank you for your continued participation.
> >
> > ERM
> > Sustainability is our business
> >
> > **Lucien Barbeau**
> > Senior Consultant
> >
> > Cape Town [redacted] **erm.com**
> >
> > **From:** ERM Arcus Amsterdam
> > **Sent:** Tuesday, July 15, 2025 4:43 PM
> > **To:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
> > **Subject:** Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
> >
> > SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER
> >
> > Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Postnet Ermelo
Sent on: Friday, 15 August 2025 11:08:32
To: ERM Arcus Amsterdam
CC: Lucien Barbeau
Subject:
Attachments: SKM_C250i25081504350.pdf (2.56 MB)

EXTERNAL MESSAGE

To : ERM Arcus Amsterdam ERM.ArcusAmsterdam@erm.com

CC Lucien.barbeau@erm.com

richard@summersinc.co.za

meyerjosua55@gmail.com

From: Josua Meyer (081 019 2213)

R/E : COMMENTS ON DRAFT EIA REPORT FOR PROPOSED SHEEPMOOR AND EMVELO WEF.

Attached are the comments on above mentioned WEF.

The comments were sent from POSTNET, Ermelo due to the lack of scanning facilities for the 17 appendixes.

Please confirm reception of it to my email meyerjosua55@gmail.com

Regards

COMMENTS ON THE MAY 2025 DRAFT EIA REPORT FOR SHEEPMOOR AND EMVELO WIND ENERGY FACILITIES, MPUMALANGA PROVINCE

Josua Meyer (081 019 2213) ***14/08/2025***

A – AVIFAUNAL

1. THE AVIFAUNAL SPECIALIST REPORT of MAY 2025 IS FATALLY FLAWED.

1.1 AfriAvian signed an **NDA (non-disclosure agreement)** with the applicant, Mulilo, concerning the tagged data of two martial eagles.

That is an undisputed CONFLICT OF INTERST?

Mr Lloyd Barnes of Mulilo also made the shocking confession in the meeting held on the farm Onverwacht on Monday, 4/08/2025 that he and AfriAvian **collective define** the shaped exclusion zones for the Southern Bald Ibis.

This puts AfriAvian integrity and credibility under supreme suspicion and is contradictory to the DECLARATION they signed as independent specialist.

1.2 An investigation of the validity on the fitting of the satellite tracking devices (tagging) to the two Martial Eagles were done by Mr Theo Mol, the ornithologist of MTPA.

Mr Moll conclusion was without a doubt that the project of the applicant, MULILO, in partnership with EWT, was done without valid permits and is therefore *illegal*, if not *criminal*.

Mulilo is in partnership with EWT to fit the satellite device on the Martial Eagle. They are therefore collectively accountable for their partner's misconduct irrespective who did it. Attempts to shift the blame cannot legalize the misconduct nor the tagged data obtained from the misconduct irrespective weather the data is useful information or not.

What aggravate the situation is that the tagged data was withheld from the I&AP and used selectively by AfriAvian.

AfriAvian used data in their May 2025 report of a Martial Eagle tagged near **Verkykerskop**. Due to the local misconduct, use of those data in AfriAvian report should be subject in providing a valid permit by the applicant under which that Martial Eagle was tagged there.

Therefore, the used of the illegal tagged data in the specialist reports is not permissible. Everything which made used or any reverence to the tagged data of the Martial Eagle must be remove from all the avifaunal assessment reports for Sheepmoor and Emvelo WEF

1.3 AfriAvian claimed that their **site surveys** were conducted over all four (4) seasons of the year.

The detail in their specialist report confirm that the site surveys were only conducted during eight (8) months of the year which exclude the four essential summer months from 21 October to 21 February. **(Appendix 1)**

The visit in January 2023 was only a drive through.

The five (5) additional surveys were only conducted close to the Martial Eagle breeding nest as confirmed in figure 19.

Their bird monitoring specialist, Mr Jason Boyce, conducts a further site survey on 16 / 17 December 2024. According to Mr Johans van Wyk from Mulilo the White-winged Flufftail was targeted.

Therefore, data compiled from the site surveys is fatally flawed and unsuitable to compile any shaped exclusion zones for the priority bird species, especially the Southern Bald Ibis.

1.4 AfriAvian added the following **highly disputable statement** to their May 2025 avifaunal report (Par 5.8 page 38)

> *'These additional surveys were done to cover the expanded WEF ..... during which time all other bird species were* also recorded ***across the entire project site during this time.***'

Why was this only revealed now and not in their reports of May 2024 and March 2025?

Where is the detail which was obtained of all the other bird species across the entire site during that time, recorded?

Why was this detail, if it exists at all, not separate documented as the detail in figure 19 where all other priority species flight paths obtained during the five (5) additional surveys near the Martial Eagle nest, documented?

If AfriAvian claiming that it was incorporated with previous site visits data then the question automatic arises way was the same not done with figure 19?

Again, AfriAvian always notified the landowners when they intend to do site surveys. No such notification was given during the additional five (5) surveys near the martial eagle's nest. The conclusion is obvious no notification was necessary because there were no such site surveys executed during that time. Those five additional surveys clearly targeted the martial eagle and concentrated around their breeding site from an observation point on the R65.

Recorded flight lines of all other priority species (excluding Martial Eagle) in figure 19 of both AfriAvian reports confirms that the additional five (5) surveys were only centralized around the martial eagle's nest. **(Appendix 2)**

Above contradict the claim from AfriAvian that surveys during the additional five (5) surveys were also done across the entire project site.

***The conclusion is that AfriAvian fraudulently forged this in reaction to the email dated 15/4/2025 where this misconduct was first brought under their attention. It is obvious the reason why this statement did not feature in their previous two reports, May 2024 and March 2025* (Appendix 3)**

1.5 AfriAvian also added the following **statement** to his May 2025 avifaunal report (Par 5.8 page 38)

'In addition, from December 2024 to February 2025 additional targeted wetland surveys were conducted ..... and again all other bird species were also recorded across the entire project site during this time.'

And again, why was this survey not mentioned in their previous avifaunal specialist report of March 2025?

And again, where are the detail flight paths of all the other bird species which were allege recorded across the entire project site during the site surveys from December 2024 to February 2025?

And again, why was this detail, if it exists at all, not separate shown as is the case with detail in figure 19?

And again, as landowners we received only one notification of a site survey during above mentioned period from AfriAvian bird monitoring specialist, Mr Jason Boyce. He mentioned that his site survey during 16/17 December 2024 targeted mainly the wetlands for the white-winged flufftail.

Nevertheless, if multiple wetland surveys were done during that period, then AfriAvian scandalous failed to allocate the active **Grey Crowned Crane** breeding nest. **(Appendix 4)** Even after they were informed of the active nest on 15/01/2025? **(Appendix 5)**

It appears to be another unethical attempt by AfriAvian to rectify the absence of their summer site surveys. In the meantime, they shamefully exposed their flawed site surveys.

1.6 The **aquatic turbine exclusion buffer zones** around the drainage lines and wetlands from the avifaunal perspective are deleted by AfriAvian in their May 2025 specialist report.

Motivation given by AfriAvian for such a drastic adjustment is highly disputable.

The scenario did not change since their March 2025 report because there was no substantial change in the May 2025 aquatic specialist report that justified it.

The March 2025 was supposed to be the final avifaunal report. It was the last opportunity for any adjustments and this should have been done in that report if necessary.

The additional three (3) months extension could not be foreseen.

The reason becomes obvious when the February 2025 (Figure 33) and May 2025 (Figure 31) reports are compared. **Mulilo had a problem and needs to obtain a restriction free corridor for their transmission line. (Appendix 6)**

The adjustment further justifies the four (4) proposed turbines on the farm Windhoek which were in narrow spaces between constrains. Specialist recommended that turbines should be excluded in narrow spaces < 500 m between constrains, no-go and high-risk areas, because birds and bats are free foragers with unpredictable flight behaviour.

This adjustment is therefore unethical, unprofessional, and highly controversial.

1.6 AfriAvian denied knowledge about the **tagging of a female martial eagle** when they were approached on 11 December 2024 **(Appendix 7)**

In the meantime, AfriAvian used that data selectively in their specialist's report but inexplicable neglected to inform us that it exists.

Not very transparent but highly suspicious behaviour of AfriAvian.

1.8 AfriAvian claimed in his March 2025 and May 2025 specialist report (Par 5.8.7.1) that

a **flight risk modelling** of the martial eagles tagged data was not conducted due to the limited number of birds and temporal span of the tagged data.

The same data seems to be sufficient to conduct sophisticated models for mitigation recommendation on the movement of the Martial Eagle?

Highly contradictory approach.

1.9 The recommended exclusion buffer for the **Martial Eagle** by AfriAvian is primary based on the **illegal obtained satellite data and cannot be used in both their May 2025 final reports.**

The only alternative is to return to the more proven circular buffers around breeding sites which are general accepted by most avifaunal specialists.

The Martial Eagle specialist of EWT, **dr Gareth Tate,** recommended a circular no-go buffer zone around a Martial Eagles nest of **six (6) km.**

Dr Andrew Jenkins of Avisence recommended the following buffer in his peer review report of 9 April 2025:

"Application of a larger protective buffer around the Martial Eagle nest (**of at least 6 km**) is the only, appropriately conservative way to mitigate impact risk in this instance, especially given that the report acknowledge that the tracked eagle spent 21% of the recorded flight time > 6 km away from the nest site."

The avifaunal specialist **Dr Low de Vries** from Volant applied a buffer zone of **five (5) km** around the Martial Eagle nest on the Daggafoort WEF. **(Appendix 8)**

Ironically, **AfriAvian** themselves applied a **five (5) km** buffer zone around the Martial Eagle nest in their avifaunal specialist report for the Phefumula Emoyeni One WEF. **(Appendix 9)**

The **satellite flight data** of the two eagles was unjustified withheld from the I&AP's by Mulilo. **(Appendix 15)** This data was selective used by AfriAvian in his reports to conduct no-go zones. These buffers and collusion risk modelling depends highly on several unproven assumptions.

The same data of the tagged eagles were eventually obtained through MTPA. The hourly daytime positions of the female martial eagle (1372) were plotted and gave a clear indication where the female eagle moved during the 14-month period. ***(Appendix 10)*** It reveals clearly that recommended buffers of AfriAvian is inadequate and that was the predominant reason while Mulilo refused to reveal the data to the I&APs.

The flight data obtained from the tagged female martial eagle clearly indicates that the shaped no-go zone calculate by AfriAvian is totally inadequate and absurd. According to the tagged data a no-go zone of ten (10) km radius will be more appropriate to secure the survival of the two Martial Eagles

1.10 On the 15 January 2025 an active breeding nest of a **Grey Crowned Crane** was reported to AfriAvian. **(Appendix 5)**

Although it is an endangered bird species the reported breeding nest, in the middle of a natural pan, was not investigated nor recorded by AfriAvian in their report of March 2025 and May 2025.

AfriAvian also failed to allocate this breeding site during their claimed wetland site surveys in December 2024 to February 2025. A clear example of their defective site surveys.

AfriAvian applied a two (2) km buffer around similar natural pans in their avifaunal report for the Phefumula Emoyeni One WEF project. **(Appendix 9)**

Dr Low de Vries of Volant recommended a circular no-go zone of three (3) km around a Wattle Crane nest and a 1 km turbine exclusion zone around the Grey Crown Crane **(Appendix 8)**

Therefore, a circular no-go buffer of 2 km is more appropriate around the breeding site of the Grey Crowned Crane because wetland buffer alone not big enough. (Appendix 13)

1.11 AfriAvian failed to allocate a breeding site of the **Southern Bald Ibis** colony on the Windhoek farm (Previous Sheepmoor WEF 3) during their first site surveys.

This breeding site was pointed out to AfriAvian bird monitoring specialist during their first site surveys but they failed to confirm it. Another proof of their defective site surveys.

Ironically, AfriAvian recorded this breeding colony in their Leghowa 3 WEF avifaunal specialist report of May 2025 for RedCap **(Appendix 11).**

AfriAvian make used of the opportunity to adjust several controversial details in their May 2025 report, this important location of another Southern Bald Ibis colony site was inexplicable not added?

AfriAvian applied a 2,5 km circular buffer around the Southern Bald Ibis breeding colonies in their avifaunal report for the Phefumula Emoyeni One WEF project. **(Appendix 9)**

AfriAvian also originally recommend a 2,5 km circular exclusion zone around the two Southern Bald Ibis colonies, FP2 and FP3, in the Sheepmoor and Emvelo WEF's. **(Appendix 12)**

Mr Lloyd Barnes of Mulilo and AfriAvian apparently collectively define afterwards the current shaped buffers. They also rely strongly on the flawed site survey data which excluded the four (4) summer months of the year. **These two actions are not acceptable.**

***Therefore, the shaped exclusion zones are unacceptable and a circular buffer of 2,5 km as originally applied by AfriAvian must be reinstated around all three (3) Southern Bold Ibis colonies sites.* (Appendix 13)**

1.12 AfriAvian failed to allocate a **Secretarybird** breeding nest on the farm Klipfontein as pointed out to them by Mr Pikkie Vorster. Although the nest might not have been active during their site visits, it was clearly identified in photo presented by Mr Vorster and should have been recorded.

The thorn three where the nest is located was unfortunately damaged by a runaway veldfire in October 2024. The tree has fortunate recovered and hopefully will be used again as a breeding site because still moved around in the area.

AfriAvian recommend a one (1) km turbine exclusion zone around the Secretary bird nest in their Leghoya WEF scoping report which is totally inadequate.

The avifaunal specialist **Dr Low de Vries** from Volant applied a buffer zone of two (2) km around the Secretary bird nest in his Daggafoort WEF specialist report. **(Appendix 8)**

Therefore, a 2 km turbine exclusion zone is more appropriate buffer around the Secretary bird nesting site (Appendix 13)

1.13 Above put the integrity, credibility, and independence of the AfriAvian report under severe suspicion and recommendations for turbine exclusion zones around priority bird species in their reports should be rejected and replaced by circular buffers as applied by other specialists. (Appendix 13)

- ***Martial Eagle = 5 km circular buffer*** *(APPENDIX 8 / 9)*
- ***Grey Crowned Crane = 2 km circular buffer*** *(APPENDIX 9)*
- ***Southern Bald Ibis = 2,5 km circular buffer*** *(APPENDIX 8 / 9)*
- ***Secretary bird = 2 km circular buffer*** *(APPENDIX 8 / 9)*

2. Ridgeline buffers

Steep rocky ridgelines spread across the entire escarpment where the Sheepmoor WEF and

Emvelo WEF are located. According Dr Low de Vries of Volant Environmental those ridgelines serve as sensitive habitat for avifaunal for the following reasons

2.1 Great perching sites for raptors to use as vantage point when searching for prey

2.2 Flyways for raptors and large priority species which use the thermals created by the change in topography to move around.

2.3 Nesting and roosting sites.

This is proven by the currently three (3) active nesting sites of the Southern Bald Ibis, the nesting and roosting site of the Martial Eagle located around the steep ridgelines. **(Appendix 14)**

The bat specialist also calls for a 200m no-go buffer around rocky outcrops in Table 8 of his report as is the case on majority ridgelines.

Dr Low de Vries of Volant Environmental applied in his avifaunal report for Ntabande WEF a 390m turbine free buffer around those ridgelines. Similar ridgelines occur in the Emvelo and Sheepmoor proposed WEF's and the same practice should be applied to protect the avifaunal.

3. Remotely triggered turbine curtailment and observer-based Shutdown on Demand (SDoD) short falls.

All the turbines must be provided with remote radar curtailment if application is succeeded. Manually SDoD will be inefficiently on its own because

3.1.1 most of the turbines is in remote and difficult accessible areas. It will be challenging to transport the people every day in time to all the turbines. The liability of the human factor playing on their cell phones or sleeping is also a reality

3.1.2 the movement of people to the turbines will increase human traffic as well as criminal activities and is not advisable with respect to the ground nesting species.

3.1.3 the fog on the escarpment becomes very dense with limited sight.

3.1.4 The visibility is during thunderstorms also limited

The turbine radar curtailment must be proven as effective and WTG must be equipped and tested before the rotor starts turning.

There is no clear indication which turbines will be fitted with radar SDoD.

All electronic devices are in danger to be damage by lightning because the WEF will be in a high intensity lightning zone. It runs the risk to be ineffective and must be tested in short intervals with enough stock as backup.

There are no official studies or report that confirms the effectiveness of above measures and devices with the enfaces on the effected priority species within this project.

Most species tend to cover more distance in flight then the time the turbine rotor takes to stop. (The southern bold ibis fly between forage and roosting sites at speed of 40-50 km/hr)

4. Mitigation short falls

4.1 **The principal that preventative considerations should always be consider before mitigation measures are implemented. (Gove et al. 2013)**

4.2 Turbines should be excluded in **narrow spaces < 500m between constrains**, no-go and high-risk areas, because birds are free foragers with unpredictable flight behaviour.

4.3 Mitigation measures recommended by AfriAvian is not proven and based on **computer models** with several assumptions without accredited field test conducted to guarantee effectiveness.

4.4 Martial Eagle mitigation models and recommendations must be removed from report because the data used it is illegal obtained.

4.5 As pointed out by AfriAvian in their avifaunal report that **bigger bird (cranes, bald head ibis etc.) with high wing loading** is less manoeuvrable in flight and will be in danger to collide even with non-rotating turbines and powerlines.

4.6 AfriAvian also confirmed in their avifaunal report that some birds (cranes, ex) have **better sight in the lateral field of view** than frontal which increase the risk of collusion even with the non-rotating turbine and powerlines.

4.7 The monitoring of birds been killed by the turbine as included in the BMP and mitigation recommendations are not reliable and **distorted figures are recorded**. According to me. Kate Webster of Vulpro, the reporting of bird deaths caused by turbines are covered up by rewarding farm workers for removing carcasses to decrease the numbers found. **Mulilo already made them guilty to similar practices by not reporting the shooting of the juvenile martial eagle and signing NDA with avifaunal specialist.**

B - GAMEFARM

We are in progress expanding our existing commercial hunting partnership with Lloyd Safaris.

Our target is the international market for commercial hunting which has big potential for expansion and created good revenue with permanent jobs.

We are busy establishing a game farm on our farm Waaihoek (P3, P4 and P12)

International hunters have become very sensitive for windfarms and any visible wind turbine will have a negative effect on our investment.

The following proposed turbines **40,41,42,43,44,45,46,50,51,52 and 53** are not acceptable due to the visual pollution.

Due to the game farm in progress no additional transmission line can be allowed over the applicable properties.

The existing farm workers house insite the proposed game farm is in the process to be moved to site XX on plan. **(Appendix 17).**

The following proposed wind **turbines, 41,42 and 43,** is therefore not acceptable due to shadow flickering and noise pollution. The **proposed substation behind turbine 42** is also not acceptable due to the potential noise.

C - DWELLING at WATERFALL

The future generation has earmarked the development of eco cabins next to the waterfall on farm Waaihoek P14. **(Appendix 16)**

Any visible wind turbine will pollute the unique scenery and damage the sense of place. There will be at least 9 proposed turbines visible which shall pollute both day and night scenery. All that proposed turbine's locations must be investigated and address accordingly for visual and noise pollution.

There is already an existing dwelling at the waterfall and proposed turbines will coarse unaccepted pollution. The following proposed turbines, 41, 42 and 43, are unacceptable due to flicker shadow and noise at the dwelling as indicated by the Visual and Noise specialist reports. **Effected proposed turbines which need to be relocated are 41,42 and 43.**

As indicated in figure 10-3 of the Visual Impact Report by Mulilo's specialist proposed **turbines 31 and 32** will courses unacceptable shadow flickering on the farm Waaihoek p14 and must be relocated.

Due to the **aggravate meteorological conditions** sound are most likely to travel much further near the waterfall as acknowledge in Mulilo's Noise Specialist Report. The save distance of 800m from the proposed turbines to the nearest NSR must increase to 1,5km or even 2km due to that. **Therefore, the following additional proposed turbine positions needs relocation, 31,32,33,34,36 and 40.**

Noise pollution can not only be quantified in decibels (dBA). The sound of running water and wind turbine might measure the same decibels but the first has a calming effect on most people where the later an irritating noise like dripping water.

D - VISUAL IMPACT

1.. **All visual impact as mention in B and C must be addressed.**

2.. My mechanic stays on the farm Windhoek in NSR 2. His daughter is on **chronical medication** for her heart and epileptic. The shadow flickering caused by nearby turbines will trigger her epileptic with fatal consequences. **Turbines 51,52 and 53 need to be relocated.**

3.. Majority of both WEG is located on the **verge of the escarpment which are unacceptable** because **(Appendix 17)**

3.1 The construction works for the infra structure and platforms will need major earthworks with an irreversible negative effect on the nature.
3.2 The access roads to turbines will have steep gradients which will cause major erosion if not concreted paved and side drains.
3.3 Proposed turbines will be highly visible which are going to change the sense of place negatively.
3.4 Biodiversity specialist prescribes in his report that **the rocky outcrop** must be avoided but is blindly ignore by the applicant.

3.5 All turbine positions on slopes more than the maximum 14% as specified in Table 0.5 of the draft EIA report must be condemned.

D – BATS

1. No detail of the specialist in the Appendix
   1.1 Appendix 1 – Figures
   1.2 Appendix 2 – CV of Specialist
   1.3 Appendix 3 – Specialist declaration
   1.4 Appendix 4 – SACNASP certificate.
2. Specialist did not consult with the local farmers to allocate possible roosting sites for bats.
3. There are abandoned natural roosting site on the escarpment for bats in the way of rocky outcrops, cliffs, caves, and redundant torbanite mines that have not been investigate by the bat specialist.
4. **The Bat specialist prescribe in Table 8 of his report that rocky outcrops are no-go areas with 200m buffer. This is blindly ignored by the applicant.**

E – ARGRICULTURAL

1. This income from turbines on the owner's farm got the danger to kept **unproductive farmers** longer on it. This will put **food security** of the whole country on the long run in danger.

2. A influx of construction workers and work seekers can be expected which will lead to an instability in workforce and communities.

3. The **upgrading of road** is positive but will lead to easier movement for criminals with criminal activities to escalate rapidly.

4. Gard's used during construction and afterwards is in many cases part of the criminal activities.

5. The slaughter of bats will have negative effect on the control of insects which then will lead to **increased virus animal diseases**. (bloutong)

6. It is proven that the ultra-low sound and vibration produces by the wind turbines, has a negative effect on the **bee colonies**. They eventually disappear. This negatively influence the pollination of agriculture crops. It will also have a negative influence on the biodiversity of the grasslands.

7. The presence of wind turbines make **crop spraying** impossible. The spraying drome are not powerful enough to follow the landscape profile, very sensitive for wind and much more time consuming than crop spraying by aeroplane. This are not a feasible alternative for crop spraying as claimed in specialist report. The crop sprayer requires at least a 1,5 km clearance next to the site where it is spraying. **Turbines 31, 41 1nd 43 are too close to my crop lands must be relocated**

8. Turbines and powerlines lead to the increase of **veld fires** due to movement of people as well as possible failure of turbines. Due to the inaccessible mountainous area of the escarpment **air support (bombers)** is frequently use to assist in with veldfires. It will not be possible due to the turbines. Veldfires can then easily escalate into the neighbouring plantation with huge financial consequences.

9. Turbines are likely to change the rainfall pattern especially from the east. The lifesaving **dew and mist** will disappear which will escalate the midsummer drought.

F – MICROCLIMATE

The basic scientific mechanism underlying microclimates is that wind turbines alter the surface meteorology through decreased wind speeds and turbulent mixing (Keith et al., 2004; Armstrong et al., 2014)

Wind farms alter the local microclimate by

- increase near- surface temperatures when the descending blades of the wind turbines bring drier air down and the ascending blades of the wind turbines move moister air up. The turbulence generated by wind turbine rotors enhance this vertical mixing
- increase in near-surface temperatures cause lower humidity rates and higher evaporation rates downwind of the turbine
- lower humidity reduces soil moisture levels significantly (3 to 4,5%), leading to drier conditions downwind, which impact on crop yields and plant health
- dew point is the temperature at which air becomes saturated with moisture. Since the occurrence of dew is contingent on near-surface moisture and atmospheric stability, the presence and duration of dew within wind farms, particularly downwind of turbines, is negative impacted by the lower humidity that turbine-induced mixing bring about
- wind farms aggravate the soil drying in grassland areas, which have impacts on grassland ecosystems
- these microclimate changes also influence other ecosystem processes, including greenhouse gas emissions and the carbon intensity of electricity generation.

Reference

- Embry-Riddle Aeronautical University – "Wind Turbines Affect Humidity Over Crop Fields, New UAS Measurements Confirm"
- MDPI – "Wind Farms and Humidity"
- ERAU – "Wind Turbines Affect Humidity Over Crop Fields"
- I E R – "Wind Farms Raise Temperatures at the Surface level"
- Gang Wang – "Wind farms dry surface soil in temporal and spatial variation"
- Gang Wang – "Wind turbine operation influences near surface air temperature and humidity"
- Lee M Millar – "Climatic Impacts of Wind Power"

Turbines are likely to change the rainfall pattern especially from the east. The lifesaving dew and mist will disappear which will increase the midsummer drought on all my properties.

Above will have a negative influence on all my properties and needs detail microclimate investigation by specialist as previous requested my Mpumalanga Department.

G – CONTRAVERSAL CONDUCT by APPLICANT / EAP.

1. No specialist contacted me as registered I&AP because Mulilo abstain my contact details from them. Josua Meyer Trust was shown as I&AP on the list but without any contact detail. This was confirmed by the Sosial specialist when accidental met at Mr Jan Robberts place. Only the avifaunal specialist notifies us before conducting site surveys.
2. No public meetings took place concerning the Sheepmoor / Emvelo proposed WEF.

10/28

3. Mulilo signed an NDA with EWT and AfriAvian concerning the tagged data of the martial eagle to kept detail secret and hidden from the I&AP's.
4. The tagged data of the martial eagles was used selectively in the avifaunal report but Mulilo refuse to share the tagged data with the I&AP's. That prevent the I&APs from their right to obtain independent evaluations.
5. There was also an attempt from Mulilo to silence MTPA by approaching them to sign an NDA.
6. **The applicant used illegal obtained data in their avifaunal specialist report and the EAP allows it.**
7. My request for 'n meeting with Mulilo in February 2025 was denied by them. After my third request Mulilo eventually meet with us on the 11th hour, 4 August 2025. Coincidental just after we revealed the illegal status of the tagged data. **Almost 6 months later!!**
8. Mulilo ignore the biodiversity specialist instruction to avoid the rocky outcrops by locating majority of turbines on the verge of the rocky outcrops. **(Appendix 17)**
9. Mulilo ignore the Bat specialist requirement of a 200m turbine free buffer around the rocky outcrops by locating majority turbines right on the verge of the rocky outcrops **(Appendix 17)**
10. Mulilo blindly ignore Social specialist mitigation recommendations in his report (Table 4.12/13/14) to engage with I&APs about concerns on powerline and turbine placements

11. Mulilo decide on the transmission line route without consent or agreements from the affected land owners.

12. Mulilo went further and just draw an alternative transmission line route through Mr Braam Moody farm. He was never part of the proposed windfarm nor contacted by Mulilo.

13. When landowners disagree with Mulilo they were threatened with the court. It happened with Mr Jan Robberts and Mr Pikkie Vorster

14. Request for the relevant documentation concerning the extension of 3 month to submit EIA report was blindly ignored. It was reluctant reveal only after insisting for it during meeting on 4/08/2025. **Almost 2 months later!!**

15. Response of EAP on DARDLEA requesting microclimate report in scoping report comments that such report was not previously done in RSA is to say the least unprofessional and unacceptable.

16. Mulilo tray to cover up the shooting of the juvenile martial eagle by not reporting it nor opening a case.

Mulilo's modus operandi has proven as very controversial and not transparent

Therefore, we appeal to DFFE to preserve this escarpment with its unique environment and very sensitive ecosystems for our children and reject this application in its totality.

11/28

5.7 Results of Pre-Construction Bird Monitoring

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

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

Monitoring at the WEF sites and a Control Site were conducted by a team of monitors during the following time envelopes:

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

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

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

- 17–22 October 2023
- 15–23 November 2023
- 30 November–05 December 2023
- 17–22 January 2024
- 14–20 February 2024

Table 7 and **Figure 11–12** below present the results of the pre-construction monitoring conducted at the WEF site and control area.

5.7.1 Transects

The results of the transect counts after seven surveys are presented in Table 7:

Table 7: The Results of The Walk and Drive Transects.

TURBINE SITE	
Species Composition	**Number**
All Species	180
Priority Species	19 (11%)
Non-Priority Species	161
Total Count	
Drive Transects	10 583
Walk Transects	8095
Total	18 678
CONTROL SITE	

12/28

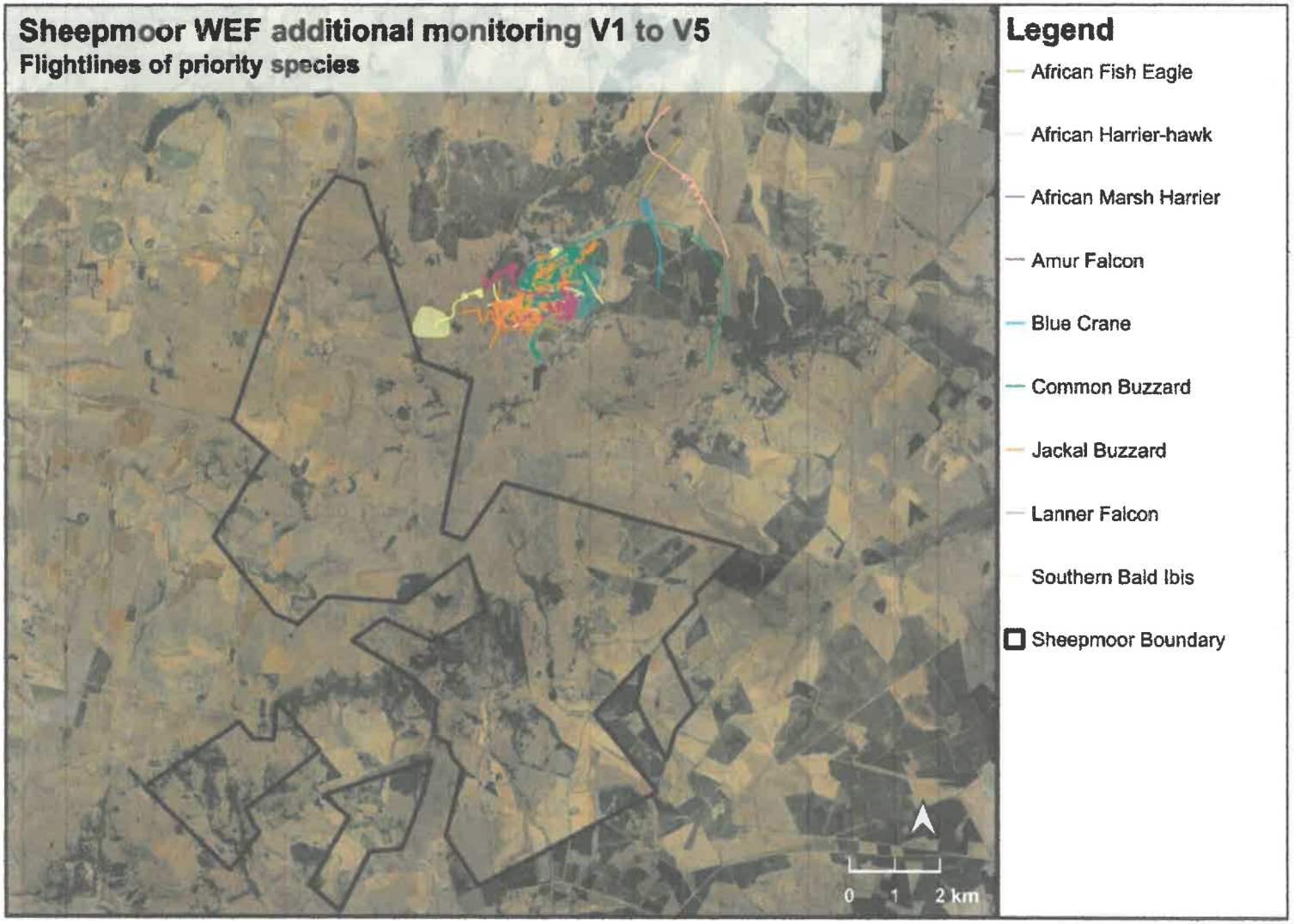


Figure 19: Recorded flight lines of all other priority species (excluding Martial Eagle) during the additional five surveys (V1 to V5) in and near the Sheepmoor WEF Project Site .

APPENDIX 2

82/28/21

APPENDIX 3

Gmail

Josua Meyer <meyerjosua55@gmail.com>

Request for proprietary information and data

Josua Meyer <meyerjosua55@gmail.com>
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Bcc: Johans Van Wyk <Piwy@mulilo.com>

Tue, Apr 15, 2025 at 10:11 PM

Re : Draft EIA report for EMVELO and SHEEPMOOR proposed WEF

Dear Mr Barbeau

The request for the data recovered from the two tagged martial eagles remains outstanding.That deprives my right as IAP to submit constructive comments on the draft EIA report.

An email was received on 14/04/2025 from Mr Johans van Wyk of the applicant in this regard. Due to your silence I like to take the opportunity to react to that. Although time for comments depart already but this is a friendly request to include this response in the comments due to ERM non-response.

The oldest trick in the book is to get your opposition on board. EWT is a NGO organization surviving on donations which might also play a part in the partnership. The moment EWT entered in a non-disclosure partnership with the applicant it destroyed their impartiality and credibility. Their name should read now ENDANGER for WILDLIFE TRUST.

It is extremely arrogant and offencive from the applicant to assume there is only one accredited avifaunal specialist. The applicant is correct that a second specialist might not come to a similar conclusion but is likely to arrive at a more meaningful conclusion due to his independence.

The combination of information/data/insights the applicant mentioned is already incorporated by the eagle in its tagged flight data. The value of that flight data is that it is undistorted and can not be adapted to fit the applicants application.

A few concerns regarding the applicant's experience project avifaunal specialist

7/10/25, 10:32 PM Gmail - Request for proprietary information and data

- the martial eagle nest was disclosed by a local farmer and not by the specialist field monitoring team during their seven site visits. This was revealed by Mr Lloyd Barnes of the applicant during a meeting at Mr Jan Robberts house in the presence of witnesses.

- site field monitoring was only executed during 8 months of the year with no monitoring during four crucial summer months (21/10/2022 to 21/02/2023) Therefore the specialist failed to identify important priority bird species breeding sites including both crane species.

- when an active Mahem breeding nest was reported to Mulilo's specialist in January 2025 no attempt was made to visit or even to record the location. The same response was experienced from Mr Lloyd Barnes from the applicant.

- a 60 year plus old breeding site of the Southern Bald Ibis was shamefully not identified

the specialist signed a non disclosure agreement with the applicant and with that sacrificed his independence.

The applicant had taken a long shot trying to classify the tracking data under NEMBA and is advised rather to pay attention to its permit conditions. The applicant is already in breach of item 1.9 and 1.10 of his permit and runs the danger that it might be cancelled.

On Thu, Apr 10, 2025 at 1:24 PM Johans Van Wyk <piwy@mulilo.com> wrote:
[Quoted text hidden]

APPENDIX 4



15/28

APPENDIX 5



BirdAlbert
last seen today at 06:28

08:24 ✓✓

15 January 2025

Dagsê
Gaan 'n aktiewe Mahem nes enige effek op die plasings van windturbines hê ..... ook 'n 2,5km no-go zone?
Monitor tans een. 18:54 ✓✓

nie noodwendig nie - meeste van die neste sal omvang word deur die meegaange vleiland buffers en vlug risiko modelle wat daarmee saamgaan so in sommige gevalle sal meer of minder as 'n sirkulêre buffer wees. Edited 19:44

Die vlug risiko model wat jy vir die ibisse voorstel gaan hul nie red nie. Saterdag toe ek die mahem en sy maat dopgehou het, het 6 ibusse verby gevlieg, ver buite die vlug zone, regoor waar 2 lyne turbines volgens nuwe uitleg beplan word.

16/28

APPENDIX 6



Figure 33: Aquatic buffer zones from an avifaunal perspective.

ALTERNATIVE ROUTE FOR TRANSMISSION LINE.

NO PERMISSION FOR TRANSMISSION LINE

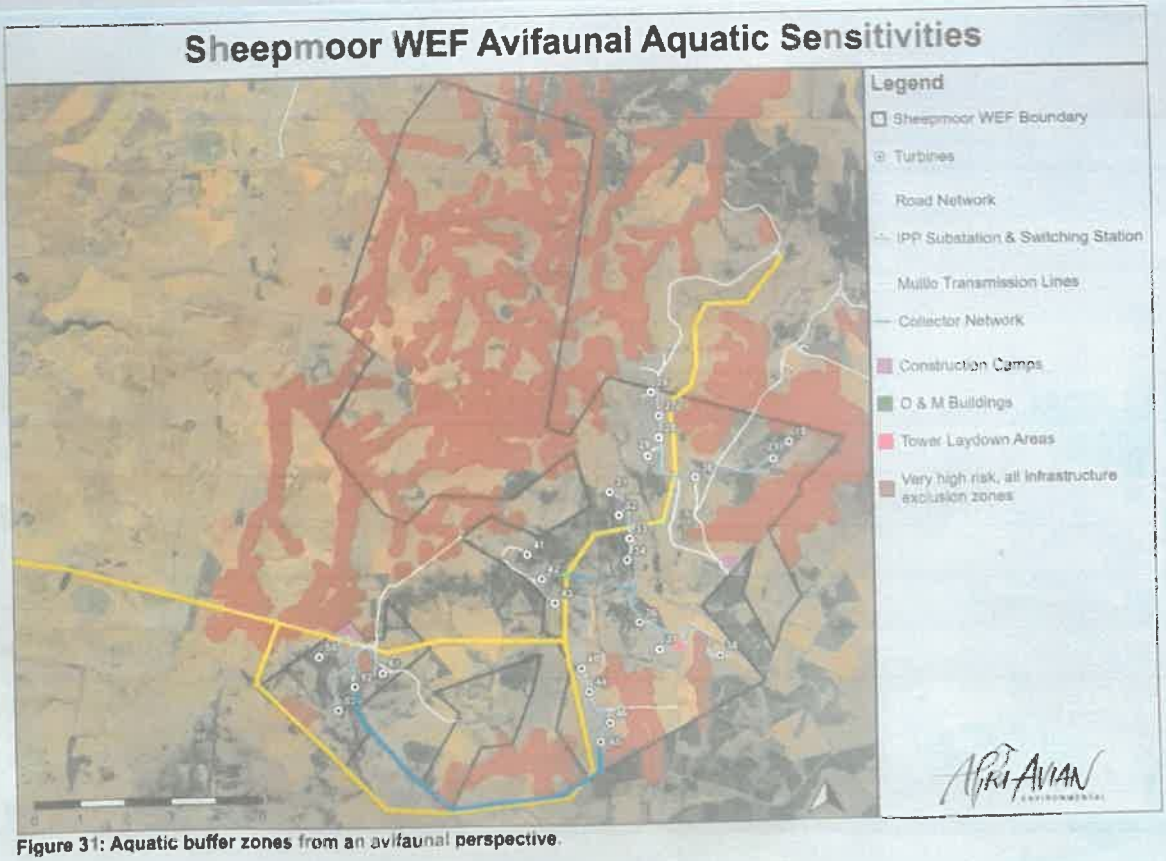


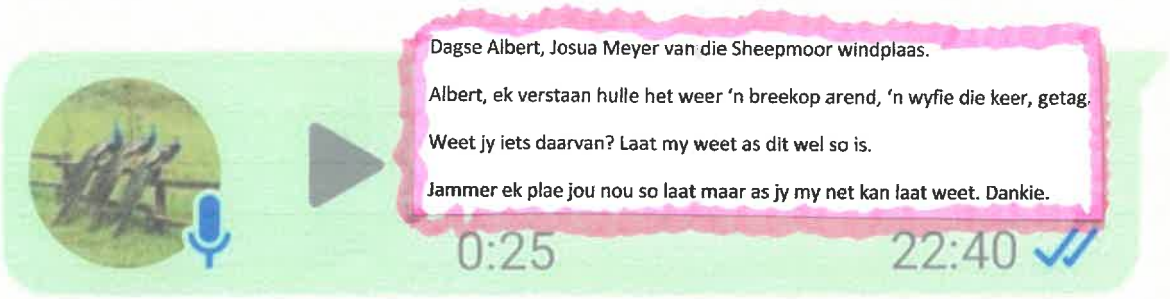
Figure 31: Aquatic buffer zones from an avifaunal perspective.

17/28

APPENDIX 7

BirdAlbert
last seen today at 06:28

11 December 2024



12 December 2024

Dagsê Joshua - nie wat ek van bewus is nie - maar sal probeer uitvind.

08:21



08:24

18/28

Low de Vries
PhD Zoology
Pr. Sci. Nat. Zoological Science

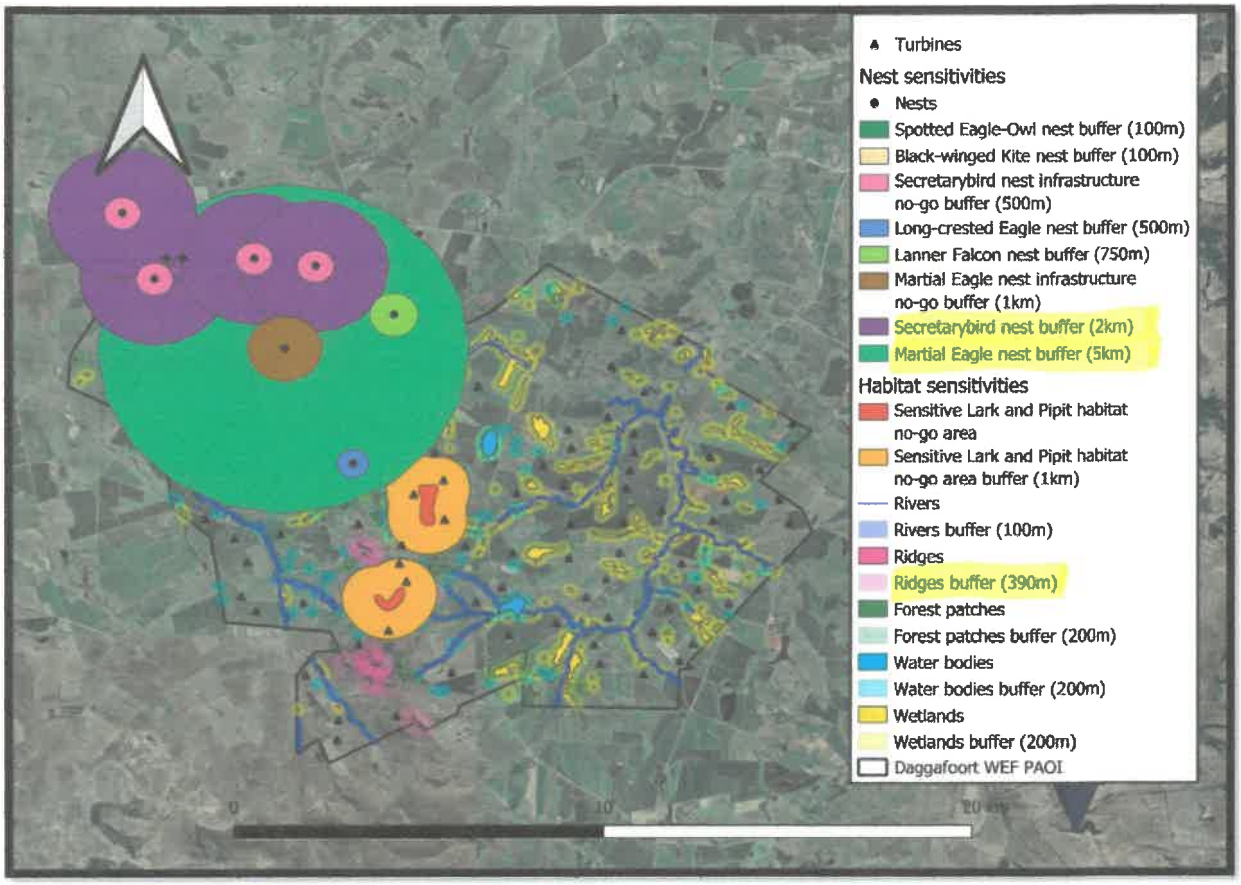


Figure 12. Preliminary turbine layout and avifaunal sensitivities for the Daggafoort WEF

At present, a number of road upgrades and new roads are proposed within sensitive habitat for avifauna. Where new roads are likely to encroach within 1kmof the nest sites for SCC, such as the two 2km Secretarybird nest buffers, construction should take place outside of the peak breeding period (Aug-Oct) until any chicks have fledged successfully. 500 m infrastructure free buffers have been assigned to these Secretarybird nests.

Figure 14: Avifaunal **Sensitivities** Map for the **Phefumula Emoyeni One WEF**. **Wind turbine exclusion zones indicated in red.**

5.6. Specialist Sensitivity Analyses and Verification

5.6.1 Very High Sensitivity: All Infrastructure Exclusion Zones

Martial Eagle nest: a 2.5km all infrastructure exclusion zone should be implemented and maintained around the identified Martial Eagle nest (coordinates can be provided) to avoid displacement and/or breeding failure due to disturbance.

Secretarybird nests: a 500m all infrastructure exclusion buffer zone should be implemented and maintained around the two identified Secretarybird nests (coordinates can be provided) to avoid displacement and/or breeding failure due to disturbance.

Southern Bald Ibis colonies: a 1km all infrastructure exclusion buffer zone should be implemented and maintained around the three identified Southern Bald Ibis colonies (coordinates can be provided) to avoid displacement and/or breeding failure due to disturbance.

5.6.2 Very High Sensitivity: Turbine Exclusion Zones

Secretarybird nests: a 1km wind turbine exclusion zone (including the rotor swept area) should be implemented and maintained around the identified Secretarybird nests to minimize the risk of collisions and to avoid displacement due to disturbance.

Southern Bald Ibis colonies: a 2.5km wind turbine exclusion zone (including the rotor swept area) should be implemented and maintained around the identified Southern Bald Ibis colonies to minimize the risk of collisions and to avoid displacement due to disturbance.

Black Sparrowhawk nests: a 750m wind turbine exclusion zone (including the rotor swept area) should be implemented and maintained around the two identified Black Sparrowhawk nests (coordinates can be provided) to minimize the risk of collisions and to avoid displacement due to disturbance.

Martial Eagle nest: a 5km wind turbine exclusion zone (including the rotor swept area) should be implemented and maintained around the identified Martial Eagle nest (coordinates can be provided) to minimize the risk of collisions and to avoid displacement due to disturbance.

Heronry: a 300m wind turbine exclusion zone (including the rotor swept area) should be implemented and maintained around the heronry to minimize the risk of collisions and to avoid displacement due to disturbance.

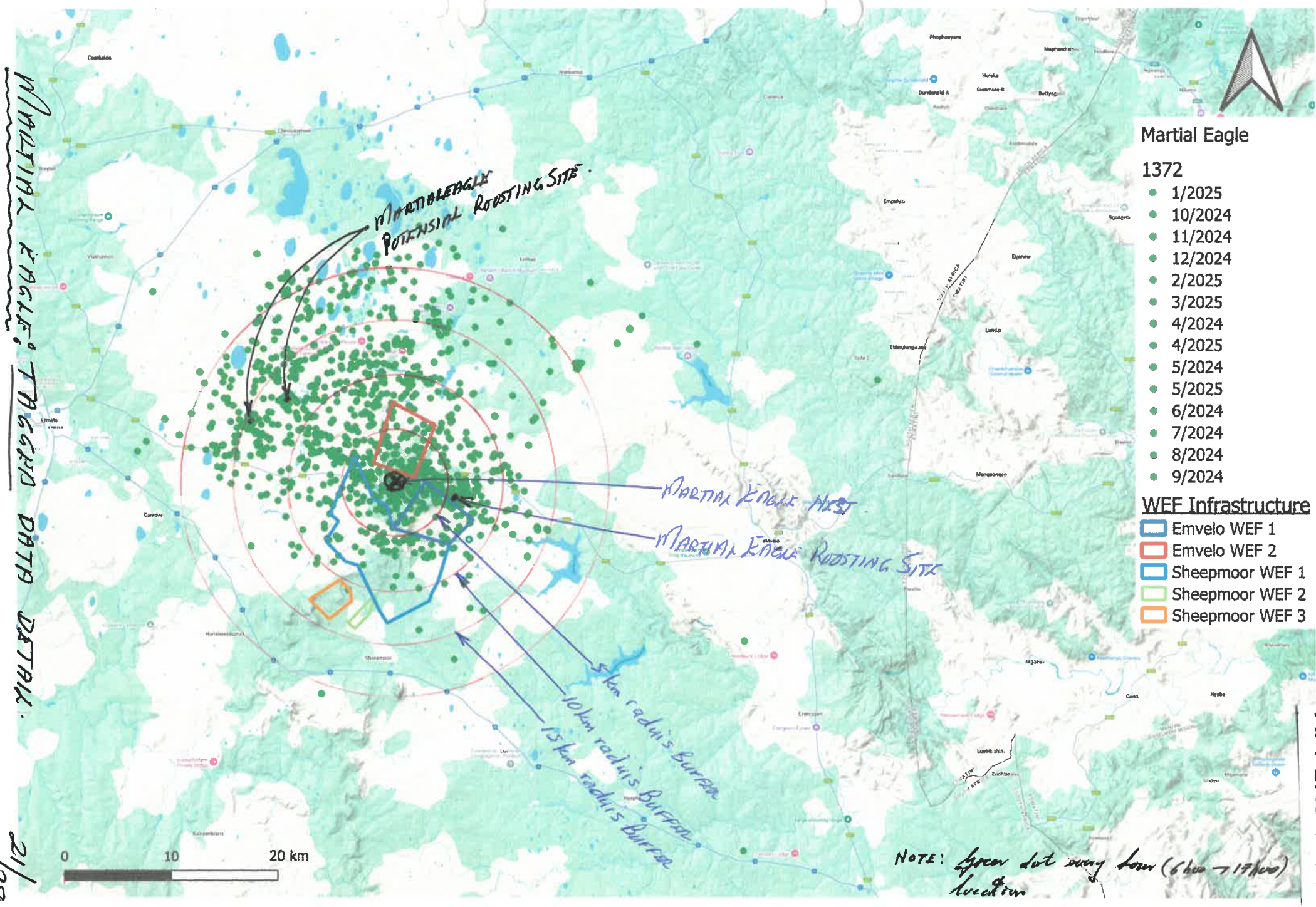
Natural pans: A 2km wind turbine exclusion zone (including the rotor swept area) should be implemented and maintained around natural pans.

Drainage lines, wetlands, dams: Major drainage lands and wetlands must be buffered according to the requirements of the aquatic specialist. The buffer zones must be classified as rotor swept free zones. Wetlands (including dam margins) are important breeding, roosting and foraging habitat for a variety of Species of Conservation Concern (SCC), most notably for African Grass Owl (Regionally Vulnerable), Greater Flamingo (Regionally Near Threatened), Yellow-billed Stork (Regionally Endangered), and Blue Crane (Regionally Near Threatened). These SCC have all been recorded in the Broader Area through the Southern African Bird Atlas Project (SABAP2). It should also be noted that any road and/or grid line crossings across these features should be restricted to what is unavoidable.

5.6.3 Medium Sensitivity: Limited Infrastructure Zones

Secretarybird nests: A 2.5km buffer zone must be implemented around the two identified Secretarybird nests (coordinates can be provided). If turbines are located in these zones, they must be subject to Shutdown on Demand (SDoD).

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20/28
1/1
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htt

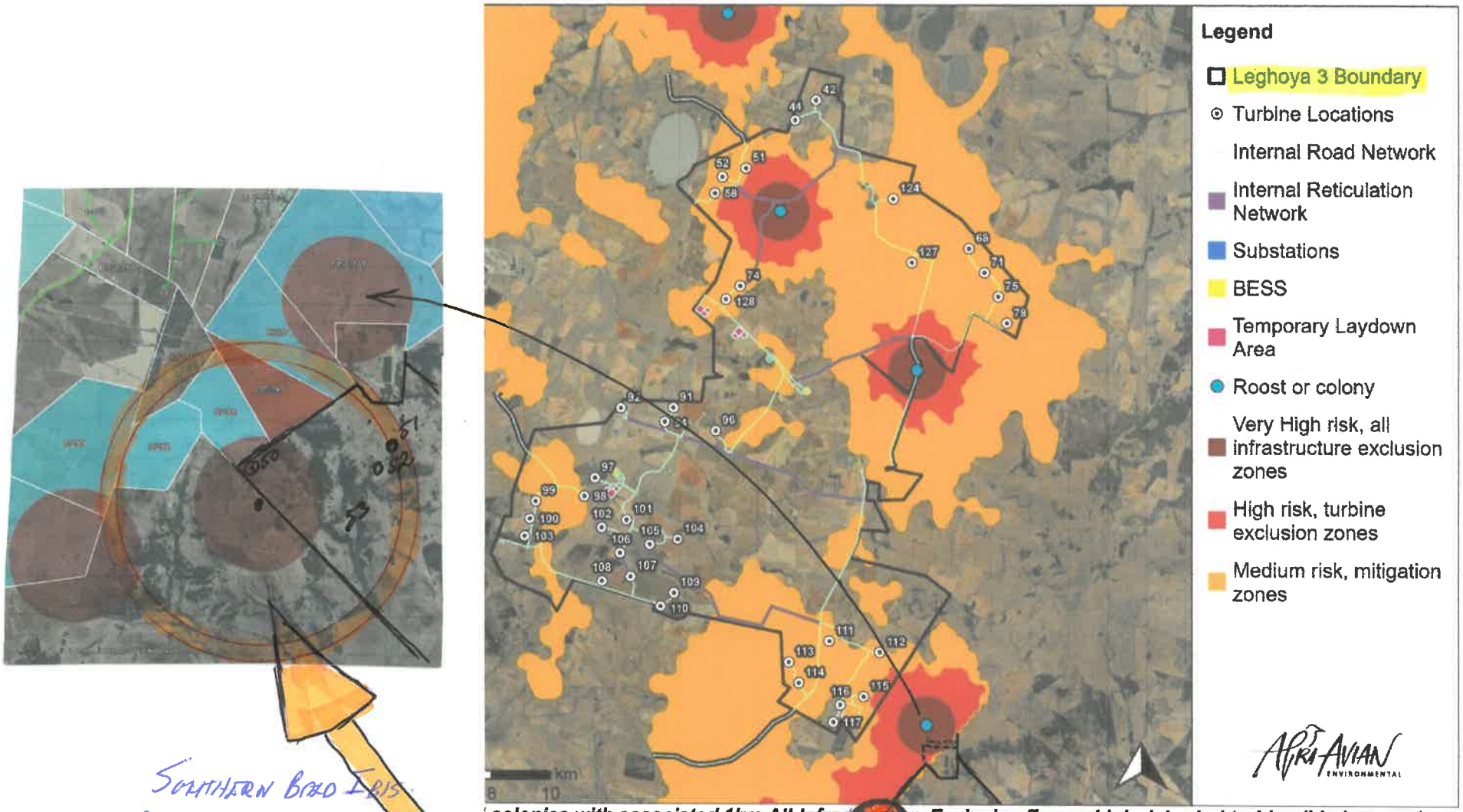


MARTIAL EAGLE TRACKED DATA DETAIL.

21/28

APPENDIX 10

Southern Bald Ibis Sensitivities



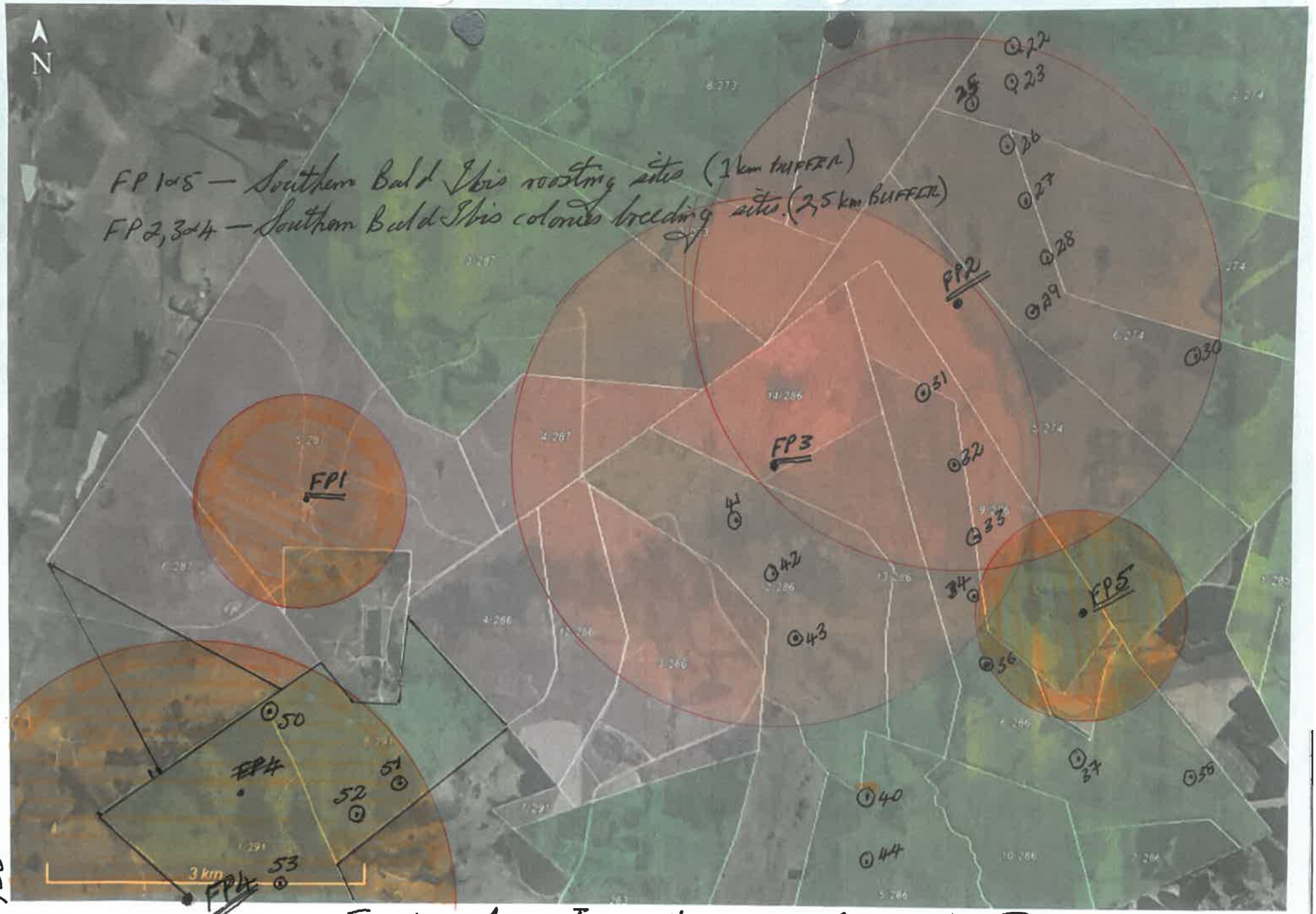
colonies with associated 1km All-Infrastructure Exclusion Zones, high-risk wind turbine (blade-swept) exclusion zon
and pro-active mitigation zones.

SOUTHERN BALD IBIS COLONY NOT RECORDED IN SHEAMOOR REPORT. BUT RECORDED IN LEGHOYA REPORT BY SAME SPECIALIST (AFRIAVIAN)

22/28

APPENDIX 11

~~FIGURE 5~~

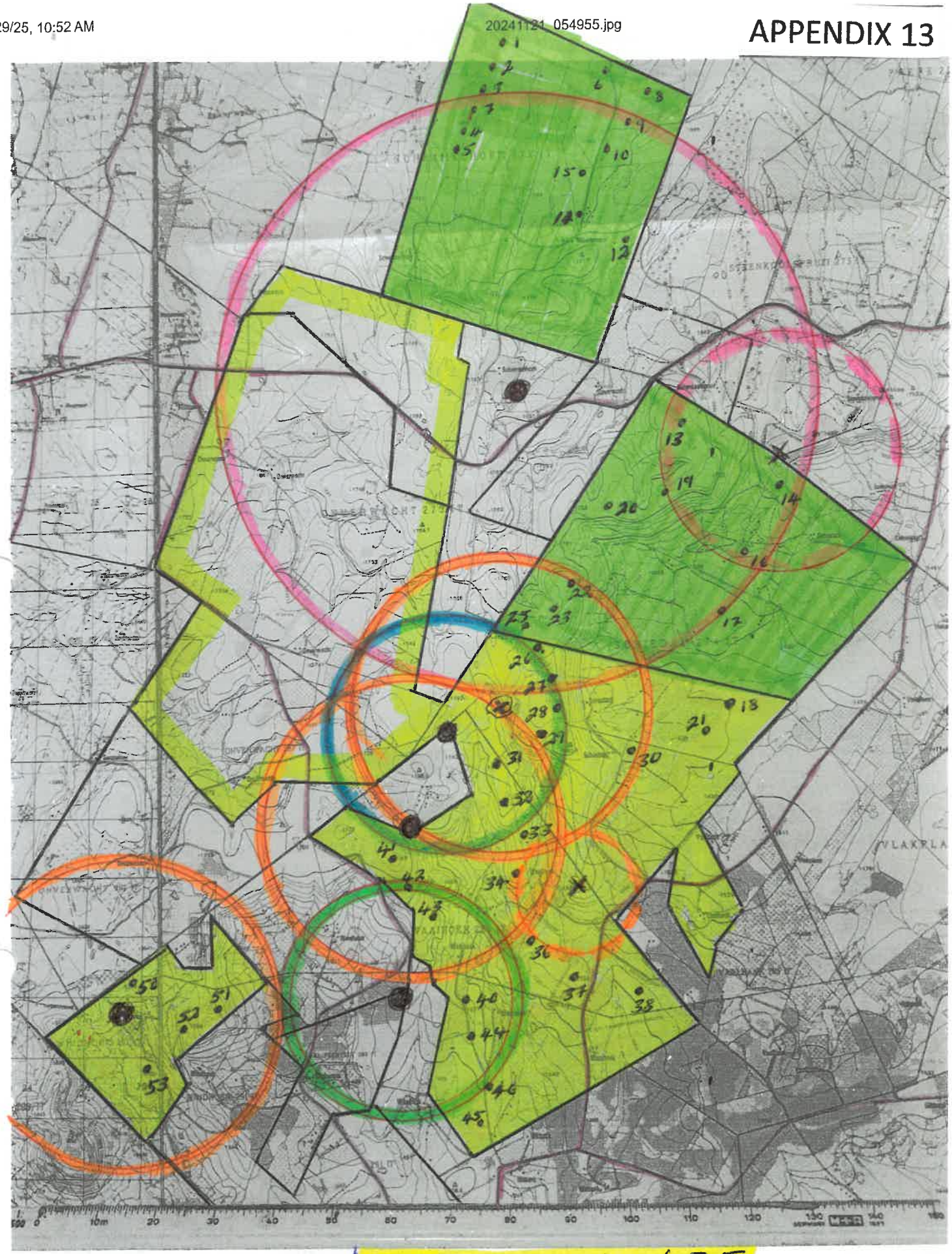


FP 1 & 5 — Southern Bald Ibis roosting sites (1 km BUFFER)
FP 2, 3 & 4 — Southern Bald Ibis colonies breeding sites. (2,5 km BUFFER)

SOUTHERN BALD IBIS: NO-GO ZONES (ORIGINAL) ~~FIGURE 5~~
2,5 km.

APPENDIX 12

APPENDIX 13



5km Martial Eagle Buffer

2,5km Southern Bald Ibis

2km Grey Crowned Crane

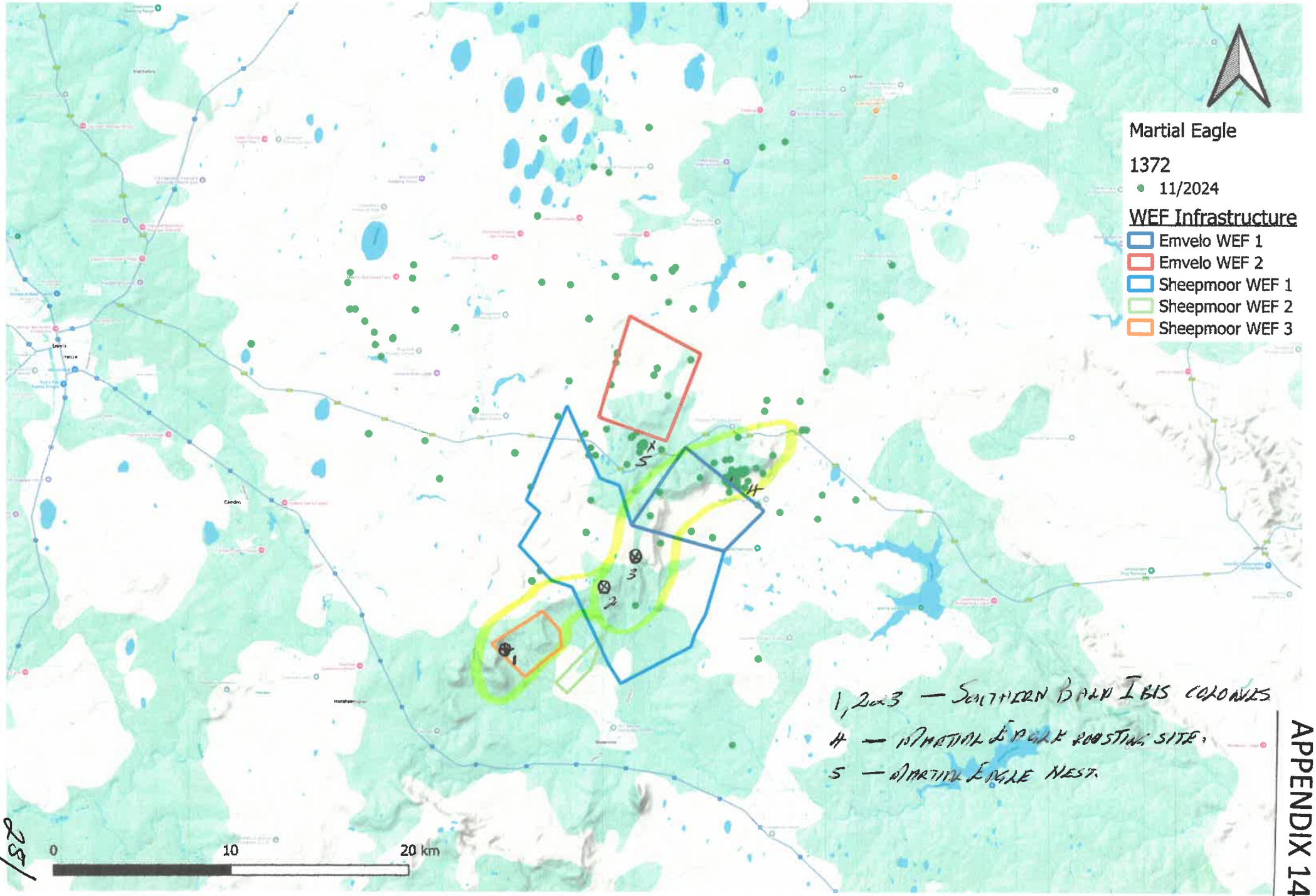
2km Secretary Bird Buffer

SHEEPMOOR WEF

EMVELO WEF

Roads

24/28



APPENDIX 14

28/28

APPENDIX 15

Fwd: Request for proprietary information and data

1 message

Josua Meyer <meyerjosua55@gmail.com> Mon, Apr 14, 2025 at 8:40 PM
To: kwalini@gmail.com

---------- Forwarded message ---------
From: **Johans Van Wyk** <pwy@mulilo.com>
Date: Thu, Apr 10, 2025 at 1:24 PM
Subject: Request for proprietary information and data
To: meyerjosua55@gmail.com <meyerjosua55@gmail.com>
Cc: **Lloyd Barnes** <Lloyd@mulilo.com>, ERM ArcusAmsterdam@erm.com <ERM.ArcusAmsterdam@erm.com>

Dear Mr Meyer,

RE: Please see below formal communications from Mulilo pertaining the Amsterdam Wind Energy Project.

Thank you for your inquiry and for your evident dedication to the conservation and understanding of Martial Eagles. We appreciate your interest in this species and acknowledge the depth of care you have expressed in your request.

As this is a protected species, the tracking data related to Martial Eagle flights, nesting locations, and movements is sensitive information that must be managed responsibly. Mulilo Renewable Project Developments, in partnership with the Endangered Wildlife Trust (EWT) is the custodian of the Data, and access to it is subject to strict regulatory and ethical considerations. We also note that your request to use this data in assessing the proposed buffer distances would not provide your specialist with the necessary insights. The buffer proposed by the project's avifaunal specialist in the draft environmental Impact Assessment was not solely based on tracking data, but included a combination of the following information/data/insights:

- Proprietary commercial Data from our met mast;
- Findings, data and in-depth site experiences gained by the specialist from the long-term bird monitoring program conducted before tracking began, following South African bird monitoring guidelines; and
- An additional focal point survey of the nest itself, over a number of months including substantial observed and documented flight paths; and
- Detailed site specific vegetation and habitat mapping and modelling.

Given this, the specific tracking data you have requested would not contribute meaningfully to further understanding or reassessment of the proposed buffer zones. A second specialist, without the above mentioned information and experience, is unlikely to arrive at a similar or meaningful conclusion of the recommended buffer size and shape. Furthermore, it must be noted that the project specialist, as required by the NEMA EIA regulations, is independent of the applicant, is SACNASP registered, and has complied with all guideline requirements to obtain an informed buffer and set of recommendations for the project.

Additionally, under the National Environmental Management: Biodiversity Act (NEMBA), this tracking

program is classified as bioprospecting. Accessing or conducting research on such data requires a permit, which neither you nor your specialist have provided. Without the necessary permit, we are unable to share this information.

Sincerely,

Johans van Wyk

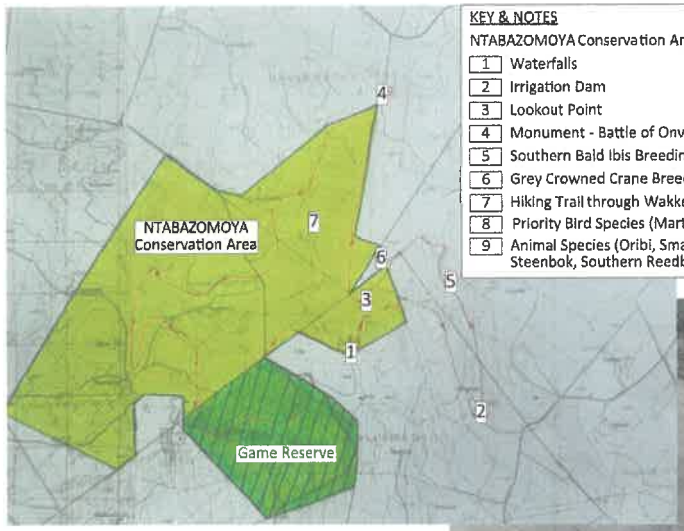
Senior Associate: Landowner Liaison

O: +27 21 685 3240 C: +27 83 796 7727

www.mulilo.com

21st Floor, Portside, 5 Buitengracht Street, Cape Town, 8001

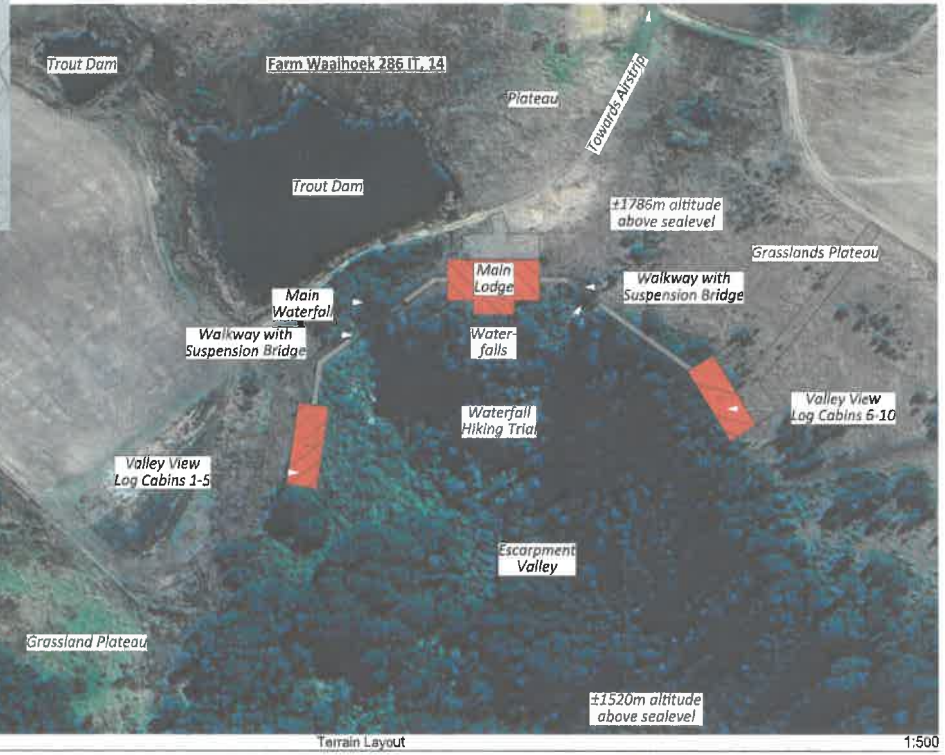
24/28



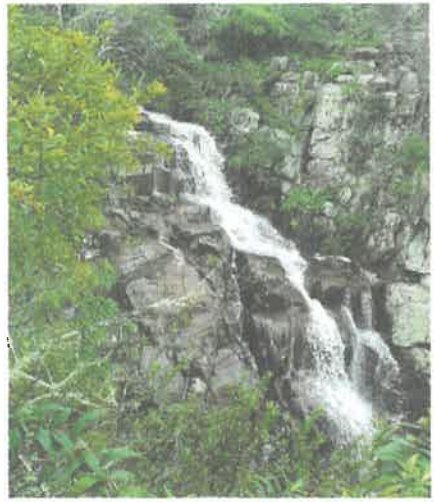
KEY & NOTES

NTABAZOMOYA Conservation Area

1. Waterfalls
2. Irrigation Dam
3. Lookout Point
4. Monument - Battle of Onverwacht
5. Southern Bald Ibis Breeding Site
6. Grey Crowned Crane Breeding Site
7. Hiking Trail through Wakkerstroom Montane Grassland
8. Priority Bird Species (Martial Eagle, Grey Crowned Crane, Southern Bald Ibis, Secretary Bird, Fish Eagle, Yellow-breasted Pipit)
9. Animal Species (Oribi, Small Spotted Cat, Honey Badger, Caracal Serval, Black-backed Jackal, Aardvark, Rock Hyrax, Blesbok, Grey Duiker, Steenbok, Southern Reedbuck, Bushbuck)



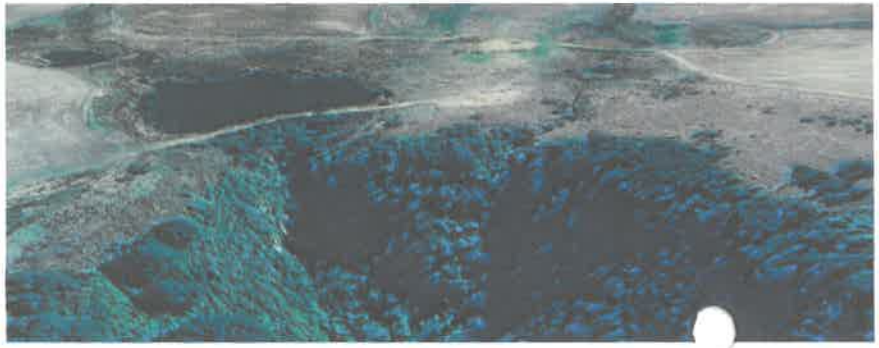
Terrain Layout 1:500















General Notes:

All services, heights, dimensions and levels to be checked prior to construction and any discrepancies to be verified with the Author.

Sewer, Storm water drainage & Earthworks to comply to Civil Engineers Design and Specifications.

All Structural work as per Structural Engineers Design and Specifications.

All Building Materials, Work and Installations to comply with SANS Act, NBR Act, Osh Act & AAAMSA Regulations.

All roofs as per Engineers Design.

As-Built Drawings: Compliance of Roof Designs, Services & Routes, Foundations sites and specifications unverified. Compliance to NBR & SANS may vary on site. Absolute location of buildings to be verified by Land Surveyor.

Any divergences on drawings or site to be discussed with the Author.

Revisions:

Description	By	Date

RW Consulting & Architectural
PO Box 1055
Ermelo
2350
E-mail: rwnel@yahoo.com
Cell: 076 827 1136
Sacap Reg. No. PAD/24742/98

Building Classification: -

This drawing is Copyright Reserved

Drawn by: R Nel
Checked by: R Nel

Signature: *Date:*
Owner:

Contact No: 0810182213
Author:

Project Name:
Proposed Eco Lodge on Ntabazomoya Conservation Area

Drawing Content:
Eco Lodge Terrain Layout, Ntabazomoya Information Map, Map Key & Notes with Photos

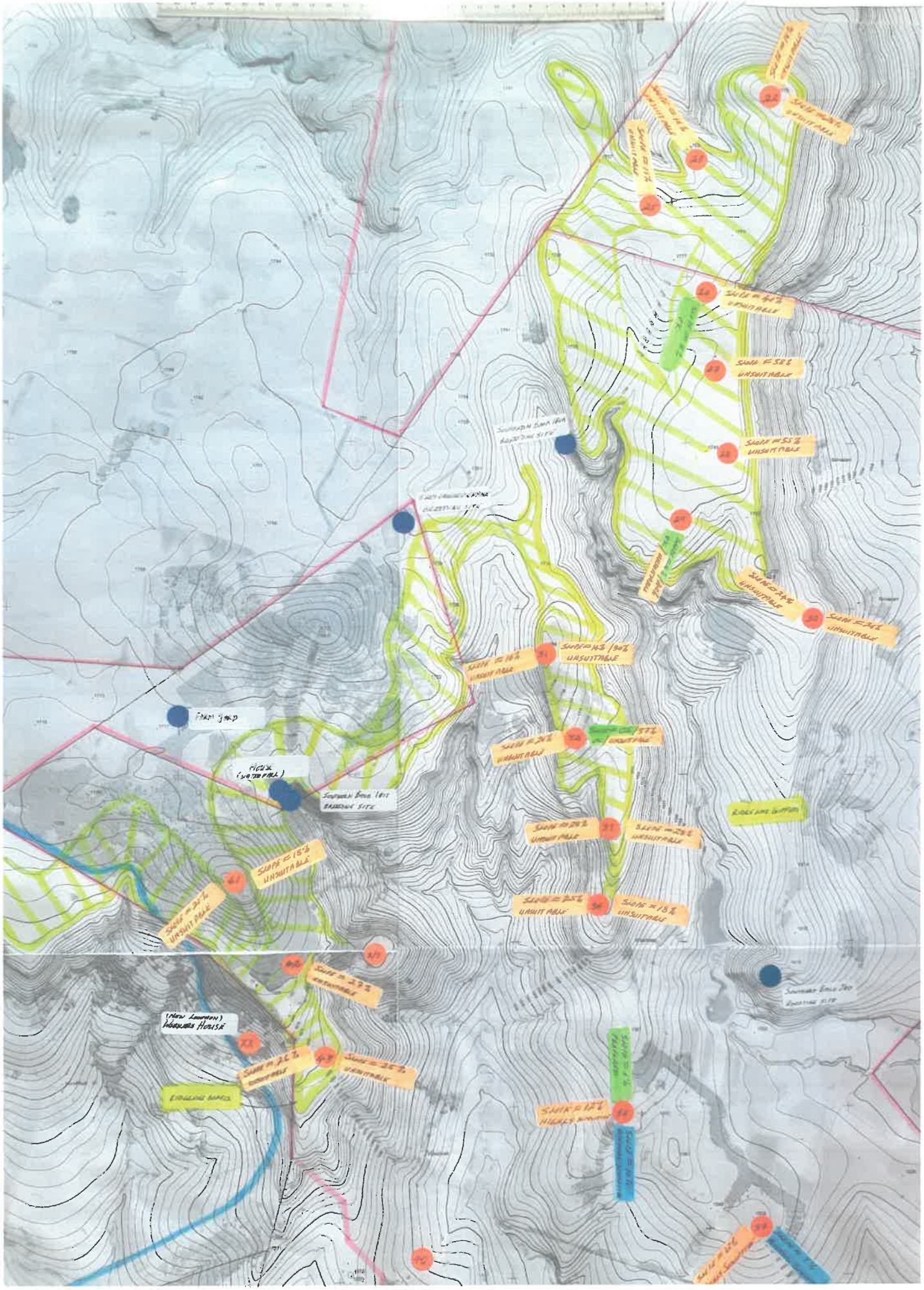
Owner/Entity:
Josua Meyer Trust
Farm Name:
Waalhoek 286 IT, 14

District Municipality:
Gert Sibande
Local Municipality: Msukaligwa

Date: 27/03/2025
Revision Number: Rev 01
Drawing Number: 01-1302SPT1

APPENDIX 16

APPENDIX 17


SLOPE = 15% UNSUITABLE
SLOPE = 20% UNSUITABLE
SLOPE = 58% UNSUITABLE
SLOPE = 55% UNSUITABLE
SLOPE = 43/90% UNSUITABLE
SLOPE = 15% UNSUITABLE
SLOPE = 18% UNSUITABLE
SLOPE = 25% UNSUITABLE
SLOPE = 12% UNSUITABLE
SLOPE = 35% UNSUITABLE
SLOPE = 22% UNSUITABLE
SLOPE = 24% UNSUITABLE
SLOPE = 24% UNSUITABLE
SLOPE = 24

From: Lloyd Barnes
Sent on: Friday, 15 August 2025 11:21:34
To: ERM Arcus Amsterdam
CC: Anton Lohse; Stephen Burton; Stephanie Gopaul; Andrew Pearson
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

Could you please provide the response sent to the I&AP on the 22nd of April?

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
www.mulilo.com
21st Floor, Portside, 5 Buitengracht Street, Cape Town, 8001

mulilo

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Wednesday, 13 August 2025 16:47
To: Lloyd Barnes <Lloyd@mulilo.com>
Cc: Anton Lohse <Anton@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <Andrew@mulilo.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

Hi Lloyd,

Please note that we have received comments and concerns from an I&AP who operates a landing strip near the proposed development.

These comments were originally submitted on 22 April after the previous Draft EIA Phase PPP period. The I&AP has now resubmitted the same comments during the current PPP period.

Given the nature of the concerns raised, and that the submission has come via the I&AP's legal representative, we kindly request that the Mulilo legal team review the comments and provide any necessary input.

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Riaan Meintjes <riaan@themis.co.za>
Sent: Thursday, August 7, 2025 1:48 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

You don't often get email from riaan@themis.co.za. Learn why this is important
EXTERNAL MESSAGE

Dear Sir/Madam

We have briefly perused the draft EIA report and have been unable to find any reference to the comment submitted by us on the instructions of our client, a copy of which is attached to this email.

Kindly refer us to the relevant pages of the draft report which deal with our client's comments?

We further note from the draft report that a formal application has been lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted. Kindly furnish us with a copy of this application and all communications to and from ATNS relating thereto.

We look forward to hearing from you as a matter of urgency.

Regards
Riaan Meintjes
Director

BusinessDay Best Lawyers for 2025: Arbitration and Mediation; Litigation; Real Estate Law

HAYES EST 2005 INCORPORATED

T: [redacted]
F:
W: www.themislawchambers.co.za

Unit 1, Roeland Square
Corner of Roeland Street and Drury Lane
Cape Town, 8001

This email was intended for the named recipient only. It may contain sensitive or privileged information. If you receive it in error please contact us immediately at info@themis.co.za

---

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Date: Wednesday, 16 July 2025 at 13:55
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Interested and Affected Party,

Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.

The revised comment period now ends on 15 August 2025.

All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.

Thank you for your continued participation.

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted]

erm.com



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Prior to making any payment to our firm, please confirm the banking details telephonically with one of our directors as listed on our website. We will never send you an email advising you of a change of our banking details. Any email mentioning a change of banking details is false, and we ask that you kindly contact one of our directors immediately should you receive such an email.

Disclaimer

Prior to making any payment to our firm, please confirm the banking details telephonically with one of our directors as listed on our website. We will never send you an email advising you of a change of our banking details. Any email mentioning a change of banking details is false, and we ask that you kindly contact one of our directors immediately should you receive such an email.

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From: Retsrov Boerdery
Sent on: Friday, 15 August 2025 13:28:15
To: ERM Arcus Amsterdam
Subject: Comments on the draft EIA report for Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province - NWJ Vorster Trust

You don't often get email from vorsterboerdery@lantic.net. Learn why this is important

EXTERNAL MESSAGE

The NWJ Vorster Trust is thankfully not part of the proposed WEF anymore.
We will still be affected by the wind farm if it becomes a reality.
Therefore we want to raise our strongest concern against it.

1. All the turbines, on the edge of the escarpment, will permanently scar the scenery and is unacceptable.
2. We are very concerned about proposed turbines 40, 44, 45 and 46 because of the noise and most probably shadow flickering.
3. The same applies for turbines 51, 52 and 53.
4. Turbines 40, 41,42,43,44,45,46, 51 and 52 will cause visual pollution which is unacceptable.
5. Proposed turbines 40,043 and 44 are too close to the breeding site of the secretary bird. A safe no-go zone of at least 2,5km should be implemented around the nest. The two secretary birds stay in the area south east of this location and provision should be made to secure its foddering habit.
6. A Marial Eagle pair were spotted several times in the past at Farm Klipfontein. It is of great concern because the always fly off in a north east direction where most of the turbines will be located.
7. The southern bald ibis are also present in great numbers on the farm Klipfontein especially when cultivating land or harvesting. Provision should be made for a safe flying zone to their roosting site on neighbouring farm Windhoek where four turbines will be located.

Regards,

Pikkie Vorster – Director at Retsrov Boerdery
[redacted]



From: Andrew Pearson
Sent on: Friday, 15 August 2025 14:02:09
To: Stephanie Gopaul; ERM Arcus Amsterdam; Lloyd Barnes
CC: Rebecca Thomas; Stephen Burton
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Thanks Stephnie

Lloyd to make the call….

Kind regards,

Andrew Pearson *Pr.Sci.Nat* (400423/11)
Senior Manager: Head of Environmental
[redacted]
www.mulilo.com
[redacted]

From: Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Sent: Friday, August 15, 2025 11:04 AM
To: Andrew Pearson <Andrew@mulilo.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lloyd Barnes <Lloyd@mulilo.com>
Cc: Rebecca Thomas <reth@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

HI Andrew

We will make the final CRR available to all registered I&APs- the notification will contain a link for him to access the CRR.

Are you wanting to send him a hard copy or usb or something like that?

Sustainability is our business

Stephanie Gopaul
Partner
She/Her/Hers

Durban [redacted] **erm.com**

From: Andrew Pearson <Andrew@mulilo.com>
Sent: Friday, August 15, 2025 10:58 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lloyd Barnes <Lloyd@mulilo.com>
Cc: Rebecca Thomas <reth@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi All

Will we, and should we, send a copy of the final CRR to Mr Meyer when we submit to DFFE?

Kind regards,

Andrew Pearson *Pr.Sci.Nat* (400423/11)
Senior Manager: Head of Environmental
[redacted]
www.mulilo.com
[redacted]



From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, August 15, 2025 10:39 AM
To: Lloyd Barnes <Lloyd@mulilo.com>
Cc: Andrew Pearson <Andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Subject: FW: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Lloyd,

As discussed, I will reply to Mr Meyer below acknowledging his email and inform him that his comments will be added to the CRR's and our responses will be provided within the report itself.

Kind Regards



Lucien Barbeau
Senior Consultant

Cape Town **erm.com**
[redacted]

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Thursday, August 14, 2025 10:44 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Dear Lucien

Just want to get the records straight without getting into an informal debate

1 - 4 : Correspondence

- Request info from ERM, Mr Lucien Barbeau, on 17/12/2024 at 11h04.
  Still no response ?

- First request for meeting to applicant, mr Johans van Wyk, on 19/2/2025 at 12h35.
  Applicant, mr Johans van Wyk, reject request on 19/02/2025 at 15h35
  First formal request for meeting through ERM on 16/4/2025 at 03h24. No response ?
  Request again for meeting through ERM, Mr Lucien Barbeau, on 18/07/2025 at 16h51.
  Meeting took place on 4/08/2025.

Almost 8 months later!?

- Requested on 16/06/2025 for official documentation concerning the 3 month extension.
Repeat request during meeting of 4/08/2025
Received info only on 12/08/2025
Almost 2 month later?!

- Request tagged data of two martial eagles from ERM on 11/03/2025 at 10h59
Repeat request for tagged data from ERM on 29/03/2025 at 11h44
Received refusal of data in email from applicant, mr Johans van Wyk, on 14/4/2025 at 20h40. ERM was also CC.
Remind ERM, Mr Barbeau, on 15/04/2025 at 22h11 that formal answer on request for tagged data is still outstanding.
Still no response from ERM !!

Is that what you and ERM means by **CREDIBLE, TRANSPARENT and ACCOUNTABLE?**

5 - 8 : Tagged data

Mulilo and EWT is in a partnership, confirmed in email from mr Johans van Wyk, in tagging the birds and therefore co-accountable for each other's conduct
The issue is not who did wrong but is the tagging done with a valid permit.?
If not, then it is illegal and that also implies for the data obtained by the unlawful act.
What ERM says by implication is that they are comfortable in driving a stolen vehicle as long as it is to their advantage?
Very dangerous and controversial approach..
We still insist that everything connected to the tagged data must be removed from the avifaunal report because it is illegally obtained regardless who did it.

The avifaunal specialist used the Verkykerkop tagged data in his report and on that ground we requested the permit to tagg that eagle (Bred)

9 - 11 : Specialist report and NDA

Mr Moodie strongly opposed the powerline crossing his farms and that also without consulting him.That was the main reason why Mr Moodie attended the meeting. Maybe you did not pick it up because Mr Moodie spoke Afrikaans.

Will address the rest in my comments.

Regards

Josua Meyer

On Tue, Aug 12, 2025 at 12:08 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Good day Mr Meyer,
>
> Please find below our responses to your comments.
>
> We are in the process of finalising the meeting minutes, which will be shared with you before the end of this week. Thank you
>
> **1 - The EAP is expected to participate and actively engage with the impacted community. Why has my request for a meeting since February 2025 repeatedly declined and pushed in at the 11th hour?**
>
> MULILO: The applicant regrets that the *ad hoc* meeting request sent by you to the applicant in February this year was not attended to immediately. Unfortunately, the request for a private meeting with the applicant was not seen at the time by the applicant's representatives, and the applicant sincerely apologises for any frustration this may have caused you. The applicant and EAP remain committed to engaging with I&APs,

and the in-person meeting requested by yourself, and attended by me as the appointed EAP for this project, and by the applicant's representatives, on the 4th of August 2025 was welcomed and seen to constitute substantive progress in responding to your queries. Your queries, and these responses, will obviously form part of the Comments and Responses Report included together with the next draft of the EIA Report.

ERM: As the EAP, we are committed to engaging meaningfully with Interested and Affected Parties (I&APs) in accordance with the requirements of the Environmental Impact Assessment (EIA) Regulations under NEMA. We have undertaken all necessary steps and where possible, gone beyond these requirements to engage with the community. This has included an additional focus group meeting with you at a mutually suitable time within the regulated timelines to address your concerns. All I&AP comments have been acknowledged, and this engagement process remains ongoing.

2 - Do you as EAP feel that the process has been credible and transparent as well as accountable in circumstances where you reach out and respond to a request for a meeting at the 11th hour? How is that considered to be meaningful and in the spirit of the constitution?

ERM take the principles of credibility, transparency, and accountability in the EIA process very seriously. In this case, we regret that your initial request for a private meeting with the applicant, sent to the applicant in February, was not seen at the time by the applicant. Had it been, ERM would have engaged with you much earlier. Please include the EAP in such requests in order to ensure this is not missed in the future. The recent outreach was made in good faith. Once ERM became aware of your request for a meeting, ERM responded promptly in an effort to engage meaningfully and ensure your views are heard.

While ERM acknowledges that earlier engagement would have been preferable, we remain fully open to meeting and engaging in a meaningful and constructive way as the EIA process continues. ERM sees this as part of our commitment to upholding the intent and spirit of public participation, as set out in the Constitution and in NEMA and the 2014 NEMA EIA Regulations.

We believe that the EIA process we are facilitating has been credible, transparent, and accountable, in line with the requirements of NEMA. While the timing of certain engagements is sometimes influenced by the availability of multiple parties, we made every effort to accommodate your request for a meeting within the regulated timeframe. The process remains open, transparent, and documented for review by the competent authority.

3 - Why are biodiversity related issues only being property investigated at the 11th hour although the Provincial Department requested it in the scoping phase?

During the scoping phase, it was noted that a biodiversity offset may be required based on final layouts proposed. However, this indication was based on preliminary findings and initial specialist inputs, which were still being refined at the time. As is typical in EIA processes, more detailed and site-specific assessments only become available during the impact assessment phase, once the full suite of specialist studies is completed and verified. It is on the basis of these completed studies that a more accurate determination of residual impacts, and thus the need for and scale of a biodiversity offset, can be made.

We understand the importance of early clarity, but it's also essential that such recommendations are based on robust, defensible data. That said, ERM has aimed to finalise and address these issues as efficiently and transparently as possible once the necessary information became available.

Biodiversity-related issues have been considered from the outset of the EIA process, beginning in the scoping phase. The assessment has been iterative, with the project layout being amended several times to address environmental sensitivities and viability concerns, including biodiversity matters. These changes are documented in the Comments and Responses Report (CRR) and specialist assessments.

4 - Why are requested documentation regarding the additional 3 months extension granted by DFFE to the applicant still outstanding?

Please see the attached correspondence as requested.

5 - Are you as EAP confident that the data and modelling that has been undertaken to address bird related impacts and specifically the martial eagle is accurate and credible? If so, please explain why.

The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible.

The appointed avifaunal specialist is an expert in the field of wind energy facility impacts on birds. Based on their expertise and experience, we have no reason to doubt the accuracy, credibility, and applicability of the data and modelling undertaken for this assessment.

6 - Are you as EAP confident and can you confirm in writing that the data that is being obtained in relation to the martial eagle was correctly obtained and in accordance with all minimal standards and legal criteria?

As illuded to in our response to Point 5 above. The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report.

This permitting process is separate from the EIA, and as the EAP we do not have direct oversight over it.

7 - Are you as EAP comfortable that if the tagging of the martial eagle were done without a valid permit, that the tagged data can still be used in the specialist report? If so, please explain why.

The legality of the data collection process is the responsibility of the avifaunal specialist and the applicant. It is our understanding that a permit for such activities is legally required, and that the data included in the specialist report was provided on the basis that the necessary permit was obtained.

The data collected from the tagged Martial Eagle is invaluable. It provides critical insight into the bird's movements and habitat use, which directly strengthens the EIA findings; informs a more effective mitigation strategy; and ultimately, enhances the likely further and better protection of the species. As explained in Point 5 above – the EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The applicant was informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible.

8 - Are you as EAP in acceptance that the permits to tag the martial eagles, also the one at Verkykerskop, were not presented at the meeting? If so, please explain why.

The proposed Verkykerskop Wind Farm cluster is not a part of the proposed Emvelo and Sheepmoor wind farms and are consequently not relevant or applicable to the current process. The EAP supports the use of

scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible.

As a general practice, fieldwork permits obtained by specialists are not typically presented during stakeholder engagement or I&AP meetings.

9 - Are you as EAP confident that all the recommendations in the specialist reports and specifically the Social report are satisfactorily addressed? If not, please explain why.

In the specialist reports, including the Social Impact Assessment, have been carefully considered and addressed to the extent possible within the on-going EIA process, and that will continue to be the case. Where certain recommendations require further action, these have been clearly outlined for implementation during the construction and operational phases, and will be monitored through the Environmental Management Programme (EMPr).

We have reviewed the social specialist's findings and recommendations and accept them as valid and credible, given the specialist's expertise in the field. Recommendations and mitigation measures that could reasonably be incorporated into the Environmental Management Programme (EMPr) have been included. If there are specific recommendations you believe have not been adequately addressed, please let us know so that we can review them.

10 - It became clear in the meeting that none of the affected landowners are prepared to allow the proposed powerline over their properties. Are AEP comfortable to support an application without a secured powerline route?

Thank you for raising this important point.

While the EIA process does not require landowner consent for linear infrastructure at this stage, the applicant is committed to engaging in good faith negotiations with affected landowners to secure the necessary servitudes following the achievement of the EA. The landowner in question (Mr Moodie) did not formally raise any objections. He advised that the routing could be relooked at in due course. In recognition of the risks involved, and in the context of the NEMA EIA Regulations' requirement to consider reasonable and feasible alternatives, alternative powerline routes have also been assessed as part of the EIA to reduce potential impacts and improve the likelihood of an acceptable alignment being secured. The other landowners did not formally raise any objections yet and formal discussions still need to take place with these landowners to the extent that the OHL needs to traverse their respective properties.

The routing referred to in your comment is an alternative powerline route considered, and is not the preferred route. Our role as the EAP is to independently assess the potential impacts of alternatives, identify mitigation measures to reduce impacts to acceptable levels, and provide an informed opinion on the acceptability of the project. The final decision on whether the project may proceed rests with the DFFE.

11 - The avifaunal specialist signed a NDA (non disclosure agreement) with the applicant and it was also revealed in the meeting by the applicant that they collectively determined the shaped exclusion zones for the southern bald ibis. Are you as EAP comfortable that it is not in contradiction with the declaration the avifaunal specialist signed as independant specialist? If so, please explain why.

The avifaunal exclusion zones are proposed by the appointed avifaunal specialist alone, informed by additional avifaunal studies commissioned by the applicant. The applicant has no role to play in determining the shape or size of proposed buffers. Please also see my response to your fifth question, above. It is common practice for parties to sign NDAs in order to protect confidential information, such as for instance intellectual property, specific project sites and does do not detract from or limits a specialist to act independently and impartially.

We operate on the assumption that all appointed specialists, including the avifaunal specialist, conduct their work in an ethical, independent manner, in compliance with the EIA Regulations. Both we as the EAP and all specialists have signed declarations of independence, as required under NEMA, confirming that our assessments are conducted impartially.

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Tuesday, August 12, 2025 11:32 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

Time is running out.

Where are the minutes of the meeting as well as a copy of the recorded transcript?

Thanks

On Tue, Aug 12, 2025 at 9:15 AM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Good day Mr Meyer,
>
> I trust that you are well. Kindly note that we will provide our responses to your comments by close of business today.
>
> Kind Regards
>
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Senior Consultant
>
> Cape Town [redacted] **erm.com**
>
>
> ---
>
> **From:** ERM Arcus Amsterdam
> **Sent:** Wednesday, August 6, 2025 2:56 PM
> **To:** Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
> **Cc:** Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard

Summers <richard@summersinc.co.za>; celine@summersinc.co.za
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Meyer,

Thank you for your email and for taking the time to share your reflections following our meeting on Monday.

We acknowledge receipt of your comments and the additional questions you have raised. We appreciate your continued engagement in the process and will respond to your queries as soon as possible.

Should you have any further inputs in the meantime, please feel free to share them with us.

Kind Regards,

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Wednesday, August 6, 2025 1:47 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

The purpose of the meeting was to address concerns of the I&AP's regarding the proposed Sheepmoor and Emvelo WEF's. The applicant gives the impression that they are not interested in taking any action regarding the I&AP's concerns and attend it only to avoid negative reflection. Therefore the meeting created unfortunately more questions than answers. Your EAP's input was also disappointing.

We urgently need clarification and answers on the following

1 - The EAP is expected to participate and actively engage with the impacted community. Why has my request for a meeting since February 2025 repeatedly declined and pushed in at the 11th hour?

2 - Do you as EAP feel that the process has been credible and transparent as well as accountable in circumstances where you reach out and respond to a request for a meeting at the 11th hour? How is that considered to be meaningful and in the spirit of the constitution?

3 - Why are biodiversity related issues only being property investigated at the 11th hour although the Provincial Department requested it in the scoping phase?

4 - Why are requested documentation regarding the additional 3 months extension granted by DFFE to the applicant still outstanding?

5 - Are you as EAP confident that the data and modelling that has been undertaken to address bird related impacts and specifically the martial eagle is accurate and credible? If so, please explain why.

6 - Are you as EAP confident and can you confirm in writing that the data that is being obtained in relation to the martial eagle was correctly obtained and in accordance with all minimal standards and legal criteria?

7 - Are you as EAP comfortable that if the tagging of the martial eagle were done without a valid permit, that the tagged data can still be used in the specialist report? If so, please explain why.

8 - Are you as EAP in acceptance that the permits to tag the martial eagles, also the one at Verkykerskop, were not presented at the meeting? If so, please explain why.

9 - Are you as EAP confident that all the recommendations in the specialist reports and specifically the Social report are satisfactorily addressed? If not, please explain why.

10 - It became clear in the meeting that none of the affected landowners are prepared to allow the proposed powerline over their properties. Are AEP comfortable to support an application without a secured powerline route?

11 - The avifaunal specialist signed a NDA (non disclosure agreement) with the applicant and it was also revealed in the meeting by the applicant that they collectively determined the shaped exclusion zones for the southern bald ibis. Are you as EAP comfortable that it is not in contradiction with the declaration the avifaunal specialist signed as independant specialist? If so, please explain why.

Due to the time constraint answers required before the 11/08/2025.

Regards

On Sun, Aug 3, 2025 at 12:36 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Mr Meyer,
>
> Thank you for confirming the meeting for 12h00 tomorrow, 4 August, at your farm. That time works perfectly, and we look forward to meeting with you.
>
> If you would kindly share the physical address or GPS coordinates for the entrance to your farm, it would be greatly appreciated to ensure we arrive without any difficulty.
>
> There will be five people attending the meeting, including myself.
>
> Should there be anything further you would like us to prepare or bring along for the meeting, please don't hesitate to let us know, we'll be happy to assist in any way we can.
>
> Kind regards,
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Senior Consultant
>
> Cape Town [redacted] **erm.com**
>
> **From:** Josua Meyer <meyerjosua55@gmail.com>
> **Sent:** Friday, August 1, 2025 1:29 PM
> **To:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
> **Subject:** Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
>
> **EXTERNAL MESSAGE**

Good day
Monday is fine with me
I did inform Johans also
Will 12h00 be convenient for you?
How may people?
Regards

On Fri, 01 Aug 2025, 11:42 ERM Arcus Amsterdam, <ERM.ArcusAmsterdam@erm.com> wrote:

> Good Morning Mr Meyer,
>
> Thank you for your response. If you feel Monday is too short availability, please do not feel rushed. We would be happy to accommodate you later in the week. We will await your feedback and move accordingly from there.
>
> Kind Regards,

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Thursday, July 31, 2025 6:13 PM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Some people who received this message don't often get email from meyerjosua55@gmail.com. Learn why this is important
EXTERNAL MESSAGE

Goodday
Will confirm tomorrow before 12h00
Thanks

On Thu, Jul 31, 2025 at 2:22 PM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Dear Mr Meyer,
>
> I hope this message finds you well.
>
> I'm writing to kindly follow up on our proposed meeting scheduled for Monday, 4 August at 13:00 at your farm. We would appreciate it if you could please confirm whether you are still available to meet on that date.
>
> Should you require any additional information or documentation ahead of the meeting, beyond what you have already requested, please don't hesitate to let me know, I'd be happy to assist.
>
> Looking forward to your confirmation.
>
> Kind regards,

Lucien Barbeau
Senior Consultant

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Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Monday, July 28, 2025 11:49 AM
To: Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Meyer,

Following discussions with the applicant, unfortunately it will not be possible to schedule a meeting prior to 1 August due to limited availability.

However, we would be pleased to meet with you on Monday the 4th of August 2025 at 13:00, as per your request, at your farm.

Kindly confirm whether this date and time are suitable, and please advise who will be attending the meeting from your side.

I will continue to provide you with the requested documentation ahead of the meeting.

Kind regards,

Lucien Barbeau
Senior Consultant

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Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 25, 2025 5:11 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

Proposed date for the meeting seems to be too close to submission of comments which is already 9/08/25.

Can you arrange the meeting for us before 1/07/2025.

Can you in the meantime forward the detail previously requested

- All the documentation with Department concerning the 3 months extension granted even after time lapps to submit final report

- Mulilo's permits to fit telemetry device on the two martial eagles

- AfriAvian motivation for altering Figure 33 in both avifaunal reports

Above info are urgently required and no reason to wait for the meeting

Regards

Josua

On Tue, Jul 22, 2025 at 10:30 AM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Hi Lucien
>
> There might be a mistake in your day or date ..... 7 August 2025 is a Thursday.
>
> Nevertheless the 6 or 7 th August 2025 is fine with us.
>
> Will appreciate it if we can meet on my farm.
>
> We intend to be three (3) I&AP
>
> Regards
>
> Josua Meyer
>
> On Mon, Jul 21, 2025 at 11:36 AM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:
>
> > Dear Mr. Meyer,
> >
> > Good day, and thank you for your recent correspondence regarding the Draft EIA Reports.
> >
> > We acknowledge your request for a meeting to discuss the concerns raised. In consultation with the applicant, Mulilo, we are proposing a provisional date of Wednesday, 7 August 2025, with the meeting to be held at a venue in Ermelo. Kindly confirm whether this date is suitable for you and whether you will be attending alone or accompanied by others.
> >
> > As a registered I&AP, your comments form an important part of the formal public participation process and will be incorporated into the Final EIA Reports. We also acknowledge the concerns raised regarding the tagging of the Martial Eagles. Relevant documentation, including permits, will be made available where appropriate to support transparency and clarity during the engagement.
> >
> > We look forward to your response.
> >
> > Kind Regards,
> >
> > ERM
> > Sustainability is our business
> >
> > **Lucien Barbeau**
> > Senior Consultant
> >
> > Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 18, 2025 4:51 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Johans Van Wyk <Piwy@mulilo.com>; Lloyd@mulilo.com
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday mr Lucien Barbeau,

Referring to your email dated 7/04/2025 it will be appreciated if you can arrange such a meeting urgently before the 9/08/2025 with the applicant, Mulilo, on site.

Concerns as previously raised with Mulilo in an email dated 19/02/2025 will be on the agenda. That request for a meeting was refused by Mulilo.

Another urgent item which also must be discussed is the tagging of the two martial eagles. According to the MTPA report in my possession, the martial eagles were tagged by Mulilo without a permit. Copy of the report can be provided at the meeting.

That leaves the tagging of the martial eagles illegally, if not criminal.

Therefore the data being used in the specialist report is illegally obtained and all sections, models and references where data has been used must be removed from the report.

Looking forward to your urgent response.

Regards

Josua Meyer (I&AP)

On Wed, Jul 16, 2025 at 4:41 PM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Goodday Sir
>
> The avifaunal specialist removed in both reports, Sheepmoor WEF and Emvelo WEF, the High Sensitivity - Turbine Exclusion Zone in Figures 33 for the aquatic buffer zones from an avifaunal perspective.
>
> It must be an unintentional mistake and request reinstatement of it.
>
> If it was deliberate we request the detailed reasoning and motivation for such a drastic decision.
>
> Thanks
>
> Josua Meyer
>
> On Wed, Jul 16, 2025 at 1:54 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:
>
> > Dear Interested and Affected Party,
> >
> > Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.
> >
> > The revised comment period now ends on 15 August 2025.

All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.

Thank you for your continued participation.



Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Lucien Barbeau
Senior Consultant

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Cape Town [redacted]

erm.com



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CONFIDENTIALITY AND DATA PROTECTION. This email is intended only for the use of the intended recipient(s) and may contain information which is privileged and confidential, or personal data which is subject to data protection legislation. If you are not the intended recipient, any disclosure, copying and/or distribution of the content of this email, or reliance upon or other use of the contents of this email is strictly prohibited. If you have received this email in error, please erase all copies of it, including all attachments, do not forward it to anybody, and please also notify the sender immediately.

From: Mpho Malema
Sent on: Friday, 15 August 2025 14:39:19
To: ERM Arcus Amsterdam
Subject: RE: Comments on the draft EIA report for Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province - NWJ Vorster Trust

Done 😊, did you respond? Please forward the response as well.

Kind Regards

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Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted] **erm.com**



From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, August 15, 2025 2:32 PM
To: Mpho Malema <mpho.malema@erm.com>
Subject: FW: Comments on the draft EIA report for Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province - NWJ Vorster Trust

Please add to CRR Mpho 😊 and lets reply there

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Retsrov Boerdery <vorsterboerdery@lantic.net>
Sent: Friday, August 15, 2025 1:28 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Comments on the draft EIA report for Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province - NWJ Vorster Trust

You don't often get email from vorsterboerdery@lantic.net. Learn why this is important
EXTERNAL MESSAGE

The NWJ Vorster Trust is thankfully not part of the proposed WEF anymore.
We will still be affected by the wind farm if it becomes a reality.
Therefore we want to raise our strongest concern against it.

1. All the turbines, on the edge of the escarpment, will permanently scar the scenery and is unacceptable.

2. We are very concerned about proposed turbines 40, 44, 45 and 46 because of the noise and most probably shadow flickering.
3. The same applies for turbines 51, 52 and 53.
4. Turbines 40, 41,42,43,44,45,46, 51 and 52 will cause visual pollution which is unacceptable.
5. Proposed turbines 40,043 and 44 are too close to the breeding site of the secretary bird. A safe no-go zone of at least 2,5km should be implemented around the nest. The two secretary birds stay in the area south east of this location and provision should be made to secure its foddering habit.
6. A Marial Eagle pair were spotted several times in the past at Farm Klipfontein. It is of great concern because the always fly off in a north east direction where most of the turbines will be located.
7. The southern bald ibis are also present in great numbers on the farm Klipfontein especially when cultivating land or harvesting. Provision should be made for a safe flying zone to their roosting site on neighbouring farm Windhoek where four turbines will be located.

Regards,

[redacted]



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From: jonathan@camissaconsulting.com
Sent on: Friday, 15 August 2025 14:44:28
To: ERM Arcus Amsterdam
Subject: Annual Leave

EXTERNAL MESSAGE

Good Day, thanks for your message.
I'm on annual leave until 22 August 2025. I will attend to your email as soon as possible. Thank you for understanding.

Sincerely,
Jonathan Aronson

From: ERM Arcus Amsterdam
Sent on: Friday, 15 August 2025 15:15:13
To: Lloyd Barnes; ERM Arcus Amsterdam
CC: Anton Lohse; Stephen Burton; Stephanie Gopaul; Andrew Pearson
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Lloyd,

Please note that we do not have a response for this I&AP comment, as it was submitted outside of the designated public participation period at the time.

Kind Regards

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Lloyd Barnes <Lloyd@mulilo.com>
Sent: Friday, August 15, 2025 11:22 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Anton Lohse <Anton@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <Andrew@mulilo.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

Could you please provide the response sent to the I&AP on the 22nd of April?

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
www.mulilo.com
[redacted]

mulilo

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Wednesday, 13 August 2025 16:47
To: Lloyd Barnes <Lloyd@mulilo.com>
Cc: Anton Lohse <Anton@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <Andrew@mulilo.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

Hi Lloyd,

Please note that we have received comments and concerns from an I&AP who operates a landing strip near the proposed development.

These comments were originally submitted on 22 April after the previous Draft EIA Phase PPP period. The I&AP has now resubmitted the same comments during the current PPP period.

Given the nature of the concerns raised, and that the submission has come via the I&AP's legal representative, we kindly request that the Mulilo legal team review the comments and provide any necessary input.

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Riaan Meintjes <riaan@themis.co.za>
Sent: Thursday, August 7, 2025 1:48 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

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EXTERNAL MESSAGE

Dear Sir/Madam

We have briefly perused the draft EIA report and have been unable to find any reference to the comment submitted by us on the instructions of our client, a copy of which is attached to this email.

Kindly refer us to the relevant pages of the draft report which deal with our client's comments?

We further note from the draft report that a formal application has been lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted. Kindly furnish us with a copy of this application and all communications to and from ATNS relating thereto.

We look forward to hearing from you as a matter of urgency.

Regards
Riaan Meintjes
Director

BusinessDay Best Lawyers for 2025: Arbitration and Mediation; Litigation; Real Estate Law

HAYES EST H 2005 INCORPORATED

[redacted]
W: www.themislawchambers.co.za

Unit 1, Roeland Square
Corner of Roeland Street and Drury Lane
Cape Town, 8001

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---

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Date: Wednesday, 16 July 2025 at 13:55
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Interested and Affected Party,

Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.

The revised comment period now ends on 15 August 2025.

All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.

Thank you for your continued participation.

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted]

erm.com



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From: Lloyd Barnes
Sent on: Friday, 15 August 2025 15:15:43
To: ERM Arcus Amsterdam
CC: Stephanie Gopaul; Stephen Burton; Andrew Pearson
Subject: RE: Comments on the draft EIA report for Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province - NWJ Vorster Trust

EXTERNAL MESSAGE

Thank you Lucien, please provide your proposed response.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
www.mulilo.com
[redacted]



From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, 15 August 2025 13:41
To: Lloyd Barnes <Lloyd@mulilo.com>
Cc: Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Andrew Pearson <Andrew@mulilo.com>
Subject: FW: Comments on the draft EIA report for Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province - NWJ Vorster Trust

Hi Lloyd,

Sharing comments that have come in from Mr Pikkie Vorster as well.

Kind Regards



Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Retsrov Boerdery <vorsterboerdery@lantic.net>
Sent: Friday, August 15, 2025 1:28 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Comments on the draft EIA report for Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province - NWJ Vorster Trust

You don't often get email from vorsterboerdery@lantic.net. Learn why this is important
EXTERNAL MESSAGE

The NWJ Vorster Trust is thankfully not part of the proposed WEF anymore.
We will still be affected by the wind farm if it becomes a reality.
Therefore we want to raise our strongest concern against it.

1. All the turbines, on the edge of the escarpment, will permanently scar the scenery and is unacceptable.
2. We are very concerned about proposed turbines 40, 44, 45 and 46 because of the noise and most probably shadow flickering.

3. The same applies for turbines 51, 52 and 53.
4. Turbines 40, 41,42,43,44,45,46, 51 and 52 will cause visual pollution which is unacceptable.
5. Proposed turbines 40,043 and 44 are too close to the breeding site of the secretary bird. A safe no-go zone of at least 2,5km should be implemented around the nest. The two secretary birds stay in the area south east of this location and provision should be made to secure its foddering habit.
6. A Marial Eagle pair were spotted several times in the past at Farm Klipfontein. It is of great concern because the always fly off in a north east direction where most of the turbines will be located.
7. The southern bald ibis are also present in great numbers on the farm Klipfontein especially when cultivating land or harvesting. Provision should be made for a safe flying zone to their roosting site on neighbouring farm Windhoek where four turbines will be located.

Regards,

[redacted]



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From: Lloyd Barnes
Sent on: Friday, 15 August 2025 15:16:49
To: ERM Arcus Amsterdam
CC: Anton Lohse; Stephen Burton; Stephanie Gopaul; Andrew Pearson
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Thank you Lucien.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
www.mulilo.com
[redacted]

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, 15 August 2025 15:15
To: Lloyd Barnes <Lloyd@mulilo.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Anton Lohse <Anton@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <Andrew@mulilo.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Lloyd,

Please note that we do not have a response for this I&AP comment, as it was submitted outside of the designated public participation period at the time.

Kind Regards

Lucien Barbeau
Senior Consultant

Cape Town
+[redacted]

erm.com

Sustainability is our business

From: Lloyd Barnes <Lloyd@mulilo.com>
Sent: Friday, August 15, 2025 11:22 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Anton Lohse <Anton@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <Andrew@mulilo.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

Could you please provide the response sent to the I&AP on the 22nd of April?

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.

[redacted]
www.mulilo.com
[redacted]

mulilo

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Wednesday, 13 August 2025 16:47
To: Lloyd Barnes <Lloyd@mulilo.com>
Cc: Anton Lohse <Anton@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <Andrew@mulilo.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

Hi Lloyd,

Please note that we have received comments and concerns from an I&AP who operates a landing strip near the proposed development.

These comments were originally submitted on 22 April after the previous Draft EIA Phase PPP period. The I&AP has now resubmitted the same comments during the current PPP period.

Given the nature of the concerns raised, and that the submission has come via the I&AP's legal representative, we kindly request that the Mulilo legal team review the comments and provide any necessary input.

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town **erm.com**
[redacted]

From: Riaan Meintjes <riaan@themis.co.za>
Sent: Thursday, August 7, 2025 1:48 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

You don't often get email from riaan@themis.co.za. Learn why this is important
EXTERNAL MESSAGE

Dear Sir/Madam

We have briefly perused the draft EIA report and have been unable to find any reference to the comment submitted by us on the instructions of our client, a copy of which is attached to this email.

Kindly refer us to the relevant pages of the draft report which deal with our client's comments?

We further note from the draft report that a formal application has been lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted. Kindly furnish us with a copy of this application and all communications to and from ATNS relating thereto.

We look forward to hearing from you as a matter of urgency.

Regards
Riaan Meintjes
Director

BusinessDay Best Lawyers for 2025: Arbitration and Mediation; Litigation; Real Estate Law

[redacted]
W: www.themislawchambers.co.za

Unit 1, Roeland Square
Corner of Roeland Street and Drury Lane
Cape Town, 8001

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---

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Date: Wednesday, 16 July 2025 at 13:55
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Interested and Affected Party,

Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.

The revised comment period now ends on 15 August 2025.

All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.

Thank you for your continued participation.

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Lloyd Barnes
Sent on: Friday, 15 August 2025 15:20:12
To: Andrew Pearson; Stephanie Gopaul; ERM Arcus Amsterdam
CC: Rebecca Thomas; Stephen Burton
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi all,

Please follow standard procedure, as explained by Stephanie.

Once submitted, please contact Mr Meyer and request if we would prefer a physical copy or USB.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
www.mulilo.com
[redacted]

From: Andrew Pearson <Andrew@mulilo.com>
Sent: Friday, 15 August 2025 14:02
To: Stephanie Gopaul <Stephanie.Gopaul@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lloyd Barnes <Lloyd@mulilo.com>
Cc: Rebecca Thomas <reth@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Thanks Stephnie

Lloyd to make the call….

Kind regards,

Andrew Pearson *Pr.Sci.Nat* (400423/11)
Senior Manager: Head of Environmental
[redacted]
www.mulilo.com
[redacted]

From: Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Sent: Friday, August 15, 2025 11:04 AM
To: Andrew Pearson <Andrew@mulilo.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lloyd Barnes <Lloyd@mulilo.com>
Cc: Rebecca Thomas <reth@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

HI Andrew

We will make the final CRR available to all registered I&APs- the notification will contain a link for him to access the CRR.

Are you wanting to send him a hard copy or usb or something like that?

Stephanie Gopaul
Partner
She/Her/Hers

Durban [redacted] **erm.com**

From: Andrew Pearson <Andrew@mulilo.com>
Sent: Friday, August 15, 2025 10:58 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lloyd Barnes <Lloyd@mulilo.com>
Cc: Rebecca Thomas <reth@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi All

Will we, and should we, send a copy of the final CRR to Mr Meyer when we submit to DFFE?

Kind regards,

Andrew Pearson *Pr.Sci.Nat* (400423/11)
[redacted]

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, August 15, 2025 10:39 AM
To: Lloyd Barnes <Lloyd@mulilo.com>
Cc: Andrew Pearson <Andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Subject: FW: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Lloyd,

As discussed, I will reply to Mr Meyer below acknowledging his email and inform him that his comments will be added to the CRR's and our responses will be provided within the report itself.

Kind Regards

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Thursday, August 14, 2025 10:44 PM

To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Dear Lucien

Just want to get the records straight without getting into an informal debate

1 - 4 : Correspondence

- Request info from ERM, Mr Lucien Barbeau, on 17/12/2024 at 11h04.
  Still no response ?

- First request for meeting to applicant, mr Johans van Wyk, on 19/2/2025 at 12h35.
  Applicant, mr Johans van Wyk, reject request on 19/02/2025 at 15h35
  First formal request for meeting through ERM on 16/4/2025 at 03h24. No response ?
  Request again for meeting through ERM, Mr Lucien Barbeau, on 18/07/2025 at 16h51.
  Meeting took place on 4/08/2025.
  Almost 8 months later!?

- Requested on 16/06/2025 for official documentation concerning the 3 month extension.
  Repeat request during meeting of 4/08/2025
  Received info only on 12/08/2025
  Almost 2 month later?!

- Request tagged data of two martial eagles from ERM on 11/03/2025 at 10h59
  Repeat request for tagged data from ERM on 29/03/2025 at 11h44
  Received refusal of data in email from applicant, mr Johans van Wyk, on 14/4/2025 at 20h40. ERM was also CC.
  Remind ERM, Mr Barbeau, on 15/04/2025 at 22h11 that formal answer on request for tagged data is still outstanding.
  Still no response from ERM !!

Is that what you and ERM means by **CREDIBLE, TRANSPARENT and ACCOUNTABLE?**

5 - 8 : Tagged data

Mulilo and EWT is in a partnership, confirmed in email from mr Johans van Wyk, in tagging the birds and therefore co-accountable for each other's conduct
The issue is not who did wrong but is the tagging done with a valid permit.?
If not, then it is illegal and that also implies for the data obtained by the unlawful act.
What ERM says by implication is that they are comfortable in driving a stolen vehicle as long as it is to their advantage?
Very dangerous and controversial approach..
We still insist that everything connected to the tagged data must be removed from the avifaunal report because it is illegally obtained regardless who did it.

The avifaunal specialist used the Verkykerkop tagged data in his report and on that ground we requested the permit to tagg that eagle (Bred)

9 - 11 : Specialist report and NDA

Mr Moodie strongly opposed the powerline crossing his farms and that also without consulting him.That was the main reason why Mr Moodie attended the meeting. Maybe you did not pick it up because Mr Moodie spoke Afrikaans.

Will address the rest in my comments.

Regards

Josua Meyer

On Tue, Aug 12, 2025 at 12:08 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Good day Mr Meyer,
>
> Please find below our responses to your comments.
>
> We are in the process of finalising the meeting minutes, which will be shared with you before the end of this week. Thank you
>
> **1 - The EAP is expected to participate and actively engage with the impacted community. Why has my request for a meeting since February 2025 repeatedly declined and pushed in at the 11th hour?**
>
> MULILO: The applicant regrets that the *ad hoc* meeting request sent by you to the applicant in February this year was not attended to immediately. Unfortunately, the request for a private meeting with the applicant was not seen at the time by the applicant's representatives, and the applicant sincerely apologises for any frustration this may have caused you. The applicant and EAP remain committed to engaging with I&APs, and the in-person meeting requested by yourself, and attended by me as the appointed EAP for this project, and by the applicant's representatives, on the 4th of August 2025 was welcomed and seen to constitute substantive progress in responding to your queries. Your queries, and these responses, will obviously form part of the Comments and Responses Report included together with the next draft of the EIA Report.
>
> ERM: As the EAP, we are committed to engaging meaningfully with Interested and Affected Parties (I&APs) in accordance with the requirements of the Environmental Impact Assessment (EIA) Regulations under NEMA. We have undertaken all necessary steps and where possible, gone beyond these requirements to engage with the community. This has included an additional focus group meeting with you at a mutually suitable time within the regulated timelines to address your concerns. All I&AP comments have been acknowledged, and this engagement process remains ongoing.
>
> **2 - Do you as EAP feel that the process has been credible and transparent as well as accountable in circumstances where you reach out and respond to a request for a meeting at the 11th hour? How is that considered to be meaningful and in the spirit of the constitution?**
>
> ERM take the principles of credibility, transparency, and accountability in the EIA process very seriously. In this case, we regret that your initial request for a private meeting with the applicant, sent to the applicant in February, was not seen at the time by the applicant. Had it been, ERM would have engaged with you much earlier. Please include the EAP in such requests in order to ensure this is not missed in the future. The recent outreach was made in good faith. Once ERM became aware of your request for a meeting, ERM responded promptly in an effort to engage meaningfully and ensure your views are heard.
>
> While ERM acknowledges that earlier engagement would have been preferable, we remain fully open to meeting and engaging in a meaningful and constructive way as the EIA process continues. ERM sees this as part of our commitment to upholding the intent and spirit of public participation, as set out in the Constitution and in NEMA and the 2014 NEMA EIA Regulations.
>
> We believe that the EIA process we are facilitating has been credible, transparent, and accountable, in line with the requirements of NEMA. While the timing of certain engagements is sometimes influenced by the availability of multiple parties, we made every effort to accommodate your request for a meeting within the regulated timeframe. The process remains open, transparent, and documented for review by the competent authority.
>
> **3 - Why are biodiversity related issues only being property investigated at the 11th hour although the Provincial Department requested it in the scoping phase?**

During the scoping phase, it was noted that a biodiversity offset may be required based on final layouts proposed. However, this indication was based on preliminary findings and initial specialist inputs, which were still being refined at the time. As is typical in EIA processes, more detailed and site-specific assessments only become available during the impact assessment phase, once the full suite of specialist studies is completed and verified. It is on the basis of these completed studies that a more accurate determination of residual impacts, and thus the need for and scale of a biodiversity offset, can be made.

We understand the importance of early clarity, but it's also essential that such recommendations are based on robust, defensible data. That said, ERM has aimed to finalise and address these issues as efficiently and transparently as possible once the necessary information became available.

Biodiversity-related issues have been considered from the outset of the EIA process, beginning in the scoping phase. The assessment has been iterative, with the project layout being amended several times to address environmental sensitivities and viability concerns, including biodiversity matters. These changes are documented in the Comments and Responses Report (CRR) and specialist assessments.

4 - Why are requested documentation regarding the additional 3 months extension granted by DFFE to the applicant still outstanding?

Please see the attached correspondence as requested.

5 - Are you as EAP confident that the data and modelling that has been undertaken to address bird related impacts and specifically the martial eagle is accurate and credible? If so, please explain why.

The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible.

The appointed avifaunal specialist is an expert in the field of wind energy facility impacts on birds. Based on their expertise and experience, we have no reason to doubt the accuracy, credibility, and applicability of the data and modelling undertaken for this assessment.

6 - Are you as EAP confident and can you confirm in writing that the data that is being obtained in relation to the martial eagle was correctly obtained and in accordance with all minimal standards and legal criteria?

As illuded to in our response to Point 5 above. The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report.

This permitting process is separate from the EIA, and as the EAP we do not have direct oversight over it.

7 - Are you as EAP comfortable that if the tagging of the martial eagle were done without a valid permit, that the tagged data can still be used in the specialist report? If so, please explain why.

The legality of the data collection process is the responsibility of the avifaunal specialist and the applicant. It is our understanding that a permit for such activities is legally required, and that the data included in the specialist report was provided on the basis that the necessary permit was obtained.

The data collected from the tagged Martial Eagle is invaluable. It provides critical insight into the bird's movements and habitat use, which directly strengthens the EIA findings; informs a more effective mitigation strategy; and ultimately, enhances the likely further and better protection of the species. As explained in Point 5 above – the EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The applicant was informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible.

8 - Are you as EAP in acceptance that the permits to tag the martial eagles, also the one at Verkykerskop, were not presented at the meeting? If so, please explain why.

The proposed Verkykerskop Wind Farm cluster is not a part of the proposed Emvelo and Sheepmoor wind farms and are consequently not relevant or applicable to the current process. The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible.

As a general practice, fieldwork permits obtained by specialists are not typically presented during stakeholder engagement or I&AP meetings.

9 - Are you as EAP confident that all the recommendations in the specialist reports and specifically the Social report are satisfactorily addressed? If not, please explain why.

In the specialist reports, including the Social Impact Assessment, have been carefully considered and addressed to the extent possible within the on-going EIA process, and that will continue to be the case. Where certain recommendations require further action, these have been clearly outlined for implementation during the construction and operational phases, and will be monitored through the Environmental Management Programme (EMPr).

We have reviewed the social specialist's findings and recommendations and accept them as valid and credible, given the specialist's expertise in the field. Recommendations and mitigation measures that could reasonably be incorporated into the Environmental Management Programme (EMPr) have been included. If there are specific recommendations you believe have not been adequately addressed, please let us know so that we can review them.

10 - It became clear in the meeting that none of the affected landowners are prepared to allow the proposed powerline over their properties. Are AEP comfortable to support an application without a secured powerline route?

Thank you for raising this important point.

While the EIA process does not require landowner consent for linear infrastructure at this stage, the applicant is committed to engaging in good faith negotiations with affected landowners to secure the necessary servitudes following the achievement of the EA. The landowner in question (Mr Moodie) did not formally raise any objections. He advised that the routing could be relooked at in due course. In recognition of the risks involved, and in the context of the NEMA EIA Regulations' requirement to consider reasonable and feasible alternatives, alternative powerline routes have also been assessed as part of the EIA to reduce potential impacts and improve the likelihood of an acceptable alignment being secured. The other landowners did not formally raise any objections yet and formal discussions still need to take place with these landowners to the extent that the OHL needs to traverse their respective properties.

The routing referred to in your comment is an alternative powerline route considered, and is not the preferred route. Our role as the EAP is to independently assess the potential impacts of alternatives, identify mitigation measures to reduce impacts to acceptable levels, and provide an informed opinion on the acceptability of the project. The final decision on whether the project may proceed rests with the DFFE.

11 - The avifaunal specialist signed a NDA (non disclosure agreement) with the applicant and it was also revealed in the meeting by the applicant that they collectively determined the shaped exclusion zones for the southern bald ibis. Are you as EAP comfortable that it is not in contradiction with the declaration the avifaunal specialist signed as independant specialist? If so, please explain why.

The avifaunal exclusion zones are proposed by the appointed avifaunal specialist alone, informed by additional avifaunal studies commissioned by the applicant. The applicant has no role to play in determining the shape or size of proposed buffers. Please also see my response to your fifth question, above. It is common practice for parties to sign NDAs in order to protect confidential information, such as for instance intellectual property, specific project sites and does do not detract from or limits a specialist to act independently and impartially.

We operate on the assumption that all appointed specialists, including the avifaunal specialist, conduct their work in an ethical, independent manner, in compliance with the EIA Regulations. Both we as the EAP and all specialists have signed declarations of independence, as required under NEMA, confirming that our assessments are conducted impartially.

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Tuesday, August 12, 2025 11:32 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

Time is running out.

Where are the minutes of the meeting as well as a copy of the recorded transcript?

Thanks

On Tue, Aug 12, 2025 at 9:15 AM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Good day Mr Meyer,
>
> I trust that you are well. Kindly note that we will provide our responses to your comments by close of business today.
>
> Kind Regards



Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Wednesday, August 6, 2025 2:56 PM
To: Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Meyer,

Thank you for your email and for taking the time to share your reflections following our meeting on Monday.

We acknowledge receipt of your comments and the additional questions you have raised. We appreciate your continued engagement in the process and will respond to your queries as soon as possible.

Should you have any further inputs in the meantime, please feel free to share them with us.

Kind Regards,



Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Wednesday, August 6, 2025 1:47 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

The purpose of the meeting was to address concerns of the I&AP's regarding the proposed Sheepmoor and Emvelo WEF's. The applicant gives the impression that they are not interested in taking any action regarding the I&AP's concerns and attend it only to avoid negative reflection. Therefore the meeting created unfortunately more questions than answers. Your EAP's input was also disappointing.

We urgently need clarification and answers on the following

1 - The EAP is expected to participate and actively engage with the impacted community. Why has my request for a meeting since February 2025 repeatedly declined and pushed in at the 11th hour?

2 - Do you as EAP feel that the process has been credible and transparent as well as accountable in circumstances where you reach out and respond to a request for a meeting at the 11th hour? How is that considered to be meaningful and in the spirit of the constitution?

3 - Why are biodiversity related issues only being property investigated at the 11th hour although the Provincial Department requested it in the scoping phase?

4 - Why are requested documentation regarding the additional 3 months extension granted by DFFE to the applicant still outstanding?

5 - Are you as EAP confident that the data and modelling that has been undertaken to address bird related impacts and specifically the martial eagle is accurate and credible? If so, please explain why.

6 - Are you as EAP confident and can you confirm in writing that the data that is being obtained in relation to the martial eagle was correctly obtained and in accordance with all minimal standards and legal criteria?

7 - Are you as EAP comfortable that if the tagging of the martial eagle were done without a valid permit, that the tagged data can still be used in the specialist report? If so, please explain why.

8 - Are you as EAP in acceptance that the permits to tag the martial eagles, also the one at Verkykerskop, were not presented at the meeting? If so, please explain why.

9 - Are you as EAP confident that all the recommendations in the specialist reports and specifically the Social report are satisfactorily addressed? If not, please explain why.

10 - It became clear in the meeting that none of the affected landowners are prepared to allow the proposed powerline over their properties. Are AEP comfortable to support an application without a secured powerline route?

11 - The avifaunal specialist signed a NDA (non disclosure agreement) with the applicant and it was also revealed in the meeting by the applicant that they collectively determined the shaped exclusion zones for the southern bald ibis. Are you as EAP comfortable that it is not in contradiction with the declaration the avifaunal specialist signed as independant specialist? If so, please explain why.

Due to the time constraint answers required before the 11/08/2025.

Regards

On Sun, Aug 3, 2025 at 12:36 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Mr Meyer,
>
> Thank you for confirming the meeting for 12h00 tomorrow, 4 August, at your farm. That time works perfectly, and we look forward to meeting with you.
>
> If you would kindly share the physical address or GPS coordinates for the entrance to your farm, it would be greatly appreciated to ensure we arrive without any difficulty.
>
> There will be five people attending the meeting, including myself.

Should there be anything further you would like us to prepare or bring along for the meeting, please don't hesitate to let us know, we'll be happy to assist in any way we can.

Kind regards,



Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, August 1, 2025 1:29 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Good day
Monday is fine with me
I did inform Johans also
Will 12h00 be convenient for you?
How may people?
Regards

On Fri, 01 Aug 2025, 11:42 ERM Arcus Amsterdam, <ERM.ArcusAmsterdam@erm.com> wrote:

> Good Morning Mr Meyer,
>
> Thank you for your response. If you feel Monday is too short availability, please do not feel rushed. We would be happy to accommodate you later in the week. We will await your feedback and move accordingly from there.
>
> Kind Regards,
>
>
> 
>
>
> **Lucien Barbeau**
> Senior Consultant
>
> Cape Town [redacted] **erm.com**
>
>
> ---
>
> **From:** Josua Meyer <meyerjosua55@gmail.com>
> **Sent:** Thursday, July 31, 2025 6:13 PM
> **To:** Lucien Barbeau <Lucien.Barbeau@erm.com>
> **Cc:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
> **Subject:** Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Some people who received this message don't often get email from meyerjosua55@gmail.com. Learn why this is important
EXTERNAL MESSAGE

Goodday
Will confirm tomorrow before 12h00
Thanks

On Thu, Jul 31, 2025 at 2:22 PM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Dear Mr Meyer,
>
> I hope this message finds you well.
>
> I'm writing to kindly follow up on our proposed meeting scheduled for Monday, 4 August at 13:00 at your farm. We would appreciate it if you could please confirm whether you are still available to meet on that date.
>
> Should you require any additional information or documentation ahead of the meeting, beyond what you have already requested, please don't hesitate to let me know, I'd be happy to assist.
>
> Looking forward to your confirmation.
>
> Kind regards,

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Monday, July 28, 2025 11:49 AM
To: Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Meyer,

Following discussions with the applicant, unfortunately it will not be possible to schedule a meeting prior to 1 August due to limited availability.

However, we would be pleased to meet with you on Monday the 4th of August 2025 at 13:00, as per your request, at your farm.

Kindly confirm whether this date and time are suitable, and please advise who will be attending the meeting from your side.

I will continue to provide you with the requested documentation ahead of the meeting.

Kind regards,

Lucien Barbeau
Senior Consultant

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Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 25, 2025 5:11 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

Proposed date for the meeting seems to be too close to submission of comments which is already 9/08/25.

Can you arrange the meeting for us before 1/07/2025.

Can you in the meantime forward the detail previously requested

- All the documentation with Department concerning the 3 months extension granted even after time lapps to submit final report

- Mulilo's permits to fit telemetry device on the two martial eagles

- AfriAvian motivation for altering Figure 33 in both avifaunal reports

Above info are urgently required and no reason to wait for the meeting

Regards

Josua

On Tue, Jul 22, 2025 at 10:30 AM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Hi Lucien
>
> There might be a mistake in your day or date ..... 7 August 2025 is a Thursday.
>
> Nevertheless the 6 or 7 th August 2025 is fine with us.
>
> Will appreciate it if we can meet on my farm.
>
> We intend to be three (3) I&AP
>
> Regards
>
> Josua Meyer
>
> On Mon, Jul 21, 2025 at 11:36 AM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:
>
> > Dear Mr. Meyer,
> >
> > Good day, and thank you for your recent correspondence regarding the Draft EIA Reports.

We acknowledge your request for a meeting to discuss the concerns raised. In consultation with the applicant, Mulilo, we are proposing a provisional date of Wednesday, 7 August 2025, with the meeting to be held at a venue in Ermelo. Kindly confirm whether this date is suitable for you and whether you will be attending alone or accompanied by others.

As a registered I&AP, your comments form an important part of the formal public participation process and will be incorporated into the Final EIA Reports. We also acknowledge the concerns raised regarding the tagging of the Martial Eagles. Relevant documentation, including permits, will be made available where appropriate to support transparency and clarity during the engagement.

We look forward to your response.

Kind Regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 18, 2025 4:51 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Johans Van Wyk <Piwy@mulilo.com>; Lloyd@mulilo.com
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday mr Lucien Barbeau,

Referring to your email dated 7/04/2025 it will be appreciated if you can arrange such a meeting urgently before the 9/08/2025 with the applicant, Mulilo, on site.

Concerns as previously raised with Mulilo in an email dated 19/02/2025 will be on the agenda. That request for a meeting was refused by Mulilo.

Another urgent item which also must be discussed is the tagging of the two martial eagles. According to the MTPA report in my possession, the martial eagles were tagged by Mulilo without a permit. Copy of the report can be provided at the meeting.

That leaves the tagging of the martial eagles illegally, if not criminal.

Therefore the data being used in the specialist report is illegally obtained and all sections, models and references where data has been used must be removed from the report.

Looking forward to your urgent response.

Regards

Josua Meyer (I&AP)

On Wed, Jul 16, 2025 at 4:41 PM Josua Meyer <meyerjosua55@gmail.com> wrote:

Goodday Sir

The avifaunal specialist removed in both reports, Sheepmoor WEF and Emvelo WEF, the High Sensitivity - Turbine Exclusion Zone in Figures 33 for the aquatic buffer zones from an avifaunal perspective.

It must be an unintentional mistake and request reinstatement of it.

If it was deliberate we request the detailed reasoning and motivation for such a drastic decision.

Thanks

Josua Meyer

On Wed, Jul 16, 2025 at 1:54 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Interested and Affected Party,
>
> Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.
>
> The revised comment period now ends on 15 August 2025.
>
> All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.
>
> Thank you for your continued participation.
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Senior Consultant
>
> Cape Town [redacted] **erm.com**
>
> **From:** ERM Arcus Amsterdam
> **Sent:** Tuesday, July 15, 2025 4:43 PM
> **To:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
> **Subject:** Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
>
> SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER
>
> Dear Interested and Affected Party,
>
> This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
>
> Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Stephanie Gopaul
Sent on: Friday, 15 August 2025 15:19:33
To: ERM Arcus Amsterdam
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Lucien

But we do have to capture it now and respond- we can even state that it was outside the comment period etc.

Stephanie Gopaul
Partner
She/Her/Hers

Durban
0656660066

erm.com

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, August 15, 2025 3:15 PM
To: Lloyd Barnes <Lloyd@mulilo.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Anton Lohse <Anton@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <Andrew@mulilo.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Lloyd,

Please note that we do not have a response for this I&AP comment, as it was submitted outside of the designated public participation period at the time.

Kind Regards

ERM
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Lucien Barbeau
Senior Consultant

Cape Town
[redacted]

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From: Lloyd Barnes <Lloyd@mulilo.com>
Sent: Friday, August 15, 2025 11:22 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Anton Lohse <Anton@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <Andrew@mulilo.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

Could you please provide the response sent to the I&AP on the 22nd of April?

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
www.mulilo.com

mulilo

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Wednesday, 13 August 2025 16:47
To: Lloyd Barnes <Lloyd@mulilo.com>
Cc: Anton Lohse <Anton@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <Andrew@mulilo.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

Hi Lloyd,

Please note that we have received comments and concerns from an I&AP who operates a landing strip near the proposed development.

These comments were originally submitted on 22 April after the previous Draft EIA Phase PPP period. The I&AP has now resubmitted the same comments during the current PPP period.

Given the nature of the concerns raised, and that the submission has come via the I&AP's legal representative, we kindly request that the Mulilo legal team review the comments and provide any necessary input.

Regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Riaan Meintjes <riaan@themis.co.za>
Sent: Thursday, August 7, 2025 1:48 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

You don't often get email from riaan@themis.co.za. Learn why this is important
EXTERNAL MESSAGE

Dear Sir/Madam

We have briefly perused the draft EIA report and have been unable to find any reference to the comment submitted by us on the instructions of our client, a copy of which is attached to this email.

Kindly refer us to the relevant pages of the draft report which deal with our client's comments?

We further note from the draft report that a formal application has been lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted. Kindly furnish us with a copy of this application and all communications to and from ATNS relating thereto.

We look forward to hearing from you as a matter of urgency.

Regards
Riaan Meintjes
Director

BusinessDay Best Lawyers for 2025: Arbitration and Mediation; Litigation; Real Estate Law

[redacted]
W: www.themislawchambers.co.za
Unit 1, Roeland Square
Corner of Roeland Street and Drury Lane
Cape Town, 8001

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Date: Wednesday, 16 July 2025 at 13:55
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Interested and Affected Party,

Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.

The revised comment period now ends on 15 August 2025.

All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.

Thank you for your continued participation.

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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Prior to making any payment to our firm, please confirm the banking details telephonically with one of our directors as listed on our website. We will never send you an email advising you of a change of our banking details. Any email mentioning a change of banking details is false, and we ask that you kindly contact one of our directors immediately should you receive such an email.

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From: Josua Meyer
Sent on: Friday, 15 August 2025 15:47:55
To: ERM Arcus Amsterdam
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

My comments were sent from Postnet, Ermelo due to lack of scanning facilities.

Can you please acknowledge if you received all 28 page.

Thanks

On Fri, Aug 15, 2025 at 10:50 AM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Good day Mr Meyer,
>
> Thank you for your email and your responses. We acknowledge receipt of your comments and confirm that they will be incorporated into the Comments and Responses Report for the proposed development.
>
> A formal response to your comments will be provided within that report, which will form part of the Final EIA submission to the DFFE.
>
> Kind Regards,
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Senior Consultant
> Cape Town [redacted] **erm.com**
>
> **From:** Josua Meyer <meyerjosua55@gmail.com>
> **Sent:** Thursday, August 14, 2025 10:44 PM
> **To:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
> **Cc:** Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>
> **Subject:** Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Dear Lucien

Just want to get the records straight without getting into an informal debate

1 - 4 : Correspondence

- Request info from ERM, Mr Lucien Barbeau, on 17/12/2024 at 11h04.

  Still no response ?

- First request for meeting to applicant, mr Johans van Wyk, on 19/2/2025 at 12h35.

  Applicant, mr Johans van Wyk, reject request on 19/02/2025 at 15h35

  First formal request for meeting through ERM on 16/4/2025 at 03h24. No response ?

  Request again for meeting through ERM, Mr Lucien Barbeau, on 18/07/2025 at 16h51.

  Meeting took place on 4/08/2025.

  Almost 8 months later!?

- Requested on 16/06/2025 for official documentation concerning the 3 month extension.

  Repeat request during meeting of 4/08/2025

  Received info only on 12/08/2025

  Almost 2 month later?!

- Request tagged data of two martial eagles from ERM on 11/03/2025 at 10h59

  Repeat request for tagged data from ERM on 29/03/2025 at 11h44

  Received refusal of data in email from applicant, mr Johans van Wyk, on 14/4/2025 at 20h40. ERM was also CC.

  Remind ERM, Mr Barbeau, on 15/04/2025 at 22h11 that formal answer on request for tagged data is still outstanding.

  Still no response from ERM !!

Is that what you and ERM means by **CREDIBLE, TRANSPARENT and ACCOUNTABLE?**

5 - 8 : Tagged data

Mulilo and EWT is in a partnership, confirmed in email from mr Johans van Wyk, in tagging the birds and therefore co-accountable for each other's conduct

The issue is not who did wrong but is the tagging done with a valid permit.?

If not, then it is illegal and that also implies for the data obtained by the unlawful act.

What ERM says by implication is that they are comfortable in driving a stolen vehicle as long as it is to their advantage?

Very dangerous and controversial approach..

We still insist that everything connected to the tagged data must be removed from the avifaunal report because it is illegally obtained regardless who did it.

The avifaunal specialist used the Verkykerkop tagged data in his report and on that ground we requested the permit to tagg that eagle (Bred)

9 - 11 : Specialist report and NDA

Mr Moodie strongly opposed the powerline crossing his farms and that also without consulting him.That was the main reason why Mr Moodie attended the meeting. Maybe you did not pick it up because Mr Moodie spoke Afrikaans.

Will address the rest in my comments.

Regards

Josua Meyer

On Tue, Aug 12, 2025 at 12:08 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Good day Mr Meyer,
>
> Please find below our responses to your comments.
>
> We are in the process of finalising the meeting minutes, which will be shared with you before the end of this week.
> Thank you

1 - The EAP is expected to participate and actively engage with the impacted community. Why has my request for a meeting since February 2025 repeatedly declined and pushed in at the 11th hour?

MULILO: The applicant regrets that the *ad hoc* meeting request sent by you to the applicant in February this year was not attended to immediately. Unfortunately, the request for a private meeting with the applicant was not seen at the time by the applicant's representatives, and the applicant sincerely apologises for any frustration this may have caused you. The applicant and EAP remain committed to engaging with I&APs, and the in-person meeting requested by yourself, and attended by me as the appointed EAP for this project, and by the applicant's representatives, on the 4th of August 2025 was welcomed and seen to constitute substantive progress in responding to your queries. Your queries, and these responses, will obviously form part of the Comments and Responses Report included together with the next draft of the EIA Report.

ERM: As the EAP, we are committed to engaging meaningfully with Interested and Affected Parties (I&APs) in accordance with the requirements of the Environmental Impact Assessment (EIA) Regulations under NEMA. We have undertaken all necessary steps and where possible, gone beyond these requirements to engage with the community. This has included an additional focus group meeting with you at a mutually suitable time within the regulated timelines to address your concerns. All I&AP comments have been acknowledged, and this engagement process remains ongoing.

2 - Do you as EAP feel that the process has been credible and transparent as well as accountable in circumstances where you reach out and respond to a request for a meeting at the 11th hour? How is that considered to be meaningful and in the spirit of the constitution?

ERM take the principles of credibility, transparency, and accountability in the EIA process very seriously. In this case, we regret that your initial request for a private meeting with the applicant, sent to the applicant in February, was not seen at the time by the applicant. Had it been, ERM would have engaged with you much earlier. Please include the EAP in such requests in order to ensure this is not missed in the future. The recent outreach was made in good faith. Once ERM became aware of your request for a meeting, ERM responded promptly in an effort to engage meaningfully and ensure your views are heard.

While ERM acknowledges that earlier engagement would have been preferable, we remain fully open to meeting and engaging in a meaningful and constructive way as the EIA process continues. ERM sees this as part of our commitment to upholding the intent and spirit of public participation, as set out in the Constitution and in NEMA and the 2014 NEMA EIA Regulations.

We believe that the EIA process we are facilitating has been credible, transparent, and accountable, in line with the requirements of NEMA. While the timing of certain engagements is sometimes influenced by the availability of multiple parties, we made every effort to accommodate your request for a meeting within the regulated timeframe. The process remains open, transparent, and documented for review by the competent authority.

3 - Why are biodiversity related issues only being property investigated at the 11th hour although the Provincial Department requested it in the scoping phase?

During the scoping phase, it was noted that a biodiversity offset may be required based on final layouts proposed. However, this indication was based on preliminary findings and initial specialist inputs, which were still being refined at the time. As is typical in EIA processes, more detailed and site-specific assessments only become available

during the impact assessment phase, once the full suite of specialist studies is completed and verified. It is on the basis of these completed studies that a more accurate determination of residual impacts, and thus the need for and scale of a biodiversity offset, can be made.

We understand the importance of early clarity, but it's also essential that such recommendations are based on robust, defensible data. That said, ERM has aimed to finalise and address these issues as efficiently and transparently as possible once the necessary information became available.

Biodiversity-related issues have been considered from the outset of the EIA process, beginning in the scoping phase. The assessment has been iterative, with the project layout being amended several times to address environmental sensitivities and viability concerns, including biodiversity matters. These changes are documented in the Comments and Responses Report (CRR) and specialist assessments.

4 - Why are requested documentation regarding the additional 3 months extension granted by DFFE to the applicant still outstanding?

Please see the attached correspondence as requested.

5 - Are you as EAP confident that the data and modelling that has been undertaken to address bird related impacts and specifically the martial eagle is accurate and credible? If so, please explain why.

The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible.

The appointed avifaunal specialist is an expert in the field of wind energy facility impacts on birds. Based on their expertise and experience, we have no reason to doubt the accuracy, credibility, and applicability of the data and modelling undertaken for this assessment.

6 - Are you as EAP confident and can you confirm in writing that the data that is being obtained in relation to the martial eagle was correctly obtained and in accordance with all minimal standards and legal criteria?

As illuded to in our response to Point 5 above. The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit

in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report.

This permitting process is separate from the EIA, and as the EAP we do not have direct oversight over it.

7 - Are you as EAP comfortable that if the tagging of the martial eagle were done without a valid permit, that the tagged data can still be used in the specialist report? If so, please explain why.

The legality of the data collection process is the responsibility of the avifaunal specialist and the applicant. It is our understanding that a permit for such activities is legally required, and that the data included in the specialist report was provided on the basis that the necessary permit was obtained.

The data collected from the tagged Martial Eagle is invaluable. It provides critical insight into the bird's movements and habitat use, which directly strengthens the EIA findings; informs a more effective mitigation strategy; and ultimately, enhances the likely further and better protection of the species. As explained in Point 5 above – the EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The applicant was informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible.

8 - Are you as EAP in acceptance that the permits to tag the martial eagles, also the one at Verkykerskop, were not presented at the meeting? If so, please explain why.

The proposed Verkykerskop Wind Farm cluster is not a part of the proposed Emvelo and Sheepmoor wind farms and are consequently not relevant or applicable to the current process. The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible.

As a general practice, fieldwork permits obtained by specialists are not typically presented during stakeholder engagement or I&AP meetings.

9 - Are you as EAP confident that all the recommendations in the specialist reports and specifically the Social report are satisfactorily addressed? If not, please explain why.

In the specialist reports, including the Social Impact Assessment, have been carefully considered and addressed to the extent possible within the on-going EIA process, and that will continue to be the case. Where certain recommendations require further action, these have been clearly outlined for implementation during the construction and operational phases, and will be monitored through the Environmental Management Programme (EMPr).

We have reviewed the social specialist's findings and recommendations and accept them as valid and credible, given the specialist's expertise in the field. Recommendations and mitigation measures that could reasonably be incorporated into the Environmental Management Programme (EMPr) have been included. If there are specific recommendations you believe have not been adequately addressed, please let us know so that we can review them.

10 - It became clear in the meeting that none of the affected landowners are prepared to allow the proposed powerline over their properties. Are AEP comfortable to support an application without a secured powerline route?

Thank you for raising this important point.

While the EIA process does not require landowner consent for linear infrastructure at this stage, the applicant is committed to engaging in good faith negotiations with affected landowners to secure the necessary servitudes following the achievement of the EA. The landowner in question (Mr Moodie) did not formally raise any objections. He advised that the routing could be relooked at in due course. In recognition of the risks involved, and in the context of the NEMA EIA Regulations' requirement to consider reasonable and feasible alternatives, alternative powerline routes have also been assessed as part of the EIA to reduce potential impacts and improve the likelihood of an acceptable alignment being secured. The other landowners did not formally raise any objections yet and formal discussions still need to take place with these landowners to the extent that the OHL needs to traverse their respective properties.

The routing referred to in your comment is an alternative powerline route considered, and is not the preferred route. Our role as the EAP is to independently assess the potential impacts of alternatives, identify mitigation measures to reduce impacts to acceptable levels, and provide an informed opinion on the acceptability of the project. The final decision on whether the project may proceed rests with the DFFE.

11 - The avifaunal specialist signed a NDA (non disclosure agreement) with the applicant and it was also revealed in the meeting by the applicant that they collectively determined the shaped exclusion zones for the southern bald ibis. Are you as EAP comfortable that it is not in contradiction with the declaration the avifaunal specialist signed as independant specialist? If so, please explain why.

The avifaunal exclusion zones are proposed by the appointed avifaunal specialist alone, informed by additional avifaunal studies commissioned by the applicant. The applicant has no role to play in determining the shape or size of proposed buffers. Please also see my response to your fifth question, above. It is common practice for parties to sign NDAs in order to protect confidential information, such as for instance intellectual property, specific project sites and does do not detract from or limits a specialist to act independently and impartially.

We operate on the assumption that all appointed specialists, including the avifaunal specialist, conduct their work in an ethical, independent manner, in compliance with the EIA Regulations. Both we as the EAP and all specialists have signed declarations of independence, as required under NEMA, confirming that our assessments are conducted impartially.

ERM

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Tuesday, August 12, 2025 11:32 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

Time is running out.

Where are the minutes of the meeting as well as a copy of the recorded transcript?

Thanks

On Tue, Aug 12, 2025 at 9:15 AM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Good day Mr Meyer,

I trust that you are well. Kindly note that we will provide our responses to your comments by close of business today.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Wednesday, August 6, 2025 2:56 PM
To: Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Meyer,

Thank you for your email and for taking the time to share your reflections following our meeting on Monday.

We acknowledge receipt of your comments and the additional questions you have raised. We appreciate your continued engagement in the process and will respond to your queries as soon as possible.

Should you have any further inputs in the meantime, please feel free to share them with us.

Kind Regards,

Lucien Barbeau
Senior Consultant

Sustainability is our business

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Wednesday, August 6, 2025 1:47 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

The purpose of the meeting was to address concerns of the I&AP's regarding the proposed Sheepmoor and Emvelo WEF's. The applicant gives the impression that they are not interested in taking any action regarding the I&AP's concerns and attend it only to avoid negative reflection. Therefore the meeting created unfortunately more questions than answers. Your EAP's input was also disappointing.

We urgently need clarification and answers on the following

1 - The EAP is expected to participate and actively engage with the impacted community. Why has my request for a meeting since February 2025 repeatedly declined and pushed in at the 11th hour?

2 - Do you as EAP feel that the process has been credible and transparent as well as accountable in circumstances where you reach out and respond to a request for a meeting at the 11th hour? How is that considered to be meaningful and in the spirit of the constitution?

3 - Why are biodiversity related issues only being property investigated at the 11th hour although the Provincial Department requested it in the scoping phase?

4 - Why are requested documentation regarding the additional 3 months extension granted by DFFE to the applicant still outstanding?

5 - Are you as EAP confident that the data and modelling that has been undertaken to address bird related impacts and specifically the martial eagle is accurate and credible? If so, please explain why.

6 - Are you as EAP confident and can you confirm in writing that the data that is being obtained in relation to the martial eagle was correctly obtained and in accordance with all minimal standards and legal criteria?

7 - Are you as EAP comfortable that if the tagging of the martial eagle were done without a valid permit, that the tagged data can still be used in the specialist report? If so, please explain why.

8 - Are you as EAP in acceptance that the permits to tag the martial eagles, also the one at Verkykerskop, were not presented at the meeting? If so, please explain why.

9 - Are you as EAP confident that all the recommendations in the specialist reports and specifically the Social report are satisfactorily addressed? If not, please explain why.

10 - It became clear in the meeting that none of the affected landowners are prepared to allow the proposed powerline over their properties. Are AEP comfortable to support an application without a secured powerline route?

11 - The avifaunal specialist signed a NDA (non disclosure agreement) with the applicant and it was also revealed in the meeting by the applicant that they collectively determined the shaped exclusion zones for the southern bald ibis. Are you as EAP comfortable that it is not in contradiction with the declaration the avifaunal specialist signed as independant specialist? If so, please explain why.

Due to the time constraint answers required before the 11/08/2025.

Regards

On Sun, Aug 3, 2025 at 12:36 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Mr Meyer,
>
> Thank you for confirming the meeting for 12h00 tomorrow, 4 August, at your farm. That time works perfectly, and we look forward to meeting with you.
>
> If you would kindly share the physical address or GPS coordinates for the entrance to your farm, it would be greatly appreciated to ensure we arrive without any difficulty.

There will be five people attending the meeting, including myself.

Should there be anything further you would like us to prepare or bring along for the meeting, please don't hesitate to let us know, we'll be happy to assist in any way we can.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, August 1, 2025 1:29 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Good day

Monday is fine with me

I did inform Johans also

Will 12h00 be convenient for you?

How may people?

Regards

On Fri, 01 Aug 2025, 11:42 ERM Arcus Amsterdam, <ERM.ArcusAmsterdam@erm.com> wrote:

Good Morning Mr Meyer,

Thank you for your response. If you feel Monday is too short availability, please do not feel rushed. We would be happy to accommodate you later in the week. We will await your feedback and move accordingly from there.

Kind Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Thursday, July 31, 2025 6:13 PM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Some people who received this message don't often get email from meyerjosua55@gmail.com. Learn why this is important
EXTERNAL MESSAGE

Goodday

Will confirm tomorrow before 12h00

Thanks

On Thu, Jul 31, 2025 at 2:22 PM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Dear Mr Meyer,
>
> I hope this message finds you well.

I'm writing to kindly follow up on our proposed meeting scheduled for Monday, 4 August at 13:00 at your farm. We would appreciate it if you could please confirm whether you are still available to meet on that date.

Should you require any additional information or documentation ahead of the meeting, beyond what you have already requested, please don't hesitate to let me know, I'd be happy to assist.

Looking forward to your confirmation.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Monday, July 28, 2025 11:49 AM
To: Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Meyer,

Following discussions with the applicant, unfortunately it will not be possible to schedule a meeting prior to 1 August due to limited availability.

However, we would be pleased to meet with you on Monday the 4th of August 2025 at 13:00, as per your request, at your farm.

Kindly confirm whether this date and time are suitable, and please advise who will be attending the meeting from your side.

I will continue to provide you with the requested documentation ahead of the meeting.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 25, 2025 5:11 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

Proposed date for the meeting seems to be too close to submission of comments which is already 9/08/25.

Can you arrange the meeting for us before 1/07/2025.

Can you in the meantime forward the detail previously requested

- All the documentation with Department concerning the 3 months extension granted even after time lapps to submit final report

- Mulilo's permits to fit telemetry device on the two martial eagles

- AfriAvian motivation for altering Figure 33 in both avifaunal reports

Above info are urgently required and no reason to wait for the meeting

Regards

Josua

On Tue, Jul 22, 2025 at 10:30 AM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Hi Lucien
>
> There might be a mistake in your day or date ..... 7 August 2025 is a Thursday.
>
> Nevertheless the 6 or 7 th August 2025 is fine with us.
>
> Will appreciate it if we can meet on my farm.
>
> We intend to be three (3) I&AP
>
> Regards
>
> Josua Meyer
>
> On Mon, Jul 21, 2025 at 11:36 AM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:
>
> > Dear Mr. Meyer,
> >
> > Good day, and thank you for your recent correspondence regarding the Draft EIA Reports.
> >
> > We acknowledge your request for a meeting to discuss the concerns raised. In consultation with the applicant, Mulilo, we are proposing a provisional date of Wednesday, 7 August 2025, with the meeting to be held at a venue in Ermelo. Kindly confirm whether this date is suitable for you and whether you will be attending alone or accompanied by others.

As a registered I&AP, your comments form an important part of the formal public participation process and will be incorporated into the Final EIA Reports. We also acknowledge the concerns raised regarding the tagging of the Martial Eagles. Relevant documentation, including permits, will be made available where appropriate to support transparency and clarity during the engagement.

We look forward to your response.

Kind Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 18, 2025 4:51 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Johans Van Wyk <Piwy@mulilo.com>; Lloyd@mulilo.com
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday mr Lucien Barbeau,

Referring to your email dated 7/04/2025 it will be appreciated if you can arrange such a meeting urgently before the 9/08/2025 with the applicant, Mulilo, on site.

Concerns as previously raised with Mulilo in an email dated 19/02/2025 will be on the agenda. That request for a meeting was refused by Mulilo.

Another urgent item which also must be discussed is the tagging of the two martial eagles. According to the MTPA report in my possession, the martial eagles were tagged by Mulilo

without a permit. Copy of the report can be provided at the meeting.

That leaves the tagging of the martial eagles illegally, if not criminal.

Therefore the data being used in the specialist report is illegally obtained and all sections, models and references where data has been used must be removed from the report.

Looking forward to your urgent response.

Regards

Josua Meyer (I&AP)

On Wed, Jul 16, 2025 at 4:41 PM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Goodday Sir
>
> The avifaunal specialist removed in both reports, Sheepmoor WEF and Emvelo WEF, the High Sensitivity - Turbine Exclusion Zone in Figures 33 for the aquatic buffer zones from an avifaunal perspective.
>
> It must be an unintentional mistake and request reinstatement of it.
>
> If it was deliberate we request the detailed reasoning and motivation for such a drastic decision.
>
> Thanks
>
> Josua Meyer
>
> On Wed, Jul 16, 2025 at 1:54 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:
>
> > Dear Interested and Affected Party,
> >
> > Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.

The revised comment period now ends on 15 August 2025.

All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.

Thank you for your continued participation.

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs

from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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RICHARD SUMMERS INC.
ATTORNEYS

Morris Environmental & Groundwater Alliances

Our reference: JSM25-001
DFFE ref.: 14/12/16/3/3/2/2611 &
14/12/16/3/3/2/2613

ERM Southern Africa (Pty) Ltd
Attention: Stephanie Gopaul
Email: erm.arcusamsterdam@erm.com
stephanie.gopaul@erm.com

15 August 2025

Dear Stephanie,

RE: COMMENTS ON THE ENVIRONMENTAL IMPACT ASSESSMENT PROCESS FOR THE PROPOSED EMVELO WIND ENERGY FACILITY AND SHEEPMOOR WIND ENERGY FACILITY [DFFE REFERENCE NUMBERS: 14/12/16/3/3/2/2611 & 14/12/16/3/3/2/2613]

1. INTRODUCTION

1.1. This document contains comments on the Environmental Impact Reports ("DEIRs") and associated Annexures for the proposed Emvelo and Sheepmoor Wind Energy Facilities ("WEFs") which were made available to interested and affected parties ("I&APs") during July 2025.

1.2. These comments are submitted on behalf of Mr. Josua Meyer a registered I&AP and owner of Portions 3, 4, 12 and 14 of the Farm Waaihoek No. 286, as well as Portions 4, 5 and 6 of the Farm Onverwacht No. 287, and Portion 7 of the Farm Windhoek No. 291.

1.3. Comments on the first version of the Draft EIA Report (March 2025) were provided within the commenting period timeframe of 30 days (i.e. by 10 April 2025) and covered both the proposed Emvelo and the Sheepmoor WEFs in a single report. ERM have released a second draft of the EIA Report dated July 2025 and the commenting period closes on 15 August 2025. The comments herein are supplementary to those made on the initial Draft EIA Reports of March 2025 and are not to be taken as substituting those earlier comments.

Unit 126, Victoria Junction
57 Prestwich Street
De Waterkant 8001
Cape Town
M [redacted]
E: richard@summersinc.co.za

Director: Richard W. Summers Reg No: 2017/536164/21

PO Box 1251, Sedgefield, 6573, South Africa
Tel: +27 (0)82 789 4139
Email: mjm@megateam.co.za
Web: www.megateam.co.za

Reg No. 1999/069163/23
Vat No. 412 0186921

1.4. It must be noted that the comments, recorded herein, are based on a review of select items using examples primarily from the Sheepmoor Draft EIA Report and associated documents, but apply equally to the proposed Emvelo WEF. This is because the same approach has been adopted by ERM for both projects.

2. FLAWED PUBLIC PARTICIPATION PROCESS (PPP)

User unfriendly documentation places an undue burden placed on I&APs

2.1. As noted in our comments of April 2025, an undue burden is placed on I&APs in the context of being forced to comment simultaneously on the EIA documents related to these two proposed WEFs. This situation has not changed in relation to the current commenting period. Yet again, an undue an unreasonable burden is placed on I&APs to comment on two Draft EIA Reports for two separate applications for the projects located adjacent to each other and proposed by the same Applicant. The commenting periods run concurrently which effectively reduces the opportunity for meaningful public participation.

2.2. In fact, as is noted elsewhere in these comments, the sites of the proposed WEFs have changed, such that they overlap to some extent. This points to the fact that separating these applications is a ruse and that it is unjustified and unreasonable to treat these as two separate applications. It serves no logical impact management purpose and simply places an undue and undesirable burden on the EIA system – I&APs, the commenting authorities and the Competent Authority.

2.3. Also noted in our comments of April 2025, the PPP reports for the respective proposed WEFs are difficult to follow. This situation persists with the current reports– no discernible effort by the EAP has been made to make these documents more user-friendly in this 'second version' of the Draft EIA Report.

2.4. There is extensive duplication of the same correspondence, which makes it an arduous exercise to track the sequence of different activities undertaken and also the issues raised by I&APs (Appendix 6 of the PPP report). Some correspondence is repeated more than 10 times. It also makes it exceedingly difficult to find the original comments made by an I&AP. This adds to the unfair burden on I&APs and reduces the opportunity for meaningful public participation.

2.5. In certain instances, one cannot read the original comments in their entirety (i.e. read the full letter or email from submitted by an I&AP) as the original communication is not provided. Thus, in these cases comments are only available in a disjointed point-by-point fashion in a tabular format (i.e. Section 7 – Comments and Responses Report in Volume III - PPP Report), hereafter referred to as the CRR. This adds to the unfair burden on I&APs and reduces the opportunity for meaningful public participation.

2.6. The burden placed on I&APs is exacerbated by the fact that the EAP has not clearly indicated or described what has changed, such as which specialist reports have been revised or which sections of the Draft EIA Reports have been updated. In addition, the documents themselves

do not show where changes have been made through use of underlining or a different colour text. This means I&APs are faced with having to compare the two draft reports (version 1 with version 2) to ascertain what changes have been made. Clearly this is wholly unreasonable and constitutes unfair process.

DFFE requirements in respect of PPP not met

2.7. The requirement by the DFFE which were communicated to the EAP regarding inclusion of original comments have not been met (see Sheepmoor PPP Report, Section 7 - CRR, page 47).

2.8. DFFE stated that: "Copies of the original comments received from I&APs and organs of state, which have jurisdiction in respect of the proposed activity, must be submitted with the Final EIAr." If these comments are required for the Final EIR Report, then it follows that must also be available in the Draft EIA Reports. Examples of missing original comments are:

2.8.1. Most notably, the **original comments on the first version of the Draft EIA Report** (dated March 2025) from DARDLEA and MTPA **are not provided** in the CRR, which forms part of the suite of documents that make up the July 2025 Draft EIA Report. These comments were submitted on 10 April 2025 (as per the CRR), but the original submissions are not included in the PPP Reports. This is the case for both Emvelo and Sheepmoor. This has been fact-checked through searching for DARDLEA, 10 April 2025, April 2025 as well as scrolling through Appendix 6 of the CRR. The EAP is requested to explain this material omission.

2.8.2. The comments submitted by Richard Summers Inc. and MEGA on the March 2025 Draft EIA Reports are ignored and not included. Email communication dated 10 April 2025 from Richard Summers Inc to ERM confirming that comments had been submitted is included in Appendix 6 of the CRR (see pages 371 and 372 Emvelo CRR and pages 377-379 Sheepmoor CRR). Several searches of both CRRs have been conducted, using various search terms as well as scrolling slowly through the respective documents. **The comments are nowhere to be found**. The EAP is requested to explain this material omission.

2.9. The DFFE also required the following: "All issues raised and comments received during the circulation of the SR and draft EIAr from registered Interested and Affected Parties (I&APs) and organs of state, as listed in your I&APs Database, and others which have jurisdiction in respect of the proposed activity must be adequately addressed and included in the final EIAr" (see Sheepmoor PPP Report, Section 7 - CRR, page 46). This also has not been achieved:

2.9.1. The aforementioned comments from Richard Summers Inc are not recorded in the CRR tables in either of the CRR reports (See Section 7). This means they have been completely ignored.

2.9.2. The comments of 15 April 2025 from Mr Joshua Meyer are not included in the CRR tables in either of the CRR reports (See Section 7). Since this communication involved follow-up

on previous comments to which Mr Meyer had not received an adequate response, these comments ought to have been included. The relevant correspondence can be found on page 369 of Appendix 6 Emvelo CRR and page 375 of Appendix 6 Sheepmoor CRR.

2.9.3. Two landowners, of which at least one is a neighbour, requested inclusion as an I&AP. These requests were submitted on 9 April 2025 (Mr Braam Moodie) and 4 April 2025 (Restov Boerdery). Neither of these I&APs were afforded a fair opportunity to comment on the Draft EIA Report – they were simply provided with a link to the EIA documentation. There is no evidence of any effort by the EAP to afford them a meaningful opportunity to comment or to assist them in familiarising themselves with the proposed projects and associated EIA process.

2.10. Whilst one of the uses of the CRR by I&APs is the ability to cross-reference a response from the EAP to the relevant section in the Draft EIA Report to see whether the I&AP's input was actually addressed (i.e. a change is discernible in the report) – this is of no use if an I&AP's comments are not recorded in the CRR first place. This is relevant because not all comments are recorded in the CRR. It therefore follows that these comments have not been considered at all.

3. INFORMATION PROVISION AND PRESENTATION

Confusing, unclear and poor-quality information

3.1. The site boundaries shown in the second version of the Draft EIR Report (dated July 2025) differs for both sites relative to the Draft EIA Report issued in March 2025. This is confusing and casts doubt on the accuracy of the information in the reports:

3.1.1. Portions 1, 6 and 5 of Farm 274, Farm Schiedamre are shown in the list of affected farm properties for both Sheepmoor (See Table 0.2) and Emvelo (See Table 0-2).

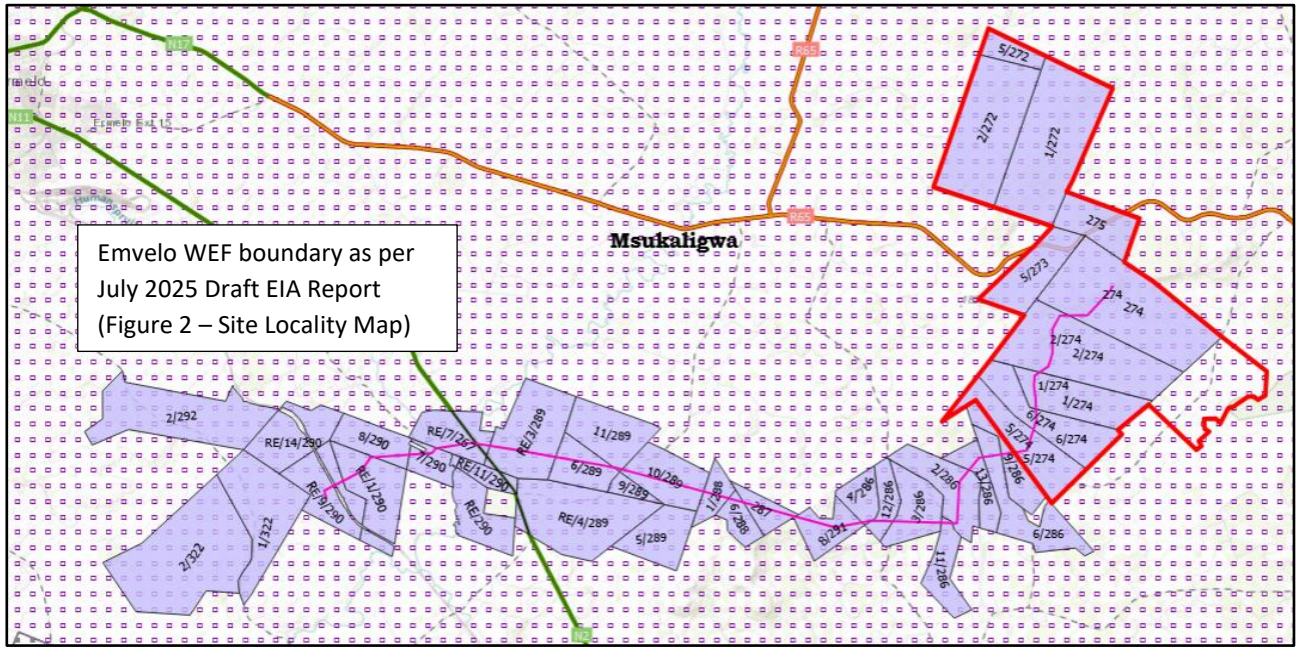
3.1.2. Further to the above, this is the case in both versions of the Draft EIA Reports, that is the March 2025 (Version 1) and July 2025 (Version 2), but the maps and diagrams in the March 2025 Draft EIA Report show a site boundary that does not include the aforementioned properties. This means that tabulated information (Table 0-2) in which affected farm properties are recorded for the proposed Emvelo WEF and the site boundary shown in diagrams and maps are different.

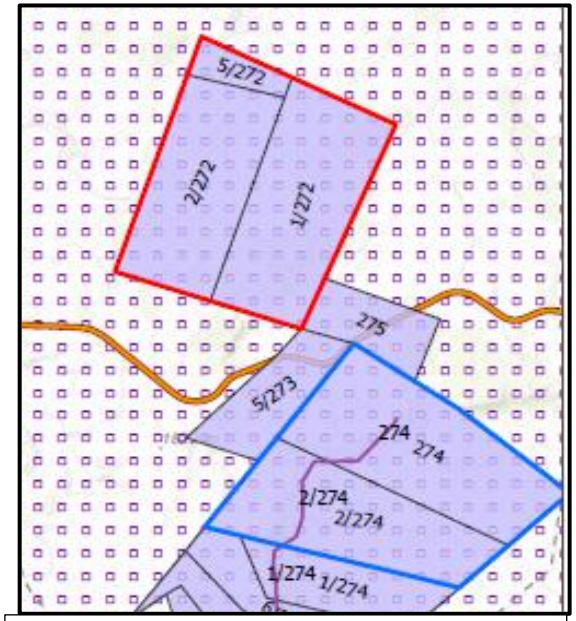
3.1.3. In addition, the site boundary for the proposed Sheepmoor WEF differs in the July 2025 Draft EIA Report, relative to that shown in the earlier version of March 2025. No explanation for the change is given. To add to the confusion, this change is not reflected in all of the maps / diagrams in the July 2025 Draft EIA Report. All of the figures in Section 6: Description of the Baseline Environment in the July 2025 Draft EIA Report show the old site boundary (i.e. as per the March 2025 Draft EIA Report).

3.1.4. The positions of WTGs on the overlapping farm portions (Portions 1, 6 and 5 of Farm 274,

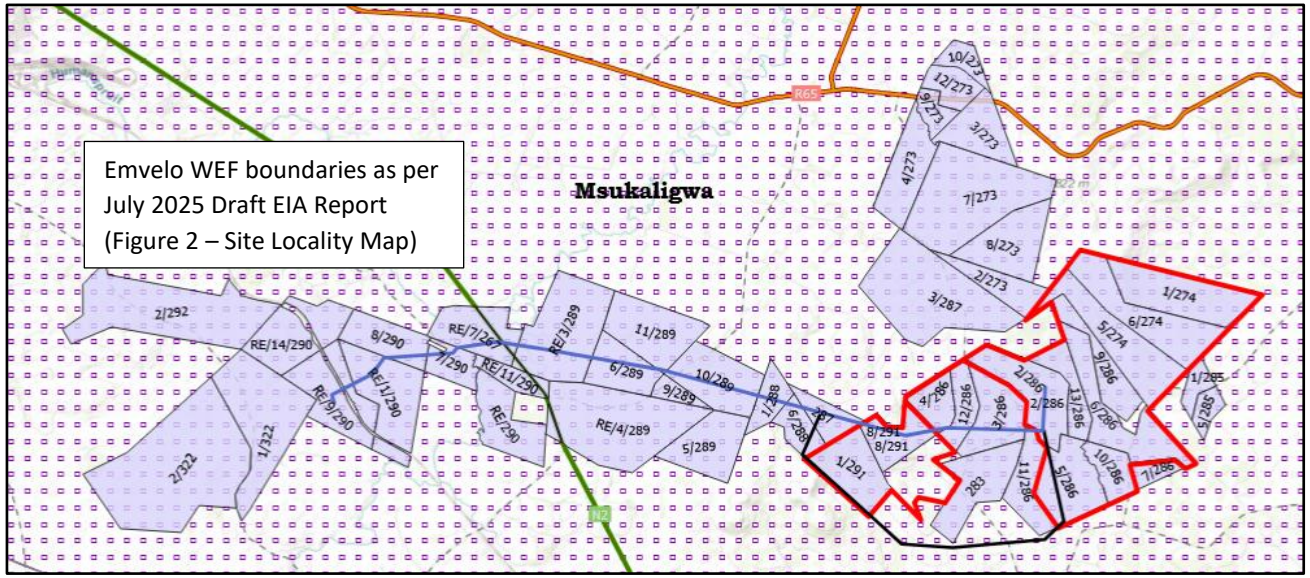
Farm Schiedamre) is unclear. Neither a written description nor a combined diagram showing WTG positions associated with the respective projects on these parcels of land is provided and the project information is materially deficient.

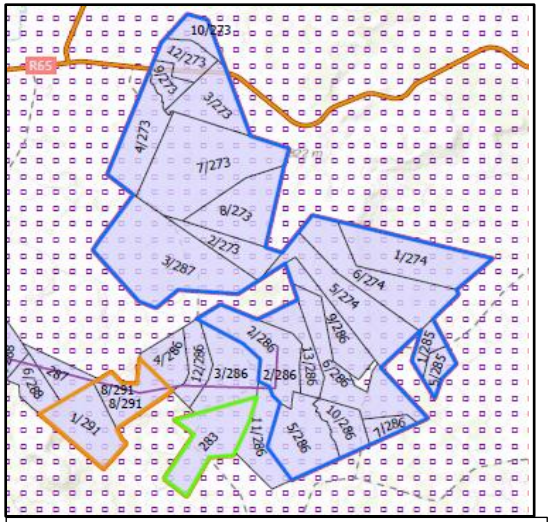
3.2. The evidence for the situation described above is shown in the following diagrams and tables. Boundary coordinates are listed in the tables, which show that no changes have been made to this list of boundary coordinates (the example is taken from the Sheepmoor Draft EIA Reports) provided in the March 2025 versus the July 2025 reports.





Emvelo WEF boundary as per March 2025 Draft EIA Report (Figure 2 – Site Locality Map)





Sheepmoor WEF boundary as per March 2025 Draft EIA Report (Figure 2 – Site Locality Map

Proposed Sheepmoor WEF coordinates

FEATURE	LATITUDE (S)			LONGITUDE (E)		
	DEG	MIN	SEC	DEG	MIN	SEC
Sheepmoor WEF 0.01	26°	33'	03"	30°	16'	20"
Sheepmoor WEF 0.02	26°	37'	21	30°	17	59 "
Sheepmoor WEF 0.03	26°	37'	27"	30°	21'	39"
Sheepmoor WEF 0.04	26°	41'	26"	30°	18'	09"
Sheepmoor WEF 0.05	26°	39'	39"	30°	17'	34 "
Sheepmoor WEF 0.06	26°	38'	32"	30°	16'	30"
Sheepmoor WEF 0.07	26°	38'	11"	30°	18'	16"
Sheepmoor WEF 0.08	26°	37'	32"	30°	18'	02"
Sheepmoor WEF 0.09	26°	38'	20"	30°	15'	48"
Sheepmoor WEF 0.10	26°	37'	18"	30°	14'	42"
Sheepmoor WEF 0.11	26°	36'	18"	30°	15'	24"
Sheepmoor WEF 0.12	26°	35'	56"	30°	14'	57"
Sheepmoor WEF 0.13	26°	40'	14"	30°	13'	46"
Sheepmoor WEF 0.14	26°	39'	29"	30°	15'	01"
Sheepmoor WEF 0.15	26°	39'	43"	30°	15'	28"

WEF boundary positions as given in Draft EIA Report dated March 2025 (Version 1)

Proposed Sheepmoor WEF coordinates

FEATURE	LATITUDE (S)			LONGITUDE (E)		
	DEG	MIN	SEC	DEG	MIN	SEC
Sheepmoor WEF 0.01	26°	33'	03"	30°	16'	20"
Sheepmoor WEF 0.02	26°	37'	21	30°	17	59 "
Sheepmoor WEF 0.03	26°	37'	27"	30°	21'	39"
Sheepmoor WEF 0.04	26°	41'	26"	30°	18'	09"
Sheepmoor WEF 0.05	26°	39'	39"	30°	17'	34 "
Sheepmoor WEF 0.06	26°	38'	32"	30°	16'	30"
Sheepmoor WEF 0.07	26°	38'	11"	30°	18'	16"
Sheepmoor WEF 0.08	26°	37'	32"	30°	18'	02"
Sheepmoor WEF 0.09	26°	38'	20"	30°	15'	48"
Sheepmoor WEF 0.10	26°	37'	18"	30°	14'	42"
Sheepmoor WEF 0.11	26°	36'	18"	30°	15'	24"
Sheepmoor WEF 0.12	26°	35'	56"	30°	14'	57"
Sheepmoor WEF 0.13	26°	40'	14"	30°	13'	46"
Sheepmoor WEF 0.14	26°	39'	29"	30°	15'	01"
Sheepmoor WEF 0.15	26°	39'	43"	30°	15'	28"

WEF boundary positions as given in Draft EIA Report dated July 2025 (Version 2)

Proposed Sheepmoor WEF coordinates						
Sheepmoor WEF 0.16	26°	39'	16"	30°	15'	30"
Sheepmoor WEF 0.17	26°	39'	50"	30°	16'	05"
Sheepmoor WEF 0.18	26°	40'	31"	30°	15'	06"
Sheepmoor WEF 0.19	26°	41'	14"	30°	14'	53"
Sheepmoor WEF 0.20	26°	41'	25"	30°	15'	56"
Sheepmoor WEF 0.21	26°	40'	36"	30°	16'	27"
Sheepmoor WEF 0.22	26°	40'	21"	30°	16'	07"
Sheepmoor WEF 0.23	26°	39'	57"	30°	17'	32"
Sheepmoor WEF 0.24	26°	40'	59"	30°	17'	09"
Sheepmoor WEF 0.25	26°	41'	01"	30°	16'	43"
Sheepmoor WEF 0.26	26°	41'	44"	30°	16'	20"

WEF boundary positions as given in Draft EIA Report dated March 2025 (Version 1)

Proposed Sheepmoor WEF coordinates						
Sheepmoor WEF 0.16	26°	39'	16"	30°	15'	30"
Sheepmoor WEF 0.17	26°	39'	50"	30°	16'	05"
Sheepmoor WEF 0.18	26°	40'	31"	30°	15'	06"
Sheepmoor WEF 0.19	26°	41'	14"	30°	14'	53"
Sheepmoor WEF 0.20	26°	41'	25"	30°	15'	56"
Sheepmoor WEF 0.21	26°	40'	36"	30°	16'	27"
Sheepmoor WEF 0.22	26°	40'	21"	30°	16'	07"
Sheepmoor WEF 0.23	26°	39'	57"	30°	17'	32"
Sheepmoor WEF 0.24	26°	40'	59"	30°	17'	09"
Sheepmoor WEF 0.25	26°	41'	01"	30°	16'	43"
Sheepmoor WEF 0.26	26°	41'	44"	30°	16'	20"

WEF boundary positions as given in Draft EIA Report dated July 2025 (Version 2)

3.3. The result of the situation as described in the foregoing points is that it is wholly unclear to I&APs as to what properties are affected by the proposed WEFs, what the extent of the respective proposed WEF sites actually is, how the two sites overlap in terms of infrastructure, WTGs and environmental constraints or sensitivities. Information which is materially deficient and reporting that is in such a state of disarray is not acceptable at the stage of a Draft EIA Report, which needs to be submitted as a Final EIA Report to the Competent Authority on 25 August 2025. It will not be possible to rectify these material omissions in that timeframe and any Final EIA Report submitted to the Competent Authority on this basis will be materially deficient.

3.4. Based on responses from the EAP in the CRR, it appears the some of the WTGs may have been relocated / moved. These site layout changes are not detailed and the rationale for any such changes is not given in the project description. In fact, the Draft EIA Report is silent on the manner in which the layout has changed and the rationale behind these changes and which were made in response to environmental constraints or sensitivities. Such details and related information are central to determining if a concerted and authentic effort has been made to avoid adverse impacts, in accordance with the precautionary principle and the mitigation hierarchy.

3.5. Coordinates of the WTGs are not provided, and therefore reliance has to be placed on the figures (diagrams), to ascertain where the turbines and other infrastructure is located relative to environmental sensitivities. This makes it confusing for I&APs to appreciate if the impact assessment is informed by credible data. This is exacerbated by the fact that the figures provided by ERM in the March 2025 Draft EIA Report did not have labels on the WTGs because the WTGs are not numbered. This makes it exceedingly difficult for I&APs and the Competent Authority to correlate these figures with those in the July 2025 Draft EIA Report. The lack of WTG coordinate information undermines the ability of I&APs and the Competent Authority to establish whether the position of WTGs has changed in response to concerns about environmental sensitivities.

3.6. Given the foregoing concerns regarding the adequacy and accuracy of information relied on by the EAP and provided in the reports, no reliance can be placed on any statements about WTGs having been relocated / moved in response to noise, biodiversity sensitivities, cultural / heritage resource sensitivities and the like because spatial data shown on maps is confusing, boundaries have changed, the two sites overlap and diagrams and maps in reports have not been updated accordingly.

Assurances given in the CRR have no substance

3.7. In the CRR the EAP has offered assurances to concerned parties that WTGs have been moved / relocated away from sensitive areas. Unfortunately, there are instances where this contention is not borne out by the facts and data contained in the reports. Therefore it must be concluded that these assertions by the EAP must be treated with extreme caution by the Competent Authority.

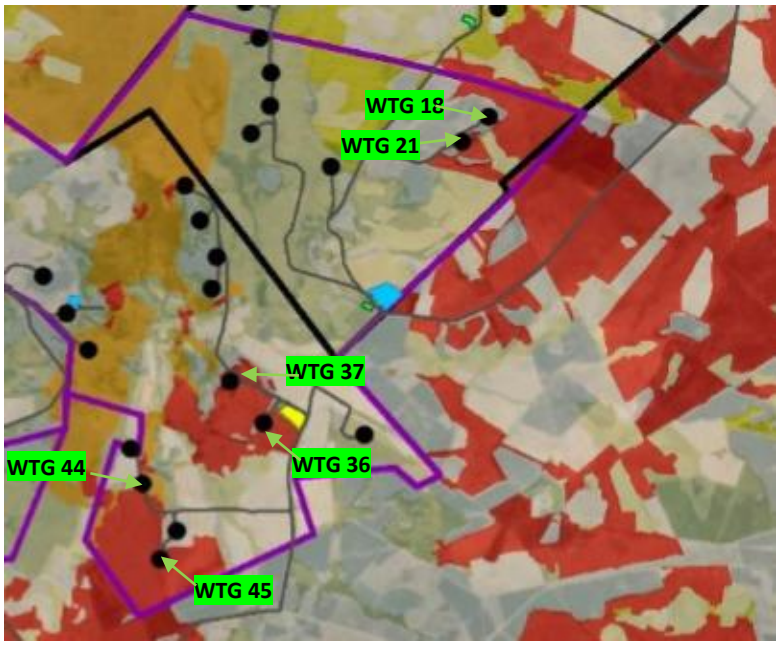
3.8. A specific example is the concern raised by DARDLEA about the location of WTGs in CBA: Irreplaceable areas, with specific mention of Turbine 45. In response the EAP has stated that

this turbine has been "relocated approximately 330 metres southward to ensure complete avoidance of the CBA: Irreplaceable area". Since the Figure 6 – Important Ecological Areas in the Draft EIA Report shows CBAs as a single entity (i.e. does not differentiate according to the CBA: Irreplaceable and CBA: Optimal categories as per the Mpumalanga Biodiversity Sector Plan (MBSP), it is difficult to verify this claim. The information is materially deficient and the Competent Authority, and I&APs are unable to determine – from the reports made available - if the claims made by the EAP are valid. There is too much uncertainty.

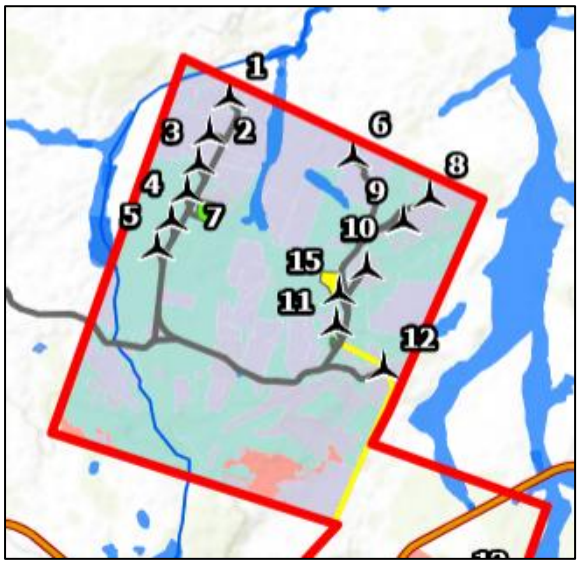
3.9. Accordingly, we considered the diagram on Biodiversity Offset Report prepared by WSP. This shows the CBA: Irreplaceable in accordance with the MBSP. It can be seen that in the case of the proposed Sheepmoor WEF, a number of WTGs fall within or right on the edge of CBA: Irreplaceable. WTG 45 remains located in CBA: Irreplaceable, despite the EAP's contention that it has been moved to completely avoid CBA: Irreplaceable.

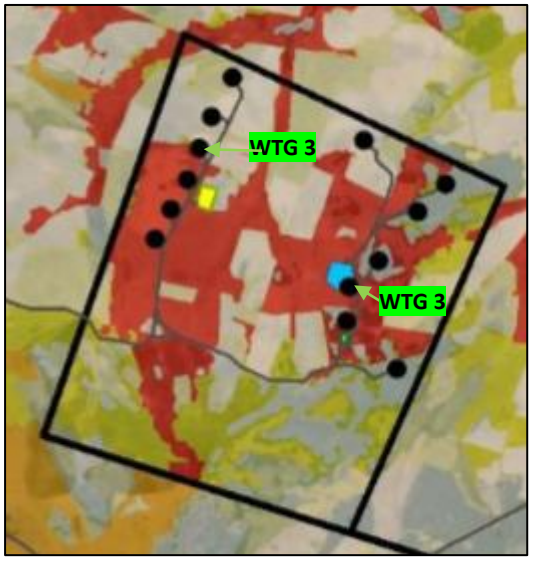
3.10. The contradiction in the documentation is deeply concerning because it misrepresents the correct factual position on the ground. Furthermore, even if it was moved southwards as stated by the EAP, this would not resolve the situation, since CBA: Irreplaceable is present to the south of this turbine.

3.11. What is notable in the case of Sheepmoor is that there are other WTGs sited within CBA: Irreplaceable or on the edge thereof, besides WTG 45: Irreplaceable, namely WTGs 44, 36, 37, 21 and 18. A similar situation exists for Emvelo as can be seen from the WSP Biodiversity Offset Report – Figure 3-1.



WTGs located in CBA: Irreplaceable – Sheepmoor (extract from Figure 3-1 of the WSP Biodiversity Offset Report). According to the key associated with this diagram, red shading shows CBA: Irreplaceable.





3.12. The EAP states "the turbine and infrastructure layout has been revised in accordance with specialist recommendations, with a strong emphasis on avoidance of ecologically sensitive areas. All no-go areas identified by biodiversity specialists have been fully excluded from the final layout." (e.g. Sheepmoor CRR, page 24).

3.13. Concern was raised about WTG 15 being located in a Key Biodiversity Area (KBA) that is untransformed (page 15 Emvelo CRR). In reply the EAP states that WTG 15 was removed from the final layout. This is not the case! Examination of the extract from Figure 6 – Important Ecological Areas (from the figures volume attached to the July 2025 Draft EIA Report) shows that both WTG 3 and WTG 15 remain located in a CBA (green shading), albeit in a different position relative to the March 2025 Draft EIA Report. A construction camp is located next to the WTG and is also shown situated in a CBA. What is the explanation for this? Therefore, the relocation of WTG 15 does not seem to have offered any advantage from an avoidance of an adverse impact on biodiversity perspective. The lower image is extracted from the Biodiversity Offsets Report and it can be seen that both WTG 3 and WTG 15 are situated within CBA: Irreplaceable. Again, it appears that this is mere tick-box exercise by the EAP with no real intent to report accurately.

3.14. The status of the layouts that have been assessed by the EAP is unclear. Terminology is used loosely as shown in the examples below, taken from the July 2025 Draft EIA Report for the proposed Emvelo WEF. The same text is evident in the Draft EIA Report for the proposed Sheepmoor WEF, albeit that the page numbers are different. Examples include:

3.14.1. Page 9 of the Emvelo July 2025 Draft EIA Report under the topic Terrestrial Biodiversity, it is stated that "It is recommended that a final site walkdown be undertaken in order to inform the final layout design and inform micro-siting of footprints."

3.14.2. Yet the project description also references final layout design as not being finalised (page 2): "The proposed turbine footprints and associated facility infrastructure will cover an area of up to 185 ha after rehabilitation, depending on final layout design."

3.14.3. Then on page 13 on the topic of fauna, the following statement is made: "Final layouts of turbine placement, access roads, OHPLs, and other associated developments were provided by ERM on 30 January 2025. The final layout plans indicate that several wind turbines and access roads fall within areas of high faunal sensitivity" .

3.14.4. Page 28: "Prior to the submission of the final layout plan to the DFFE for approval….."

3.15. It is unclear as to what the final layout constitutes because as already noted, in the CRR the EAP makes reference to WTGs being moved in the "final layout". The reports are plagued with inaccuracies and contradictory statements. The credibility of the assessment process is doubtful as so many uncertainties prevail. IN this regard, the following questions arise:

3.15.1. If as noted by the terrestrial biodiversity specialist (for example), final layout plans were provided by ERM in January 2025, then is this the layout that was assessed for the purposes of the March 2025 Draft EIA Report? This is not clear at all from the reports made available to I&APs.

3.15.2. If concerns were raised by I&APs, specifically commenting authorities, about the layout plan presented in the March 2025 Draft EIA Report, and the EAP's response is that this has been resolved in the final layout, then which final layout is this? This is not clear at all from the reports made available to I&APs.

3.15.3. More importantly, why is there a disparity between the EAP's claim that WTGs and infrastructure has been moved / relocated (and thus, according to the EAP, the concerns about environmental sensitivities have been addressed). This is NOT the case. The figures presented in the July 2025 Draft EIA Report, which show definitively that this is not the case, with one or two exceptions (WTG 7 was moved due to the sensitivity of bird species 23).

3.15.4. Why is there reference to the need to do a walkover to develop a final layout and inform micro-siting of turbines and infrastructure, whereas the CRR creates the impression that micrositing has already been done?

3.16. As evident from the foregoing discussion, as well as that in relation to avifaunal sensitivity, any assertion by the EAP that layouts have been changed, WTGs and infrastructure moved to avoid or reduce adverse impacts, are questionable. Such assertions must be interrogated by the Competent Authority and treated with caution. In fact, these claims cannot be relied upon and the manner in which information in this regard has been presented serves to compromise the entire EIA process. Moreover, it undermines the validity of significance ratings (over and above the weaknesses in the rating methodology highlighted in Section 4 of this document) pre-and post-mitigation.

4. INADEQUATE IDENTIFICATION AND ASSESSMENT OF IMPACTS

4.1. As noted in our previous comments (dated April 2025), the significance ratings of impacts reported by the EAP cannot be relied upon. It is inconceivable that in an environment that has so many highly sensitive environmental attributes, that not one single negative impact post-mitigation is rated more than being of 'moderate' significance. In general significance has been understated and this situation persists.

4.2. An example is the way the criterion "extent" is applied. To illustrate this point, avifauna is given as an example using the operational impact "Mortality due to Collisions with Turbines". The first problem is that all birds are considered as a single entity – there is no differentiation between Species of Conservation Concern versus other species. Where a species is listed globally as CE or E, then the extent of any impact that could cause mortality is a major concern at an international level and cannot be rated as medium in terms of extent. It is immediately apparent just from this single example of the criterion of "extent", that the result will be understatement of impact significance.

4.3. Impacts on policies and plans have not been assessed. For example, NPAES (National Protected Area Expansion Strategy) areas occur on the sites of both proposed WEFs. This is not shown on the sensitivity maps / diagrams. In addition, the impact on this strategy has not been assessed. Similarly, the potential impact of the proposed projects on conservation targets and objectives such as those expressed in the or on MBSP have not been assessed. There is also no indication that these types of policies, plans and programmes influenced impact significance rating.

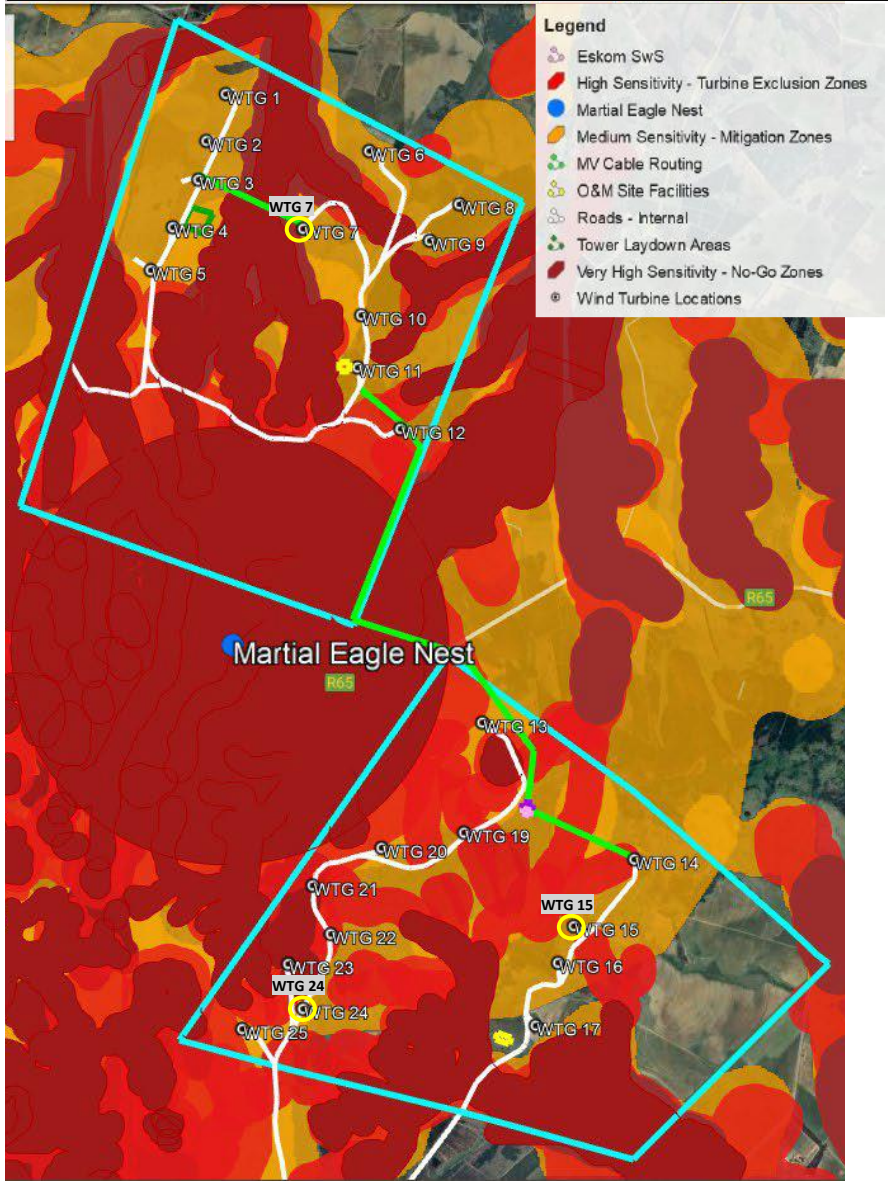
4.4. The figures overleaf (extracted from Figure 39 of the Avifaunal Specialist Study) do show that WTG 7 was moved (in response to the sensitivity of Species 23). Relocation of WTG 15 as described in point 19 would seem to be disadvantageous in the context of Martial Eagle sensitivity. It is located closer to the Martial Eagle buffer (May 2025 Avifaunal Specialist Study) and also closer to the "Very high risk – all infrastructure exclusion zone". It is not known to what extent the relocation of WTG 15 was considered in the May 2025 Avian Specialist Study as no reference could be found to a specific discussion in this regard. Note that changed turbine positions are shown in yellow circles in the diagrams overleaf.

4.5. There are several WTGs that are still located within the Martial Eagle Turbine Exclusion Zone. These are WTGs 12, 13, 14, 19 and 20 are located. This was raised in the comments on the Draft EIA Report dated March 2025 (page 20 Emvelo CRR). In response the EAP states the following: "Noted. WTGs 12, 20 and 21 have been moved outside of the Avifaunal Turbine Exclusion Zone (Martial Eagle nest buffer), and WTG 13 has been micro sited to be located further away with the rotor swept area also not intersecting with this zone. This is simply not the case, which means this response by the EAP is **factually incorrect**. In fact, the specialist notes in his revised report (May 2025 – page 106) that these turbines need to be moved. Accordingly, the EAP has misrepresented the situation with regard to an extremely sensitive species.

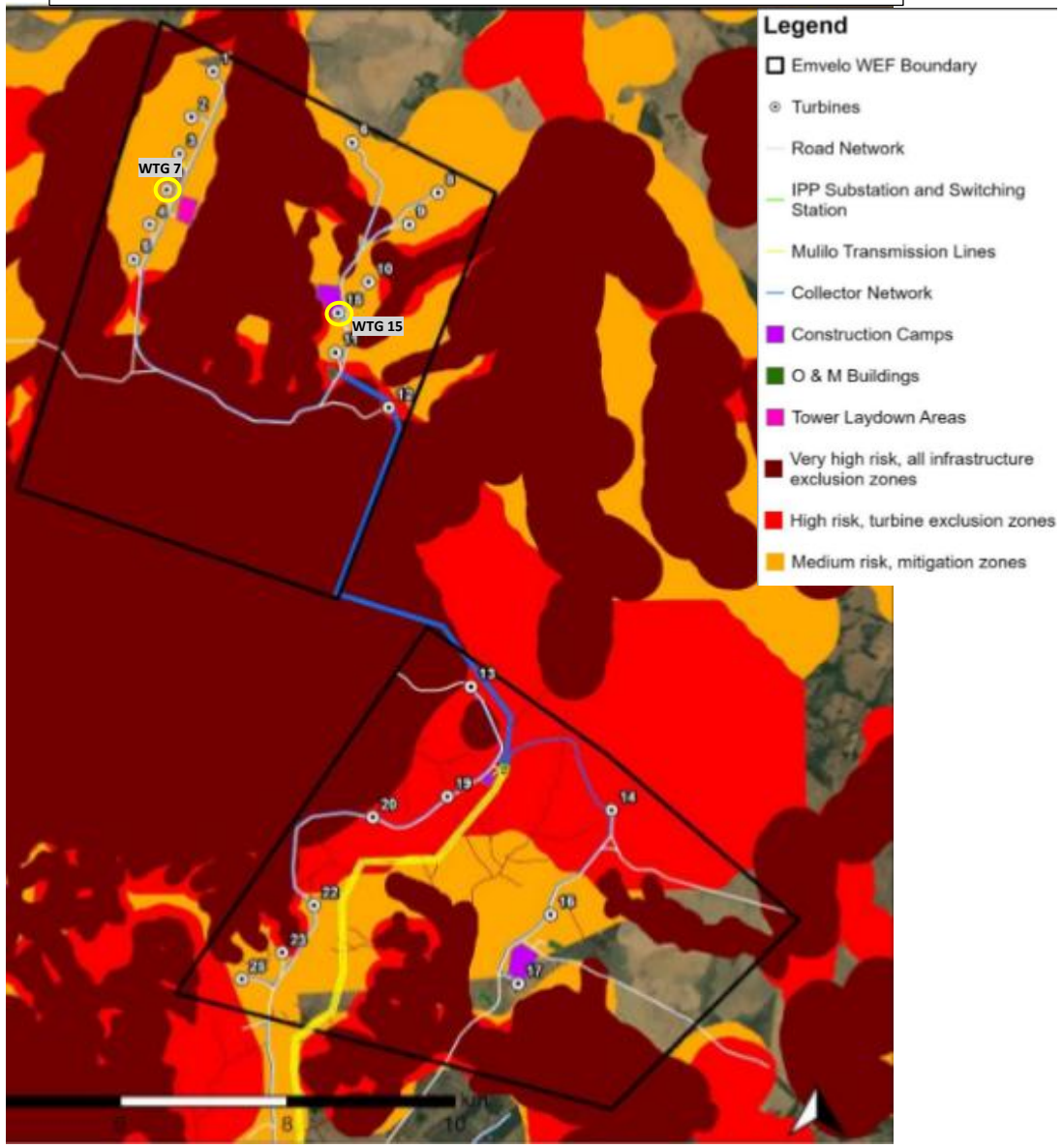
4.6. Further to the above, fatality rate decreases described in the Avifaunal Specialist Study (Section 5.8.8) are open to question. It is unclear how the fatality rate for the Martial Eagle,

for example, can be predicted to reduce as much as described in of the specialist study, especially as the reduction of >50% is attributed to project layout changes. In the absence of specific details of what was changed so as to result in this predicted fall in fatality rates, together with clear diagrams showing 'before' and 'after' layouts, this conclusion cannot carry a high degree of certainty. This is particularly as the recommended buffer zone for Martial Eagles has not been adhered to (5-6 km not 2.5 km radius). Moreover, the layout itself does not appear to have altered so significantly relative to Martial Eagle sensitive areas so as to point to a substantial reduction in the threat of fatality. The following diagrams from the Avifaunal Specialist Studies provided with the Draft EIA Reports of March and July 2025 show that it is exceedingly difficult to discern layout changes that may have been in response to avifaunal sensitivities.

Combined Avian Sensitivity – Proposed Emvelo WEF (extract from Fig. 3.9 of February 2025 specialist study included in March 2025 Draft EIA



Combined Avian Sensitivity – Proposed Emvelo WEF (extract from Fig. 3.9 of May 2025 specialist study included in July 2025 Draft EIA Report



5. INADEQUATE APPLICATION OF THE MITIGATION HIERARCHY

Avoiding avoidance – the pinnacle of the mitigation hierarchy

5.1. One just has to consider the impact tables where one of the questions is: "Can impact be avoided, managed, or mitigated?" realise that the impact assessment methodology is based on a misconception of the mitigation hierarchy. The specialist response to the question "Can impact be avoided, managed, or mitigated?" is either "yes" or "no". There is no requirement to specify which mitigation strategy is being applied. Avoidance is different to management / mitigation, but the EAP makes no account for this. It is important to know whether the impact can be avoided as opposed to whether it can be mitigated. This ought to be explicitly explained by the EAP, but the EAP has failed to provide a rational explanation.

5.2. Avoidance is preferred and should always be considered before any other options in terms of the sequence of tiered steps mandated by the impact mitigation hierarchy. Definitively proving that avoidance has been implemented in accordance with the mitigation hierarch is something the EAP has categorically failed to establish.

5.3. The EAP's trend and preferred methodology – as shown in the Draft EIA Report - is to avoid 'avoidance' as the primary means for preventing adverse impacts in terms of the hierarchy. The EAP's approach flies in the face of IEM and the mitigation hierarchy because avoidance is assumed but not reflected in the project documentation. When working in such a sensitive environment, such as the sites of the proposed projects, it goes without question that AVOIDANCE should be top priority and a critical threshold to adhere to BEFORE proceeding to the following stages of the mitigation hierarchy. The role of the EAP is to ensure development is undertaken in a manner that ensures the interests of the biophysical environment and affected communities. This is an enormous responsibility and cannot be fulfilled if concerns raised by I&APs and conservation authorities are downplayed and effectively ignored. The impact assessment and public participation processes are materially inadequate.

5.4. Instead of avoiding areas of high sensitivity the EAP recommends pre-commencement flora relocation and faunal relocation (see for example page 384 Draft EIA Report). This is unacceptable and illustrative of a fundamentally defective approach to impact assessment and management. Areas of high sensitivity ought to be avoided outright in terms of the mitigation hierarchy. This has NOT been done.

5.5. There is no clarity of which species will be affected or whether they are good candidates for relocation (i.e. is the success of this proposed mitigation measure proven). The proposal to relocate species has associated impacts and these have NOT been assessed. In a scenario where relocation is unavoidable (i.e. all other options in terms of the mitigation hierarchy have been applied and exhausted) – **this constitutes a project impact and is not solely a proposed mitigation measure.**

5.6. It is stated "Several burrowing faunal species are present and will allow for relocation of less mobile species, although most faunal species in proximity are likely to vacate the area once

earth moving equipment commences clearing and construction, however some species may require manual relocation." Firstly, the way this proposal is framed is muddled / does not make sense. It reads like some sort of circular argument. Secondly, the impacts of relocation have not been assessed. Thirdly, once earth-moving equipment moves in, the project has commenced – which does not tie up with the proposed pre-commencement relocation of the sensitive species.

5.7. Inadequate thought has been given to relocation of plant and animal species, which results in the following unsubstantiated, bland and rather meaningless statement by the EAP: "They are relocated into a suitable habitat and protected from further damage and all disturbances to aid their re-establishment."

5.8. There are too many unanswered questions to place any reliance on this relocation proposal:

5.8.1. Have suitable alternative habitat locations been identified for relocation purposes? How far away are these and is the location accessible for this purpose? These questions are unanswered.

5.8.2. What is the impact of the faunal species that might be relocated? What about their wellbeing? These questions are unanswered.

5.8.3. How will they be caught so as to avoid trauma? Are they territorial species and if so, how will they be introduced into a new territory? How will faunal species in the new territory react? These questions are unanswered.

5.8.4. Has a faunal relocation expert been consulted? Where is the specialist input on relocation? These questions are unanswered.

5.9. The key priority and statutory obligation for an EAP is to determine whether a proposed project can respond to the environmental constraints present at the proposed location. This is the most important assessment and guidance that an EAP can provide. Instead, in this case, focus is placed on mitigation such as relocation of sensitive flora and fauna. It appears that little or no thought is given to the recipients or receiving environment of this relocation, as if one is dealing with environmental impact management is akin to dealing with inanimate objects.

5.10. There is also a disproportionate reliance placed by the EAP on reconsideration of WTG positions following a post-authorisation walkthrough. The question that has not been answered by the EAP is this: Why can such a walkthrough not be conducted during the EIA process when the specialists have been on site? Emphasis is placed on how much field work has been done, so why did this not include detailed examination of proposed WTG locations? For example (page 87 of the Emvelo CRR) concern is raised about the location of turbines and roads within Yellow-breasted Pipit habitat, contrary to the avifaunal specialist's recommendations. The EAP's response is "All WTGs were removed from Yellow-breasted Pipit habitat with the exception of WTG 23 that still appears to be fringing on a high-risk area as identified for the Yellow-breasted Pipit. It is recommended that this turbine position be

reconsidered following the avifaunal walkthrough, post-EA (should such EA be granted) prior to construction." It seems that WTG 31 (Sheepmoor) is also located on the edge of this bird's habitat.

5.11. There is reference to turbines having been micro-sited out of certain areas. See for example the Emvelo CRR (page 20) in relation to Martial Eagle. This raises the obvious question as to why micro-siting was not completed for all bird species and other environmental sensitivities. The maps are such that it is extremely difficult to discern whether the positions of turbines have changed, and this is due to lack of information on coordinates as mentioned elsewhere in this report. An explanation as to how the siting of WTGs was done is required. Was this done in field? When and how was micro-siting done? Were the edges between sensitive habitats and WTG positions verified in the field?

5.12. It is strange that if there is such precision about blade sweep and how far it extends and that it does not impinge into sensitive areas (see page 19 and 20 of Emvelo CRR) that more detailed diagrams / maps are not provided at a scale that clearly shows the difference between the before and after changes that have been made to the layout. Another example (page 36 of the Sheepmoor CRR) of this type of feedback is: "The Sheepmoor WEF has undergone significant layout refinement to avoid high-sensitivity areas, particularly Critical Biodiversity Areas (CBAs) and known flight paths of key species." Again, is one looks at the figures, it is extremely difficult to see any material difference in the layout.

5.13. Given the foregoing points, no reliance can be placed of assurances that the layout has been substantially changed and that micro-siting has been conducted. If this were the case, then the information presentation would be clearer, especially spatial information. Precise coordinates would be given of WTG positions before and after relocation, for example.

Misunderstanding of legal obligations – alien invasive legislation

5.14. Clearing of alien invaded areas is offered as a trade-off, at a ratio of 1:3 for direct loss of natural grassland habitat (as a trade-off or offset), in conjunction with other mitigation proposed by the terrestrial biodiversity specialist. This proposal is repeated many times in the Draft EIA Report for both proposed WEFs (e.g. page 32 Emvelo Draft EIA Report of July 2025). This proposal cannot be accepted as a trade-off or an offset. The reason is that this proposal is attached to the site of the proposed development, and the influence / impacts are not confined solely to the development footprint.

5.15. Furthermore, alien vegetation control is a legal requirement under the Alien and Invasive Species Regulations (GNR 1020 of 25 September 2020). As such, the meeting of a legal obligation cannot be used as a trade-off. Even if the WEF owner is not the same party as the landowner, this applies, because the WEF is being operated on that land. Thus, under the duty of care obligations under NEMA, the WEF operator is required to fulfil alien vegetation control obligations.

5.16. It may be argued that the WEF operator has no obligation to control alien invasive vegetation, especially that present prior to development. This is a weak argument because one of the

impacts associated with disturbance caused by the proposed development is the possible spread of alien invasive vegetation.

Misuse of biodiversity offsets

5.17. The proposed offset does not meet the required outcomes of the National Biodiversity Offset Guideline of 2023, which are that the offset outcomes must be ***practically measurable on the ground***. Importantly an offset must ensure that:

5.17.1. biodiversity is secured in the long term through the protection and appropriate management of ecosystems and species;

5.17.2. efforts to protect biodiversity in the long term contribute to the expansion of South Africa's protected area network, and are focused in areas identified as biodiversity priorities, with particular emphasis on the consolidation of protected areas and biodiversity priority areas and securing effective ecological links between priority areas; and

5.17.3. it contributes to the long-term security of biodiversity priority areas and maintains or improves their ecological condition, thereby resulting in tangible and measurable positive outcomes for biodiversity conservation 'on the ground'.

5.18. Internationally, research, capacity building, training and other activities are not recognised as 'offsets' but can be used to support, expedite, improve or bolster the outcomes required of an offset.

5.19. The offset report proposes various measures to deal with residual impacts on birds. Area-based offsets are not feasible; several offsite actions have been proposed in an effort to achieve no net loss of these species. How no nett loss of bird species through these measures is to be achieved is wholly unclear. Furthermore, since WEFs pose a threat of bird deaths the loss of a single bird within the category of a species categorised as Critically Endangered or Endangered is one too many and pushes the species ever closer to a tipping point.

5.20. 13.7 ha of the 31 ha total residual impacts are in CBA 1 which is, by definition, **IRREPLACEABLE** and constitute a **FATAL FLAW** as noted in the national offset guideline. i.e. 44% of the proposed footprint. Also, it is in a NPAES focus area (Fig 3.1 of the WSP Biodiversity Offset Report).

5.21. **No assurance that land can be secured for conservation**, and **no assurance of long-term protection of a possible offset area is provided**. There is passing mention of 'may' look at conservation servitudes, but that is all." To suggest that Mulilo can motivate to the lessor that the offset plan is part of "maintenance and repairs" is wholly unacceptable and nonsensical.

5.22. **Furthermore, suggesting that target areas be identified in the context the existing site due to having lease agreements in place is counter to the intention of offsets. This land is within**

the proposed project's sphere of influence – so it is in fact not an offset as applied internationally and as understood in the aforementioned national guideline.

5.23. There is no clarity on responsibility for managing the offset area(s) (i.e. who would implement the offset and do the work) and covering costs of the offset, and duration of liability. Talking about clearing of alien species 'in a (questionable) ratio of 1:3' as a 'trade-off or offset' is nonsense. Any offset site would need to be cleared of alien species as an integral part of its management.

5.24. Of the **proposed offset measures for birds** (Section 10.2 in Biodiversity Offset report) – only the bird flight diverters may be acceptable BUT evidence that this would translate into on-the-ground outcomes is required (i.e. improvement in bird populations commensurate with expected residual impacts/ reduction in numbers due to electrocution/ collision with turbines/ powerlines). These outcomes must be directly linked to the affected species. Furthermore, no basis is given for specifying 5000 bird diverters every 10 years.

5.25. Support of research programmes are not recognised as an offset.

5.26. All of the items listed are in fact what a responsible corporate citizen ought to be doing and therefore do not constitute a praiseworthy offset (see point 53 below), particularly in circumstances where the mitigation hierarchy has not been applied. The first or top priority in the mitigation hierarchy is to avoid the adverse impact in the first place. This is precisely the mitigation approach that has been avoided in the EIA process for these proposed WEFs. Avoidance would mean removing any WEFs that is within away from bird sensitive areas on the basis of the precautionary principle – meaning do more than the minimum. For example, if there is a general guideline buffer applicable to nest areas, then application of the precautionary principle would mean adding to this buffer, because of the uncertainties about bird movements, for example.

5.27. The use of an offset demonstrates that there are residual adverse impacts, which means that the project has significant adverse impacts associated with it. It is not proactive compliance as espoused by the EAP. "This BOR is not a reactive add-on; it reflects a proactive compliance, demonstrating that the project has embraced its environmental responsibilities. Significant resources, technical input, and time were invested to ensure the offset plan would stand up to scrutiny and deliver real conservation value. It is a key part of what gives this project its integrity, and the applicant is proud to include it as a cornerstone of the DEIR submission. It should provide the competent authorities with a clear assurance that residual impacts have not only been recognised, but systematically addressed, avoided where possible, and responsibly offset where unavoidable." Besides the fact that the foregoing paragraph is verbiage, it is also factually incorrect. This type of language is wholly inappropriate – the language is not objective and compromises the independence of the EIA process.

5.28. Additional comments and concerns regarding the Offset Report prepared by WSP include:

Re: Section 3.1.2 PRIORITY AREAS FOR PROTECTED AREA EXPANSION

5.28.1. How has this section influenced the need for and design of any offset? This information would have and should have been evident during project planning and should have triggered upfront offset development at the earliest stages of the design process. What was this not investigated by the EAP before the 11th hour of the EIA process?

Re: 3.2.1 ECOLOGICAL IMPORTANCE OF VEGETATION COMMUNITIES IN THE LSA

5.28.2. The applicable Guideline suggest that impacts on CBAs should be AVOIDED AT ALL COSTS, unless the CBA can be shown to be inaccurately mapped or otherwise wrongly determined. The actual drivers of why the area is designated a CBA are important in terms of understanding the impact, requisite offset (if possible) and offset design to accommodate the feature driving CBA.

Re: Figure 3-7 - Sheepmoor Vegetation Sensitivity

5.28.3. It is curious (and inexplicable) to note that the areas in green are mapped as only moderate sensitive - although from an avifaunal perspective many areas are rated High or VERY HIGH. Offsets must synthesize the full array of features to derive a trigger but this has not been undertaken by the EAP.

Re: Section 5 AQUATIC BIODIVERSITY OVERVIEW

5.28.4. It is not clear whether there are any significant impacts on wetland systems (for instance from stream crossings by access roads or buried power lines) and whether these may trigger wetland offsets? This is unresolved and unanswered. The gaps in information and inadequacy of the assessment and it is not possible for the Competent Authority to render an informed decision on such impacts.

Re: Section 6.1.2 FLORA

5.28.5. EAP to confirm whether this is the first time a footprint figure has been made available during the EIA process. If so, why is this information made available at the 11th hour only?

5.28.6. There is no table of impact areas by feature, with a clear indication of what ratio should be applied. In order to determine a final offset quantum that can be audited for compliance monitoring the relevant information is not tabled. How much invaded area needs to be cleared? This is not clear from the reports. How is it to be rehabilitated to secondary grassland? This is not clear from the reports. Does this qualify as an acceptable offset for loss of intact grassland? If so, why? Again, this is not clear from the reports.

5.28.7. There is no map to determine whether it is feasible compensate for loss of secondary grassland in corridors between intact patches that are ESA designated – but the EAP states:

"this impact to negligible levels with only a very small proportion of the footprint occurring in or near higher sensitivity areas. Very High Sensitivity or No- Go habitat has largely been avoided and reduced to an acceptable level."

5.28.8. The above contradicts what the Avifauna report says or the fact that there are impacted CBAs and ecological corridors and processes. only valid for narrow vegetation lens. What is the total footprint of these areas impacted? Who is able to determine whether the impacts significance is acceptable without the material underlying data which has not been made available?

Re: Section 6.1.3 FAUNA

5.28.9. Agreed. This requires a clear and compensatory offset. i hope it still is to be clarified how much and where? could the OHPL be constructed without a service road? It seems unlikely

5.28.10. In this finely dissected landscape, with no-go areas immediately adjacent to low sensitivity, micro-siting would seem vital to have been completed before arriving at an impact statement and an estimation of footprint and offset liability. This is a key and material flaw in the entire EIA process. This weakness in impact assessment methodology flies in the face of IEM and the mitigation hierarchy.

5.28.11. The report relies on an indefinable and this un-auditable requirement and is fatally flawed.

Re: Plant Species page 410

5.28.12. Any loss of intact or degraded grassland habitat in corridors or wetland catchments cannot be rated as a positive impact!

Re: Table 9-2 – Terrestrial habitat offset targets

5.28.13. How does this relate to the 180 ha indicated in the report above? This is an unacceptable impact. fully 40% of the impact is in CBA1 ?

Re: Section 10 CANDIDATE OFFSET SITES

5.28.14. There is no candidate list, or any credible analysis of the contribution of each? do sufficient sites exist? are the landowners amenable to having their activities curtalied?

5.28.15. There is no evidence these lease conditions include restriction of farming activities and proactive biodiversity management. When were they signed, and has proof been submitted to the authorities?

5.28.16. Much of the assessment is entirely theoretical. Actual offset sites need to be identified and the specifics of their rehabilitation are determined to assess functional gains before

a decision can be made. More specifics would have helped the decision maker here regarding the biodiversity impacts

5.28.17. Rehab of grasslands is difficult and expensive, and often incomplete/inconclusive. restoration is likely impossible - especially to achieve prior diversity levels and structure, and keep invasive and alien species out.

Re: Section 10.1 SIGNED LEASE AGREEMENTS

5.28.18. The mooted lease agreements are likely to be contested by the landowners. A dedicated offset lease agreement and servitude - with accompanying management plan setting out the requisite outcomes - should have been concluded with the sites but this has not been done. . All of these proposed offset areas will be adjacent to the WEF/ WTG and this is questionable in terms of offset efficacy.

5.28.19. There is little indication of competing interests which might undermine potential offset efficacy e.g. Mining & Prospecting Rights, and the limits that these rights might impose on the applicants' ability to attain offset outcomes

Re: Section 11 10.2 OFFSITE ACTIONS FOR PRIORITY BIRD SPECIES

5.28.20. None of the actions listed qualify as offsets, or are so insufficiently described as to be so vague and meaningless that it is impossible to link the action directly to an impact (which methodology is expressly prohibited by the Offset Guideline). The reason being that the impact is not quantifiable and is unauditable based on the available information.

Re: Section 11 RECOMMENDED CONDITIONS FOR ENVIRONMENTAL AUTHORISATION

5.28.21. The quantum needs to be specified here, but it isn't quantified. The final status and/or protection and management regime need to be confirmed but this information has not been made available

5.28.22. There is insufficient information to demonstrate that the landowner has consented to the proposed arrangement. It is also not clear how certain this outcome is and whether this is covered in the lease conditions.

Re: Section: AFFECTED TERRESTRIAL HABITATS

5.28.23. This assessment is meaningless unless attached to a specific infrastructure element, which it is not. In the circumstances, the DFFE is unable to determine accurately what the offset liability is should they choose to only approve a portion of the project

The reliance on micro-siting

5.29. Whilst post-approval micrositing is applied internationally in the wind energy sector, this is

within very specific limitations. According to Scottish Natural Heritage[1], for example, the siting of wind turbines in small incremental distances and is used at two main stages of wind farm development:

5.29.1. Firstly, during the design stage to ensure that turbine layout is satisfactory from key viewpoints and achieves the design objectives.

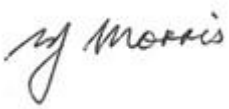
5.29.2. Secondly, during the construction phase of a project, where previously unexpected conditions are encountered on site.

5.30. Provision for micrositing is normally covered by a specification in the EIA Report which can then be included in the conditions in the approval. This serves to set a limit within which micrositing is permitted and normally limits this to 50-100m from the specified (approved) turbine location. This information ought to be known to ERM South Africa, since exactly this approach is applied by the company in the UK (for example Crosbie Wind Farm.[2]

5.31. From the foregoing information it can be seen that micrositing is not to be applied in a non-specific manner. It is recognised that some flexibility is required in final design stages and also to allow for unforeseen circumstances during construction. It is standard and accepted practice internationally to specify a distance limitation within which micrositing is permitted. This must of course be included in the project description and included in the impact assessment. This way, I&APs and the Competent Authority are provided with a full picture of the potential development footprint (including the micrositing zone) and the associated footprint. More importantly, it means the Competent Authority has full information and can include a specific zone for each WTG within which micrositing is permissible. Hence, this is clear and known to the Competent Authority upfront from the provision of this information in the EIA Report, instead of being faced with an unknown quantity in terms of

RICHARD SUMMERS INC. **Morris Environmental & Groundwater Alliances**





Per: R W Summers **Per MJ Morris**

[1] Scottish Natural Heritage (2017): Siting and Designing Wind Farms in the Landscape. https://www.nature.scot/sites/default/files/2017-11/Siting%20and%20designing%20windfarms%20in%20the%20landscape%20-%20version%203a.pdf

[2] https://crosbiewindfarm.co.uk/wp-content/uploads/2025/01/Volume-1-EIAR-Chapter-8-Ground-Conditions-Peat-and-Geology.pdf. Accessed 11 August 2025.

From: Bathandwa Ncube
Sent on: Friday, 15 August 2025 21:25:22
To: Stephanie Gopaul; ERM Arcus Amsterdam
CC: Andrew Pearson; R Luyt; SB. Mbuyane; Mervyn Lotter; complaints@msukaligwa.gov.za; Ephron Maradwa; EIA Applications; Salome Mambane; Lydia Kutu
Subject: 14/12/16/3/3/2/2611: Amended DEIAr comments
Attachments: 14-12-16-3-3-2-2611.pdf (406.34 KB)

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

EXTERNAL MESSAGE

Goodday

Please find attached, Amended DEIAr comments.

Kind regards
Ms Bathandwa Ncube (EAPASA)
Department of Forestry, Fisheries and the Environment (DFFE)
Integrated Environmental Authorisations
[redacted]

From: Bathandwa Ncube
Sent on: Friday, 15 August 2025 21:25:23
To: Stephanie Gopaul; ERM Arcus Amsterdam
CC: Andrew Pearson; R Luyt; SB. Mbuyane; Mervyn Lotter; complaints@msukaligwa.gov.za; Ephron Maradwa; EIA Applications; Salome Mambane; Lydia Kutu
Subject: 14/12/16/3/3/2/2613: Amended DEIAr comments
Attachments: 14-12-16-3-3-2-2613.pdf (406.12 KB)

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

EXTERNAL MESSAGE

Goodday

Please find attached, Amended DEIAr comments.

Kind regards
Ms Bathandwa Ncube (EAPASA)
Department of Forestry, Fisheries and the Environment (DFFE)
Integrated Environmental Authorisations
([redacted]

forestry, fisheries
& the environment
Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 399 9000, Fax: +27 86 625 1042

DFFE Reference: 14/12/16/3/3/2/2611
Enquiries: Ms Bathandwa Ncube
Telephone: 012 399 9368 **E-mail:** BNcube@dffe.gov.za

Ms Stephanie Gopaul
Environmental Resource Management Southern Africa (Pty) Ltd
Regus, Floor-3
18 The Boulevard
Westway Office Park
WESTVILLE
Durban
7700

Telephone Number : [redacted]
Cellphone Number : [redacted]
Email Address : stephanie.gopaul@erm.com / erm.arcusamsterdam@erm.com

PER E-MAIL

Dear Ms Gopaul

COMMENTS ON THE AMENDED DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF THE EMVELO WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE

The amended draft Environmental Impact Assessment Report (EIAr) dated July 2025 and received by this Department on 15 July 2025 refers.

This letter serves to inform you that the following amendments and information must be included in the final EIAr

(a) General Comments

1. The final EIAr must comply with all comments on the draft scoping report signed on 20 September 2024; conditions of the acceptance of the scoping report signed on 19 November 2024; the comments on the draft EIAr signed on 10 April 2025; as well as these comments on the amended draft EIAr, and must address all comments received for the DSR, FSR, draft EIAr and amended draft EIAr.

The processing of personal information by the Department of Forestry, Fisheries and the Environment is done lawfully and not excessive to the purpose of processing in compliance with the POPI Act, any codes of conduct issued by the Information Regulator in terms of the POPI Act and/or relevant legislation providing appropriate security safeguards for the processing of personal information of others.

2. It is noted that the proposed ideal location of the activity is within the amended development footprint, which is still outside of the approved site as contemplated in the accepted scoping report. This results in the process being procedural flawed in terms of legislative requirements under EIA Regulations 2014, as amended. The concerns raised and recommendations in the email sent to you from this Department, dated 17 February 2025 still apply.
3. The Avifaunal Specialist Assessment Report for the proposed Emvelo Wind Energy Facility has not been included as part of the amended DEIAr.
4. Please ensure that all information is included, where the draft EIAr refers to missing information that will be included in the final EIAr or any information that will be confirmed in the final EIAr.
5. Should a specialist recommend specific mitigation measures, these must be clearly indicated.

(b) Public Participation Process

1. Please ensure that comments from all relevant stakeholders are submitted to the Department with the final EIAr, including comments from the relevant sections of this Department.
2. All issues raised and comments received during the circulation of the SR, draft EIAr and the amended draft EIAr from registered Interested and Affected Parties (I&APs) and organs of state, as listed in your I&APs Database, and others which have jurisdiction in respect of the proposed activity must be adequately addressed and included in the final EIAr.
3. Proof of correspondence with the various stakeholders must be included in the final EIAr. This must indicate that this amended draft EIAr has been subjected to 30 days public participation process, stating the start and end date of the PPP.
4. Evidence that all identified and relevant competent authorities have been given an opportunity to comment on the amended draft EIAr for the proposed development must be provided with the final EIAr. Should you be unable to obtain comments, proof must be submitted to the Department of the attempts that were made to obtain comments.
5. Copies of the original comments received from I&APs and organs of state, which have jurisdiction in respect of the proposed activity must be submitted with the final EIAr.
6. In the final EIAr, the Comments and Response Report (CRR) must include all historical comments and issues raised to date.

General

Please also ensure that the final EIAr includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 3 of the NEMA EIA Regulations, 2014, as amended.

You are further reminded to comply with Regulation 23(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: *"The applicant must within 106 days of the acceptance of the scoping report submit to the competent authority -*
(a) an environmental impact assessment report inclusive of any specialist reports, an EMPr, a closure plan in the case of a closure activity and where the application is a mining application, the plans, report and calculations contemplated in the Financial Provisioning Regulations, which must have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority."

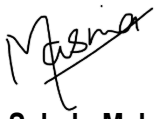
Should there be significant changes or new information that has been added to the EIAr or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 23(1)(b) of the NEMA EIA Regulations,

2014, as amended, which states: *"The applicant must within 106 days of the acceptance of the scoping report submit to the competent authority – (b) a notification in writing that the documents contemplated in sub-regulation 1(a) will be submitted within 156 days of acceptance of the scoping report by the competent authority or where regulation 21(2) applies, within 156 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the documents, which changes or information was not contained in the original documents consulted on during the initial public participation process contemplated in sub-regulation (1)(a), and that the revised documents contemplated in sub-regulation 1(a) will be subjected to another public participation process of at least 30 days".*

Should you fail to meet any of the timeframes stipulated in Regulation 23 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 sincerely



Dr Sabelo Malaza
Chief Director: Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment
Signed by: Ms. Masina Morudu
Designation: Control Environmental Officer: National Integrated Authorisation Projects
Date: 15/08/2025.

cc:	Mr Andrew Pearson	Emvelo Wind Energy Facility (Pty) Ltd	Email: Andrew@mulilo.com
	Mr G.O Xaba	Mpumalanga DARDLEA	Email: rluyt@mpg.gov.za / mbuyanesb@mpg.gov.za
	Mr Mervyn Lotter	MTPA	Email: mervyn.lotter@gmail.com
	Ms Mapulane Nkosi	Msukaligwa Local Municipality	Email: complaints@msukaligwa.gov.za

forestry, fisheries
& the environment
Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 399 9000, Fax: +27 86 625 1042

DFFE Reference: 14/12/16/3/3/2/2613
Enquiries: Ms Bathandwa Ncube
Telephone: 012 399 9368 **E-mail:** BNcube@dffe.gov.za

Ms Stephanie Gopaul
Environmental Resource Management Southern Africa (Pty) Ltd
Regus, Floor-3
18 The Boulevard
Westway Office Park
WESTVILLE
Durban
7700

Telephone Number : [redacted]
Cellphone Number : [redacted]
Email Address : stephanie.gopaul@erm.com / erm.arcusamsterdam@erm.com

PER E-MAIL

Dear Ms Gopaul

COMMENTS ON THE AMENDED DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF THE SHEEPMOOR WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE

The amended draft Environmental Impact Assessment Report (EIAr) dated July 2025 and received by this Department on 15 July 2025 refers.

This letter serves to inform you that the following amendments and information must be included in the final EIAr

(a) General Comments

1. The final EIAr must comply with all comments on the draft scoping report signed on 20 September 2024; conditions of the acceptance of the scoping report signed on 19 November 2024; the comments on the draft EIAr signed on 10 April 2025; as well as these comments on the amended draft EIAr, and must address all comments received for the DSR, FSR, draft EIAr and amended draft EIAr.

The processing of personal information by the Department of Forestry, Fisheries and the Environment is done lawfully and not excessive to the purpose of processing in compliance with the POPI Act, any codes of conduct issued by the Information Regulator in terms of the POPI Act and/or relevant legislation providing appropriate security safeguards for the processing of personal information of others.

2. It is noted that the proposed ideal location of the activity is within the amended development footprint, which is still outside of the approved site as contemplated in the accepted scoping report. This results in the process being procedural flawed in terms of legislative requirements under EIA Regulations 2014, as amended. It is recommended that the Sheepmoor WEF application be withdrawn, and a new application, with the amended proposed development site, be resubmitted to the Department.
3. Please ensure that all information is included, where the draft EIAr refers to missing information that will be included in the final EIAr or any information that will be confirmed in the final EIAr.
4. Should a specialist recommend specific mitigation measures, these must be clearly indicated.

(b) Public Participation Process

1. Please ensure that comments from all relevant stakeholders are submitted to the Department with the final EIAr, including comments from the relevant sections of this Department.
2. All issues raised and comments received during the circulation of the SR, draft EIAr and the amended draft EIAr from registered Interested and Affected Parties (I&APs) and organs of state, as listed in your I&APs Database, and others which have jurisdiction in respect of the proposed activity must be adequately addressed and included in the final EIAr.
3. Proof of correspondence with the various stakeholders must be included in the final EIAr. This must indicate that this amended draft EIAr has been subjected to 30 days public participation process, stating the start and end date of the PPP.
4. Evidence that all identified and relevant competent authorities have been given an opportunity to comment on the amended draft EIAr for the proposed development must be provided with the final EIAr. Should you be unable to obtain comments, proof must be submitted to the Department of the attempts that were made to obtain comments.
5. Copies of the original comments received from I&APs and organs of state, which have jurisdiction in respect of the proposed activity must be submitted with the final EIAr.
6. In the final EIAr, the Comments and Response Report (CRR) must include all historical comments and issues raised to date.

General

Please also ensure that the final EIAr includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 3 of the NEMA EIA Regulations, 2014, as amended.

You are further reminded to comply with Regulation 23(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: *"The applicant must within 106 days of the acceptance of the scoping report submit to the competent authority -*
(a) an environmental impact assessment report inclusive of any specialist reports, an EMPr, a closure plan in the case of a closure activity and where the application is a mining application, the plans, report and calculations contemplated in the Financial Provisioning Regulations, which must have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority."

Should there be significant changes or new information that has been added to the EIAr or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 23(1)(b) of the NEMA EIA Regulations, 2014, as amended, which states: *"The applicant must within 106 days of the acceptance of the scoping report submit to the competent authority – (b) a notification in writing that the documents contemplated*

in sub-regulation 1(a) will be submitted within 156 days of acceptance of the scoping report by the competent authority or where regulation 21(2) applies, within 156 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the documents, which changes or information was not contained in the original documents consulted on during the initial public participation process contemplated in sub-regulation (1)(a), and that the revised documents contemplated in sub-regulation 1(a) will be subjected to another public participation process of at least 30 days".

Should you fail to meet any of the timeframes stipulated in Regulation 23 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 sincerely



Dr Sabelo Malaza
Chief Director: Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment
Signed by: Ms. Masina Morudu
Designation: Control Environmental Officer: National Integrated Authorisation Projects
Date: 15/08/2025.

cc:	Mr Andrew Pearson	Sheepmoor Wind Energy Facility (Pty) Ltd	Email: Andrew@mulilo.com
	Mr G.O Xaba	Mpumalanga DARDLEA	Email: rluyt@mpg.gov.za / mbuyanesb@mpg.gov.za
	Mr Mervyn Lotter	MTPA	Email: mervyn.lotter@gmail.com
	Ms Mapulane Nkosi	Msukaligwa Local Municipality	Email: complaints@msukaligwa.gov.za

From: Josua Meyer
Sent on: Saturday, 16 August 2025 10:33:24
To: ERM Arcus Amsterdam
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

To avoid any confusion, I just want to inform ERM that I have submitted 3 reports with comments on the relevant draft EIA reports for the Mulilo Sheepmoor and Emveli WEFs. Each report with comments cover both the Sheepmoor and Emvelo proposed WEFs and are listed below for clarity

- Comments date 10/04/2025 compiled by Richard Summers attorney on the March 2025 draft EIA report (Submitted on 10/04/2025)
- Comments date 15/08/2025 compiled by Richard Summers attorney on the July 2025 draft EIA report (Submitted on 15/08/2025)
- Comments date 14/08/2025 compiled by Josua Meyer on the July 2025 draft EIA report (Submitted on 15/08/2025)

All three reports with comments were provided within the applicable commenting period timeframe of 30 days.

Richard Summers Attorney was appointed by myself and he submitted the comments on behalf of Josua Meyer as a registered I&AP.

All comments submitted are supplementary to each other and are NOT to be taken as substituting the other one.

Please contact me if anything remains unclear.

Regards

Josua Meyer

On Fri, Aug 15, 2025 at 3:47 PM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Goodday Lucien
>
> My comments were sent from Postnet, Ermelo due to lack of scanning facilities.
>
> Can you please acknowledge if you received all 28 page.
>
> Thanks
>
> On Fri, Aug 15, 2025 at 10:50 AM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:
>
> > Good day Mr Meyer,
> >
> > Thank you for your email and your responses. We acknowledge receipt of your comments and confirm that they will be incorporated into the Comments and Responses Report for the proposed development.
> >
> > A formal response to your comments will be provided within that report, which will form part of the Final EIA submission to the DFFE.

Kind Regards,

Lucien Barbeau
Senior Consultant

Sustainability is our business

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Thursday, August 14, 2025 10:44 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Dear Lucien

Just want to get the records straight without getting into an informal debate

1 - 4 : Correspondence

- Request info from ERM, Mr Lucien Barbeau, on 17/12/2024 at 11h04.

  Still no response ?

- First request for meeting to applicant, mr Johans van Wyk, on 19/2/2025 at 12h35.

  Applicant, mr Johans van Wyk, reject request on 19/02/2025 at 15h35

  First formal request for meeting through ERM on 16/4/2025 at 03h24. No response ?

  Request again for meeting through ERM, Mr Lucien Barbeau, on 18/07/2025 at 16h51.

  Meeting took place on 4/08/2025.

  Almost 8 months later!?

- Requested on 16/06/2025 for official documentation concerning the 3 month extension.

Repeat request during meeting of 4/08/2025

Received info only on 12/08/2025

Almost 2 month later?!

- Request tagged data of two martial eagles from ERM on 11/03/2025 at 10h59

Repeat request for tagged data from ERM on 29/03/2025 at 11h44

Received refusal of data in email from applicant, mr Johans van Wyk, on 14/4/2025 at 20h40. ERM was also CC.

Remind ERM, Mr Barbeau, on 15/04/2025 at 22h11 that formal answer on request for tagged data is still outstanding.

Still no response from ERM !!

Is that what you and ERM means by **CREDIBLE, TRANSPARENT and ACCOUNTABLE?**

5 - 8 : Tagged data

Mulilo and EWT is in a partnership, confirmed in email from mr Johans van Wyk, in tagging the birds and therefore co-accountable for each other's conduct

The issue is not who did wrong but is the tagging done with a valid permit.?

If not, then it is illegal and that also implies for the data obtained by the unlawful act.

What ERM says by implication is that they are comfortable in driving a stolen vehicle as long as it is to their advantage?

Very dangerous and controversial approach..

We still insist that everything connected to the tagged data must be removed from the avifaunal report because it is illegally obtained regardless who did it.

The avifaunal specialist used the Verkykerkop tagged data in his report and on that ground we requested the permit to tagg that eagle (Bred)

9 - 11 : Specialist report and NDA

Mr Moodie strongly opposed the powerline crossing his farms and that also without consulting him.That was the main reason why Mr Moodie attended the meeting. Maybe you did not pick it up because Mr Moodie spoke Afrikaans.

Will address the rest in my comments.

Regards

Josua Meyer

On Tue, Aug 12, 2025 at 12:08 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Good day Mr Meyer,
>
> Please find below our responses to your comments.
>
> We are in the process of finalising the meeting minutes, which will be shared with you before the end of this week. Thank you
>
> **1 - The EAP is expected to participate and actively engage with the impacted community. Why has my request for a meeting since February 2025 repeatedly declined and pushed in at the 11th hour?**
>
> MULILO: The applicant regrets that the *ad hoc* meeting request sent by you to the applicant in February this year was not attended to immediately. Unfortunately, the request for a private meeting with the applicant was not seen at the time by the applicant's representatives, and the applicant sincerely apologises for any frustration this may have caused you. The applicant and EAP remain committed to engaging with I&APs, and the in-person meeting requested by yourself, and attended by me as the appointed EAP for this project, and by the applicant's representatives, on the 4th of August 2025 was welcomed and seen to constitute substantive progress in responding to your queries. Your queries, and these responses, will obviously form part of the Comments and Responses Report included together with the next draft of the EIA Report.
>
> ERM: As the EAP, we are committed to engaging meaningfully with Interested and Affected Parties (I&APs) in accordance with the requirements of the Environmental Impact Assessment (EIA) Regulations under NEMA. We have undertaken all necessary steps and where possible, gone beyond these requirements to engage with the community. This has included an additional focus group meeting with you at a mutually suitable time within the regulated timelines to address your concerns. All I&AP comments have been acknowledged, and this engagement process remains ongoing.
>
> **2 - Do you as EAP feel that the process has been credible and transparent as well as accountable in circumstances where you reach out and respond to a request for a meeting at the 11th hour? How is that considered to be meaningful and in the spirit of the constitution?**

ERM take the principles of credibility, transparency, and accountability in the EIA process very seriously. In this case, we regret that your initial request for a private meeting with the applicant, sent to the applicant in February, was not seen at the time by the applicant. Had it been, ERM would have engaged with you much earlier. Please include the EAP in such requests in order to ensure this is not missed in the future. The recent outreach was made in good faith. Once ERM became aware of your request for a meeting, ERM responded promptly in an effort to engage meaningfully and ensure your views are heard.

While ERM acknowledges that earlier engagement would have been preferable, we remain fully open to meeting and engaging in a meaningful and constructive way as the EIA process continues. ERM sees this as part of our commitment to upholding the intent and spirit of public participation, as set out in the Constitution and in NEMA and the 2014 NEMA EIA Regulations.

We believe that the EIA process we are facilitating has been credible, transparent, and accountable, in line with the requirements of NEMA. While the timing of certain engagements is sometimes influenced by the availability of multiple parties, we made every effort to accommodate your request for a meeting within the regulated timeframe. The process remains open, transparent, and documented for review by the competent authority.

3 - Why are biodiversity related issues only being property investigated at the 11th hour although the Provincial Department requested it in the scoping phase?

During the scoping phase, it was noted that a biodiversity offset may be required based on final layouts proposed. However, this indication was based on preliminary findings and initial specialist inputs, which were still being refined at the time. As is typical in EIA processes, more detailed and site-specific assessments only become available during the impact assessment phase, once the full suite of specialist studies is completed and verified. It is on the basis of these completed studies that a more accurate determination of residual impacts, and thus the need for and scale of a biodiversity offset, can be made.

We understand the importance of early clarity, but it's also essential that such recommendations are based on robust, defensible data. That said, ERM has aimed to finalise and address these issues as efficiently and transparently as possible once the necessary information became available.

Biodiversity-related issues have been considered from the outset of the EIA process, beginning in the scoping phase. The assessment has been iterative, with the project layout being amended several times to address environmental sensitivities and viability concerns, including biodiversity matters. These changes are documented in the Comments and Responses Report (CRR) and specialist assessments.

4 - Why are requested documentation regarding the additional 3 months extension granted by DFFE to the applicant still outstanding?

Please see the attached correspondence as requested.

5 - Are you as EAP confident that the data and modelling that has been undertaken to address bird related impacts and specifically the martial eagle is accurate and credible? If so, please explain why.

The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible.

The appointed avifaunal specialist is an expert in the field of wind energy facility impacts on birds. Based on their expertise and experience, we have no reason to doubt the accuracy, credibility, and applicability of the data and modelling undertaken for this assessment.

6 - Are you as EAP confident and can you confirm in writing that the data that is being obtained in relation to the martial eagle was correctly obtained and in accordance with all minimal standards and legal criteria?

As illuded to in our response to Point 5 above. The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report.

This permitting process is separate from the EIA, and as the EAP we do not have direct oversight over it.

7 - Are you as EAP comfortable that if the tagging of the martial eagle were done without a valid permit, that the tagged data can still be used in the specialist report? If so, please explain why.

The legality of the data collection process is the responsibility of the avifaunal specialist and the applicant. It is our understanding that a permit for such activities is legally required, and that the data included in the specialist report was provided on the basis that the necessary permit was obtained.

The data collected from the tagged Martial Eagle is invaluable. It provides critical insight into the bird's movements and habitat use, which directly strengthens the EIA findings; informs a more effective mitigation strategy; and ultimately, enhances the likely further and better protection of the species. As explained in Point 5 above – the EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The applicant was informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the

tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible.

8 - Are you as EAP in acceptance that the permits to tag the martial eagles, also the one at Verkykerskop, were not presented at the meeting? If so, please explain why.

The proposed Verkykerskop Wind Farm cluster is not a part of the proposed Emvelo and Sheepmoor wind farms and are consequently not relevant or applicable to the current process. The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible.

As a general practice, fieldwork permits obtained by specialists are not typically presented during stakeholder engagement or I&AP meetings.

9 - Are you as EAP confident that all the recommendations in the specialist reports and specifically the Social report are satisfactorily addressed? If not, please explain why.

In the specialist reports, including the Social Impact Assessment, have been carefully considered and addressed to the extent possible within the on-going EIA process, and that will continue to be the case. Where certain recommendations require further action, these have been clearly outlined for implementation during the construction and operational phases, and will be monitored through the Environmental Management Programme (EMPr).

We have reviewed the social specialist's findings and recommendations and accept them as valid and credible, given the specialist's expertise in the field. Recommendations and mitigation measures that could reasonably be incorporated into the Environmental Management Programme (EMPr) have been included. If there are specific recommendations you believe have not been adequately addressed, please let us know so that we can review them.

10 - It became clear in the meeting that none of the affected landowners are prepared to allow the proposed powerline over their properties. Are AEP comfortable to support an application without a secured powerline route?

Thank you for raising this important point.

While the EIA process does not require landowner consent for linear infrastructure at this stage, the applicant is committed to engaging in good faith negotiations with affected landowners to secure the necessary servitudes following the achievement of the EA. The landowner in question (Mr Moodie) did not formally raise any objections. He advised that the routing could be relooked at in due course. In recognition of the risks involved, and in the context of the NEMA EIA Regulations' requirement to consider reasonable and feasible alternatives, alternative powerline routes have also been assessed as part of the EIA to reduce potential impacts and improve the likelihood of an acceptable alignment being secured. The other landowners did not formally raise any objections yet and formal discussions still need to take place with these landowners to the extent that the OHL needs to traverse their respective properties.

The routing referred to in your comment is an alternative powerline route considered, and is not the preferred route. Our role as the EAP is to independently assess the potential impacts of alternatives, identify mitigation measures to reduce impacts to acceptable levels, and provide an informed opinion on the acceptability of the project. The final decision on whether the project may proceed rests with the DFFE.

11 - The avifaunal specialist signed a NDA (non disclosure agreement) with the applicant and it was also revealed in the meeting by the applicant that they collectively determined the shaped exclusion zones for the southern bald ibis. Are you as EAP comfortable that it is not in contradiction with the declaration the avifaunal specialist signed as independant specialist? If so, please explain why.

The avifaunal exclusion zones are proposed by the appointed avifaunal specialist alone, informed by additional avifaunal studies commissioned by the applicant. The applicant has no role to play in determining the shape or size of proposed buffers. Please also see my response to your fifth question, above. It is common practice for parties to sign NDAs in order to protect confidential information, such as for instance intellectual property, specific project sites and does do not detract from or limits a specialist to act independently and impartially.

We operate on the assumption that all appointed specialists, including the avifaunal specialist, conduct their work in an ethical, independent manner, in compliance with the EIA Regulations. Both we as the EAP and all specialists have signed declarations of independence, as required under NEMA, confirming that our assessments are conducted impartially.

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Tuesday, August 12, 2025 11:32 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

Time is running out.

Where are the minutes of the meeting as well as a copy of the recorded transcript?

Thanks

On Tue, Aug 12, 2025 at 9:15 AM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Good day Mr Meyer,
>
> I trust that you are well. Kindly note that we will provide our responses to your comments by close of business today.
>
> Kind Regards

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Wednesday, August 6, 2025 2:56 PM
To: Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Meyer,

Thank you for your email and for taking the time to share your reflections following our meeting on Monday.

We acknowledge receipt of your comments and the additional questions you have raised. We appreciate your continued engagement in the process and will respond to your queries as soon as possible.

Should you have any further inputs in the meantime, please feel free to share them with us.

Kind Regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Wednesday, August 6, 2025 1:47 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

The purpose of the meeting was to address concerns of the I&AP's regarding the proposed Sheepmoor and Emvelo WEF's. The applicant gives the impression that they are not interested in taking any action regarding the I&AP's concerns and attend it only to avoid negative reflection. Therefore the meeting created unfortunately more questions than answers. Your EAP's input was also disappointing.

We urgently need clarification and answers on the following

1 - The EAP is expected to participate and actively engage with the impacted community. Why has my request for a meeting since February 2025 repeatedly declined and pushed in at the 11th hour?

2 - Do you as EAP feel that the process has been credible and transparent as well as accountable in circumstances where you reach out and respond to a request for a meeting at the 11th hour? How is that considered to be meaningful and in the spirit of the constitution?

3 - Why are biodiversity related issues only being property investigated at the 11th hour although the Provincial Department requested it in the scoping phase?

4 - Why are requested documentation regarding the additional 3 months extension granted by DFFE to the applicant still outstanding?

5 - Are you as EAP confident that the data and modelling that has been undertaken to address bird related impacts and specifically the martial eagle is accurate and credible? If so, please explain why.

6 - Are you as EAP confident and can you confirm in writing that the data that is being obtained in relation to the martial eagle was correctly obtained and in accordance with all minimal standards and legal criteria?

7 - Are you as EAP comfortable that if the tagging of the martial eagle were done without a valid permit, that the tagged data can still be used in the specialist report? If so, please explain why.

8 - Are you as EAP in acceptance that the permits to tag the martial eagles, also the one at Verkykerskop, were not presented at the meeting? If so, please explain why.

9 - Are you as EAP confident that all the recommendations in the specialist reports and specifically the Social report are satisfactorily addressed? If not, please explain why.

10 - It became clear in the meeting that none of the affected landowners are prepared to allow the proposed powerline over their properties. Are AEP comfortable to support an application without a secured powerline route?

11 - The avifaunal specialist signed a NDA (non disclosure agreement) with the applicant and it was also revealed in the meeting by the applicant that they collectively determined the shaped exclusion zones for the southern bald ibis. Are you as EAP comfortable that it is not in contradiction with the declaration the avifaunal specialist signed as independant specialist? If so, please explain why.

Due to the time constraint answers required before the 11/08/2025.

Regards

On Sun, Aug 3, 2025 at 12:36 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Mr Meyer,
>
> Thank you for confirming the meeting for 12h00 tomorrow, 4 August, at your farm. That time works perfectly, and we look forward to meeting with you.
>
> If you would kindly share the physical address or GPS coordinates for the entrance to your farm, it would be greatly appreciated to ensure we arrive without any difficulty.
>
> There will be five people attending the meeting, including myself.
>
> Should there be anything further you would like us to prepare or bring along for the meeting, please don't hesitate to let us know, we'll be happy to assist in any way we can.
>
> Kind regards,

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, August 1, 2025 1:29 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Good day

Monday is fine with me

I did inform Johans also

Will 12h00 be convenient for you?

How may people?

Regards

On Fri, 01 Aug 2025, 11:42 ERM Arcus Amsterdam, <ERM.ArcusAmsterdam@erm.com> wrote:

> Good Morning Mr Meyer,
>
> Thank you for your response. If you feel Monday is too short availability, please do not feel rushed. We would be happy to accommodate you later in the week. We will await your feedback and move accordingly from there.
>
> Kind Regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Thursday, July 31, 2025 6:13 PM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Some people who received this message don't often get email from meyerjosua55@gmail.com. Learn why this is important

EXTERNAL MESSAGE

Goodday

Will confirm tomorrow before 12h00

Thanks

On Thu, Jul 31, 2025 at 2:22 PM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Dear Mr Meyer,
>
> I hope this message finds you well.
>
> I'm writing to kindly follow up on our proposed meeting scheduled for Monday, 4 August at 13:00 at your farm. We would appreciate it if you could please confirm whether you are still available to meet on that date.
>
> Should you require any additional information or documentation ahead of the meeting, beyond what you have already requested, please don't hesitate to let me know, I'd be happy to assist.
>
> Looking forward to your confirmation.
>
> Kind regards,

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Monday, July 28, 2025 11:49 AM
To: Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Meyer,

Following discussions with the applicant, unfortunately it will not be possible to schedule a meeting prior to 1 August due to limited availability.

However, we would be pleased to meet with you on Monday the 4th of August 2025 at 13:00, as per your request, at your farm.

Kindly confirm whether this date and time are suitable, and please advise who will be attending the meeting from your side.

I will continue to provide you with the requested documentation ahead of the meeting.

Kind regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 25, 2025 5:11 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

Proposed date for the meeting seems to be too close to submission of comments which is already 9/08/25.

Can you arrange the meeting for us before 1/07/2025.

Can you in the meantime forward the detail previously requested

- All the documentation with Department concerning the 3 months extension granted even after time lapps to submit final report

- Mulilo's permits to fit telemetry device on the two martial eagles

- AfriAvian motivation for altering Figure 33 in both avifaunal reports

Above info are urgently required and no reason to wait for the meeting

Regards

Josua

On Tue, Jul 22, 2025 at 10:30 AM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Hi Lucien
>
> There might be a mistake in your day or date ..... 7 August 2025 is a Thursday.

Nevertheless the 6 or 7 th August 2025 is fine with us.

Will appreciate it if we can meet on my farm.

We intend to be three (3) I&AP

Regards

Josua Meyer

On Mon, Jul 21, 2025 at 11:36 AM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Mr. Meyer,
>
> Good day, and thank you for your recent correspondence regarding the Draft EIA Reports.
>
> We acknowledge your request for a meeting to discuss the concerns raised. In consultation with the applicant, Mulilo, we are proposing a provisional date of Wednesday, 7 August 2025, with the meeting to be held at a venue in Ermelo. Kindly confirm whether this date is suitable for you and whether you will be attending alone or accompanied by others.
>
> As a registered I&AP, your comments form an important part of the formal public participation process and will be incorporated into the Final EIA Reports. We also acknowledge the concerns raised regarding the tagging of the Martial Eagles. Relevant documentation, including permits, will be made available where appropriate to support transparency and clarity during the engagement.
>
> We look forward to your response.
>
> Kind Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 18, 2025 4:51 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Johans Van Wyk <Piwy@mulilo.com>; Lloyd@mulilo.com
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday mr Lucien Barbeau,

Referring to your email dated 7/04/2025 it will be appreciated if you can arrange such a meeting urgently before the 9/08/2025 with the applicant, Mulilo, on site.

Concerns as previously raised with Mulilo in an email dated 19/02/2025 will be on the agenda. That request for a meeting was refused by Mulilo.

Another urgent item which also must be discussed is the tagging of the two martial eagles. According to the MTPA report in my possession, the martial eagles were tagged by Mulilo without a permit. Copy of the report can be provided at the meeting.

That leaves the tagging of the martial eagles illegally, if not criminal.

Therefore the data being used in the specialist report is illegally obtained and all sections, models and references where data has been used must be removed from the report.

Looking forward to your urgent response.

Regards

Josua Meyer (I&AP)

On Wed, Jul 16, 2025 at 4:41 PM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Goodday Sir
>
> The avifaunal specialist removed in both reports, Sheepmoor WEF and Emvelo WEF, the High Sensitivity - Turbine Exclusion Zone in Figures 33 for the aquatic buffer zones from an avifaunal perspective.
>
> It must be an unintentional mistake and request reinstatement of it.
>
> If it was deliberate we request the detailed reasoning and motivation for such a drastic decision.
>
> Thanks
>
> Josua Meyer
>
> On Wed, Jul 16, 2025 at 1:54 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:
>
> > Dear Interested and Affected Party,
> >
> > Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.
> >
> > The revised comment period now ends on 15 August 2025.
> >
> > All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.
> >
> > Thank you for your continued participation.

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted]

erm.com



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From: Mpho Malema
Sent on: Saturday, 16 August 2025 12:12:39
To: ERM Arcus Amsterdam
CC: Stephanie Gopaul; Lucien Barbeau
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Lucien, the response needs to be the one we are still waiting from Mulilo. The letter is the one that was sent again during this revised Draft submission. Please remind Mulilo.

Kind Regards

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Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted] **erm.com**



From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, August 15, 2025 3:33 PM
To: Mpho Malema <mpho.malema@erm.com>
Cc: Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Mpho,

Could you please include this comment and respond as per Steph's recommendation

Thank you!

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Sent: Friday, August 15, 2025 3:20 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Lucien

But we do have to capture it now and respond- we can even state that it was outside the comment period etc.

Stephanie Gopaul
Partner
She/Her/Hers

Durban [redacted] **erm.com**

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, August 15, 2025 3:15 PM
To: Lloyd Barnes <Lloyd@mulilo.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Anton Lohse <Anton@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <Andrew@mulilo.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Lloyd,

Please note that we do not have a response for this I&AP comment, as it was submitted outside of the designated public participation period at the time.

Kind Regards

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Lloyd Barnes <Lloyd@mulilo.com>
Sent: Friday, August 15, 2025 11:22 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Anton Lohse <Anton@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <Andrew@mulilo.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

Could you please provide the response sent to the I&AP on the 22nd of April?

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
C[redacted]
www.mulilo.com
21st Floor, Portside, 5 Buitengracht Street, Cape Town, 8001

mulilo

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Wednesday, 13 August 2025 16:47
To: Lloyd Barnes <Lloyd@mulilo.com>
Cc: Anton Lohse <Anton@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <Andrew@mulilo.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

Hi Lloyd,

Please note that we have received comments and concerns from an I&AP who operates a landing strip near the proposed development.

These comments were originally submitted on 22 April after the previous Draft EIA Phase PPP period. The I&AP has now resubmitted the same comments during the current PPP period.

Given the nature of the concerns raised, and that the submission has come via the I&AP's legal representative, we kindly request that the Mulilo legal team review the comments and provide any necessary input.

Regards,

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Riaan Meintjes <riaan@themis.co.za>
Sent: Thursday, August 7, 2025 1:48 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

You don't often get email from riaan@themis.co.za. Learn why this is important
EXTERNAL MESSAGE

Dear Sir/Madam

We have briefly perused the draft EIA report and have been unable to find any reference to the comment submitted by us on the instructions of our client, a copy of which is attached to this email.

Kindly refer us to the relevant pages of the draft report which deal with our client's comments?

We further note from the draft report that a formal application has been lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted. Kindly furnish us with a copy of this application and all communications to and from ATNS relating thereto.

We look forward to hearing from you as a matter of urgency.

Regards
Riaan Meintjes
Director

BusinessDay Best Lawyers for 2025: Arbitration and Mediation; Litigation; Real Estate Law

HAYES EST 2005 INCORPORATED

[redacted]
W: www.themislawchambers.co.za

Unit 1, Roeland Square
Corner of Roeland Street and Drury Lane
Cape Town, 8001

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Date: Wednesday, 16 July 2025 at 13:55
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Interested and Affected Party,

Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.

The revised comment period now ends on 15 August 2025.

All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.

Thank you for your continued participation.

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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Disclaimer

Prior to making any payment to our firm, please confirm the banking details telephonically with one of our directors as listed on our website. We will never send you an email advising you of a change of our banking details. Any email mentioning a change of banking details is false, and we ask that you kindly contact one of our directors immediately should you receive such an email.

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From: ERM Arcus Amsterdam
Sent on: Saturday, 16 August 2025 12:32:54
To: Josua Meyer; ERM Arcus Amsterdam
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr. Meyer I hope this email finds you well.

I hereby confirm that your comments have been received and will be incorporated in the final CRR as indicated below.

Kind Regards

ERM
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Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted] **erm.com**



From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, August 15, 2025 3:48 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

My comments were sent from Postnet, Ermelo due to lack of scanning facilities.

Can you please acknowledge if you received all 28 page.

Thanks

On Fri, Aug 15, 2025 at 10:50 AM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Good day Mr Meyer,
>
> Thank you for your email and your responses. We acknowledge receipt of your comments and confirm that they will be incorporated into the Comments and Responses Report for the proposed development.
>
> A formal response to your comments will be provided within that report, which will form part of the Final EIA submission to the DFFE.
>
> Kind Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Thursday, August 14, 2025 10:44 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Dear Lucien

Just want to get the records straight without getting into an informal debate

1 - 4 : Correspondence

- Request info from ERM, Mr Lucien Barbeau, on 17/12/2024 at 11h04.
  Still no response ?

- First request for meeting to applicant, mr Johans van Wyk, on 19/2/2025 at 12h35.
  Applicant, mr Johans van Wyk, reject request on 19/02/2025 at 15h35
  First formal request for meeting through ERM on 16/4/2025 at 03h24. No response ?
  Request again for meeting through ERM, Mr Lucien Barbeau, on 18/07/2025 at 16h51.
  Meeting took place on 4/08/2025.
  Almost 8 months later!?

- Requested on 16/06/2025 for official documentation concerning the 3 month extension.
  Repeat request during meeting of 4/08/2025
  Received info only on 12/08/2025
  Almost 2 month later?!

- Request tagged data of two martial eagles from ERM on 11/03/2025 at 10h59
  Repeat request for tagged data from ERM on 29/03/2025 at 11h44
  Received refusal of data in email from applicant, mr Johans van Wyk, on 14/4/2025 at 20h40. ERM was also CC.
  Remind ERM, Mr Barbeau, on 15/04/2025 at 22h11 that formal answer on request for tagged data is still outstanding.
  Still no response from ERM !!

Is that what you and ERM means by **CREDIBLE, TRANSPARENT and ACCOUNTABLE?**

5 - 8 : Tagged data

Mulilo and EWT is in a partnership, confirmed in email from mr Johans van Wyk, in tagging the birds and therefore co-accountable for each other's conduct
The issue is not who did wrong but is the tagging done with a valid permit.?
If not, then it is illegal and that also implies for the data obtained by the unlawful act.
What ERM says by implication is that they are comfortable in driving a stolen vehicle as long as it is to their advantage?

Very dangerous and controversial approach..
We still insist that everything connected to the tagged data must be removed from the avifaunal report because it is illegally obtained regardless who did it.

The avifaunal specialist used the Verkykerkop tagged data in his report and on that ground we requested the permit to tagg that eagle (Bred)

9 - 11 : Specialist report and NDA

Mr Moodie strongly opposed the powerline crossing his farms and that also without consulting him.That was the main reason why Mr Moodie attended the meeting. Maybe you did not pick it up because Mr Moodie spoke Afrikaans.

Will address the rest in my comments.

Regards

Josua Meyer

On Tue, Aug 12, 2025 at 12:08 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Good day Mr Meyer,
>
> Please find below our responses to your comments.
>
> We are in the process of finalising the meeting minutes, which will be shared with you before the end of this week. Thank you
>
> **1 - The EAP is expected to participate and actively engage with the impacted community. Why has my request for a meeting since February 2025 repeatedly declined and pushed in at the 11th hour?**
>
> MULILO: The applicant regrets that the *ad hoc* meeting request sent by you to the applicant in February this year was not attended to immediately. Unfortunately, the request for a private meeting with the applicant was not seen at the time by the applicant's representatives, and the applicant sincerely apologises for any frustration this may have caused you. The applicant and EAP remain committed to engaging with I&APs, and the in-person meeting requested by yourself, and attended by me as the appointed EAP for this project, and by the applicant's representatives, on the 4th of August 2025 was welcomed and seen to constitute substantive progress in responding to your queries. Your queries, and these responses, will obviously form part of the Comments and Responses Report included together with the next draft of the EIA Report.
>
> ERM: As the EAP, we are committed to engaging meaningfully with Interested and Affected Parties (I&APs) in accordance with the requirements of the Environmental Impact Assessment (EIA) Regulations under NEMA. We have undertaken all necessary steps and where possible, gone beyond these requirements to engage with the community. This has included an additional focus group meeting with you at a mutually suitable time within the regulated timelines to address your concerns. All I&AP comments have been acknowledged, and this engagement process remains ongoing.
>
> **2 - Do you as EAP feel that the process has been credible and transparent as well as accountable in circumstances where you reach out and respond to a request for a meeting at the 11th hour? How is that considered to be meaningful and in the spirit of the constitution?**
>
> ERM take the principles of credibility, transparency, and accountability in the EIA process very seriously. In this case, we regret that your initial request for a private meeting with the applicant, sent to the applicant in February, was not seen at the time by the applicant. Had it been, ERM would have engaged with you much earlier. Please include the EAP in such requests in order to ensure this is not missed in the future. The recent outreach was made in good faith. Once ERM became aware of your request for a meeting, ERM responded promptly in an effort to engage meaningfully and ensure your views are heard.

While ERM acknowledges that earlier engagement would have been preferable, we remain fully open to meeting and engaging in a meaningful and constructive way as the EIA process continues. ERM sees this as part of our commitment to upholding the intent and spirit of public participation, as set out in the Constitution and in NEMA and the 2014 NEMA EIA Regulations.

We believe that the EIA process we are facilitating has been credible, transparent, and accountable, in line with the requirements of NEMA. While the timing of certain engagements is sometimes influenced by the availability of multiple parties, we made every effort to accommodate your request for a meeting within the regulated timeframe. The process remains open, transparent, and documented for review by the competent authority.

3 - Why are biodiversity related issues only being property investigated at the 11th hour although the Provincial Department requested it in the scoping phase?

During the scoping phase, it was noted that a biodiversity offset may be required based on final layouts proposed. However, this indication was based on preliminary findings and initial specialist inputs, which were still being refined at the time. As is typical in EIA processes, more detailed and site-specific assessments only become available during the impact assessment phase, once the full suite of specialist studies is completed and verified. It is on the basis of these completed studies that a more accurate determination of residual impacts, and thus the need for and scale of a biodiversity offset, can be made.

We understand the importance of early clarity, but it's also essential that such recommendations are based on robust, defensible data. That said, ERM has aimed to finalise and address these issues as efficiently and transparently as possible once the necessary information became available.

Biodiversity-related issues have been considered from the outset of the EIA process, beginning in the scoping phase. The assessment has been iterative, with the project layout being amended several times to address environmental sensitivities and viability concerns, including biodiversity matters. These changes are documented in the Comments and Responses Report (CRR) and specialist assessments.

4 - Why are requested documentation regarding the additional 3 months extension granted by DFFE to the applicant still outstanding?

Please see the attached correspondence as requested.

5 - Are you as EAP confident that the data and modelling that has been undertaken to address bird related impacts and specifically the martial eagle is accurate and credible? If so, please explain why.

The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible.

The appointed avifaunal specialist is an expert in the field of wind energy facility impacts on birds. Based on their expertise and experience, we have no reason to doubt the accuracy, credibility, and applicability of the data and modelling undertaken for this assessment.

6 - Are you as EAP confident and can you confirm in writing that the data that is being obtained in relation to the martial eagle was correctly obtained and in accordance with all minimal standards and legal criteria?

As illuded to in our response to Point 5 above. The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report.

This permitting process is separate from the EIA, and as the EAP we do not have direct oversight over it.

7 - Are you as EAP comfortable that if the tagging of the martial eagle were done without a valid permit, that the tagged data can still be used in the specialist report? If so, please explain why.

The legality of the data collection process is the responsibility of the avifaunal specialist and the applicant. It is our understanding that a permit for such activities is legally required, and that the data included in the specialist report was provided on the basis that the necessary permit was obtained.

The data collected from the tagged Martial Eagle is invaluable. It provides critical insight into the bird's movements and habitat use, which directly strengthens the EIA findings; informs a more effective mitigation strategy; and ultimately, enhances the likely further and better protection of the species. As explained in Point 5 above – the EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The applicant was informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible.

8 - Are you as EAP in acceptance that the permits to tag the martial eagles, also the one at Verkykerskop, were not presented at the meeting? If so, please explain why.

The proposed Verkykerskop Wind Farm cluster is not a part of the proposed Emvelo and Sheepmoor wind farms and are consequently not relevant or applicable to the current process. The EAP supports the use of scientifically robust data and modelling, as this forms the foundation for effective and objectively defensible mitigation strategies. The EAP and applicant were informed by the EWT at the time that the Martial Eagles were trapped with the necessary permit in terms of the relevant provisions of the Mpumalanga Nature Conservation Act, 10 of 1998 (to catch birds for scientific purposes) was in place for the capture of the Martial Eagles. If the Martial Eagles were trapped without the necessary permit in place, then that might have implications for the person who undertook the capture in respect of possible sanction under the provincial conservation legislation referred to directly above. It does not however have the automatic consequence that the tracking data is unusable or otherwise unsuitable for purposes of the avifaunal expert's research, and ultimately, for inclusion in the draft EIA Report. As EAP, I am confident that the data and modelling undertaken to date to address avifaunal impacts (with particular reference to the Martial Eagle in response to your question) is both accurate and credible.

As a general practice, fieldwork permits obtained by specialists are not typically presented during stakeholder engagement or I&AP meetings.

9 - Are you as EAP confident that all the recommendations in the specialist reports and specifically the Social report are satisfactorily addressed? If not, please explain why.

In the specialist reports, including the Social Impact Assessment, have been carefully considered and addressed to the extent possible within the on-going EIA process, and that will continue to be the case.

Where certain recommendations require further action, these have been clearly outlined for implementation during the construction and operational phases, and will be monitored through the Environmental Management Programme (EMPr).

We have reviewed the social specialist's findings and recommendations and accept them as valid and credible, given the specialist's expertise in the field. Recommendations and mitigation measures that could reasonably be incorporated into the Environmental Management Programme (EMPr) have been included. If there are specific recommendations you believe have not been adequately addressed, please let us know so that we can review them.

10 - It became clear in the meeting that none of the affected landowners are prepared to allow the proposed powerline over their properties. Are AEP comfortable to support an application without a secured powerline route?

Thank you for raising this important point.

While the EIA process does not require landowner consent for linear infrastructure at this stage, the applicant is committed to engaging in good faith negotiations with affected landowners to secure the necessary servitudes following the achievement of the EA. The landowner in question (Mr Moodie) did not formally raise any objections. He advised that the routing could be relooked at in due course. In recognition of the risks involved, and in the context of the NEMA EIA Regulations' requirement to consider reasonable and feasible alternatives, alternative powerline routes have also been assessed as part of the EIA to reduce potential impacts and improve the likelihood of an acceptable alignment being secured. The other landowners did not formally raise any objections yet and formal discussions still need to take place with these landowners to the extent that the OHL needs to traverse their respective properties.

The routing referred to in your comment is an alternative powerline route considered, and is not the preferred route. Our role as the EAP is to independently assess the potential impacts of alternatives, identify mitigation measures to reduce impacts to acceptable levels, and provide an informed opinion on the acceptability of the project. The final decision on whether the project may proceed rests with the DFFE.

11 - The avifaunal specialist signed a NDA (non disclosure agreement) with the applicant and it was also revealed in the meeting by the applicant that they collectively determined the shaped exclusion zones for the southern bald ibis. Are you as EAP comfortable that it is not in contradiction with the declaration the avifaunal specialist signed as independant specialist? If so, please explain why.

The avifaunal exclusion zones are proposed by the appointed avifaunal specialist alone, informed by additional avifaunal studies commissioned by the applicant. The applicant has no role to play in determining the shape or size of proposed buffers. Please also see my response to your fifth question, above. It is common practice for parties to sign NDAs in order to protect confidential information, such as for instance intellectual property, specific project sites and does do not detract from or limits a specialist to act independently and impartially.

We operate on the assumption that all appointed specialists, including the avifaunal specialist, conduct their work in an ethical, independent manner, in compliance with the EIA Regulations. Both we as the EAP and all specialists have signed declarations of independence, as required under NEMA, confirming that our assessments are conducted impartially.

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Tuesday, August 12, 2025 11:32 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

Time is running out.

Where are the minutes of the meeting as well as a copy of the recorded transcript?

Thanks

On Tue, Aug 12, 2025 at 9:15 AM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Good day Mr Meyer,
>
> I trust that you are well. Kindly note that we will provide our responses to your comments by close of business today.
>
> Kind Regards
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Senior Consultant
>
> Cape Town [redacted] **erm.com**
>
> **From:** ERM Arcus Amsterdam
> **Sent:** Wednesday, August 6, 2025 2:56 PM
> **To:** Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
> **Cc:** Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za
> **Subject:** RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
>
> Dear Mr Meyer,
>
> Thank you for your email and for taking the time to share your reflections following our meeting on Monday.
>
> We acknowledge receipt of your comments and the additional questions you have raised. We appreciate your continued engagement in the process and will respond to your queries as soon as possible.
>
> Should you have any further inputs in the meantime, please feel free to share them with us.
>
> Kind Regards,

Lucien Barbeau
Senior Consultant

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Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Wednesday, August 6, 2025 1:47 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

The purpose of the meeting was to address concerns of the I&AP's regarding the proposed Sheepmoor and Emvelo WEF's. The applicant gives the impression that they are not interested in taking any action regarding the I&AP's concerns and attend it only to avoid negative reflection. Therefore the meeting created unfortunately more questions than answers. Your EAP's input was also disappointing.

We urgently need clarification and answers on the following

1 - The EAP is expected to participate and actively engage with the impacted community. Why has my request for a meeting since February 2025 repeatedly declined and pushed in at the 11th hour?

2 - Do you as EAP feel that the process has been credible and transparent as well as accountable in circumstances where you reach out and respond to a request for a meeting at the 11th hour? How is that considered to be meaningful and in the spirit of the constitution?

3 - Why are biodiversity related issues only being property investigated at the 11th hour although the Provincial Department requested it in the scoping phase?

4 - Why are requested documentation regarding the additional 3 months extension granted by DFFE to the applicant still outstanding?

5 - Are you as EAP confident that the data and modelling that has been undertaken to address bird related impacts and specifically the martial eagle is accurate and credible? If so, please explain why.

6 - Are you as EAP confident and can you confirm in writing that the data that is being obtained in relation to the martial eagle was correctly obtained and in accordance with all minimal standards and legal criteria?

7 - Are you as EAP comfortable that if the tagging of the martial eagle were done without a valid permit, that the tagged data can still be used in the specialist report? If so, please explain why.

8 - Are you as EAP in acceptance that the permits to tag the martial eagles, also the one at Verkykerskop, were not presented at the meeting? If so, please explain why.

9 - Are you as EAP confident that all the recommendations in the specialist reports and specifically the Social report are satisfactorily addressed? If not, please explain why.

10 - It became clear in the meeting that none of the affected landowners are prepared to allow the proposed powerline over their properties. Are AEP comfortable to support an application without a secured powerline route?

11 - The avifaunal specialist signed a NDA (non disclosure agreement) with the applicant and it was also revealed in the meeting by the applicant that they collectively determined the shaped exclusion zones for the southern bald ibis. Are you as EAP comfortable that it is not in contradiction with the declaration the avifaunal specialist signed as independant specialist? If so, please explain why.

Due to the time constraint answers required before the 11/08/2025.

Regards

On Sun, Aug 3, 2025 at 12:36 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Mr Meyer,
>
> Thank you for confirming the meeting for 12h00 tomorrow, 4 August, at your farm. That time works perfectly, and we look forward to meeting with you.
>
> If you would kindly share the physical address or GPS coordinates for the entrance to your farm, it would be greatly appreciated to ensure we arrive without any difficulty.
>
> There will be five people attending the meeting, including myself.
>
> Should there be anything further you would like us to prepare or bring along for the meeting, please don't hesitate to let us know, we'll be happy to assist in any way we can.
>
> Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, August 1, 2025 1:29 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Good day
Monday is fine with me
I did inform Johans also
Will 12h00 be convenient for you?
How may people?
Regards

On Fri, 01 Aug 2025, 11:42 ERM Arcus Amsterdam, <ERM.ArcusAmsterdam@erm.com> wrote:

> Good Morning Mr Meyer,
>
> Thank you for your response. If you feel Monday is too short availability, please do not feel rushed. We would be happy to accommodate you later in the week. We will await your feedback and move accordingly from there.
>
> Kind Regards,

Lucien Barbeau
Senior Consultant

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Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Thursday, July 31, 2025 6:13 PM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Some people who received this message don't often get email from meyerjosua55@gmail.com. Learn why this is important
EXTERNAL MESSAGE

Goodday
Will confirm tomorrow before 12h00
Thanks

On Thu, Jul 31, 2025 at 2:22 PM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Dear Mr Meyer,
>
> I hope this message finds you well.
>
> I'm writing to kindly follow up on our proposed meeting scheduled for Monday, 4 August at 13:00 at your farm. We would appreciate it if you could please confirm whether you are still available to meet on that date.
>
> Should you require any additional information or documentation ahead of the meeting, beyond what you have already requested, please don't hesitate to let me know, I'd be happy to assist.
>
> Looking forward to your confirmation.
>
> Kind regards,

Lucien Barbeau
Senior Consultant

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Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Monday, July 28, 2025 11:49 AM
To: Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Meyer,

Following discussions with the applicant, unfortunately it will not be possible to schedule a meeting prior to 1 August due to limited availability.

However, we would be pleased to meet with you on Monday the 4th of August 2025 at 13:00, as per your request, at your farm.

Kindly confirm whether this date and time are suitable, and please advise who will be attending the meeting from your side.

I will continue to provide you with the requested documentation ahead of the meeting.

Kind regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 25, 2025 5:11 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

Proposed date for the meeting seems to be too close to submission of comments which is already 9/08/25.

Can you arrange the meeting for us before 1/07/2025.

Can you in the meantime forward the detail previously requested

- All the documentation with Department concerning the 3 months extension granted even after time lapps to submit final report

- Mulilo's permits to fit telemetry device on the two martial eagles

- AfriAvian motivation for altering Figure 33 in both avifaunal reports

Above info are urgently required and no reason to wait for the meeting

Regards

Josua

On Tue, Jul 22, 2025 at 10:30 AM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Hi Lucien
>
> There might be a mistake in your day or date ..... 7 August 2025 is a Thursday.

Nevertheless the 6 or 7 th August 2025 is fine with us.

Will appreciate it if we can meet on my farm.

We intend to be three (3) I&AP

Regards

Josua Meyer

On Mon, Jul 21, 2025 at 11:36 AM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Mr. Meyer,
>
> Good day, and thank you for your recent correspondence regarding the Draft EIA Reports.
>
> We acknowledge your request for a meeting to discuss the concerns raised. In consultation with the applicant, Mulilo, we are proposing a provisional date of Wednesday, 7 August 2025, with the meeting to be held at a venue in Ermelo. Kindly confirm whether this date is suitable for you and whether you will be attending alone or accompanied by others.
>
> As a registered I&AP, your comments form an important part of the formal public participation process and will be incorporated into the Final EIA Reports. We also acknowledge the concerns raised regarding the tagging of the Martial Eagles. Relevant documentation, including permits, will be made available where appropriate to support transparency and clarity during the engagement.
>
> We look forward to your response.
>
> Kind Regards,
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Senior Consultant
>
> Cape Town [redacted] **erm.com**
>
> **From:** Josua Meyer <meyerjosua55@gmail.com>
> **Sent:** Friday, July 18, 2025 4:51 AM
> **To:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
> **Cc:** Johans Van Wyk <Piwy@mulilo.com>; Lloyd@mulilo.com
> **Subject:** Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
>
> **EXTERNAL MESSAGE**
>
> Goodday mr Lucien Barbeau,
>
> Referring to your email dated 7/04/2025 it will be appreciated if you can arrange such a meeting urgently before the 9/08/2025 with the applicant, Mulilo, on site.
>
> Concerns as previously raised with Mulilo in an email dated 19/02/2025 will be on the agenda. That request for a meeting was refused by Mulilo.
>
> **Another urgent item which also must be discussed is the tagging of the two martial eagles. According to the MTPA report in my possession, the martial eagles were**

tagged by Mulilo without a permit. Copy of the report can be provided at the meeting.

That leaves the tagging of the martial eagles illegally, if not criminal.

Therefore the data being used in the specialist report is illegally obtained and all sections, models and references where data has been used must be removed from the report.

Looking forward to your urgent response.

Regards

Josua Meyer (I&AP)

On Wed, Jul 16, 2025 at 4:41 PM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Goodday Sir
>
> The avifaunal specialist removed in both reports, Sheepmoor WEF and Emvelo WEF, the High Sensitivity - Turbine Exclusion Zone in Figures 33 for the aquatic buffer zones from an avifaunal perspective.
>
> It must be an unintentional mistake and request reinstatement of it.
>
> If it was deliberate we request the detailed reasoning and motivation for such a drastic decision.
>
> Thanks
>
> Josua Meyer
>
> On Wed, Jul 16, 2025 at 1:54 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:
>
> > Dear Interested and Affected Party,
> >
> > Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.
> >
> > The revised comment period now ends on 15 August 2025.
> >
> > All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.
> >
> > Thank you for your continued participation.
> >
> > 
> >
> >
> > **Lucien Barbeau**
> > Senior Consultant
> >
> > Cape Town [redacted] **erm.com**
> >
> > **From:** ERM Arcus Amsterdam
> > **Sent:** Tuesday, July 15, 2025 4:43 PM
> > **To:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>

Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner



Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Stephanie Gopaul
Sent on: Saturday, 16 August 2025 16:51:36
To: ERM Arcus Amsterdam; Lucien Barbeau; Mpho Malema; Stephen Burton; Lloyd Barnes; Gavin Cowden
Subject: Fw: MTPA comments on proposed Emvelo and Sheepmoor WEF
Attachments: LUA25-3966(4) MTPA obj Emvelo revised D EIA R WEF & Auxiliary infrastructure ERM.pdf (1.03 MB), LUA25-3967(4) MTPA obj Sheepmoor DEIA R WEF Auxiliary infrastructure ERM.pdf (1.78 MB)

Hi All

Please see comments from MTPA attached.

Regards
Stephanie

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From: Mervyn Lotter <Mervyn.Lotter@mtpa.co.za>
Sent: Friday, August 15, 2025 11:59:16 pm
To: Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Cc: Bathandwa Ncube <bncube@dffe.gov.za>; Masina Morudu <memorudu@dffe.gov.za>; Mashudu Mudau <mamudau@dffe.gov.za>; Portia Makitla <pmakitla@dffe.gov.za>; BC Admin <bcadmin@dffe.gov.za>; Robyn Luyt <rluyt@mpg.gov.za>; Gavin Cowden <gcowden@mpg.gov.za>; Ms S Mbuyane <mbuyanesb@mpg.gov.za>; Khumbelo Malele <Khumbelo.Malele@mtpa.co.za>; Frans Krige <frans@mtpa.co.za>; Celia de Waal <celia@mtpa.co.za>
Subject: Re: MTPA comments on proposed Emvelo and Sheepmoor WEF

You don't often get email from mervyn.lotter@mtpa.co.za. Learn why this is important

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

EXTERNAL MESSAGE



Dear Ms Gopaul

Please find attached the MTPA's comments on the proposed Emvelo and Sheepmoor WEFs.

Best wishes
Mervyn

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From: Lucien Barbeau
Sent on: Monday, 18 August 2025 11:59:55
To: Jamie Pote; ERM Arcus Amsterdam
CC: Stephen Burton
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]
Attachments: Sheepmoor WEF_Revised EIA 5G28_Aug2025.pdf (2.34 MB), Emvelo WEF Revised EIA 5G30_Aug2025.pdf (2.58 MB)

Hi Jamie,

Thank you for your support and delivering these reports at short notice. If you feel that these report updates were out of your scope and you would like to submit a change order, the client is open to it so please do share that with me.

I have attached the DARDLEA comments for your attention, I kindly require assistance with the with regards to comments directed to your specialism, notably 18.3 and 18.5.

If I could kindly request your assistance to argue your point on these grassland comments.

Kind Regards

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Jamie Pote <jamiepote@live.co.za>
Sent: Friday, August 15, 2025 7:38 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Hi Lucien, here are the reports with the revised layouts replaced where applicable (the last few maps in the reports).

There is an overlap with the Emvelo/Sheepmoor boundary that was provided where a central area fall within both sites. I have not had time to figure out what's going on there or to scrutinise the layout to check if there are any changes that affect the outcome of the assessment.

Terr Bio Assess Report - Mulilo Emvelo WEF (Jamie Pote) 20250815) Final.docx

Terr Bio Assess Report - Mulilo Sheepmoor WEF (Jamie Pote) 20250815_Final.docx

Terr Bio Assess Report - Mulilo Sheepmoor WEF (Jamie Pote) 20250815_Final.pdf

Terr Bio Assess Report - Mulilo Emvelo WEF (Jamie Pote) 20250815) Final.pdf

Regards
Jamie

Mr Jamie Pote
Biodiversity – Environmental – GIS

BSc (Hons) Pr. Sci. Nat (115233)
Postnet Suite 57, Private Bag X13130, Humewood - Port Elizabeth - South Africa
[redacted]
jamiepote@live.co.za

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 06 August 2025 16:26
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Specialist,

I trust you are well.

Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by Monday, 12 August 2025.

If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.

Kind regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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Departement van Landbou, LandelikeOntwikkeling, GrondenOngewing Sake

umNyangoweZelimo UkuThuthukiswakweeNdawozemaKhaya, iNarhaneeNdabazeBhoduluko

Enquiries : **R. Luyt / O. Fakude**
Telephone : **(013) 004 1099**
Reference : **1/3/1/16/5G-30**

Stephanie Gopaul
ERM Southern Africa (Pty) Ltd
240 Main Road
Rondebosch
7700

Email: ERM.ArcusAmsterdam@erm.com

Dear Madam,

REVISED DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT: ACTIVITIES ASSOCIATED WITH THE EMVELO WIND ENERGY FACILITY ON PORTIONS 1, 2, 5 & RE OF THE FARM SCHIMMELHOEK 272 IT, AND PORTIONS 1, 2, 5, 6 & RE OF THE FARM SCHIEDAM 274 IT; THE ASSOCIATED GRID CONNECTION ON PORTIONS 1, 2, 5, 6 & RE OF THE FARM SCHIEDAM 274 IT, PORTIONS 2, 3, 4, 6, 9, 11, 12 & 13 OF THE FARM WAAIHOEK 286 IT, PORTION 7 OF THE FARM WITPUNT 267 IT, REMAINDER OF THE FARM ONVERWACHT 273 IT, PORTIONS 1 & 6 OF THE FARM ZWARTWATER 288 IT, PORTIONS 3, 4, 5, RE 6, 9, 10 & 11 OF THE FARM WELTEVREDEN 289 IT, THE REMAINDER, RE 1, RE 9, RE 11, RE 14 AND PORTIONS 7 & 8 OF THE FARM MOOIPLAATS 290 IT, PORTION 8 OF THE FARM BOSJESSPRUIT 291 IT, AND PORTIONS 1 & 2 OF THE FARM WELGELEGEN 322 IT; AND ASSOCIATED ACCESS ROADS ON PORTIONS 6, 7, 12, 23 & 26 OF THE FARM ROODEWAL 272 IT AND PORTIONS 1, 2, 3, 4 & 26 OF THE FARM ONVERWACHT 273 IT, MSUKALIGWA LOCAL MUNICIPALITY

The revised draft environmental impact assessment report which was submitted by you in respect of the abovementioned application and received by the Department on 16 July 2025 has reference. The Department has considered the content of the report, and has the following comments:

1. The layout provided in the initial draft EIAR included 24 turbines. It was not explicit in the revised draft EIR, which now includes 22 turbines, but after scrutinizing the layout plan and the responses provided in the comments and response report (CRR), we have been able to ascertain the following changes: The removal of WTG 24; the movement of WTG 21 out of Emvelo and into the Sheepmoor site; and slight changes to the localities of WTGs 3, 7, 12, 13, 14, 19, 20, 22, 23 and 25. None of the turbines that were moved or micro-sited have been moved into less sensitive areas. Sixteen (16) of the 22 turbines proposed in the current layout, all of which were flagged in our previous comments, are still located in sensitive areas. Given that the requirement to avoid impacts in accordance with the mitigation hierarchy has not been adequately addressed, **these comments must be read in conjunction with our comments dated 10 April 2025, which still stand.**
2. The proposed Emvelo Wind Energy Facility and associated grid infrastructure is located on a site comprising: CBA Irreplaceable and Optimal; Intact Grassland Patches; Key Biodiversity Areas; the Grasslands Important Bird Area (IBA); Ecological Support Areas; National Protected Area Expansion Strategy Areas (NPAES); Threatened Ecosystems – including Wakkerstroom Montane Grassland and Eastern Highveld Grassland; CBA: Aquatic Rivers; ESA: Strategic Water Source Area; ESA: Wetlands and ESA: Important Subcatchments.

3. Furthermore, the proposed Emvelo WEF and associated grid connection is located in an area comprising a high fauna sensitivity, a high diversity of threatened bird species, and a high number of priority species for wind energy developments and power lines, including the following confirmed on site: African Grass Owl, African Marsh Harrier, Blue Crane, Cape Vulture, Denham's Bustard, Greater Flamingo, Grey Crowned Crane, Lanner Falcon, Martial Eagle, Secretarybird, Southern Bald Ibis, Sensitive Species 23, White-bellied Bustard, and Yellow-breasted Pipit.
4. According to the Avifaunal Assessment, a total of 253 bird species could potentially occur in the Broader Area where the Emvelo WEF and associated Grid Connection Infrastructure are proposed to be located. Of the 253 species, 38 species are classified as priority species for wind energy developments, of which 32 were recorded during pre-construction monitoring. Of the 253 species, 76 are considered power line sensitive species, 57 of which were recorded during the pre-construction monitoring.
5. DARDLEA is not supportive of development of WEFs (or any non-compatible land use) within Critical Biodiversity Areas and Key Biodiversity Areas, or within intact grassland patches. In respect of Intact Grassland Patches, it is important to note that the Mpumalanga Biodiversity Sector Plan (MBSP) specifically incorporated climate change into spatial priorities through the prioritisation of the connectivity of remaining intact grassland patches in the province, as they provide habitat for species to thrive, and allow for their dispersal. Intact grasslands are crucial for supporting threatened fauna and avifauna. This is verified in the faunal assessment which states that "any remaining Oribi sub-populations and any contiguous areas of intact grassland are considered as high conservation importance" and that "cumulative impacts may become more significant if added to existing or future impacts from other activities, such as other renewable energy projects in the area". Intact Grassland Patches are important source areas in terms of metapopulation dynamics. The MBSP - adopted in 2023 (Provincial Notice 279 of 2023) - is a planning tool that has been developed to manage biodiversity resources of the province by setting strategic objectives to ensure that spatial biodiversity and climate change priorities are effectively incorporated into land-use and development planning, environmental assessments and authorisations, and natural resource management within Mpumalanga Province. The links to the various reports and shape files, including the MBSP Technical Report which details the scientific methods used to identify Intact Grassland Patches, can be accessed at https://mtpa.maps.arcgis.com/sharing/rest/content/items/fc6d8f9e7ef84d2f87f86b91e8e9f87a/data).
6. While we acknowledge efforts to acquire GPS tracking data for Martial Eagle, the modelling of the data and the datasets must be subjected to additional independent peer-reviewed analyses in order to verify accuracy and confidence levels. In the absence of this, the precautionary approach, which is the application of sector-accepted buffers, must be applied.
7. While we acknowledge the methodology applied to inform the Avifaunal Specialist's Sensitivity Zones (Very High, High and Medium) for Martial Eagle and Southern Bald Ibis, confidence in the methodology also requires testing through a broad, formal peer-reviewed analysis within the avifaunal sector, which is beyond the scope of an EIA. Until this is achieved, a precautionary approach is warranted, as follows:
    7.1. In accordance with BirdLife SA's Bird Monitoring Reports from Operational Wind Energy Facilities in South Africa (2025), a nest buffer of 6km is recommended for Martial Eagles (which report also states that that the available data suggests that this buffer will not eliminate the risk of collisions, and that it would be necessary to implement additional mitigation measures outside of this area).
    7.2. A minimum buffer of 1km from Southern Bald Ibis colonies.
8. Similarly, turbines and all associated infrastructure, including access roads as well as the upgrading of existing roads (which are currently seldom-used jeep tracks), must avoid Yellow-breasted Pipit habitat entirely, i.e. both "Very High" and "High" sensitivity zones. It is also concerning to note that in the initial draft EIA, the Avifaunal Specialist had designated the modelled Yellow-breasted Pipit habitat entirely as "Very High Sensitivity – No-go Zone", but has in the revised report, incorporated a new "High Risk – Turbine exclusion zone" into the initial no-go zone, for, what it appears, the purpose of accommodating Collector networks and road networks. The Avifaunal Specialist does recommend moving Turbine 23 as it is located in the

turbine exclusion zone, but as indicated above, infrastructure – including roads and collector networks within Yellow-breasted Pipit habitat is not supported.

9. Given the limited data available on Species 23 movements and collision risks, the curtailment strategy for turbines proposed in the "Medium Sensitivity" Zone for the species is not supported. Mitigation strategies that have no data to validate their success cannot be used to replace the requirement for avoidance. All Turbines and all associated infrastructure must avoid Species 23 habitat entirely, i.e. in "Very High", "Medium" and "High" sensitivity zones.
10. The Avifaunal Report confirms the presence of Species 23, but the location is not disclosed. The Avifaunal Assessment must confirm how the recommended sensitivity zones for Species 23 align with BirdLife SA's "Guidelines for surveying and mitigating impacts on [Species 23] in avifaunal assessments for development applications", particularly in respect of the following excerpt of the guideline that specifies a 5km buffer to be applied to suitable wetlands:

    "*Birds function at a wider ecological scale than most upper-catchment wetlands, thus requiring a larger and interconnected species buffer zone to ensure adequate impact mitigation from developments. Literature from studies on waterbirds, particularly rallids, provides several recommendations for designing and implementing buffer zones. As a general guideline for developments with collision risks, like wind turbines,* ***buffer zones of at least 5 km between the development and wetlands suitable for the [Species 23] are recommended, with buffer zones of at least 1 km for delineated wetland inputs*** *(e.g., streams and aquifers), aquatic-habitat corridors (e.g., riverine habitat), and potential movement pathways between wetlands".*

11. The number of turbines that are located in areas recommended for avoidance (at least 16 out of 22), and the location of the roads, construction camps and OHLs in sensitive areas demonstrates that the site is not compatible with the proposed land use. The areas of concern as they relate to the abovementioned comments, are outlined below:
    11.1. WTG 3 – KBA; NPAES; Terrestrial Biodiversity High (Edge of Highveld Grassland).
    11.2. WTG 4 – Within 5km Martial Eagle Buffer.
    11.3. WTG 5 – Edge of High Risk Turbine Exclusion Zone for Sp23 (Highlighted in Revised Avifaunal Assessment to be moved); Within 5km Martial Eagle Buffer; Terrestrial Biodiversity High (Edge of Highveld Grassland).
    11.4. WTG 7 - Terrestrial Biodiversity High (Edge of Highveld Grassland).
    11.5. WTG 10 – Within 5km Martial Eagle Buffer.
    11.6. WTG 11 – Within 5km Martial Eagle Buffer; Terrestrial Biodiversity High (Edge of Highveld Grassland).
    11.7. WTG 12 – Within 5km Martial Eagle Buffer; Avifaunal High Risk Turbine Exclusion Zone (Highlighted in Revised Avifaunal Assessment to be moved); KBA.
    11.8. WTG 13 – Intact Grassland, Within 5km Martial Eagle Buffer; Avifaunal High Risk Turbine Exclusion Zone (Highlighted in Revised Avifaunal Assessment to be moved); Edge of High Risk Turbine Exclusion Zone for Sp23 (Highlighted in Revised Avifaunal Assessment to be moved); Faunal High Sensitivity - escarpment (highest category); IBA; NPAES.
    11.9. WTG 14 – CBA Optimal (no evidence of "invasion"); Within 5km Martial Eagle Buffer; Avifaunal High Risk Turbine Exclusion Zone (Highlighted in Revised Avifaunal Assessment to be moved); Edge of Intact Grassland; Fauna High Sensitivity; NPAES; IBA.
    11.10. WTG 15 - Partially within an untransformed CBA Irreplaceable, Edge of High Risk Turbine Exclusion Zone for Sp23 (Highlighted in Revised Avifaunal Assessment to be moved); Within 5km Martial Eagle Buffer; NPAES; KBA; Terrestrial Biodiversity High (Edge of Highveld Grassland).
    11.11. WTG 17 – KBA; IBA; NPAES.
    11.12. WTG 19 – Intact Grassland; IBA; NPAES; Faunal High Sensitivity - escarpment (highest category); Within 5km Martial Eagle Buffer; Avifaunal High Risk Turbine Exclusion Zone (Highlighted in Revised Avifaunal Assessment to be moved); Medium Risk Zone for Sp23.
    11.13. WTG 20 - Intact Grassland; Within 5km Martial Eagle Buffer; Avifaunal High Risk Turbine Exclusion Zone (Highlighted in Revised Avifaunal Assessment to be moved);

Medium Risk Zone for Sp23; Faunal High Sensitivity - escarpment (highest category); NPAES.

11.14. WTG 22 – Intact Grassland; Faunal High Sensitivity - escarpment (highest category); NPAES; IBA; within 5km Martial Eagle Buffer.

11.15. WTG 23 – Intact Grassland; Within 5km Martial Eagle Buffer; Yellow-breasted Pipit habitat (Highlighted in Revised Avifaunal Assessment to be moved); Medium Risk Zone for Sp23; Faunal High Sensitivity - escarpment (highest category); IBA; NPAES.

11.16. WTG 25 – Intact Grassland; Faunal High Sensitivity - escarpment (highest category); Within 5km Martial Eagle Buffer; Rotor-swept area penetrates High Risk Turbine Exclusion Zone for Southern Bald Ibis (Highlighted in Revised Avifaunal Assessment to be moved); Medium Risk Zone for Sp23; NPAES; IBA.

12. The following infrastructure is located in sensitive areas:
    12.1. The entire Grid in the southern Emvelo site: Intact Grassland; Faunal High Sensitivity - escarpment (highest category); High Avifauna Sensitivity (Due to, inter alia, the large amount of wetlands/drainage lines and natural grasslands).
    12.2. Portions of the OHL and access roads in southern Emvelo site: Intact Grasslands, which is confirmed High Sensitivity for Fauna, but note that intact grassland also crucial for avifauna).
    12.3. Collector network and Roads in Southern portion of Emvelo are in Yellow-breasted Pipit habitat (noting that upgrading seldom used jeep tracks will still have substantive impacts for the species).
    12.4. The construction camp is located adjacent to WTG15, which is in the Avifaunal Medium Risk Zone for Sp23 (which was recommended for removal by the Avifaunal Specialist).
13. Turbines locations in terms of Bat Sensitivity could not be confirmed. The Figures in the Bat Specialist Report dated February 2025 were once again not provided. We have not been able to determine whether any turbines in the current layout – following the re-positioning of turbines since the bat assessment was undertaken - are located in No-Go areas for Bats.
14. The Terrestrial Assessment (inclusive of Plant Species), did not apply the Site Ecological Importance (SEI) methodology, which is a requirement of the Species Environmental Assessment Guideline. The Species Protocols specifically stipulate that assessments "must be undertaken in accordance with the *Species Environmental Assessment Guideline"* (South African National Biodiversity Institute, 2020. Species Environmental Assessment Guideline. Guidelines for the implementation of the Terrestrial Fauna and Terrestrial Flora Species Protocols for environmental impact assessments in South Africa. South African National Biodiversity Institute, Pretoria). Non-compliance with the *Species Environmental Assessment Guideline* has resulted in the following deficiencies:
    14.1. Insufficient time was allocated to surveying in the appropriate season (only 4 days for both Sheepmoor and Emvelo WEF sites, as well as the Grid sites).
    14.2. The classification of the Montane Grassland on site as "moderate sensitivity" in the absence of applying all relevant criteria, including *inter alia*, conservation importance, functional integrity, receptor resilience, as well as species of conservation concern, spatial priorities, intact grassland patches, and CBAs.
    14.1. The montane ridge (where WTGs 13, 19, 20, 22, 23 and 25, along with grid infrastructure are proposed), which also coincides with intact grassland and the highest sensitivity for Fauna (according to the Faunal Assessment), being classified as "moderate sensitivity". (Noting further that according to the Fauna Assessment, "the high sensitive escarpment area is likely of general importance for a range of faunal groups, <u>representative of a large contiguous and ecologically intact area</u> <u>of mostly good-quality montane grassland</u>". If the correct and required criteria are applied, the classification of this area is more likely to be classified as "High" or "Very High Sensitivity".
15. As a result of the deficiencies in the Terrestrial Assessment outlined above, we have low confidence in the associated impact analysis, and dispute the Specialist's "low" significance ratings.
16. The Impact Analyses in respect of Avifauna and Fauna are also disputed.
    16.1. The Avifaunal Assessment recommended that 9 turbines in high risk zones be relocated, but this has not been implemented in the layout presented as the preferred alternative.

This is misleading; the impact analysis must be based on the layout presented, which would translate to High Significance ratings for all impacts assessed with respect to Avifauna.

16.2. The Fauna Assessment recommendations included moving turbines out of High Sensitivity Areas for Fauna. The Impact Analysis was therefore not undertaken on the layout that was presented, and is accordingly disputed. The significance ratings for impacts assessed with respect to fauna should remain High.

17. While an Oribi Management Plan has been undertaken and included in this revised draft EIA (not in the initial draft EIA), it cannot be motivation to mitigate the potential impact on the species. The Oribi Management Plan clearly states that an "Oribi baseline assessment will be required to understand the current status of the subpopulation, including distribution and population estimates". The report further states that the "WEF layout needs to minimise number of turbines and infrastructure (including laydown)".
18. Biodiversity Offset Strategy:
    18.1. According to the Biodiversity Offset Guideline, "*The desired outcome of biodiversity offsets is to ensure that - the cumulative impact of an authorised activity, or activities, and land and resource use change does not: result in the loss of irreplaceable biodiversity or jeopardise the ability to meet biodiversity targets; lead to any ecosystem with a threat status of Vulnerable or Least Concern becoming Endangered; or any Endangered ecosystem becoming Critically Endangered; or cause an irreversible decline in the conservation status of species and the presence of special habitats; or cause a significant loss in ecosystem services*". A biodiversity offset cannot therefore cater for the loss of Irreplaceable CBAs or intact grasslands. As detailed in the comments above, intact grasslands are crucial for supporting threatened fauna and avifauna.
    18.2. The Biodiversity Offset Guideline specifically states that "biodiversity offsets are not appropriate when an activity, or activities, will have residual impacts on biodiversity of very high significance, including when residual negative impacts will result in loss of irreplaceable biodiversity".
    18.3. In addition to Irreplaceable CBAs, the Biodiversity Offset Guideline also categorises the following as "irreplaceable biodiversity": Biodiversity of major potential concern, where residual impacts in this category could lead to – loss of vulnerable or potentially irreplaceable biodiversity in areas of recognised importance, such as – areas evaluated as having High Ecological Site Importance. We maintain that the correct and required implementation of the Species Environmental Assessment Guideline would have resulted in the Montane Grassland being classified as having High Ecological Site Importance.
    18.4. The Intact Grassland Patches on the site must therefore be avoided, and cannot be offset. The requirement to consider biodiversity offsets is applicable only once it has been demonstrated that all measures of avoidance have been exhausted. The loss of irreplaceable biodiversity cannot be offset, and, as outlined above, "irreplaceable biodiversity" includes, key ecological corridors recognized as important for evolutionary processes and climate change adaptation where no options to safeguard these processes exist.
    18.5. Furthermore, the Biodiversity Offset Report does not meet the following minimum requirements:
        i. A portfolio of candidate biodiversity offset sites, including the likelihood of each site's availability and feasibility.
        ii. The required biodiversity outcomes on each of the candidate biodiversity offset sites.
19. Cumulative Impact Assessment:
    19.1. In our comments dated 10 April 2025 on your original draft EIA, despite bringing another 5 approved and in-process WEFs (within a 35 km radius) to your attention (i.e. Zephyr, Ujekamanzi Ntabande and Daggafoort and Emvelo), your revised cumulative impact assessment once again fails to mention or assess these. Subsequently, there are now an additional 3 WEFs within 35 km that are now in-process, i.e. Leghoya WEF 1, 2 & 3, and another one (1) within a 55 km radius (i.e. Anemoi WEF).

19.2. Furthermore, although section 4.3.3 states that "the scope of this assessment will include all operational, approved or current and planned renewable energy applications", in addition to the approved or in-process WEFs identified in 17.1. above (not included in this assessment), there are actually an additional two (2) WEFs within 35 km and a further two (2) proposed WEFs (i.e. Pre-Application) within a 55 km radius, that have not been identified. The total number of turbines within 35 km is more than double that indicated in both the Draft EIA and Revised Draft EIA reports, i.e. 435 (and not 192) and within a 55 km radius there are more than 663 turbines (approved, in-process and proposed). As a minimum, the cumulative impact of approved and in-process applications must be assessed.

19.3. The potential cumulative impact on avifauna, as indicated in our comments dated 10 April 2025, is now therefore likely to be even more substantial, due to the increased number of proposed turbines in the surrounding landscape. Of particular concern is the potential cumulative impact on Martial Eagles and Cape Vultures. The BirdLife South Africa Occasional Report Series 3: Summary of Bird Monitoring Reports from Operational Wind Energy Facilities in South Africa (February 2025), indicates that at current fatality rates due to collisions with wind turbines, "fatalities of Martial Eagles may already be exceeding the Potential Biological Removal (PBR) rate". Furthermore, "if current fatality rates at operational wind farms continue, at least 37 Cape Vultures could be lost to turbine collisions annually, representing a significant portion of the PBR. This figure is most probably an underestimate" (see limitations in the report) "and does not account for the anticipated acceleration of wind energy development. Unless other human-induced threats, such as powerline electrocutions and collisions, and poisoning, are urgently addressed, the population may not be able to withstand the added impact of turbine collisions."

19.4. Further to our comments dated 10 April 2025 and considering the additional WEFs in the surrounding landscape, we are now even more concerned about the cumulative impacts of these facilities on Oribi habitat, as expressed in the faunal assessment which states that "any remaining Oribi sub-populations and any contiguous areas of intact grassland are considered as high conservation importance" and that "cumulative impacts may become more significant if added to existing or future impacts from other activities, such as other renewable energy projects in the area".

19.5. DFFE also requires that "the cumulative impact assessment for all identified and assessed impacts must indicate the following: (a) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land". The Revised EIA Report does again not accurately quantify the size of the identified impacts, i.e. hectares of cumulatively transformed land. The overall footprint size of this, and all other similar proposed and approved renewable energy facilities within a 35 km radius is now 178 017.24 ha (Approved: 31 440.17 ha, In Progress: 89 247.96 ha, Pre-Application: 57 329.11 ha). Again, as a minimum, the cumulative impact of approved and in-process applications must be assessed.

19.6. As there has been no amendment in the revised EIA Report to the number of facilities identified surrounding this proposed facility, or a comprehensive comparative cumulative assessment undertaken, our previous comments on this matter dated 10 April 2025 remain unchanged, i.e. the cumulative impact assessment undertaken as part of this EIA does not adequately assess the cumulative impacts of this proposed facility, in relation to current and future similar renewable development facilities in the surrounding area.

20. Environmental Management Programme:

20.1. Our concerns related to the EMPr raised previously, still remain. The EMPr is unclear and vague, ambiguous, and does not provide adequate mitigation measures, timeframes, roles, responsibilities and reporting to adequately mitigate the potential impacts of this facility.

20.2. Given that we do not agree with the impact analyses undertaken in the EIA, the measures included in the EMPr as mitigation are, similarly, disputed.

20.3. The EMPr does not include a specific, measurable and timebound framework for decision-making regarding the duration of monitoring, and the specific circumstances for extension or curtailment.
20.4. The EMPr must be clear on when additional research is required.
20.5. Landowners must understand all access requirements and impacts associated with monitoring *throughout the lifespan of a project*.
20.6. Lease agreements must ensure that the effectiveness of monitoring is not compromised, and that restrictions do not compromise monitoring requirements in any way.

21. Public Participation:
21.1. In paragraph 9.3.2 (page 280) of the EIA Report, it is stated that "A comprehensive record of all comments received to date along with detailed responses from the Environmental Assessment Practitioner (EAP), specialists, and the project applicant is presented in the Comments and Responses Report (Volume II). For transparency and ease of reference, the original comments and corresponding responses are also appended to this volume". Then in the Paragraph 6 of the Public Participation Report (Volume III), it states that "During the DEIAR PPP comments were received from I&AP's. Follow-up e-mails were sent to all registered I&APs, stakeholders and authorities, and comments were received. Responses to comments received during the PP period are provided in Section 7, Table 7.1 below, with EAP / specialist / applicant responses, and the original comment and responses has been appended to the PP report which will be submitted with the FSR for DFFE decision".
21.2. However, in the copies of Emails included in the Public Participation Report, comments were submitted to you on 4, 9 and 10 April 2025 by: Megan Kim Govender; Adelma Vorster (Retsrov Boerdery); Celine Oats (Richard Summers Inc.); and Elize Robberts. *These comments have not been incorporated in your Comments and Response Report, nor have copies of the comments been appended to the Public Participation Report.*

Based on what has been outlined above, at least more than half (i.e. 16) of the 22 turbines proposed are located in unsuitable areas. Furthermore, the application of no-go buffers in accordance with BirdLife SA's Guidelines for surveying and mitigating impacts on [Species 23] referred to herein would likely increase the number of turbines that are in unsuitable areas. In light of this, and in conjunction with the location of associated roads, OHLs and cabling in CBAs, intact grasslands, and avifauna and fauna high sensitivity areas, DARDLEA cannot support the application in its current format.

Please do not hesitate to contact this office if there are any enquiries.

Sincerely,

MS. R. LUYT
DIRECTOR: ENVIRONMENTAL IMPACT MANAGEMENT
DATE: 14/08/2025

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Ms. Stephanie Gopaul
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7700

Email: ERM.ArcusAmsterdam@erm.com

Dear Madam,

DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT: ACTIVITIES ASSOCIATED WITH THE SHEEPMOOR WIND ENERGY FACILITY ON THE FARM KLIPFONTEIN 283 IT, PORTIONS 1, 2 & 6 OF THE FARM SCHIEDAM 274 IT, PORTIONS 2, 3, 5, 6, 7, 9, 10 & 13 OF THE FARM WAAIHOEK 286 IT, RE 1 & PORTION 5 OF THE FARM VAALBANK 285 IT, PORTION 3 OF THE FARM ONVERWACHT 287 IT, AND PORTIONS 1 & 8 OF THE FARM WINDHOEK 291 JT; THE ASSOCIATED GRID CONNECTION ON PORTIONS 2, 3, 4 & 12 OF THE FARM WAAIHOEK 286 IT, PORTION 8 OF THE FARM WINDHOEK 291 IT, RE OF THE FARM ONVERWACHT 287 IT, PORTIONS 3, 4, 5, 6, 9, 10 & 11 OF THE FARM WELTEVREDEN 290 IT, RE, RE 1, PORTIONS 7 & 8, RE 9, RE, 11, RE 14 OF THE FARM MOOIPLAATS 290 IT, PORTION 8 OF THE FARM BOSJESSPRUIT 291 IT, PORTION 2 OF THE FARM 292 IT, PORTIONS 1 & 2 OF THE FARM WELGELEGEN 322 IT, PORTION 6 OF THE FARM ZWARTWATER 288 IT, AND PORTION 7 OF THE FARM WITPUNT 267 IT; AND ASSOCIATED ACCESS ROADS ON PORTIONS 6, 7, 12, 23 & 26 OF THE FARM ROODEWAL 272 IT, AND PORTIONS 2, 3, 4 & 7 OF THE FARM ONVERWACHT 273 IT, MSUKALIGWA LOCAL MUNICIPALITY

The revised draft environmental impact assessment report (EIAR)which was submitted by you in respect of the abovementioned application and received by the Department on 16 July 2025 has reference. The Department has considered the content of the report, and has the following comments:

1. The layout provided in the initial draft EIAR included 29 turbines. It was not explicit in the revised draft EIR, which now includes 25 turbines, but after scrutinizing the layout plan and the responses provided in the comments and response report (CRR), we have been able to ascertain the following changes: The removal of WTGs 35, 39, 47 and 49, and the addition of WTG 21 (i.e. the removal of four turbines). A total of 10 turbines have been moved, but of these, only one has been moved into an area without sensitivities. Seventeen (17) of the 25 turbines proposed in the current layout, all of which were flagged in our previous comments, are still located in sensitive areas. Given that the requirement to avoid impacts in accordance with the mitigation hierarchy has not been adequately addressed, **these comments must be read in conjunction with our comments dated 10 April 2025, which still stand.**
2. DARDLEA remains concerned that the proposed location of the Sheepmoor WEF and associated grid infrastructure is not compatible with the desired land use.

3. The proposed Sheepmoor Wind Energy Facility and associated grid infrastructure is located on a site comprising: CBA Irreplaceable and Optimal; Intact Grassland Patches; Key Biodiversity Areas; the Grasslands Important Bird Area (IBA); Ecological Support Areas; National Protected Area Expansion Strategy Areas (NPAES); Local-scale and Landscape-scale Climate Change Corridors; Threatened Ecosystems – including Wakkerstroom Montane Grassland and Eastern Highveld Grassland; CBA: Wetlands; CBA: Aquatic Rivers; ESA: Strategic Water Source Area and ESA: Important Subcatchments.
4. Furthermore, the proposed Sheepmoor WEF and associated grid connection is located in an area comprising a high fauna sensitivity, a high diversity of threatened bird species, and a high number of priority species for wind energy developments and power lines, including the following confirmed on site: African Fish Eagle, African Grass Owl, African Harrier-Hawk, African Marsh Harrier, Amur Falcon, Black Sparrowhawk, Black-winged Kite, Black-winged Lapwing, Black-winged Pratincole, Blue Crane, Cape Vulture, Common Buzzard, Denham's Bustard, Greater Flamingo, Grey Crowned Crane, Grey-winged Francolin, Jackal Buzzard, Lanner Falcon, Long-crested Eagle, Marsh Owl, Martial Eagle, Rufous-breasted Sparrowhawk, Secretarybird, Southern Bald Ibis, Sensitive Species 23, Spotted Eagle-Owl, White Stork, White-bellied Bustard, and Yellow-breasted Pipit.
5. According to the Avifaunal Assessment, a total of 253 bird species could potentially occur in the Broader Area where the Sheepmoor WEF and associated Grid Connection Infrastructure are proposed to be located. Of the 253 species, 38 species are classified as priority species for wind energy developments, of which 32 were recorded during pre-construction monitoring. Of the 253 species, 76 are considered power line sensitive species, 57 of which were recorded during the pre-construction monitoring.
6. DARDLEA is not supportive of development of WEFs (or any non-compatible land use) within Critical Biodiversity Areas and Key Biodiversity Areas, or within intact grassland patches. In respect of Intact Grassland Patches, it is important to note that the Mpumalanga Biodiversity Sector Plan (MBSP) specifically incorporated climate change into spatial priorities through the prioritisation of the connectivity of remaining intact grassland patches in the province, as they provide habitat for species to thrive, and allow for their dispersal. Intact grasslands are crucial for supporting threatened fauna and avifauna. This is verified in the faunal assessment which states that "any remaining Oribi sub-populations and any contiguous areas of intact grassland are considered as high conservation importance" and that "cumulative impacts may become more significant if added to existing or future impacts from other activities, such as other renewable energy projects in the area". Intact Grassland Patches are important source areas in terms of metapopulation dynamics. The MBSP - adopted in 2023 (Provincial Notice 279 of 2023) - is a planning tool that has been developed to manage biodiversity resources of the province by setting strategic objectives to ensure that spatial biodiversity and climate change priorities are effectively incorporated into land-use and development planning, environmental assessments and authorisations, and natural resource management within Mpumalanga Province. The links to the various reports and shape files, including the MBSP Technical Report which details the scientific methods used to identify Intact Grassland Patches, can be accessed at https://mtpa.maps.arcgis.com/sharing/rest/content/items/fc6d8f9e7ef84d2f87f86b91e8e9f87a/data).
7. While we acknowledge efforts to acquire GPS tracking data for the Martial Eagle, the modelling of the data and the datasets must be subjected to additional independent peer-reviewed analyses in order to verify accuracy and confidence levels. In the absence of this, the precautionary approach, which is the application of sector-accepted buffers, must be applied.
8. While we acknowledge the methodology applied to inform the Avifaunal Specialist's Sensitivity Zones (Very High, High and Medium) for Martial Eagle and Southern Bald Ibis, confidence in the methodology also requires testing through a broad, formal peer-reviewed analysis within the avifaunal sector, which is beyond the scope of an EIA. Until this is achieved, a precautionary approach is warranted, as follows:
    8.1. In accordance with BirdLife SA's Bird Monitoring Reports from Operational Wind Energy Facilities in South Africa (2025), a nest buffer of 6km is recommended for Martial Eagles

(which report also states that that the available data suggests that this buffer will not eliminate the risk of collisions, and that it would be necessary to implement additional mitigation measures outside of this area).

8.2. A minimum buffer of 1km from Southern Bald Ibis colonies.

9. Similarly, turbines and all associated infrastructure, including access roads as well as the upgrading of existing roads (which are currently seldom-used jeep tracks), must avoid Yellow-breasted Pipit habitat entirely, i.e. both "Very High" and "High" sensitivity zones.
10. Given the limited data available on Species 23 movements and collision risks, the curtailment strategy for turbines proposed in the "Medium Sensitivity" Zone for the species is not supported. Mitigation strategies that have no data to validate their success cannot be used to replace the requirement for avoidance. All Turbines and all associated infrastructure must avoid Species 23 habitat entirely, i.e. "Medium", "High" and "Very High" sensitivity zones.
11. The Avifaunal Report confirms the presence of Species 23, but the location is not disclosed. The Avifaunal Assessment must confirm how the recommended sensitivity zones for Species 23 align with BirdLife SA's "Guidelines for surveying and mitigating impacts on [Species 23] in avifaunal assessments for development applications", particularly in respect of the following excerpt of the guideline that specifies a 5km buffer to be applied to suitable wetlands:

    "*Birds function at a wider ecological scale than most upper-catchment wetlands, thus requiring a larger and interconnected species buffer zone to ensure adequate impact mitigation from developments. Literature from studies on waterbirds, particularly rallids, provides several recommendations for designing and implementing buffer zones. As a general guideline for developments with collision risks, like wind turbines,* ***buffer zones of at least 5 km between the development and wetlands suitable for the [Species 23] are recommended, with buffer zones of at least 1 km for delineated wetland inputs*** *(e.g., streams and aquifers), aquatic-habitat corridors (e.g., riverine habitat), and potential movement pathways between wetlands".*

12. The number of turbines that are located in areas recommended for avoidance (at least 17 out of 25), and the location of the O&M building, roads and OHLs in sensitive areas demonstrates that the site is not compatible with the proposed land use. The areas of concern as they relate to the abovementioned comments, are outlined below:
    12.1. WTG 26: Intact grassland; IBA; NPAES; Fauna High Sensitivity - escarpment (highest category); Within 5km Martial Eagle buffer; Less than 1km from Southern Bald Ibis colony; Species 23 Avifaunal Medium Zone.
    12.2. WTG 27: Intact grassland; IBA; NPAES; Fauna High Sensitivity - escarpment (highest category); Within 1km of Southern Bald Ibis colony; Species 23 Avifaunal Medium Zone.
    12.3. WTG 28: Intact grassland; IBA; NPAES; Fauna High Sensitivity - escarpment (highest category); Within 1km of Southern Bald Ibis colony; Species 23 Avifaunal Medium Zone.
    12.4. WTG 29: Intact grassland; IBA; NPAES; Fauna High Sensitivity - escarpment (highest category); Within 1km of Southern Bald Ibis colony; Species 23 Avifaunal Medium Zone.
    12.5. WTG 30: Intact grassland; Partial IBA; NPAES; Fauna High Sensitivity - escarpment (highest category).
    12.6. WTG 31: Intact grassland; NPAES; Species 23 Avifaunal Medium Zone.
    12.7. WTG 33: Intact grassland partial; NPAES.
    12.8. WTG 36: CBA Irreplaceable; NPAES.
    12.9. WTG 38: High/Very High Terrestrial Sensitivity.
    12.10. WTG 41: Within 650m of Southern Bald Ibis Colony.
    12.11. WTG 42: Within 1km of Southern Bald Ibis Colony.
    12.12. WTG 43: Climate change corridor; Intact grassland; ESA; NPAES.
    12.13. WTG 44: Climate change corridor; ESA; NPAES; Species 23 Avifaunal Medium Zone.
    12.14. WTG 46: High/Very High Terrestrial Sensitivity.
    12.15. WTG 45: CBA Irreplaceable; NPAES, Climate change corridor; Species 23 Avifaunal Medium Zone.
    12.16. WTG 52: Climate change corridor; Intact grassland; ESA; IBA; NPAES.

12.17. WTG 53: Climate change corridor; Intact grassland; ESA; IBA; NPAES; High/Very High Terrestrial Sensitivity.
12.18. The O&M Building is located in Bat No-Go area.
12.19. The road network, collector network, and transmission lines traverse the Avifaunal All Infrastructure Exclusion Zone, the High Fauna Sensitivity Zone, Intact Grasslands, CBAs and ESAs.

13. It is noted that the Noise Specialist recommended the relocation of WTGs 29 and 30, and the reduction of the number of turbines within 800m of receptors.
14. The Terrestrial Assessment (inclusive of Plant Species), did not apply the Site Ecological Importance (SEI) methodology, which is a requirement of the Species Environmental Assessment Guideline. The Species Protocols specifically stipulate that assessments "must be undertaken in accordance with the *Species Environmental Assessment Guideline"* (South African National Biodiversity Institute, 2020. Species Environmental Assessment Guideline. Guidelines for the implementation of the Terrestrial Fauna and Terrestrial Flora Species Protocols for environmental impact assessments in South Africa. South African National Biodiversity Institute, Pretoria). Non-compliance with the *Species Environmental Assessment Guideline* has resulted in the following deficiencies:
    14.1. Insufficient time was allocated to surveying in the appropriate season (only 4 days for both Sheepmoor and Emvelo WEF sites, as well as the Grid sites).
    14.2. The classification of the Montane Grassland on site as "moderate sensitivity" in the absence of applying all relevant criteria, including *inter alia*, conservation importance, functional integrity, receptor resilience, as well as species of conservation concern, spatial priorities, intact grassland patches, and CBAs.
    14.1. The montane ridge (where WTGs 26, 27, 28, 29, 30 and 33, along with grid infrastructure are proposed), which also coincides with intact grassland and the highest sensitivity for Fauna (according to the Faunal Assessment), being classified as "moderate sensitivity". (Noting further that according to the Fauna Assessment, "the high sensitive escarpment area is likely of general importance for a range of faunal groups, <u>representative of a large contiguous and ecologically intact area</u> <u>of mostly good-quality montane grassland</u>".
15. As a result of the deficiencies in the Terrestrial Assessment outlined above, we have low confidence in the associated impact analysis, and dispute the Specialist's "low" significance ratings.
16. While an Oribi Management Plan has been undertaken and included in this revised draft EIA (not in the initial draft EIA), it cannot be motivation to mitigate the potential impact on the species. The Oribi Management Plan clearly states that an "Oribi baseline assessment will be required to understand the current status of the subpopulation, including distribution and population estimates". The report further states that the "WEF layout needs to minimise number of turbines and infrastructure (including laydown)".
17. Cumulative Impact Assessment:
    17.1. In our comments dated 10 April 2025 on your original draft EIA, despite bringing another 5 approved and in-process WEFs (within a 35 km radius) to your attention (i.e. Zephyr, Ujekamanzi Ntabande and Daggafoort and Emvelo), your revised cumulative impact assessment once again fails to mention or assess these. Subsequently, there are now an additional 3 WEFs within 35 km that are now in-process, i.e. Leghoya WEF 1, 2 & 3, and another one (1) within a 55 km radius (i.e. Anemoi WEF).
    17.2. Furthermore, although section 4.3.3 states that "the scope of this assessment will include all operational, approved or current <u>and planned</u> renewable energy applications", in addition to the approved or in-process WEFs identified in 17.1. above (not included in this assessment), there are actually an additional two (2) WEFs within 35 km and a further two (2) proposed WEFs (i.e. Pre-Application) within a 55 km radius, that have not been identified. The total number of turbines within 35 km is more than double that indicated in both the Draft EIA and Revised Draft EIA reports, i.e. 435 (and not 192) and within a 55 km radius there are more than 663 turbines (approved, in-process and

proposed). As a minimum, the cumulative impact of approved and in-process applications must be assessed.

17.3. The potential cumulative impact on avifauna, as indicated in our comments dated 10 April 2025, is now therefore likely to be even more substantial, due to the increased number of proposed turbines in the surrounding landscape. Of particular concern is the potential cumulative impact on Martial Eagles and Cape Vultures. The BirdLife South Africa Occasional Report Series 3: Summary of Bird Monitoring Reports from Operational Wind Energy Facilities in South Africa (February 2025), indicates that at current fatality rates due to collisions with wind turbines, "fatalities of Martial Eagles may already be exceeding the Potential Biological Removal (PBR) rate". Furthermore, "if current fatality rates at operational wind farms continue, at least 37 Cape Vultures could be lost to turbine collisions annually, representing a significant portion of the PBR. This figure is most probably an underestimate" (see limitations in the report) "and does not account for the anticipated acceleration of wind energy development. Unless other human-induced threats, such as powerline electrocutions and collisions, and poisoning, are urgently addressed, the population may not be able to withstand the added impact of turbine collisions."

17.4. Further to our comments dated 10 April 2025 and considering the additional WEFs in the surrounding landscape, we are now even more concerned about the cumulative impacts of these facilities on Oribi habitat, as expressed in the faunal assessment which states that "any remaining Oribi sub-populations and any contiguous areas of intact grassland are considered as high conservation importance" and that "cumulative impacts may become more significant if added to existing or future impacts from other activities, such as other renewable energy projects in the area".

17.5. DFFE also requires that "the cumulative impact assessment for all identified and assessed impacts must indicate the following: (a) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land". The Revised EIA Report does again not accurately quantify the size of the identified impacts, i.e. hectares of cumulatively transformed land. The overall footprint size of this, and all other similar proposed and approved renewable energy facilities within a 35 km radius is now 178 017.24 ha (Approved: 31 440.17 ha, In Progress: 89 247.96 ha, Pre-Application: 57 329.11 ha). Again, as a minimum, the cumulative impact of approved and in-process applications must be assessed.

17.6. As there has been no amendment in the revised EIA Report to the number of facilities identified surrounding this proposed facility, or a comprehensive comparative cumulative assessment undertaken, our previous comments on this matter dated 10 April 2025 remain unchanged, i.e. the cumulative impact assessment undertaken as part of this EIA does not adequately assess the cumulative impacts of this proposed facility, in relation to current and future similar renewable development facilities in the surrounding area.

18. Environmental Management Programme:

18.1. Our concerns related to the EMPr raised previously, still remain. The EMPr is unclear and vague, ambiguous, and does not provide adequate mitigation measures, timeframes, roles, responsibilities and reporting to adequately mitigate the potential impacts of this facility.

18.2. Given that we do not agree with the impact analyses undertaken in the EIA, the measures included in the EMPr as mitigation are, similarly, disputed.

18.3. The EMPr does not include a specific, measurable and timebound framework for decision-making regarding the duration of monitoring, and the specific circumstances for extension or curtailment.

18.4. The EMPr must be clear on when additional research is required.

18.5. Landowners must understand all access requirements and impacts associated with monitoring *throughout the lifespan of a project.*

18.6. Lease agreements must ensure that the effectiveness of monitoring is not compromised, and that restrictions do not compromise monitoring requirements in any way.

19. Biodiversity Offset Strategy:

19.1. According to the Biodiversity Offset Guideline, "*The desired outcome of biodiversity offsets is to ensure that - the cumulative impact of an authorised activity, or activities, and land and resource use change does not: result in the loss of irreplaceable biodiversity or jeopardise the ability to meet biodiversity targets; lead to any ecosystem with a threat status of Vulnerable or Least Concern becoming Endangered; or any Endangered ecosystem becoming Critically Endangered; or cause an irreversible decline in the conservation status of species and the presence of special habitats; or cause a significant loss in ecosystem services*". A biodiversity offset cannot therefore cater for the loss of Irreplaceable CBAs or intact grasslands. As detailed in the comments above, intact grasslands are crucial for supporting threatened fauna and avifauna.

19.2. The Biodiversity Offset Guideline specifically states that "biodiversity offsets are not appropriate when an activity, or activities, will have residual impacts on biodiversity of very high significance, including when residual negative impacts will result in loss of irreplaceable biodiversity".

19.3. In addition to Irreplaceable CBAs, the Biodiversity Offset Guideline also categorises the following as "irreplaceable biodiversity": Biodiversity of major potential concern, where residual impacts in this category could lead to – loss of vulnerable or potentially irreplaceable biodiversity in areas of recognised importance, such as – areas evaluated as having High Ecological Site Importance. We maintain that the correct and required implementation of the Species Environmental Assessment Guideline would have resulted in the Montane Grassland being classified as having High Ecological Site Importance.

19.4. The Intact Grassland Patches on the site must therefore be avoided, and cannot be offset. The requirement to consider biodiversity offsets is applicable only once it has been demonstrated that all measures of avoidance have been exhausted. The loss of irreplaceable biodiversity cannot be offset, and, as outlined above, "irreplaceable biodiversity" includes, key ecological corridors recognized as important for evolutionary processes and climate change adaptation where no options to safeguard these processes exist.

19.5. Furthermore, the Biodiversity Offset Report does not meet the following minimum requirements:

i. A portfolio of candidate biodiversity offset sites, including the likelihood of each site's availability and feasibility.

ii. The required biodiversity outcomes on each of the candidate biodiversity offset sites.

20. Public Participation:

20.1. In paragraph 9.3.3, it is stated that a "A comprehensive record of all comments received to date along with detailed responses from the Environmental Assessment Practitioner (EAP), specialists, and the project applicant is presented in the Comments and Responses Report (Volume II). For transparency and ease of reference, the original comments and corresponding responses are also appended to this volume". In your Public Participation Report (Volume III), it states that "During the DEIAR PPP comments were received from I&AP's. Follow-up e-mails were sent to all registered I&APs, stakeholders and authorities, and comments were received. Responses to comments received during the PP period are provided in Section 7, Table 7.1 below, with EAP / specialist / applicant responses, and the original comment and responses has been appended to the PP report which will be submitted with the FSR for DFFE decision".

20.2. However, in the copies of Emails included in the Public Participation Report, comments were submitted to you on 4, 9 and 10 April 2025 by: Megan Kim Govender; Adelma Vorster (Retsrov Boerdery) and Celine Oats (Richard Summers Inc.). *These comments have not been incorporated in your Comments and Response Report, nor have copies of the comments been appended to the Public Participation Report.*

20.3. Furthermore, a copy of the comments submitted to you by MTPA on 10 April 2025 have not been appended to the Public Participation Report, and have not been captured correctly in the Comments and Response Report (refer specifically to the list of flagged turbines).

Based on what has been outlined above, at least 17 of the 25 turbines proposed are located in unsuitable areas. In light of this, and in conjunction with the location of associated roads, OHLs and cabling in CBAs and avifauna and fauna high sensitivity areas, DARDLEA cannot support the application in its current form.

Please do not hesitate to contact this office if there are any enquiries.

Sincerely,

MS. R. LUYT
DIRECTOR: ENVIRONMENTAL IMPACT MANAGEMENT
DATE: 14/08/2025

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RICHARD SUMMERS INC.
ATTORNEYS

Morris¶
Environmental·&¶
Groundwater¶
Alliances¶

Our reference: JSM25-001
DFFE ref.: 14/12/16/3/3/2/2611 &
14/12/16/3/3/2/2613

ERM Southern Africa (Pty) Ltd
Attention: Stephanie Gopaul
Email: erm.arcusamsterdam@erm.com
stephanie.gopaul@erm.com

15 August 2025

Dear Stephanie,

RE: COMMENTS ON THE ENVIRONMENTAL IMPACT ASSESSMENT PROCESS FOR THE PROPOSED EMVELO WIND ENERGY FACILITY AND SHEEPMOOR WIND ENERGY FACILITY [DFFE REFERENCE NUMBERS: 14/12/16/3/3/2/2611 & 14/12/16/3/3/2/2613]

1. INTRODUCTION

1.1. This document contains comments on the Environmental Impact Reports ("DEIRs") and associated Annexures for the proposed Emvelo and Sheepmoor Wind Energy Facilities ("WEFs") which were made available to interested and affected parties ("I&APs") during July 2025.

1.2. These comments are submitted on behalf of Mr. Josua Meyer a registered I&AP and owner of Portions 3, 4, 12 and 14 of the Farm Waaihoek No. 286, as well as Portions 4, 5 and 6 of the Farm Onverwacht No. 287, and Portion 7 of the Farm Windhoek No. 291.

1.3. Comments on the first version of the Draft EIA Report (March 2025) were provided within the commenting period timeframe of 30 days (i.e. by 10 April 2025) and covered both the proposed Emvelo and the Sheepmoor WEFs in a single report. ERM have released a second draft of the EIA Report dated July 2025 and the commenting period closes on 15 August 2025. The comments herein are supplementary to those made on the initial Draft EIA Reports of March 2025 and are not to be taken as substituting those earlier comments.

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1.4. It must be noted that the comments, recorded herein, are based on a review of select items using examples primarily from the Sheepmoor Draft EIA Report and associated documents, but apply equally to the proposed Emvelo WEF. This is because the same approach has been adopted by ERM for both projects.

2. FLAWED PUBLIC PARTICIPATION PROCESS (PPP)

User unfriendly documentation places an undue burden placed on I&APs

2.1. As noted in our comments of April 2025, an undue burden is placed on I&APs in the context of being forced to comment simultaneously on the EIA documents related to these two proposed WEFs. This situation has not changed in relation to the current commenting period. Yet again, an undue an unreasonable burden is placed on I&APs to comment on two Draft EIA Reports for two separate applications for the projects located adjacent to each other and proposed by the same Applicant. The commenting periods run concurrently which effectively reduces the opportunity for meaningful public participation.

2.2. In fact, as is noted elsewhere in these comments, the sites of the proposed WEFs have changed, such that they overlap to some extent. This points to the fact that separating these applications is a ruse and that it is unjustified and unreasonable to treat these as two separate applications. It serves no logical impact management purpose and simply places an undue and undesirable burden on the EIA system – I&APs, the commenting authorities and the Competent Authority.

2.3. Also noted in our comments of April 2025, the PPP reports for the respective proposed WEFs are difficult to follow. This situation persists with the current reports– no discernible effort by the EAP has been made to make these documents more user-friendly in this 'second version' of the Draft EIA Report.

2.4. There is extensive duplication of the same correspondence, which makes it an arduous exercise to track the sequence of different activities undertaken and also the issues raised by I&APs (Appendix 6 of the PPP report). Some correspondence is repeated more than 10 times. It also makes it exceedingly difficult to find the original comments made by an I&AP. This adds to the unfair burden on I&APs and reduces the opportunity for meaningful public participation.

2.5. In certain instances, one cannot read the original comments in their entirety (i.e. read the full letter or email from submitted by an I&AP) as the original communication is not provided. Thus, in these cases comments are only available in a disjointed point-by-point fashion in a tabular format (i.e. Section 7 – Comments and Responses Report in Volume III - PPP Report), hereafter referred to as the CRR. This adds to the unfair burden on I&APs and reduces the opportunity for meaningful public participation.

2.6. The burden placed on I&APs is exacerbated by the fact that the EAP has not clearly indicated or described what has changed, such as which specialist reports have been revised or which sections of the Draft EIA Reports have been updated. In addition, the documents themselves

do not show where changes have been made through use of underlining or a different colour text. This means I&APs are faced with having to compare the two draft reports (version 1 with version 2) to ascertain what changes have been made. Clearly this is wholly unreasonable and constitutes unfair process.

DFFE requirements in respect of PPP not met

2.7. The requirement by the DFFE which were communicated to the EAP regarding inclusion of original comments have not been met (see Sheepmoor PPP Report, Section 7 - CRR, page 47).

2.8. DFFE stated that: "Copies of the original comments received from I&APs and organs of state, which have jurisdiction in respect of the proposed activity, must be submitted with the Final EIAr." If these comments are required for the Final EIR Report, then it follows that must also be available in the Draft EIA Reports. Examples of missing original comments are:

2.8.1. Most notably, the **original comments on the first version of the Draft EIA Report** (dated March 2025) from DARDLEA and MTPA **are not provided** in the CRR, which forms part of the suite of documents that make up the July 2025 Draft EIA Report. These comments were submitted on 10 April 2025 (as per the CRR), but the original submissions are not included in the PPP Reports. This is the case for both Emvelo and Sheepmoor. This has been fact-checked through searching for DARDLEA, 10 April 2025, April 2025 as well as scrolling through Appendix 6 of the CRR. The EAP is requested to explain this material omission.

2.8.2. The comments submitted by Richard Summers Inc. and MEGA on the March 2025 Draft EIA Reports are ignored and not included. Email communication dated 10 April 2025 from Richard Summers Inc to ERM confirming that comments had been submitted is included in Appendix 6 of the CRR (see pages 371 and 372 Emvelo CRR and pages 377-379 Sheepmoor CRR). Several searches of both CRRs have been conducted, using various search terms as well as scrolling slowly through the respective documents. **The comments are nowhere to be found**. The EAP is requested to explain this material omission.

2.9. The DFFE also required the following: "All issues raised and comments received during the circulation of the SR and draft EIAr from registered Interested and Affected Parties (I&APs) and organs of state, as listed in your I&APs Database, and others which have jurisdiction in respect of the proposed activity must be adequately addressed and included in the final EIAr" (see Sheepmoor PPP Report, Section 7 - CRR, page 46). This also has not been achieved:

2.9.1. The aforementioned comments from Richard Summers Inc are not recorded in the CRR tables in either of the CRR reports (See Section 7). This means they have been completely ignored.

2.9.2. The comments of 15 April 2025 from Mr Joshua Meyer are not included in the CRR tables in either of the CRR reports (See Section 7). Since this communication involved follow-up

on previous comments to which Mr Meyer had not received an adequate response, these comments ought to have been included. The relevant correspondence can be found on page 369 of Appendix 6 Emvelo CRR and page 375 of Appendix 6 Sheepmoor CRR.

2.9.3. Two landowners, of which at least one is a neighbour, requested inclusion as an I&AP. These requests were submitted on 9 April 2025 (Mr Braam Moodie) and 4 April 2025 (Restov Boerdery). Neither of these I&APs were afforded a fair opportunity to comment on the Draft EIA Report – they were simply provided with a link to the EIA documentation. There is no evidence of any effort by the EAP to afford them a meaningful opportunity to comment or to assist them in familiarising themselves with the proposed projects and associated EIA process.

2.10. Whilst one of the uses of the CRR by I&APs is the ability to cross-reference a response from the EAP to the relevant section in the Draft EIA Report to see whether the I&AP's input was actually addressed (i.e. a change is discernible in the report) – this is of no use if an I&AP's comments are not recorded in the CRR first place. This is relevant because not all comments are recorded in the CRR. It therefore follows that these comments have not been considered at all.

3. INFORMATION PROVISION AND PRESENTATION

Confusing, unclear and poor-quality information

3.1. The site boundaries shown in the second version of the Draft EIR Report (dated July 2025) differs for both sites relative to the Draft EIA Report issued in March 2025. This is confusing and casts doubt on the accuracy of the information in the reports:

3.1.1. Portions 1, 6 and 5 of Farm 274, Farm Schiedamre are shown in the list of affected farm properties for both Sheepmoor (See Table 0.2) and Emvelo (See Table 0-2).

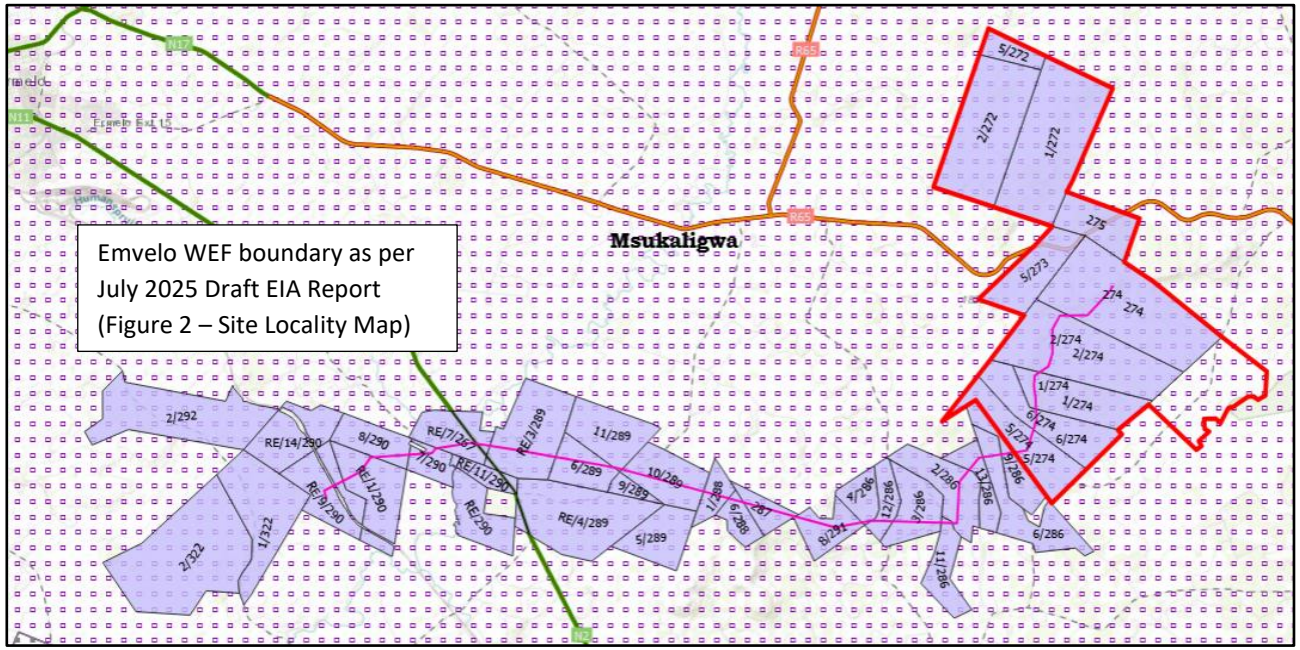
3.1.2. Further to the above, this is the case in both versions of the Draft EIA Reports, that is the March 2025 (Version 1) and July 2025 (Version 2), but the maps and diagrams in the March 2025 Draft EIA Report show a site boundary that does not include the aforementioned properties. This means that tabulated information (Table 0-2) in which affected farm properties are recorded for the proposed Emvelo WEF and the site boundary shown in diagrams and maps are different.

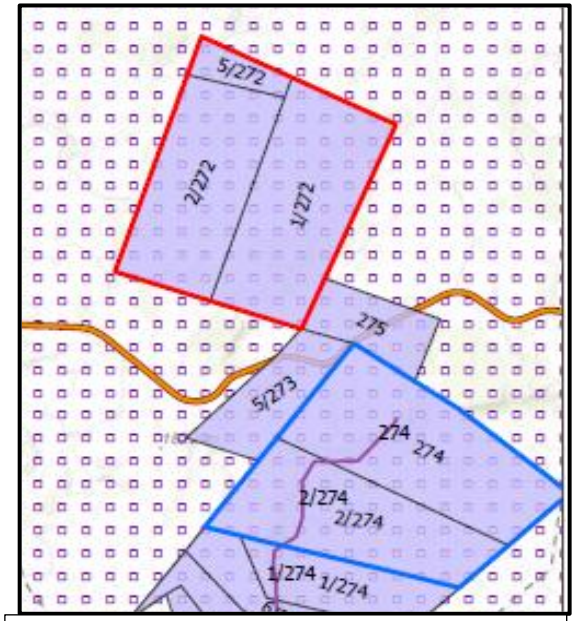
3.1.3. In addition, the site boundary for the proposed Sheepmoor WEF differs in the July 2025 Draft EIA Report, relative to that shown in the earlier version of March 2025. No explanation for the change is given. To add to the confusion, this change is not reflected in all of the maps / diagrams in the July 2025 Draft EIA Report. All of the figures in Section 6: Description of the Baseline Environment in the July 2025 Draft EIA Report show the old site boundary (i.e. as per the March 2025 Draft EIA Report).

3.1.4. The positions of WTGs on the overlapping farm portions (Portions 1, 6 and 5 of Farm 274,

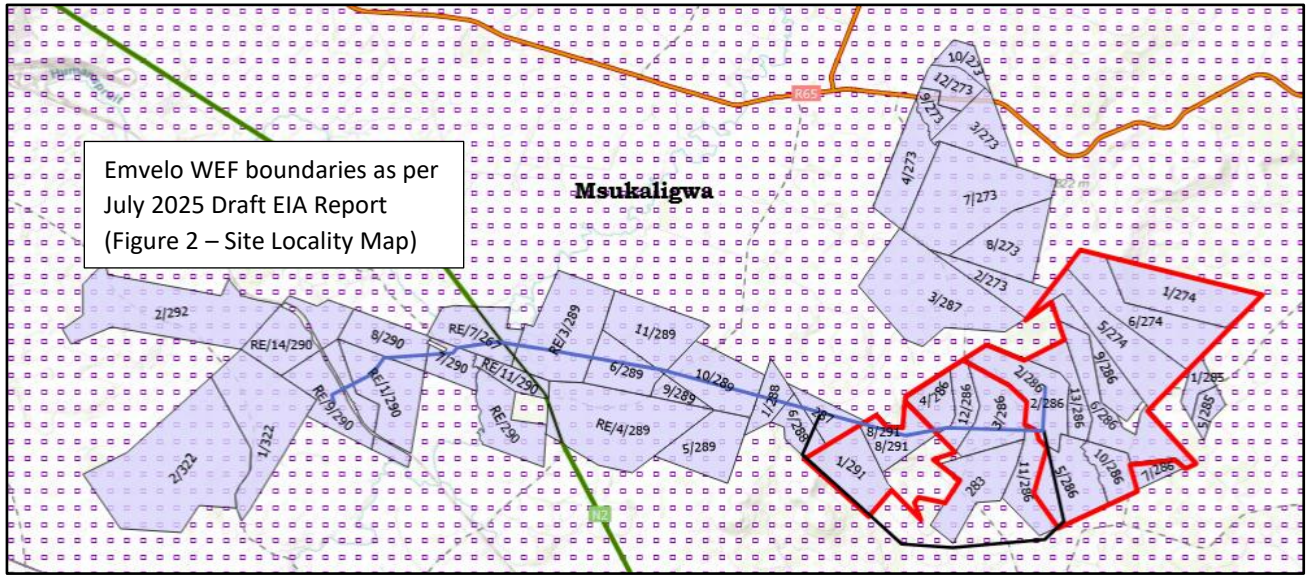
Farm Schiedamre) is unclear. Neither a written description nor a combined diagram showing WTG positions associated with the respective projects on these parcels of land is provided and the project information is materially deficient.

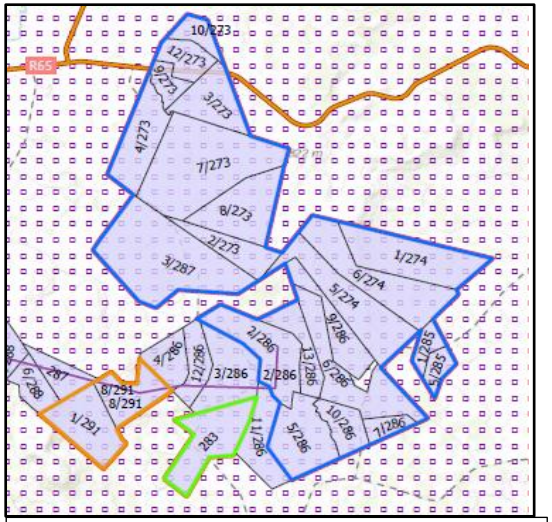
3.2. The evidence for the situation described above is shown in the following diagrams and tables. Boundary coordinates are listed in the tables, which show that no changes have been made to this list of boundary coordinates (the example is taken from the Sheepmoor Draft EIA Reports) provided in the March 2025 versus the July 2025 reports.





Emvelo WEF boundary as per March 2025 Draft EIA Report (Figure 2 – Site Locality Map)





Sheepmoor WEF boundary as per March 2025 Draft EIA Report (Figure 2 – Site Locality Map

Proposed Sheepmoor WEF coordinates

FEATURE	LATITUDE (S)			LONGITUDE (E)		
	DEG	MIN	SEC	DEG	MIN	SEC
Sheepmoor WEF 0.01	26°	33'	03"	30°	16'	20"
Sheepmoor WEF 0.02	26°	37'	21	30°	17	59 "
Sheepmoor WEF 0.03	26°	37'	27"	30°	21'	39"
Sheepmoor WEF 0.04	26°	41'	26"	30°	18'	09"
Sheepmoor WEF 0.05	26°	39'	39"	30°	17'	34 "
Sheepmoor WEF 0.06	26°	38'	32"	30°	16'	30"
Sheepmoor WEF 0.07	26°	38'	11"	30°	18'	16"
Sheepmoor WEF 0.08	26°	37'	32"	30°	18'	02"
Sheepmoor WEF 0.09	26°	38'	20"	30°	15'	48"
Sheepmoor WEF 0.10	26°	37'	18"	30°	14'	42"
Sheepmoor WEF 0.11	26°	36'	18"	30°	15'	24"
Sheepmoor WEF 0.12	26°	35'	56"	30°	14'	57"
Sheepmoor WEF 0.13	26°	40'	14"	30°	13'	46"
Sheepmoor WEF 0.14	26°	39'	29"	30°	15'	01"
Sheepmoor WEF 0.15	26°	39'	43"	30°	15'	28"

WEF boundary positions as given in Draft EIA Report dated March 2025 (Version 1)

Proposed Sheepmoor WEF coordinates

FEATURE	LATITUDE (S)			LONGITUDE (E)		
	DEG	MIN	SEC	DEG	MIN	SEC
Sheepmoor WEF 0.01	26°	33'	03"	30°	16'	20"
Sheepmoor WEF 0.02	26°	37'	21	30°	17	59 "
Sheepmoor WEF 0.03	26°	37'	27"	30°	21'	39"
Sheepmoor WEF 0.04	26°	41'	26"	30°	18'	09"
Sheepmoor WEF 0.05	26°	39'	39"	30°	17'	34 "
Sheepmoor WEF 0.06	26°	38'	32"	30°	16'	30"
Sheepmoor WEF 0.07	26°	38'	11"	30°	18'	16"
Sheepmoor WEF 0.08	26°	37'	32"	30°	18'	02"
Sheepmoor WEF 0.09	26°	38'	20"	30°	15'	48"
Sheepmoor WEF 0.10	26°	37'	18"	30°	14'	42"
Sheepmoor WEF 0.11	26°	36'	18"	30°	15'	24"
Sheepmoor WEF 0.12	26°	35'	56"	30°	14'	57"
Sheepmoor WEF 0.13	26°	40'	14"	30°	13'	46"
Sheepmoor WEF 0.14	26°	39'	29"	30°	15'	01"
Sheepmoor WEF 0.15	26°	39'	43"	30°	15'	28"

WEF boundary positions as given in Draft EIA Report dated July 2025 (Version 2)

Proposed Sheepmoor WEF coordinates						
Sheepmoor WEF 0.16	26°	39'	16"	30°	15'	30"
Sheepmoor WEF 0.17	26°	39'	50"	30°	16'	05"
Sheepmoor WEF 0.18	26°	40'	31"	30°	15'	06"
Sheepmoor WEF 0.19	26°	41'	14"	30°	14'	53"
Sheepmoor WEF 0.20	26°	41'	25"	30°	15'	56"
Sheepmoor WEF 0.21	26°	40'	36"	30°	16'	27"
Sheepmoor WEF 0.22	26°	40'	21"	30°	16'	07"
Sheepmoor WEF 0.23	26°	39'	57"	30°	17'	32"
Sheepmoor WEF 0.24	26°	40'	59"	30°	17'	09"
Sheepmoor WEF 0.25	26°	41'	01"	30°	16'	43"
Sheepmoor WEF 0.26	26°	41'	44"	30°	16'	20"

WEF boundary positions as given in Draft EIA Report dated March 2025 (Version 1)

Proposed Sheepmoor WEF coordinates						
Sheepmoor WEF 0.16	26°	39'	16"	30°	15'	30"
Sheepmoor WEF 0.17	26°	39'	50"	30°	16'	05"
Sheepmoor WEF 0.18	26°	40'	31"	30°	15'	06"
Sheepmoor WEF 0.19	26°	41'	14"	30°	14'	53"
Sheepmoor WEF 0.20	26°	41'	25"	30°	15'	56"
Sheepmoor WEF 0.21	26°	40'	36"	30°	16'	27"
Sheepmoor WEF 0.22	26°	40'	21"	30°	16'	07"
Sheepmoor WEF 0.23	26°	39'	57"	30°	17'	32"
Sheepmoor WEF 0.24	26°	40'	59"	30°	17'	09"
Sheepmoor WEF 0.25	26°	41'	01"	30°	16'	43"
Sheepmoor WEF 0.26	26°	41'	44"	30°	16'	20"

WEF boundary positions as given in Draft EIA Report dated July 2025 (Version 2)

3.3. The result of the situation as described in the foregoing points is that it is wholly unclear to I&APs as to what properties are affected by the proposed WEFs, what the extent of the respective proposed WEF sites actually is, how the two sites overlap in terms of infrastructure, WTGs and environmental constraints or sensitivities. Information which is materially deficient and reporting that is in such a state of disarray is not acceptable at the stage of a Draft EIA Report, which needs to be submitted as a Final EIA Report to the Competent Authority on 25 August 2025. It will not be possible to rectify these material omissions in that timeframe and any Final EIA Report submitted to the Competent Authority on this basis will be materially deficient.

3.4. Based on responses from the EAP in the CRR, it appears the some of the WTGs may have been relocated / moved. These site layout changes are not detailed and the rationale for any such changes is not given in the project description. In fact, the Draft EIA Report is silent on the manner in which the layout has changed and the rationale behind these changes and which were made in response to environmental constraints or sensitivities. Such details and related information are central to determining if a concerted and authentic effort has been made to avoid adverse impacts, in accordance with the precautionary principle and the mitigation hierarchy.

3.5. Coordinates of the WTGs are not provided, and therefore reliance has to be placed on the figures (diagrams), to ascertain where the turbines and other infrastructure is located relative to environmental sensitivities. This makes it confusing for I&APs to appreciate if the impact assessment is informed by credible data. This is exacerbated by the fact that the figures provided by ERM in the March 2025 Draft EIA Report did not have labels on the WTGs because the WTGs are not numbered. This makes it exceedingly difficult for I&APs and the Competent Authority to correlate these figures with those in the July 2025 Draft EIA Report. The lack of WTG coordinate information undermines the ability of I&APs and the Competent Authority to establish whether the position of WTGs has changed in response to concerns about environmental sensitivities.

3.6. Given the foregoing concerns regarding the adequacy and accuracy of information relied on by the EAP and provided in the reports, no reliance can be placed on any statements about WTGs having been relocated / moved in response to noise, biodiversity sensitivities, cultural / heritage resource sensitivities and the like because spatial data shown on maps is confusing, boundaries have changed, the two sites overlap and diagrams and maps in reports have not been updated accordingly.

Assurances given in the CRR have no substance

3.7. In the CRR the EAP has offered assurances to concerned parties that WTGs have been moved / relocated away from sensitive areas. Unfortunately, there are instances where this contention is not borne out by the facts and data contained in the reports. Therefore it must be concluded that these assertions by the EAP must be treated with extreme caution by the Competent Authority.

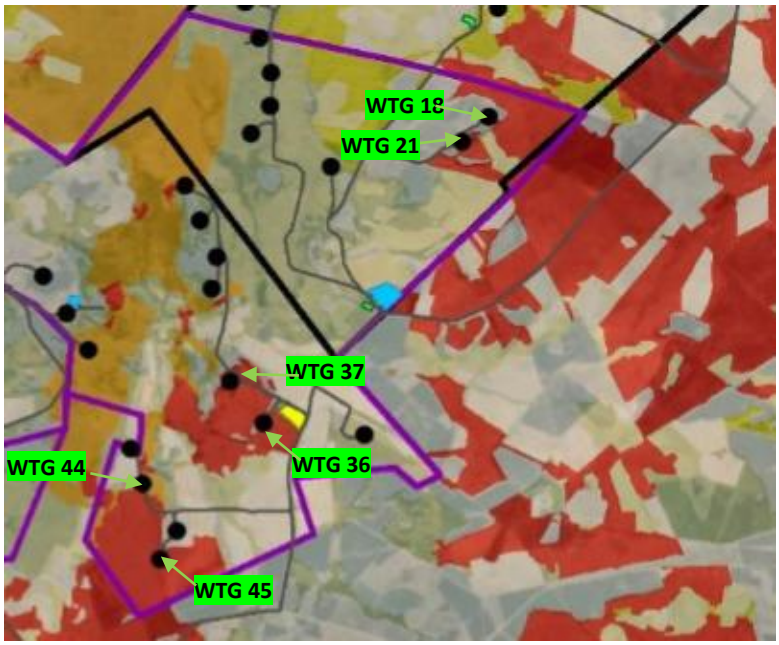
3.8. A specific example is the concern raised by DARDLEA about the location of WTGs in CBA: Irreplaceable areas, with specific mention of Turbine 45. In response the EAP has stated that

this turbine has been "relocated approximately 330 metres southward to ensure complete avoidance of the CBA: Irreplaceable area". Since the Figure 6 – Important Ecological Areas in the Draft EIA Report shows CBAs as a single entity (i.e. does not differentiate according to the CBA: Irreplaceable and CBA: Optimal categories as per the Mpumalanga Biodiversity Sector Plan (MBSP), it is difficult to verify this claim. The information is materially deficient and the Competent Authority, and I&APs are unable to determine – from the reports made available - if the claims made by the EAP are valid. There is too much uncertainty.

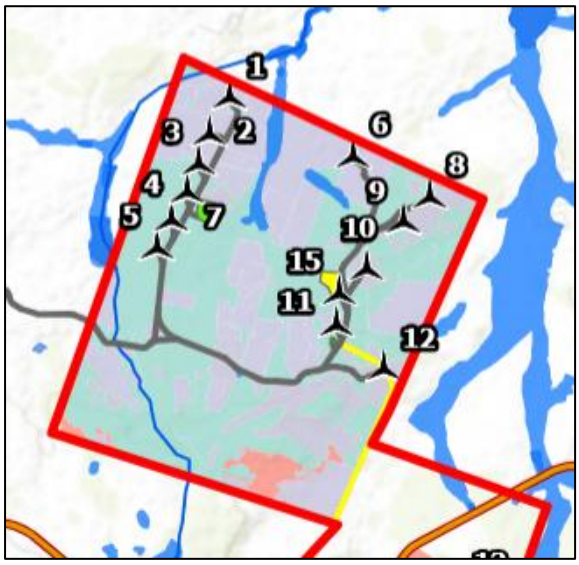
3.9. Accordingly, we considered the diagram on Biodiversity Offset Report prepared by WSP. This shows the CBA: Irreplaceable in accordance with the MBSP. It can be seen that in the case of the proposed Sheepmoor WEF, a number of WTGs fall within or right on the edge of CBA: Irreplaceable. WTG 45 remains located in CBA: Irreplaceable, despite the EAP's contention that it has been moved to completely avoid CBA: Irreplaceable.

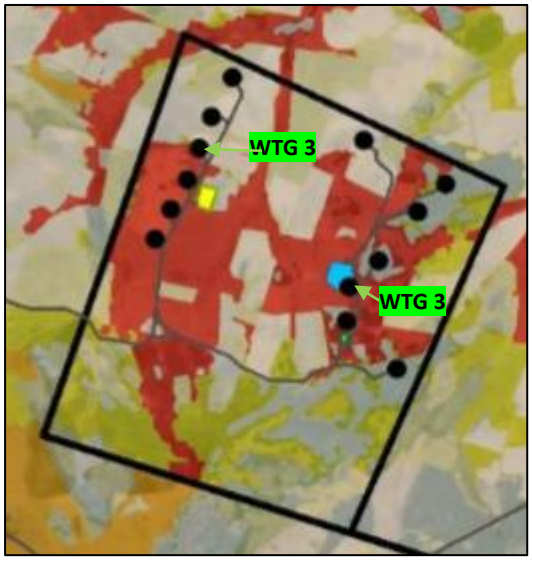
3.10. The contradiction in the documentation is deeply concerning because it misrepresents the correct factual position on the ground. Furthermore, even if it was moved southwards as stated by the EAP, this would not resolve the situation, since CBA: Irreplaceable is present to the south of this turbine.

3.11. What is notable in the case of Sheepmoor is that there are other WTGs sited within CBA: Irreplaceable or on the edge thereof, besides WTG 45: Irreplaceable, namely WTGs 44, 36, 37, 21 and 18. A similar situation exists for Emvelo as can be seen from the WSP Biodiversity Offset Report – Figure 3-1.



WTGs located in CBA: Irreplaceable – Sheepmoor (extract from Figure 3-1 of the WSP Biodiversity Offset Report). According to the key associated with this diagram, red shading shows CBA: Irreplaceable.





3.12. The EAP states "the turbine and infrastructure layout has been revised in accordance with specialist recommendations, with a strong emphasis on avoidance of ecologically sensitive areas. All no-go areas identified by biodiversity specialists have been fully excluded from the final layout." (e.g. Sheepmoor CRR, page 24).

3.13. Concern was raised about WTG 15 being located in a Key Biodiversity Area (KBA) that is untransformed (page 15 Emvelo CRR). In reply the EAP states that WTG 15 was removed from the final layout. This is not the case! Examination of the extract from Figure 6 – Important Ecological Areas (from the figures volume attached to the July 2025 Draft EIA Report) shows that both WTG 3 and WTG 15 remain located in a CBA (green shading), albeit in a different position relative to the March 2025 Draft EIA Report. A construction camp is located next to the WTG and is also shown situated in a CBA. What is the explanation for this? Therefore, the relocation of WTG 15 does not seem to have offered any advantage from an avoidance of an adverse impact on biodiversity perspective. The lower image is extracted from the Biodiversity Offsets Report and it can be seen that both WTG 3 and WTG 15 are situated within CBA: Irreplaceable. Again, it appears that this is mere tick-box exercise by the EAP with no real intent to report accurately.

3.14. The status of the layouts that have been assessed by the EAP is unclear. Terminology is used loosely as shown in the examples below, taken from the July 2025 Draft EIA Report for the proposed Emvelo WEF. The same text is evident in the Draft EIA Report for the proposed Sheepmoor WEF, albeit that the page numbers are different. Examples include:

3.14.1. Page 9 of the Emvelo July 2025 Draft EIA Report under the topic Terrestrial Biodiversity, it is stated that "It is recommended that a final site walkdown be undertaken in order to inform the final layout design and inform micro-siting of footprints."

3.14.2. Yet the project description also references final layout design as not being finalised (page 2): "The proposed turbine footprints and associated facility infrastructure will cover an area of up to 185 ha after rehabilitation, depending on final layout design."

3.14.3. Then on page 13 on the topic of fauna, the following statement is made: "Final layouts of turbine placement, access roads, OHPLs, and other associated developments were provided by ERM on 30 January 2025. The final layout plans indicate that several wind turbines and access roads fall within areas of high faunal sensitivity" .

3.14.4. Page 28: "Prior to the submission of the final layout plan to the DFFE for approval….."

3.15. It is unclear as to what the final layout constitutes because as already noted, in the CRR the EAP makes reference to WTGs being moved in the "final layout". The reports are plagued with inaccuracies and contradictory statements. The credibility of the assessment process is doubtful as so many uncertainties prevail. IN this regard, the following questions arise:

3.15.1. If as noted by the terrestrial biodiversity specialist (for example), final layout plans were provided by ERM in January 2025, then is this the layout that was assessed for the purposes of the March 2025 Draft EIA Report? This is not clear at all from the reports made available to I&APs.

3.15.2. If concerns were raised by I&APs, specifically commenting authorities, about the layout plan presented in the March 2025 Draft EIA Report, and the EAP's response is that this has been resolved in the final layout, then which final layout is this? This is not clear at all from the reports made available to I&APs.

3.15.3. More importantly, why is there a disparity between the EAP's claim that WTGs and infrastructure has been moved / relocated (and thus, according to the EAP, the concerns about environmental sensitivities have been addressed). This is NOT the case. The figures presented in the July 2025 Draft EIA Report, which show definitively that this is not the case, with one or two exceptions (WTG 7 was moved due to the sensitivity of bird species 23).

3.15.4. Why is there reference to the need to do a walkover to develop a final layout and inform micro-siting of turbines and infrastructure, whereas the CRR creates the impression that micrositing has already been done?

3.16. As evident from the foregoing discussion, as well as that in relation to avifaunal sensitivity, any assertion by the EAP that layouts have been changed, WTGs and infrastructure moved to avoid or reduce adverse impacts, are questionable. Such assertions must be interrogated by the Competent Authority and treated with caution. In fact, these claims cannot be relied upon and the manner in which information in this regard has been presented serves to compromise the entire EIA process. Moreover, it undermines the validity of significance ratings (over and above the weaknesses in the rating methodology highlighted in Section 4 of this document) pre-and post-mitigation.

4. INADEQUATE IDENTIFICATION AND ASSESSMENT OF IMPACTS

4.1. As noted in our previous comments (dated April 2025), the significance ratings of impacts reported by the EAP cannot be relied upon. It is inconceivable that in an environment that has so many highly sensitive environmental attributes, that not one single negative impact post-mitigation is rated more than being of 'moderate' significance. In general significance has been understated and this situation persists.

4.2. An example is the way the criterion "extent" is applied. To illustrate this point, avifauna is given as an example using the operational impact "Mortality due to Collisions with Turbines". The first problem is that all birds are considered as a single entity – there is no differentiation between Species of Conservation Concern versus other species. Where a species is listed globally as CE or E, then the extent of any impact that could cause mortality is a major concern at an international level and cannot be rated as medium in terms of extent. It is immediately apparent just from this single example of the criterion of "extent", that the result will be understatement of impact significance.

4.3. Impacts on policies and plans have not been assessed. For example, NPAES (National Protected Area Expansion Strategy) areas occur on the sites of both proposed WEFs. This is not shown on the sensitivity maps / diagrams. In addition, the impact on this strategy has not been assessed. Similarly, the potential impact of the proposed projects on conservation targets and objectives such as those expressed in the or on MBSP have not been assessed. There is also no indication that these types of policies, plans and programmes influenced impact significance rating.

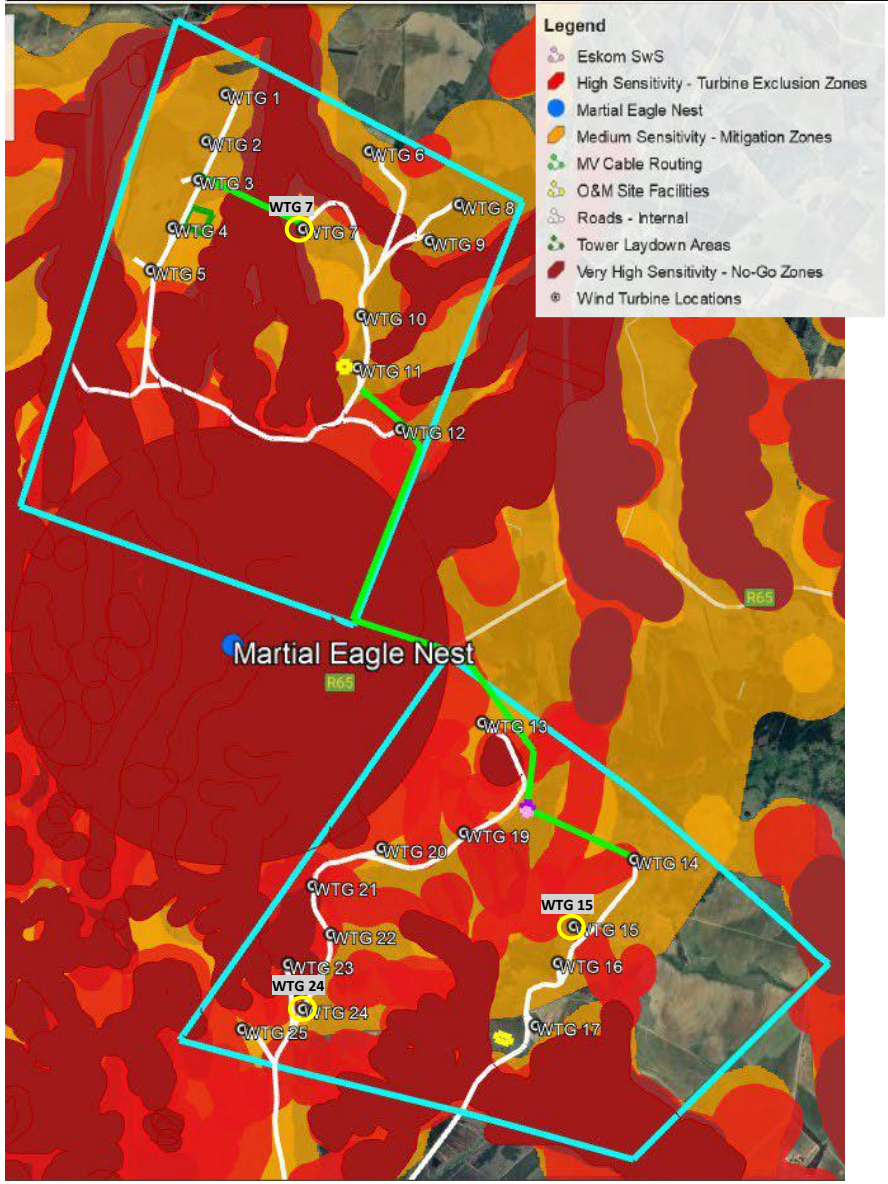
4.4. The figures overleaf (extracted from Figure 39 of the Avifaunal Specialist Study) do show that WTG 7 was moved (in response to the sensitivity of Species 23). Relocation of WTG 15 as described in point 19 would seem to be disadvantageous in the context of Martial Eagle sensitivity. It is located closer to the Martial Eagle buffer (May 2025 Avifaunal Specialist Study) and also closer to the "Very high risk – all infrastructure exclusion zone". It is not known to what extent the relocation of WTG 15 was considered in the May 2025 Avian Specialist Study as no reference could be found to a specific discussion in this regard. Note that changed turbine positions are shown in yellow circles in the diagrams overleaf.

4.5. There are several WTGs that are still located within the Martial Eagle Turbine Exclusion Zone. These are WTGs 12, 13, 14, 19 and 20 are located. This was raised in the comments on the Draft EIA Report dated March 2025 (page 20 Emvelo CRR). In response the EAP states the following: "Noted. WTGs 12, 20 and 21 have been moved outside of the Avifaunal Turbine Exclusion Zone (Martial Eagle nest buffer), and WTG 13 has been micro sited to be located further away with the rotor swept area also not intersecting with this zone. This is simply not the case, which means this response by the EAP is **factually incorrect**. In fact, the specialist notes in his revised report (May 2025 – page 106) that these turbines need to be moved. Accordingly, the EAP has misrepresented the situation with regard to an extremely sensitive species.

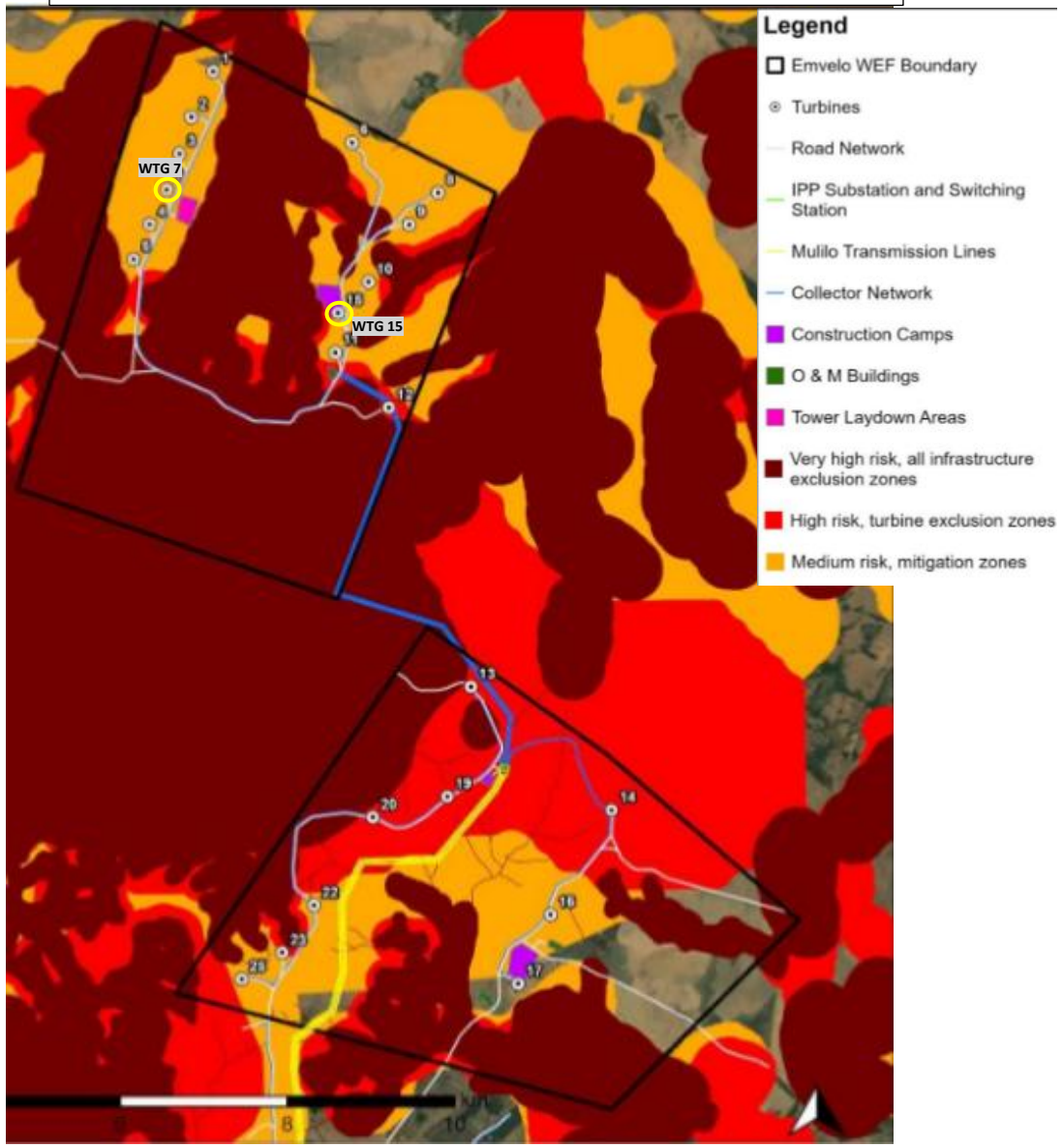
4.6. Further to the above, fatality rate decreases described in the Avifaunal Specialist Study (Section 5.8.8) are open to question. It is unclear how the fatality rate for the Martial Eagle,

for example, can be predicted to reduce as much as described in of the specialist study, especially as the reduction of >50% is attributed to project layout changes. In the absence of specific details of what was changed so as to result in this predicted fall in fatality rates, together with clear diagrams showing 'before' and 'after' layouts, this conclusion cannot carry a high degree of certainty. This is particularly as the recommended buffer zone for Martial Eagles has not been adhered to (5-6 km not 2.5 km radius). Moreover, the layout itself does not appear to have altered so significantly relative to Martial Eagle sensitive areas so as to point to a substantial reduction in the threat of fatality. The following diagrams from the Avifaunal Specialist Studies provided with the Draft EIA Reports of March and July 2025 show that it is exceedingly difficult to discern layout changes that may have been in response to avifaunal sensitivities.

Combined Avian Sensitivity – Proposed Emvelo WEF (extract from Fig. 3.9 of February 2025 specialist study included in March 2025 Draft EIA



Combined Avian Sensitivity – Proposed Emvelo WEF (extract from Fig. 3.9 of May 2025 specialist study included in July 2025 Draft EIA Report



5. INADEQUATE APPLICATION OF THE MITIGATION HIERARCHY

Avoiding avoidance – the pinnacle of the mitigation hierarchy

5.1. One just has to consider the impact tables where one of the questions is: "Can impact be avoided, managed, or mitigated?" realise that the impact assessment methodology is based on a misconception of the mitigation hierarchy. The specialist response to the question "Can impact be avoided, managed, or mitigated?" is either "yes" or "no". There is no requirement to specify which mitigation strategy is being applied. Avoidance is different to management / mitigation, but the EAP makes no account for this. It is important to know whether the impact can be avoided as opposed to whether it can be mitigated. This ought to be explicitly explained by the EAP, but the EAP has failed to provide a rational explanation.

5.2. Avoidance is preferred and should always be considered before any other options in terms of the sequence of tiered steps mandated by the impact mitigation hierarchy. Definitively proving that avoidance has been implemented in accordance with the mitigation hierarch is something the EAP has categorically failed to establish.

5.3. The EAP's trend and preferred methodology – as shown in the Draft EIA Report - is to avoid 'avoidance' as the primary means for preventing adverse impacts in terms of the hierarchy. The EAP's approach flies in the face of IEM and the mitigation hierarchy because avoidance is assumed but not reflected in the project documentation. When working in such a sensitive environment, such as the sites of the proposed projects, it goes without question that AVOIDANCE should be top priority and a critical threshold to adhere to BEFORE proceeding to the following stages of the mitigation hierarchy. The role of the EAP is to ensure development is undertaken in a manner that ensures the interests of the biophysical environment and affected communities. This is an enormous responsibility and cannot be fulfilled if concerns raised by I&APs and conservation authorities are downplayed and effectively ignored. The impact assessment and public participation processes are materially inadequate.

5.4. Instead of avoiding areas of high sensitivity the EAP recommends pre-commencement flora relocation and faunal relocation (see for example page 384 Draft EIA Report). This is unacceptable and illustrative of a fundamentally defective approach to impact assessment and management. Areas of high sensitivity ought to be avoided outright in terms of the mitigation hierarchy. This has NOT been done.

5.5. There is no clarity of which species will be affected or whether they are good candidates for relocation (i.e. is the success of this proposed mitigation measure proven). The proposal to relocate species has associated impacts and these have NOT been assessed. In a scenario where relocation is unavoidable (i.e. all other options in terms of the mitigation hierarchy have been applied and exhausted) – **this constitutes a project impact and is not solely a proposed mitigation measure.**

5.6. It is stated "Several burrowing faunal species are present and will allow for relocation of less mobile species, although most faunal species in proximity are likely to vacate the area once

earth moving equipment commences clearing and construction, however some species may require manual relocation." Firstly, the way this proposal is framed is muddled / does not make sense. It reads like some sort of circular argument. Secondly, the impacts of relocation have not been assessed. Thirdly, once earth-moving equipment moves in, the project has commenced – which does not tie up with the proposed pre-commencement relocation of the sensitive species.

5.7. Inadequate thought has been given to relocation of plant and animal species, which results in the following unsubstantiated, bland and rather meaningless statement by the EAP: "They are relocated into a suitable habitat and protected from further damage and all disturbances to aid their re-establishment."

5.8. There are too many unanswered questions to place any reliance on this relocation proposal:

5.8.1. Have suitable alternative habitat locations been identified for relocation purposes? How far away are these and is the location accessible for this purpose? These questions are unanswered.

5.8.2. What is the impact of the faunal species that might be relocated? What about their wellbeing? These questions are unanswered.

5.8.3. How will they be caught so as to avoid trauma? Are they territorial species and if so, how will they be introduced into a new territory? How will faunal species in the new territory react? These questions are unanswered.

5.8.4. Has a faunal relocation expert been consulted? Where is the specialist input on relocation? These questions are unanswered.

5.9. The key priority and statutory obligation for an EAP is to determine whether a proposed project can respond to the environmental constraints present at the proposed location. This is the most important assessment and guidance that an EAP can provide. Instead, in this case, focus is placed on mitigation such as relocation of sensitive flora and fauna. It appears that little or no thought is given to the recipients or receiving environment of this relocation, as if one is dealing with environmental impact management is akin to dealing with inanimate objects.

5.10. There is also a disproportionate reliance placed by the EAP on reconsideration of WTG positions following a post-authorisation walkthrough. The question that has not been answered by the EAP is this: Why can such a walkthrough not be conducted during the EIA process when the specialists have been on site? Emphasis is placed on how much field work has been done, so why did this not include detailed examination of proposed WTG locations? For example (page 87 of the Emvelo CRR) concern is raised about the location of turbines and roads within Yellow-breasted Pipit habitat, contrary to the avifaunal specialist's recommendations. The EAP's response is "All WTGs were removed from Yellow-breasted Pipit habitat with the exception of WTG 23 that still appears to be fringing on a high-risk area as identified for the Yellow-breasted Pipit. It is recommended that this turbine position be

reconsidered following the avifaunal walkthrough, post-EA (should such EA be granted) prior to construction." It seems that WTG 31 (Sheepmoor) is also located on the edge of this bird's habitat.

5.11. There is reference to turbines having been micro-sited out of certain areas. See for example the Emvelo CRR (page 20) in relation to Martial Eagle. This raises the obvious question as to why micro-siting was not completed for all bird species and other environmental sensitivities. The maps are such that it is extremely difficult to discern whether the positions of turbines have changed, and this is due to lack of information on coordinates as mentioned elsewhere in this report. An explanation as to how the siting of WTGs was done is required. Was this done in field? When and how was micro-siting done? Were the edges between sensitive habitats and WTG positions verified in the field?

5.12. It is strange that if there is such precision about blade sweep and how far it extends and that it does not impinge into sensitive areas (see page 19 and 20 of Emvelo CRR) that more detailed diagrams / maps are not provided at a scale that clearly shows the difference between the before and after changes that have been made to the layout. Another example (page 36 of the Sheepmoor CRR) of this type of feedback is: "The Sheepmoor WEF has undergone significant layout refinement to avoid high-sensitivity areas, particularly Critical Biodiversity Areas (CBAs) and known flight paths of key species." Again, is one looks at the figures, it is extremely difficult to see any material difference in the layout.

5.13. Given the foregoing points, no reliance can be placed of assurances that the layout has been substantially changed and that micro-siting has been conducted. If this were the case, then the information presentation would be clearer, especially spatial information. Precise coordinates would be given of WTG positions before and after relocation, for example.

Misunderstanding of legal obligations – alien invasive legislation

5.14. Clearing of alien invaded areas is offered as a trade-off, at a ratio of 1:3 for direct loss of natural grassland habitat (as a trade-off or offset), in conjunction with other mitigation proposed by the terrestrial biodiversity specialist. This proposal is repeated many times in the Draft EIA Report for both proposed WEFs (e.g. page 32 Emvelo Draft EIA Report of July 2025). This proposal cannot be accepted as a trade-off or an offset. The reason is that this proposal is attached to the site of the proposed development, and the influence / impacts are not confined solely to the development footprint.

5.15. Furthermore, alien vegetation control is a legal requirement under the Alien and Invasive Species Regulations (GNR 1020 of 25 September 2020). As such, the meeting of a legal obligation cannot be used as a trade-off. Even if the WEF owner is not the same party as the landowner, this applies, because the WEF is being operated on that land. Thus, under the duty of care obligations under NEMA, the WEF operator is required to fulfil alien vegetation control obligations.

5.16. It may be argued that the WEF operator has no obligation to control alien invasive vegetation, especially that present prior to development. This is a weak argument because one of the

impacts associated with disturbance caused by the proposed development is the possible spread of alien invasive vegetation.

Misuse of biodiversity offsets

5.17. The proposed offset does not meet the required outcomes of the National Biodiversity Offset Guideline of 2023, which are that the offset outcomes must be ***practically measurable on the ground***. Importantly an offset must ensure that:

5.17.1. biodiversity is secured in the long term through the protection and appropriate management of ecosystems and species;

5.17.2. efforts to protect biodiversity in the long term contribute to the expansion of South Africa's protected area network, and are focused in areas identified as biodiversity priorities, with particular emphasis on the consolidation of protected areas and biodiversity priority areas and securing effective ecological links between priority areas; and

5.17.3. it contributes to the long-term security of biodiversity priority areas and maintains or improves their ecological condition, thereby resulting in tangible and measurable positive outcomes for biodiversity conservation 'on the ground'.

5.18. Internationally, research, capacity building, training and other activities are not recognised as 'offsets' but can be used to support, expedite, improve or bolster the outcomes required of an offset.

5.19. The offset report proposes various measures to deal with residual impacts on birds. Area-based offsets are not feasible; several offsite actions have been proposed in an effort to achieve no net loss of these species. How no nett loss of bird species through these measures is to be achieved is wholly unclear. Furthermore, since WEFs pose a threat of bird deaths the loss of a single bird within the category of a species categorised as Critically Endangered or Endangered is one too many and pushes the species ever closer to a tipping point.

5.20. 13.7 ha of the 31 ha total residual impacts are in CBA 1 which is, by definition, **IRREPLACEABLE** and constitute a **FATAL FLAW** as noted in the national offset guideline. i.e. 44% of the proposed footprint. Also, it is in a NPAES focus area (Fig 3.1 of the WSP Biodiversity Offset Report).

5.21. **No assurance that land can be secured for conservation**, and **no assurance of long-term protection of a possible offset area is provided**. There is passing mention of 'may' look at conservation servitudes, but that is all." To suggest that Mulilo can motivate to the lessor that the offset plan is part of "maintenance and repairs" is wholly unacceptable and nonsensical.

5.22. **Furthermore, suggesting that target areas be identified in the context the existing site due to having lease agreements in place is counter to the intention of offsets. This land is within**

the proposed project's sphere of influence – so it is in fact not an offset as applied internationally and as understood in the aforementioned national guideline.

5.23. There is no clarity on responsibility for managing the offset area(s) (i.e. who would implement the offset and do the work) and covering costs of the offset, and duration of liability. Talking about clearing of alien species 'in a (questionable) ratio of 1:3' as a 'trade-off or offset' is nonsense. Any offset site would need to be cleared of alien species as an integral part of its management.

5.24. Of the **proposed offset measures for birds** (Section 10.2 in Biodiversity Offset report) – only the bird flight diverters may be acceptable BUT evidence that this would translate into on-the-ground outcomes is required (i.e. improvement in bird populations commensurate with expected residual impacts/ reduction in numbers due to electrocution/ collision with turbines/ powerlines). These outcomes must be directly linked to the affected species. Furthermore, no basis is given for specifying 5000 bird diverters every 10 years.

5.25. Support of research programmes are not recognised as an offset.

5.26. All of the items listed are in fact what a responsible corporate citizen ought to be doing and therefore do not constitute a praiseworthy offset (see point 53 below), particularly in circumstances where the mitigation hierarchy has not been applied. The first or top priority in the mitigation hierarchy is to avoid the adverse impact in the first place. This is precisely the mitigation approach that has been avoided in the EIA process for these proposed WEFs. Avoidance would mean removing any WEFs that is within away from bird sensitive areas on the basis of the precautionary principle – meaning do more than the minimum. For example, if there is a general guideline buffer applicable to nest areas, then application of the precautionary principle would mean adding to this buffer, because of the uncertainties about bird movements, for example.

5.27. The use of an offset demonstrates that there are residual adverse impacts, which means that the project has significant adverse impacts associated with it. It is not proactive compliance as espoused by the EAP. "This BOR is not a reactive add-on; it reflects a proactive compliance, demonstrating that the project has embraced its environmental responsibilities. Significant resources, technical input, and time were invested to ensure the offset plan would stand up to scrutiny and deliver real conservation value. It is a key part of what gives this project its integrity, and the applicant is proud to include it as a cornerstone of the DEIR submission. It should provide the competent authorities with a clear assurance that residual impacts have not only been recognised, but systematically addressed, avoided where possible, and responsibly offset where unavoidable." Besides the fact that the foregoing paragraph is verbiage, it is also factually incorrect. This type of language is wholly inappropriate – the language is not objective and compromises the independence of the EIA process.

5.28. Additional comments and concerns regarding the Offset Report prepared by WSP include:

Re: Section 3.1.2 PRIORITY AREAS FOR PROTECTED AREA EXPANSION

5.28.1. How has this section influenced the need for and design of any offset? This information would have and should have been evident during project planning and should have triggered upfront offset development at the earliest stages of the design process. What was this not investigated by the EAP before the 11th hour of the EIA process?

Re: 3.2.1 ECOLOGICAL IMPORTANCE OF VEGETATION COMMUNITIES IN THE LSA

5.28.2. The applicable Guideline suggest that impacts on CBAs should be AVOIDED AT ALL COSTS, unless the CBA can be shown to be inaccurately mapped or otherwise wrongly determined. The actual drivers of why the area is designated a CBA are important in terms of understanding the impact, requisite offset (if possible) and offset design to accommodate the feature driving CBA.

Re: Figure 3-7 - Sheepmoor Vegetation Sensitivity

5.28.3. It is curious (and inexplicable) to note that the areas in green are mapped as only moderate sensitive - although from an avifaunal perspective many areas are rated High or VERY HIGH. Offsets must synthesize the full array of features to derive a trigger but this has not been undertaken by the EAP.

Re: Section 5 AQUATIC BIODIVERSITY OVERVIEW

5.28.4. It is not clear whether there are any significant impacts on wetland systems (for instance from stream crossings by access roads or buried power lines) and whether these may trigger wetland offsets? This is unresolved and unanswered. The gaps in information and inadequacy of the assessment and it is not possible for the Competent Authority to render an informed decision on such impacts.

Re: Section 6.1.2 FLORA

5.28.5. EAP to confirm whether this is the first time a footprint figure has been made available during the EIA process. If so, why is this information made available at the 11th hour only?

5.28.6. There is no table of impact areas by feature, with a clear indication of what ratio should be applied. In order to determine a final offset quantum that can be audited for compliance monitoring the relevant information is not tabled. How much invaded area needs to be cleared? This is not clear from the reports. How is it to be rehabilitated to secondary grassland? This is not clear from the reports. Does this qualify as an acceptable offset for loss of intact grassland? If so, why? Again, this is not clear from the reports.

5.28.7. There is no map to determine whether it is feasible compensate for loss of secondary grassland in corridors between intact patches that are ESA designated – but the EAP states:

"this impact to negligible levels with only a very small proportion of the footprint occurring in or near higher sensitivity areas. Very High Sensitivity or No- Go habitat has largely been avoided and reduced to an acceptable level."

5.28.8. The above contradicts what the Avifauna report says or the fact that there are impacted CBAs and ecological corridors and processes. only valid for narrow vegetation lens. What is the total footprint of these areas impacted? Who is able to determine whether the impacts significance is acceptable without the material underlying data which has not been made available?

Re: Section 6.1.3 FAUNA

5.28.9. Agreed. This requires a clear and compensatory offset. i hope it still is to be clarified how much and where? could the OHPL be constructed without a service road? It seems unlikely

5.28.10. In this finely dissected landscape, with no-go areas immediately adjacent to low sensitivity, micro-siting would seem vital to have been completed before arriving at an impact statement and an estimation of footprint and offset liability. This is a key and material flaw in the entire EIA process. This weakness in impact assessment methodology flies in the face of IEM and the mitigation hierarchy.

5.28.11. The report relies on an indefinable and this un-auditable requirement and is fatally flawed.

Re: Plant Species page 410

5.28.12. Any loss of intact or degraded grassland habitat in corridors or wetland catchments cannot be rated as a positive impact!

Re: Table 9-2 – Terrestrial habitat offset targets

5.28.13. How does this relate to the 180 ha indicated in the report above? This is an unacceptable impact. fully 40% of the impact is in CBA1 ?

Re: Section 10 CANDIDATE OFFSET SITES

5.28.14. There is no candidate list, or any credible analysis of the contribution of each? do sufficient sites exist? are the landowners amenable to having their activities curtalied?

5.28.15. There is no evidence these lease conditions include restriction of farming activities and proactive biodiversity management. When were they signed, and has proof been submitted to the authorities?

5.28.16. Much of the assessment is entirely theoretical. Actual offset sites need to be identified and the specifics of their rehabilitation are determined to assess functional gains before

a decision can be made. More specifics would have helped the decision maker here regarding the biodiversity impacts

5.28.17. Rehab of grasslands is difficult and expensive, and often incomplete/inconclusive. restoration is likely impossible - especially to achieve prior diversity levels and structure, and keep invasive and alien species out.

Re: Section 10.1 SIGNED LEASE AGREEMENTS

5.28.18. The mooted lease agreements are likely to be contested by the landowners. A dedicated offset lease agreement and servitude - with accompanying management plan setting out the requisite outcomes - should have been concluded with the sites but this has not been done. . All of these proposed offset areas will be adjacent to the WEF/ WTG and this is questionable in terms of offset efficacy.

5.28.19. There is little indication of competing interests which might undermine potential offset efficacy e.g. Mining & Prospecting Rights, and the limits that these rights might impose on the applicants' ability to attain offset outcomes

Re: Section 11 10.2 OFFSITE ACTIONS FOR PRIORITY BIRD SPECIES

5.28.20. None of the actions listed qualify as offsets, or are so insufficiently described as to be so vague and meaningless that it is impossible to link the action directly to an impact (which methodology is expressly prohibited by the Offset Guideline). The reason being that the impact is not quantifiable and is unauditable based on the available information.

Re: Section 11 RECOMMENDED CONDITIONS FOR ENVIRONMENTAL AUTHORISATION

5.28.21. The quantum needs to be specified here, but it isn't quantified. The final status and/or protection and management regime need to be confirmed but this information has not been made available

5.28.22. There is insufficient information to demonstrate that the landowner has consented to the proposed arrangement. It is also not clear how certain this outcome is and whether this is covered in the lease conditions.

Re: Section: AFFECTED TERRESTRIAL HABITATS

5.28.23. This assessment is meaningless unless attached to a specific infrastructure element, which it is not. In the circumstances, the DFFE is unable to determine accurately what the offset liability is should they choose to only approve a portion of the project

The reliance on micro-siting

5.29. Whilst post-approval micrositing is applied internationally in the wind energy sector, this is

within very specific limitations. According to Scottish Natural Heritage[1], for example, the siting of wind turbines in small incremental distances and is used at two main stages of wind farm development:

5.29.1. Firstly, during the design stage to ensure that turbine layout is satisfactory from key viewpoints and achieves the design objectives.

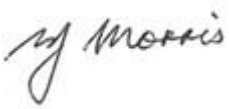
5.29.2. Secondly, during the construction phase of a project, where previously unexpected conditions are encountered on site.

5.30. Provision for micrositing is normally covered by a specification in the EIA Report which can then be included in the conditions in the approval. This serves to set a limit within which micrositing is permitted and normally limits this to 50-100m from the specified (approved) turbine location. This information ought to be known to ERM South Africa, since exactly this approach is applied by the company in the UK (for example Crosbie Wind Farm.[2]

5.31. From the foregoing information it can be seen that micrositing is not to be applied in a non-specific manner. It is recognised that some flexibility is required in final design stages and also to allow for unforeseen circumstances during construction. It is standard and accepted practice internationally to specify a distance limitation within which micrositing is permitted. This must of course be included in the project description and included in the impact assessment. This way, I&APs and the Competent Authority are provided with a full picture of the potential development footprint (including the micrositing zone) and the associated footprint. More importantly, it means the Competent Authority has full information and can include a specific zone for each WTG within which micrositing is permissible. Hence, this is clear and known to the Competent Authority upfront from the provision of this information in the EIA Report, instead of being faced with an unknown quantity in terms of

RICHARD SUMMERS INC. **Morris Environmental & Groundwater Alliances**





Per: R W Summers **Per MJ Morris**

[1] Scottish Natural Heritage (2017): Siting and Designing Wind Farms in the Landscape. https://www.nature.scot/sites/default/files/2017-11/Siting%20and%20designing%20windfarms%20in%20the%20landscape%20-%20version%203a.pdf

[2] https://crosbiewindfarm.co.uk/wp-content/uploads/2025/01/Volume-1-EIAR-Chapter-8-Ground-Conditions-Peat-and-Geology.pdf. Accessed 11 August 2025.

From: Brian EnviroSci
Sent on: Monday, 18 August 2025 13:37:04
To: Lucien Barbeau
CC: ERM Arcus Amsterdam
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]
Attachments: Amsterdam Mulilo Cluster Sheepmoor aquatic - ERM 2025.docx (9.29 MB), Amsterdam Mulilo Cluster Emvelo Aquatic - ERM 2025.docx (8.95 MB)

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

EXTERNAL MESSAGE

HI

Please see attached my revised reports - note the sections in yellow - need the updated information i.e. project descriptions and the STR maps

Thanks

Brian

On 06 Aug 2025, at 16:26, Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

Dear Specialist,

I trust you are well.

Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by Monday, 12 August 2025.

If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.

Kind regards,

<image001.png>

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

<image002.jpg>

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<Sheepmoor 06-08-2025.kmz><Sheepmoor Boundary.kmz><Emvelo 06-08-2025.kmz><Emvelo Boundary.kmz>

EIA PHASE FOR THE PROPOSED MULILO CLUSTER WEF, NEAR ERMELO, MPUMALANGA PROVINCE

Sheepmoor Wind Energy Facility

AQUATIC IMPACT ASSESSMENT

FOR

ERM Southern Africa (Pty) Ltd

BY

EnviroSci (Pty) Ltd

Dr Brian Colloty

1 Rossini Rd
Pari Park
Gqeberha
6070

DATE

15 August 2025

REVISION 1

Executive Summary

ERM Southern Africa (Pty) Ltd appointed EnviroSci (Pty) Ltd to conduct an aquatic assessment of the proposed Mulilo Amsterdam Wind Energy Facility cluster between Ermelo and Amsterdam in the Mpumalanga Province. This report is focused on assessing the Sheepmoor Wind Energy Facility and its associated Overhead Line allignment

This assessment includes delineating any natural waterbodies, as well as assessing the potential consequences of the proposed project – The study area) on the surrounding wetlands and or watercourses. This was based on information collected during various site visits conducted within the region from March 2022 and a site-specific assessment in April & September 2023. Substantiated by the National Wetland Inventory v5.2 spatial data (NWI). Additional site visits were conducted in February 2025, while working in the region to confirm any changes since the initial surveys.

These surveys adhered to the assessment criteria contained in the DWAF 2005 / 2008 delineation manuals and the National Wetland Classification System. This report will inform the Environmental Authorisation process, as well as the required Water Use License Application that will be initiated, once the final project layout is available, i.e. once all the constraints, if any from this and other specialists have been considered in the design process.

The PROTOCOL FOR SPECIALIST ASSESSMENT AND MINIMUM REPORT CONTENT REQUIREMENTS FOR THE ENVIRONMENTAL IMPACTS ON AQUATIC BIODIVERSITY (Government Gazette 43110, 20 March 2020), superseding the Appendix 6 NEMA requirements, was also adhered to as results of the DFFE Screening tool indicated that portions of the study area are located within a VERY HIGH SENSITIVITY area, requiring this assessment. This is due to following being highlighted by the DFFE Screening Tool Results:

- Very High CBA: Aquatic rivers
- Very High CBA: Wetlands
- Very High ESA: Important sub catchments
- Very High ESA: Strategic Water Source Area (SWSA)
- Very High ESA: Wetland clusters
- Very High ESA: Wetlands
- Very High FEPA Subcatchment
- Very High Rivers_AB
- Very High Rivers_B
- Very High Rivers_C
- Very High SWSA (Surface Water) _Upper Usutu
- Very High SWSA (Surface Water) _Upper Vaal
- Very High Wetlands_Mesic Highveld Grassland Bioregion (Seep)
- Very High Wetlands_Mesic Highveld Grassland Bioregion (Valley-bottom)
- Very High Wetlands_Mesic (Riverine)
- Very High Wetlands_Mesic Highveld Grassland Bioregion (Depression)
- Very High Wetlands_Mesic Highveld Grassland Bioregion (Floodplain)
- Very High Wetlands_Mesic Highveld Grassland Bioregion (Seep)

The proposed Wind Energy Facility (WEF) is located in a portion of the Inkomati-Usuthu Water Management Area, within the upper catchment of the Mpama River (SQ W53) and the Sandspruit (SQ W53A) and the proposed grid connection options are located in the Upper Vaal River (SQ C11B) in the Vaal Water Management Area. Thus, several permanent rivers and a variety of wetland hydrogeomorphic types are anticipated both associated with the riverine valleys and bench or plateaux areas located between river valleys on higher lying areas.

The study region is further characterised by several National Biodiversity Assessment (2018) Wetland Clusters, National Freshwater Ecosystem Area (NFEPAs), Threatened Ecosystems and Strategic Water Resources Areas.

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

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

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

In terms of the National Freshwater Ecosystems Priority Areas (NFEPA) assessment, all the watercourses within the site have been assigned a condition score of C (Nel et al. 2011), indicating that they are Moderately Modified, but still have biological significance, while the NBA (2018). These scores were substantiated by observations made in the field within the study area, and due to the impacts or disturbance observed these scores would be upheld.

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

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

This report also indicates the significant watercourses and wetlands delineated within the study area, inclusive of the respective buffers. Any activities within these areas and or the 100m (riverine) 500m (wetland) regulated zones will require a Water Use license under Section 21 c & i of the National Water Act (Act 36 of 1998). The respective Water Use Licenses must be finalised once the preferred layout has been determined especially if any access roads will need to cross these areas, but it is advised that any new crossing over watercourses and wetlands areas are avoided.

Using the baseline description, aquatic features were identified, then categorised into one of number pre-determined sensitivity categories to provide protection and/or guide the layout planning processes. The sensitivity ratings of High (No-Go) to Low were determined through an assessment of the habitat sensitivity and related constraints. However, these No-Go areas (with buffers) relate in general terms to the project and there are areas where encroachment on these areas would occur (i.e. existing road crossings within systems) and this is considered acceptable since these areas are already disturbed.

These proposed constraints / buffers do not include bird buffers / constraints as theirs buffers along aquatic features are at times far larger around aquatic features, than those required for the known aquatic species within this region.

Development Component	Habitat type	Sensitivity rating of the respective habitat type against the development type	Buffer distance (m)	Development acceptability	Sensitivity rating override if an impact such as a road or other disturbance already occurs within the proposed footprint and confirmed by the specialist
WTG towers	Channelled Valley Bottom Wetlands	No-Go	105m	No WTGs should be placed in any of these areas, regardless of the state, type and functionality of the respective aquatic ecosystem	None
	Pans and Depressions		95m		
	Rivers and Floodplains		65m		
	Seeps		65m		
	Minor watercourses		35m		
Hardstands, Buildings / Substations & BESS	Channelled Valley Bottom Wetlands	No-Go	105m	None of these types of infrastructure should be placed in any of these areas	None
	Pans and Depressions		95m		
	Rivers and Floodplains		65m		
	Seeps		65m		
	Minor watercourses		35m		
Roads & Underground cables alignment roads	Channelled Valley Bottom Wetlands	High	105m	New roads and underground cables would not be deem appropriate within any of these areas, unless some form of disturbance already occurs, such as an existing track or bridge	Only existing tracks or disturbed areas may be used
	Pans and Depressions		95m		
	Rivers and Floodplains				
	Seeps		65m		
	Minor watercourses		35m		

Development Component	Habitat type	Sensitivity rating of the respective habitat type against the development type	Buffer distance (m)	Development acceptability	Sensitivity rating override if an impact such as a road or other disturbance already occurs within the proposed footprint and confirmed by the specialist
OHL	Channelled Valley Bottom Wetlands	High	105m	OHL towers must be placed outside of these area so that only the cables span these systems. The exception being that Pans & Depression inclusive of buffers must be avoided completely	
	Pans and Depressions		95m		
	Rivers and Floodplains		65m		
	Seeps		65m		
	Minor watercourses		35m		

In summary, any structures such as turbines/towers, crane pads, hardstands, buildings, substations and BESS, have been placed outside of the observed Very High Sensitivity watercourses, while any remaining structures (Roads and transmission lines) could cross or span the other sensitivity areas. Noting Low Sensitivity = Moderate areas but with existing impacts e.g., current roads, farm tracks of previously disturbed areas

The following direct impacts were assessed with regard the aquatic systems in this impact assessment phase based on the assumptions that any of the delineated Very High no-Go sensitivity areas shown in this assessment will either be avoided by the WEF components or spanned by the grid connections, noting that some access roads must cross some of these areas, but should preferably be within previously disturbed areas:

- Impact 1: Loss of habitat containing protected species or Species of Special Concern
- Impact 2: Loss of any critical corridors, important catchment areas and connected habitats that are linked to any Critical Biodiversity Areas or Ecological Support Areas
- Impact 3: The potential spread of alien vegetation
- Impact 4: Loss of riparian and or wetland habitat
- Impact 5: Changes to the hydrological regime and increased potential for erosion
- Impact 6: Changes to water quality
- Impact 7: Cumulative Impacts

During this assessment, several sensitive aquatic habitats were observed and are shown in the maps provided in this report. Noteworthy areas, were then avoided by the required infrastructure, and include the main riverine and wetland systems, while the access roads will make use of existing roads thus previously disturbed areas as far as possible, especially near or when need to span aquatic systems.

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

Mitigation should focus on these areas and include measures to halt erosion and rehabilitate habitat in the sections affected by the construction. Without the implementation of mitigation measures, the project has potential to cause a Moderate cumulative impact upon aquatic biodiversity. However, with the adoption of mitigation, the proposed project will have a Low impact upon aquatic biodiversity.

As the proposed activities have the potential to create erosion the following recommendations are reiterated:

- Vegetation clearing should occur in a phased manner in accordance with the construction programme to minimise erosion and/or run-off. Large tracts of bare soil will either cause dust pollution or quickly erode and then cause sedimentation in the lower portions of the catchment, and suitable dust and erosion control mitigation measures should be included in the generic EMPr, if not included already to mitigate.
- All construction materials including fuels and oil should be stored in demarcated areas that are contained within berms / bunds to avoid spread of any contamination / leaks. Washing and cleaning of equipment should also be done in berms or bunds, to trap any cement / hazardous substances and prevent excessive soil erosion. Mechanical plant and bowsers must not be refuelled or serviced within or directly adjacent to any channel. It is therefore suggested that all construction camps, lay down areas, batching plants or areas and any stores should be located more than 50 m from any demarcated watercourses.
- It is also advised that an Environmental Control Officer (ECO), with a good understanding of the local flora be appointed during the construction phase. The ECO should be able to make clear recommendations with regards to the re-vegetation of the newly completed / disturbed areas along aquatic features, using selected species detailed in this report.
- All alien plant re-growth must be monitored and should these alien plants reoccur these plants should be re-eradicated. The scale of the operation does however not warrant the use of a Landscape Architect and / or Landscape Contractor.
- It is further recommended from the project onset that all watercourse areas (inclusive of buffers) are included into any existing EMPr as reference, this to ensure a net benefit to the aquatic environment. This should from part of the suggested walk down as part of the final EMP preparation.

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ACRONYMS

CARA	Conservation of Agricultural Resources Act
CBA	Critical Biodiversity Area
CSIR	Council for Scientific and Industrial Research
DWS	Department of Water and Sanitation formerly the Department of Water Affairs
EIA	Environmental Impact Assessment
EIS	Ecological Importance and Sensitivity
ESA	Ecological Support Area
GIS	Geographic Information System
NFEPA	National Freshwater Ecosystem Priority Atlas (Nel, *et al*. 2011).
PES	Present Ecological State
SANBI	South African National Biodiversity Institute
SQ	Subquaternary catchment
WUL	Water Use License
WULA	Water Use License Application

SPECIALIST REPORT DETAILS

Report prepared by: Dr. Brian Colloty Pr.Sci.Nat. (Ecology) / Member SAEIES.

Expertise / Field of Study: BSc (Hons) Zoology, MSc Botany (Rivers), Ph. D Botany Conservation Importance rating (Estuaries) and interior wetland / riverine assessment consultant from 1996 to present.

I, Dr. Brian Michael Colloty declare that this report has been prepared independently of any influence or prejudice as may be specified by the National Department of Environmental Affairs and or Department of Human Settlement, Water and Sanitation.



Signed: ..... Date:15 August 2025.....

Appendix 1 of this report contains a detailed CV

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1. Introduction

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- Very High Wetlands_Mesic Highveld Grassland Bioregion (Seep)

Several important national, provincial and municipal scale conservation plans were also reviewed, with the results of those studies being included in this report. Most conservation plans are produced at a high level, so it is therefore important to verify the actual status of the study area during this initial phase, prior to the final layout plan being produced.

1.1 Aims and objectives

The aim of this report is to firstly provide a summary of the aquatic baseline and identify any No-Go areas. The report also makes recommendations with regard to further management and mitigation, to further reduce, avoid or mitigate the potential impacts and ultimately ensure the responsible and sustainable use of South

Africa's aquatic resources. The proposed layout was then assessed with regard the potential impacts and mitigations later in this report.

Certain aspects of the development could trigger the need for Section 21, Water Use License Applications (WULAs) (or general authorisation [GA] applications) such as river crossings or any activities within 500m of a wetland. Once the final layout receives Environmental Authorisation, these applications must then be submitted to the Department of Water and Sanitation (DWS).

Information regarding the state and function of the observed water bodies, including suitable no-go buffers areas is thus also provided. Information with regard to the state and function of the observed water bodies, suitable no-go buffers and assessment of the potential impacts are also provided, but it is the intent that where possible sensitive areas such as the wetlands will be avoided or spanned (OHL).

1.2 Assumptions and Limitation

To obtain a comprehensive understanding of the dynamics of both the flora and fauna of the aquatic communities within a study site, as well as the status of endemic, rare or threatened species in any area, assessments should always consider investigations at different time scales (across seasons/years) and through replication. No baseline long-term monitoring was undertaken as part of this assessment. However, a concerted effort was made to assess as much of the potential site, as well as make use of any available literature, species distribution data and aerial photography. Furthermore, based on the previous assessments undertaken between 2003 and 2023 in the area and this was not foreseen as a huge limiting factor. Detailed site visits conducted within the region from March 2022 and a site-specific assessment in April & September 2023 were also conducted. The level of investigation undertaken is sufficient to inform this assessment. Additional site visits were conducted in February 2025, while working in the region to confirm any changes since the initial surveys.

It should be emphasised that information, as presented in this document, only has reference to the study area as indicated on the accompanying maps. Therefore, this information cannot be applied to any other area without detailed investigation.

For the purposes of this report, it is assumed that any existing roads and tracks will be used, while structures will be placed outside the wetlands and or watercourses. A further assumption is that water will be sourced from a licensed resource and not illegally abstracted from any surrounding watercourses, particularly if dust suppression is required for example at the laydown areas or along main / district roads.

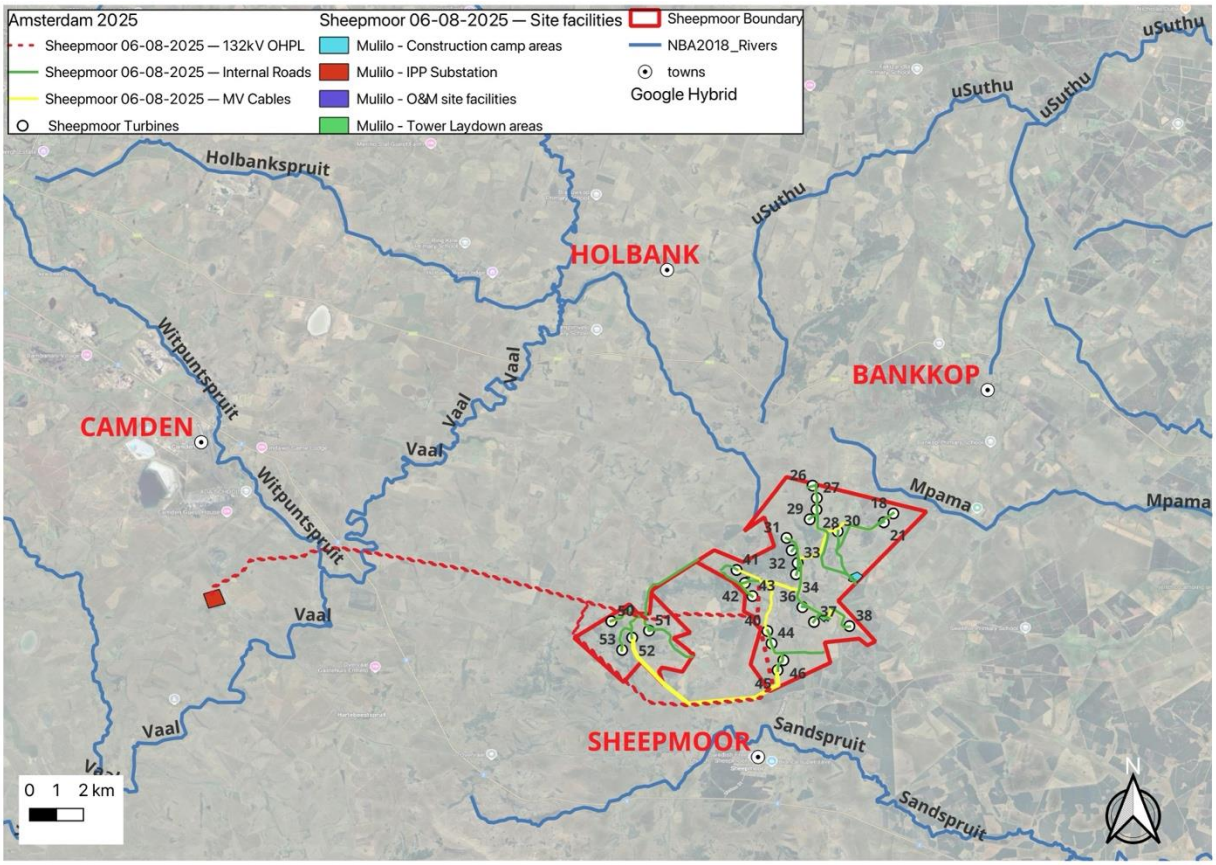


Figure 1: The proposed Wind Energy Facility (WEF) site boundaries, possible infrastructure layout (excluding hardstand and crane pads) and the potential OHL alignment alternatives

2. Terms of Reference

The proposed methods used in this assessment have been developed with the renewable industry in mind, coupled to the minimum requirements stipulated by DFFE and the Department of Water and Sanitation. These have been successful in assessing the direct, indirect and cumulative impacts of ca 200 renewable energy projects (2010 – 2025), of which 28 have been constructed:

- Desktop analysis
- Site investigation
- Compilation of one draft and one final site screening / sensitivity report for the project which adheres to the following (this list is not exhaustive):
    - The Initial Site Sensitivity Verification reporting requirements for environmental themes set out in Government Gazette No. 43110 which was promulgated on 20 March 2020 in terms of section 24(5)(a) and (h) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA).
    - Identification and mapping of any discrepancies with the environmental sensitivity as identified on the national web based environmental screening tool.
    - Identification of sensitive areas to be avoided (including corresponding spatial data) and the determination of the respective buffers (if applicable) for each site.
    - Initial recommendations for the layout and allowable development footprint from a surface water and aquatic biodiversity perspective (including corresponding spatial data).
    - Recommendations regarding the areas to be utilised for solar technologies within the project site from a surface water and aquatic biodiversity perspective (including corresponding spatial data)
- Assess the potential impacts, based on a supplied methodology, including cumulative impacts and for pre-construction, construction, operations and decommissioning phases.

- Provide mitigations regarding project related impacts, including engineering services that could negatively affect demarcated wetland areas.
- Supply the client with geo-referenced GIS shape files of the wetland / riverine areas.
- Provide one draft report for comment, with a maximum of two rounds of comments addressed per project phase (max of 2).

3. Project Description

The following information was provided by the client:

Sheepmoor WEF is proposed to comprise up to 45 turbines with a maximum output capacity of up to 360 MW. The WEF will be located on seventeen (17) land parcels and will have an anticipated lifespan of 20 – 25 years. The final design which will be requested for approval in the EA, will be determined based on the outcome of the specialist studies undertaken for the EIA phase of the development. The proposed turbine footprints and associated facility infrastructure will cover an area of up to 180 ha after rehabilitation, depending on final layout design.

It is proposed that an on-site substation with a capacity up 132 kV and an up to 132 kV Overhead Powerline (OHPL) of approximately 22.3 km (300 m corridor) in distance, traversing sixteen (16) land parcels, be constructed to connect the proposed WEF to the Eskom Uitkoms Substation.

Sheepmoor WEF			
Landowner	Farm Name	Farm No.	Portion No.
Marandellas Trust (Philip Randall)	Remainder Portion 9 of the Farm Onverwacht No. 273	273	9
Marandellas Trust (Philip Randall)	Portion 10 of the Farm Onverwacht No. 273	273	10
Marandellas Trust (Philip Randall)	Portion 12 of the Farm Onverwacht No. 273	273	12
Multiple Owners	Portion 3 of the Farm Onverwacht No. 273	273	3
No Info	Onverwacht	273	13
Daniel Abraham Louw Bothma	Portion 6 of the Farm Onverwacht No. 273	273	6
Shammah Trust	Portion 4 of the Farm Onverwacht No. 273	273	4
Shammah Trust	Portion 7 of the Farm Onverwacht No. 273	273	7
Harrob Beleggings Pty Ltd (Jan Roberts)	Portion 2 of the Farm Onverwacht No. 273	273	2
Harrob Beleggings Pty Ltd (Jan Roberts)	Portion 8 of the Farm Onverwacht No. 273	273	8
Harrob Beleggings Pty Ltd (Jan Roberts)	Portion 3 of the Farm Onverwacht No. 287	287	3
Josua Meyer Trust	Onverwacht	287	4
Josua Meyer Trust	Onverwacht	287	5
Josua Meyer Trust	Onverwacht	287	6
Josua Meyer Trust	Waaihoek	286	4
Tallyprops 7 Pty Ltd (Pieter Langenhoven)	Remainder Portion 1 of the Farm Windhoek No. 291	291	1

Sheepmoor WEF			
Landowner	Farm Name	Farm No.	Portion No.
Tallyprops 7 Pty Ltd (Pieter Langenhoven)	Remainder Portion 8 of the Farm Windhoek No. 291	291	8
Sheepmoor WEF Grid Connection			
Shammah Trust	Portion 7 of the Farm Onverwacht No. 273	273	7
Harrob Beleggings Pty Ltd (Jan Roberts)	Portion 8 of the Farm Onverwacht No. 273	273	8
Harrob Beleggings Pty Ltd (Jan Roberts)	Portion 3 of the Farm Onverwacht No. 287	287	3
Van Der Merwe Broers Trust	Portion 9 of the Farm Zwartwater No. 288	288	9
Merwe Johannes Jacobus Van Der	Portion 10 of the Farm Zwartwater No. 288	288	10
Kansvat Beleggings Pty Ltd	Zwartwater	288	2
National Government of SA	Zwartwater	288	1
Dream World Inv 450 Pty Ltd	Weltevreden	289	10
Dream World Inv 450 Pty Ltd	Weltevreden	289	11
Dream World Inv 450 Pty Ltd	Weltevreden	289	6
Van Der Merwe Broers Trust	Weltevreden	289	RE/3
National Government of SA	Witpunt	267	RE/7
National Government of SA	Mooiplaats	290	7
National Government of SA	Mooiplaats	290	8
Kayipheli Trust	Witpunt	267	29
Eskom Holdings Ltd	Camden Power Station	329	RE

4. Methodology

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

Current water resource classification systems make use of the Hydrogeomorphic (HGM) approach, and for this reason, the National Wetland Classification System (NWCS) approach will be used in this study. It is also important to understand wetland definition, means of assessing wetland conservation and importance as well as understanding the pertinent legislation with regards to protecting wetlands. These aspects will be discussed in greater depth in this section of the report, as they form the basis of the study approach to assessing wetland impacts.

4.1 Waterbody classification systems

Since the late 1960's, wetland classification systems have undergone a series of international and national revisions. These revisions allowed for the inclusion of additional wetland types, ecological and conservation rating metrics, together with a need for a system that would allude to the functional requirements of any given wetland (Ewart-Smith *et al*., 2006). Wetland function is a consequence of biotic and abiotic factors, and wetland

classification should strive to capture these aspects. Coupled to this was the inclusion of other criteria within the classification systems to differentiate between river, riparian and wetland systems, as well as natural versus artificial waterbodies.

The South African National Biodiversity Institute (SANBI) in collaboration with several specialists and stakeholders developed the newly revised and now accepted National Wetland Classification Systems (NWCS) (Ollis *et al*., 2013). This system comprises a hierarchical classification process of defining a wetland based on the principles of the hydrogeomorphic (HGM) approach at higher levels, with including structural features at the finer or lower levels of classification (Ollis *et al*., 2013).

Wetlands develop in a response to elevated water tables, linked either to rivers, groundwater flows or seepage from aquifers (Parsons, 2004). These water levels or flows then interact with localised geology and soil forms, which then determines the form and function of the respective wetlands. Water is thus the common driving force, in the formation of wetlands (DWAF, 2005). It is significant that the HGM approach has now been included in the wetland classifications as the HGM approach has been adopted throughout the water resources management realm with regards to the determination of the Present Ecological State (PES) and Ecological Importance and Sensitivity (EIS) and WET-Health assessments for aquatic environments. All these systems are then easily integrated using the HGM approach in line with the Eco-classification process of river and wetland reserve determinations used by the Department of Human Settlement, Water and Sanitation (DHSWS). The Ecological Reserve of a wetland or river is used by DHSWS to assess the water resource allocations when assessing WULAs.

The National Wetland Classification System process is provided in more detail in the methods section of the report, but some of the terms and definitions used in this document are presented below:

Definition Box

Present Ecological State is a term for the current ecological condition of the resource. This is assessed relative to the deviation from the Reference State. Reference State/Condition is the natural or pre-impacted condition of the system. The reference state is not a static condition but refers to the natural dynamics (range and rates of change or flux) prior to development. The PES is determined per component - for rivers and wetlands this would be for the drivers: flow, water quality and geomorphology; and the biotic response indicators: fish, macroinvertebrates, riparian vegetation and diatoms. PES categories for every component would be integrated into an overall PES for the river reach or wetland being investigated. This integrated PES is called the EcoStatus of the reach or wetland.

EcoStatus is the overall PES or current state of the resource. It represents the totality of the features and characteristics of a river and its riparian areas or wetland that bear upon its ability to support an appropriate natural flora and fauna and its capacity to provide a variety of goods and services. The EcoStatus value is an integrated ecological state made up of a combination of various PES findings from component EcoStatus assessments (such as for invertebrates, fish, riparian vegetation, geomorphology, hydrology and water quality).

Reserve: The quantity and quality of water needed to sustain basic *human needs* and *ecosystems* (e.g. estuaries, rivers, lakes, groundwater and wetlands) to ensure ecologically sustainable development and utilisation of a water resource. The *Ecological Reserve* pertains specifically to aquatic ecosystems.

Reserve requirements: The quality, quantity and reliability of water needed to satisfy the requirements of basic human needs and the Ecological Reserve (inclusive of instream requirements).

Ecological Reserve determination study: The study undertaken to determine Ecological Reserve requirements.

Licensing applications: Water users are required (by legislation) to apply for licenses prior to extracting water resources from a water catchment.

Ecological Water Requirements: This is the quality and quantity of water flowing through a natural stream course that is needed to sustain instream functions and ecosystem integrity at an acceptable level as determined during an EWR study. These then form part of the conditions for managing achievable water quantity and quality conditions as stipulated in the Reserve Template

Water allocation process (compulsory licensing): This is a process where all existing and new water users are requested to reapply for their licenses, particularly in stressed catchments where there is an over-allocation of water or an inequitable distribution of entitlements.

Ecoregions are geographic regions that have been delineated in a top-down manner on the basis of physical/abiotic factors. • NOTE: For purposes of the classification system, the 'Level I Ecoregions' for South Africa, Lesotho and Swaziland (Kleynhans *et al.* 2005), which have been specifically developed by the Department of Water Affairs & Forestry (DWAF) for rivers but are used for the management of inland aquatic ecosystems more generally, are applied at Level 2A of the classification system. These Ecoregions are based on physiography, climate, geology, soils and potential natural vegetation.

4.2 Wetland definition

Although the National Wetland Classification System (NWCS) (Ollis *et al*., 2013) is used to classify wetland types, it is still necessary to understand the definition of a wetland. Terminology currently strives to characterise a wetland not only on its structure (visible form), but also to relate this to the function and value of any given wetland.

The Ramsar Convention definition of a wetland is widely accepted as "areas of marsh, fen, peatland or water, whether natural or artificial, permanent or temporary, with water that is static or flowing, fresh, brackish or salt, including areas of marine water the depth of which at low tide does not exceed six metres" (Davis 1994). South Africa is a signatory to the Ramsar Convention and therefore its extremely broad definition of wetlands has been adopted for the proposed NWCS, with a few modifications.

Whereas the Ramsar Convention included marine water to a depth of six metres, the definition used for the NWCS extends to a depth of ten metres at low tide, as this is recognised as the seaward boundary of the shallow photic zone (Lombard et al., 2005). An additional minor adaptation of the definition is the removal of the term

'fen' as fens are considered a type of peatland. The adapted definition for the NWCS is, therefore, as follows (Ollis *et al*., 2013):

WETLAND: an area of marsh, peatland or water, whether natural or artificial, permanent or temporary, with water that is static or flowing, fresh, brackish or salt, including areas of marine water the depth of which at low tide does not exceed ten metres.

This definition encompasses all ecosystems characterised by the permanent or periodic presence of water other than marine waters deeper than ten metres. The only legislated definition of wetlands in South Africa, however, is contained within the National Water Act (Act No. 36 of 1998) (NWA), where wetlands are defined as "land which is transitional between terrestrial and aquatic systems, where the water table is usually at, or near the surface, or the land is periodically covered with shallow water and which land in normal circumstances supports, or would support, vegetation adapted to life in saturated soil." This definition is consistent with more precise working definitions of wetlands and therefore includes only a subset of ecosystems encapsulated in the Ramsar definition. It should be noted that the NWA definition is not concerned with marine systems and clearly distinguishes wetlands from estuaries, classifying the latter as a watercourse (Ollis *et al*., 2013). Table 1 below provides a comparison of the various wetlands included within the main sources of wetland definitions used in South Africa.

Although a subset of Ramsar-defined wetlands was used as a starting point for the compilation of the first version of the National Wetland Inventory (i.e. "wetlands", as defined by the NWA, together with open waterbodies), it is understood that subsequent versions of the Inventory include the full suite of Ramsar-defined wetlands in order to ensure that South Africa meets its wetland inventory obligations as a signatory to the Convention (Ollis *et al.*, 2013).

Wetlands must therefore have one or more of the following attributes to meet the above definition (DWAF, 2005):

- A high-water table that results in the saturation at or near the surface, leading to anaerobic conditions developing in the top 50 cm of the soil.
- Wetland or hydromorphic soils that display characteristics resulting from prolonged saturation, i.e. mottling or grey soils
- The presence of, at least occasionally, hydrophilic plants, i.e. hydrophytes (water loving plants).

It should be noted that riparian systems that are not permanently or periodically inundated are not considered true wetlands, i.e. those associated with the drainage lines and rivers.

Table 1: Comparison of ecosystems considered to be 'wetlands' as defined by the proposed NWCS, the NWA and ecosystems included in DWAF's (2005) delineation manual.

Ecosystem	NWCS "wetland"	National Water Act wetland	DWAF (2005) delineation manual
Marine	YES	NO	NO
Estuarine	YES	NO	NO
Waterbodies deeper than 2 m (i.e. limnetic habitats often described as lakes or dams)	YES	NO	NO
Rivers, channels and canals	YES	NO[1]	NO
Inland aquatic ecosystems that are not river channels and are less than 2 m deep	YES	YES	YES
Riparian[2] areas that are permanently / periodically inundated or saturated with water within 50 cm of the surface	YES	YES	YES[3]
Riparian [3] areas that are not permanently / periodically inundated or saturated with water within 50 cm of the surface	NO	NO	YES[3]

[1] Although river channels and canals would generally not be regarded as wetlands in terms of the National Water Act, they are included as a 'watercourse' in terms of the Act

[2] According to the National Water Act and Ramsar, riparian areas are those areas that are saturated or flooded for prolonged periods and would be considered riparian wetlands, as opposed to non –wetland riparian areas that are only periodically inundated and the riparian vegetation persists due to having deep root systems drawing on water many meters below the surface.

[3] The delineation of 'riparian areas' (including both wetland and non-wetland components) is treated separately to the delineation of wetlands in DWAF's (2005) delineation manual.

4.3 National Wetland Classification System method

During this study, due to the nature of the wetlands and watercourses observed, it was determined that the newly accepted NWCS be adopted. This classification approach has integrated aspects of the HGM approach used in the WET-Health system as well as the widely accepted eco-classification approach used for rivers.

The NWCS (Ollis *et al*., 2013) as stated previously, uses hydrological and geomorphological traits to distinguish the primary wetland units, i.e. direct factors that influence wetland function. Other wetland assessment techniques, such as the DWAF (2005) delineation method, only infer wetland function based on abiotic and biotic descriptors (size, soils & vegetation) stemming from the Cowardin approach (Ollis *et al.,* 2013).

The classification system used in this study is thus based on Ollis *et al*. (2013) and is summarised below:

The NWCS has a six-tiered hierarchical structure, with four spatially nested primary levels of classification (Figure 2). The hierarchical system firstly distinguishes between Marine, Estuarine and Inland ecosystems (Level 1), based on the degree of connectivity the particular system has with the open ocean (greater than 10 m in depth). Level 2 then categorises the regional wetland setting using a combination of biophysical attributes at the landscape level, which operate at a broad bioregional scale.

This is opposed to specific attributes such as soils and vegetation. Level 2 has adopted the following systems:

- Inshore bioregions (marine)
- Biogeographic zones (estuaries)
- Ecoregions (Inland)

Level 3 of the NWCS assess the topographical position of inland wetlands as this factor broadly defines certain hydrological characteristics of the inland systems. Four landscape units based on topographical position are used in distinguishing between Inland systems at this level. No subsystems are recognised for Marine systems, but estuaries are grouped according to their periodicity of connection with the marine environment, as this would affect the biotic characteristics of the estuary.

Level 4 classifies the hydrogeomorphic (HGM) units discussed earlier. The HGM units are defined as follows:

- Landform – shape and localised setting of wetland
- Hydrological characteristics – nature of water movement into, through and out of the wetland
- Hydrodynamics – the direction and strength of flow through the wetland

These factors characterise the geomorphological processes within the wetland, such as erosion and deposition, as well as the biogeochemical processes.

Level 5 of the assessment pertains to the classification of the tidal regime within the marine and estuarine environments, while the hydrological and inundation depth classes are determined for inland wetlands. Classes are based on frequency and depth of inundation, which are used to determine the functional unit of the wetlands and are considered secondary discriminators within the NWCS.

Level 6 uses six descriptors to characterise the wetland types based on biophysical features. As with Level 5, these are non-hierarchal in relation to each other and are applied in any order, dependent on the availability of information. The descriptors include:

- Geology;
- Natural vs. Artificial;
- Vegetation cover type;
- Substratum;
- Salinity; and
- Acidity or Alkalinity.

It should be noted that where sub-categories exist within the above descriptors, hierarchical systems are employed, and these are thus nested in relation to each other.

The HGM unit (Level 4) is the focal point of the NWCS, with the upper levels (Figure 3 – Inland systems only) providing means to classify the broad bio-geographical context for grouping functional wetland units at the HGM level, while the lower levels provide more descriptive detail on the particular wetland type characteristics of a particular HGM unit. Therefore Level 1 – 5 deals with functional aspects, while Level 6 classifies wetlands on structural aspects.

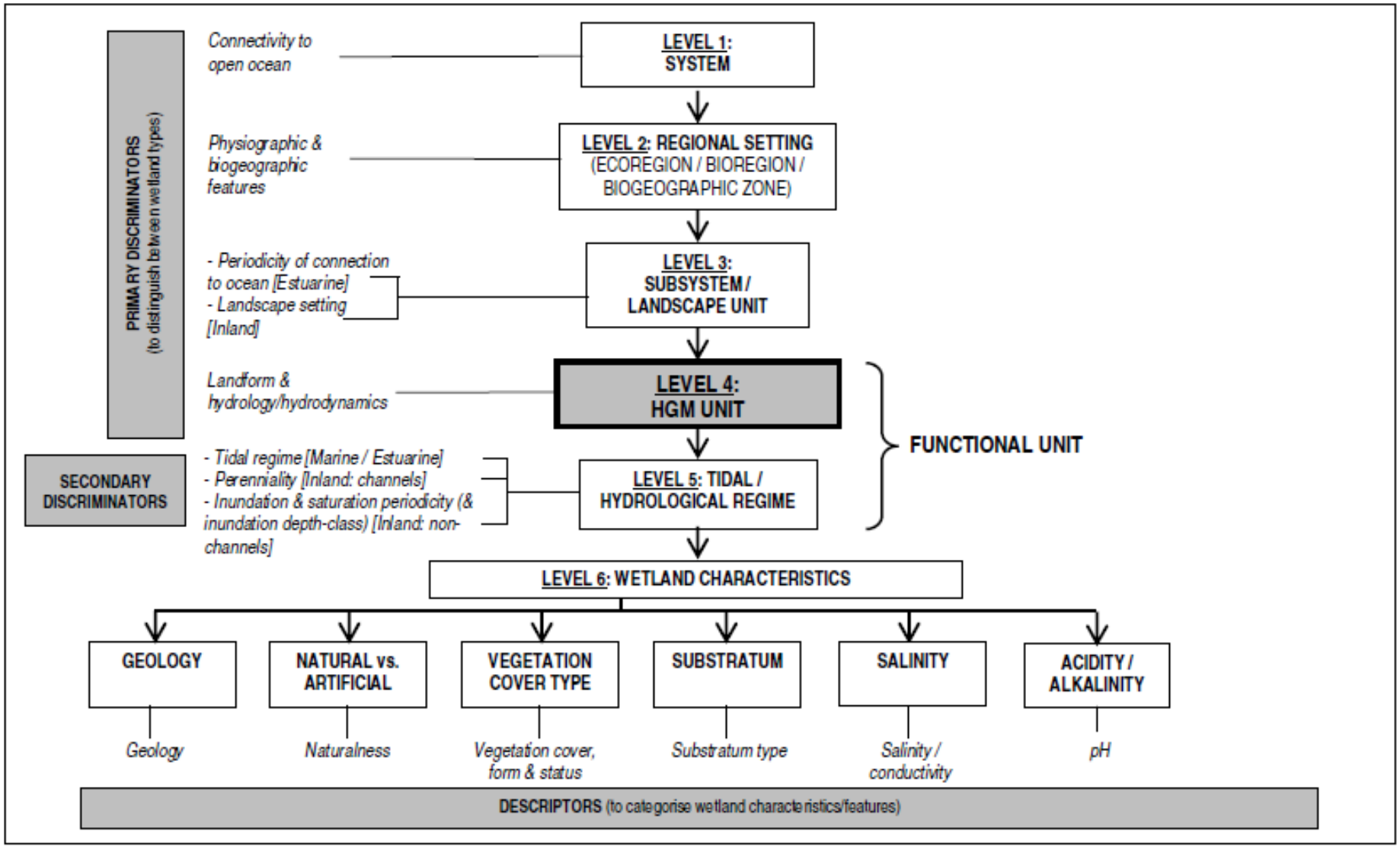


Figure 2: Basic structure of the NWCS, showing how 'primary discriminators' are applied up to Level 4 to classify Hydrogeomorphic (HGM) Units, with 'secondary discriminators' applied at Level 5 to classify the tidal/hydrological regime, and 'descriptors' applied at Level 6 to categorise the characteristics of wetlands classified up to Level 5 (From Ollis *et al*., 2013).

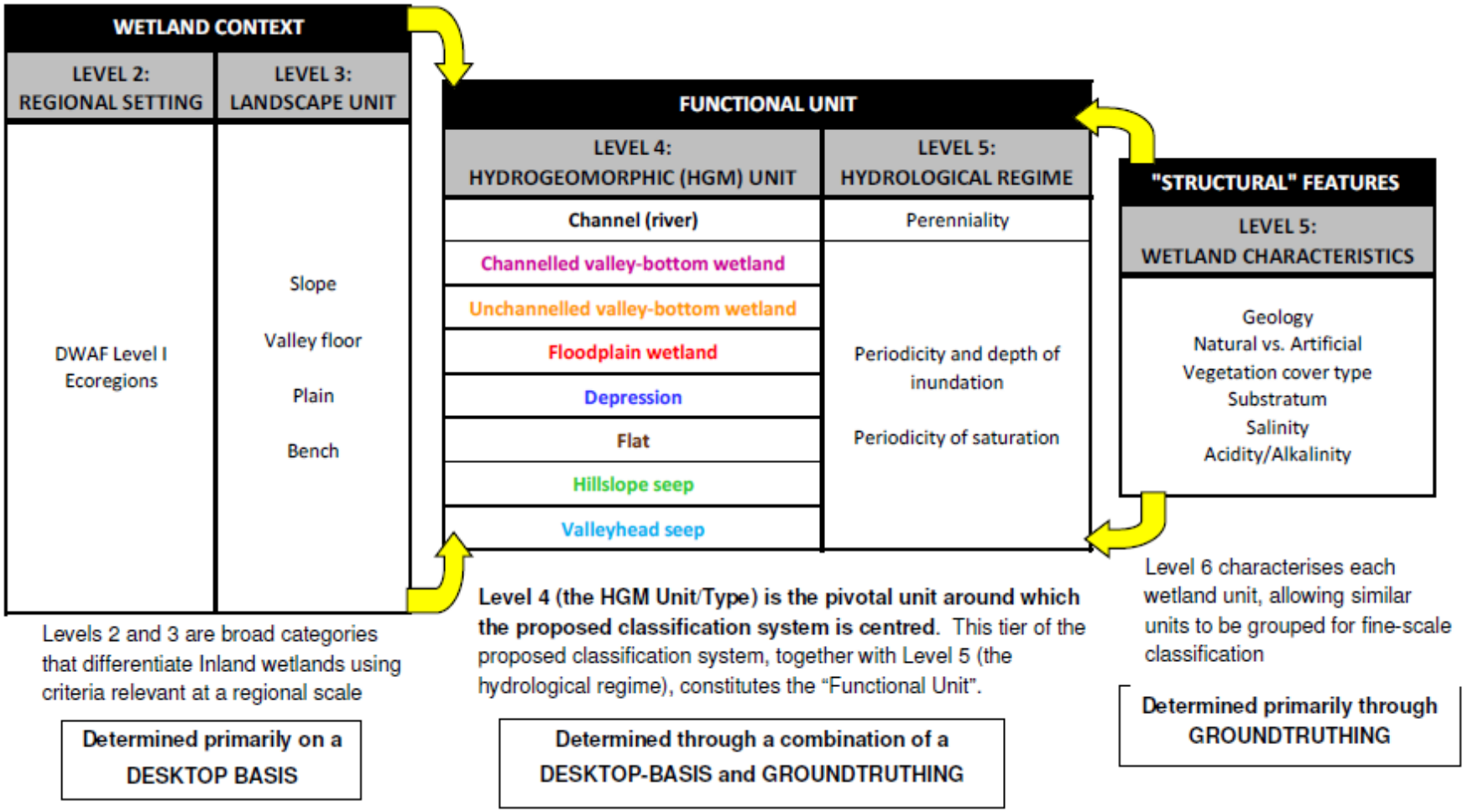


Figure 3: Illustration of the conceptual relationship of HGM Units (at Level 4) with higher and lower levels (relative sizes of the boxes show the increasing spatial resolution and level of detail from the higher to the lower levels) for Inland Systems (from Ollis *et al*., 2013).

4.4 Waterbody condition

To assess the PES or condition of the observed wetlands, a modified Wetland Index of Habitat Integrity (DWAF, 2007) was used. The Wetland Index of Habitat Integrity (WETLAND-IHI) is a tool developed for use in the National Aquatic Ecosystem Health Monitoring Programme (NAEHMP), formerly known as the River Health Programme (RHP). The output scores from the WETLAND-IHI model are presented in the standard DWAF A-F ecological categories (Table 2) and provide a score of the PES of the habitat integrity of the wetland system being examined. The author has included additional criteria into the model-based system to include additional wetland types. This system is preferred when compared to systems such as WET-Health – wetland management series (WRC 2009), as WET-Health (Level 1) was developed with wetland rehabilitation in mind and is not always suitable for impact assessments. This coupled with the degraded state of the wetlands in the study area, indicated that a complex study approach was not warranted, i.e. conduct a Wet-Health Level 2 and WET-Ecosystems Services study required for an impact assessment.

Table 2: Description of A – F ecological categories based on Kleynhans *et al*., (2005)

ECOLOGICAL CATEGORY	ECOLOGICAL DESCRIPTION	MANAGEMENT PERSPECTIVE
A	Unmodified, natural.	Protected systems; relatively untouched by human hands; no discharges or impoundments allowed
B	Largely natural with few modifications. A small change in natural habitats and biota may have taken place but the ecosystem functions are essentially unchanged.	Some human-related disturbance, but mostly of low impact potential
C	Moderately modified. Loss and change of natural habitat and biota have occurred, but the basic ecosystem functions are still predominantly unchanged.	Multiple disturbances associated with need for socio-economic development, e.g. impoundment, habitat modification and water quality degradation
D	Largely modified. A large loss of natural habitat, biota and basic ecosystem functions has occurred.	
E	Seriously modified. The loss of natural habitat, biota and basic ecosystem functions is extensive.	Often characterized by high human densities or extensive resource exploitation. Management intervention is needed to improve health, e.g. to restore flow patterns, river habitats or water quality
F	Critically / Extremely modified. Modifications have reached a critical level and the system has been modified completely with an almost complete loss of natural habitat and biota. In the worst instances the basic ecosystem functions have been destroyed and the changes are irreversible.	

The WETLAND-IHI model is composed of four modules. The "Hydrology", "Geomorphology" and "Water Quality" modules all assess the contemporary driving processes behind wetland formation and maintenance. The last module, "Vegetation Alteration", provides an indication of the intensity of human land use activities on the wetland surface itself and how these may have modified the condition of the wetland. The integration of the scores from these 4 modules provides an overall PES score for the wetland system being examined. The WETLAND-IHI model is an MS Excel-based model, and the data required for the assessment are generated during a site visit.

Additional data may be obtained from remotely sensed imagery (aerial photos; maps and/or satellite imagery) to assist with the assessment. The interface of the WETLAND-IHI has been developed in a format which is similar to DWA's River EcoStatus models which are currently used for the assessment of PES in riverine environments.

4.5 Aquatic ecosystem importance and function

South Africa is a Contracting Party to the Ramsar Convention on Wetlands, signed in Ramsar, Iran, in 1971, and has thus committed itself to this intergovernmental treaty, which provides the framework for the national protection of wetlands and the resources they could provide. Wetland conservation is now driven by the South African National Biodiversity Institute, a requirement under the National Environmental Management: Biodiversity Act (No 10 of 2004).

Wetlands are among the most valuable and productive ecosystems on earth, providing important opportunities for sustainable development (Davies and Day, 1998). However, wetlands in South Africa are still rapidly being lost or degraded through direct human induced pressures (Nel *et al.,* 2004).

The most common attributes or goods and services provided by wetlands include:

- Improve water quality;
- Impede flow and reduce the occurrence of floods;
- Reeds and sedges used in construction and traditional crafts;
- Bulbs and tubers, a source of food and natural medicine;
- Store water and maintain base flow of rivers;
- Trap sediments; and
- Reduce the number of water-borne diseases.

In terms of this study, the wetlands provide ecological (environmental) value to the area acting as refugia for various wetland associated plants, butterflies and birds.

In the past wetland conservation has focused on biodiversity as a means of substantiating the protection of wetland habitat. However not all wetlands provide such motivation for their protection, thus wetland managers and conservationists began assessing the importance of wetland function within an ecosystem.

Table 3 below summarises the importance of wetland function when related to ecosystem services or ecoservices (Kotze *et al*., 2008). One such example is emergent reed bed wetlands that function as transformers converting inorganic nutrients into organic compounds (Mitsch and Gosselink, 2000).

Table 3: Summary of direct and indirect ecoservices provided by wetlands from Kotze *et al*., 2008

Ecosystem services supplied by wetlands	Indirect benefits	Hydro-geochemical benefits		Flood attenuation
				Stream flow regulation
			Water quality enhancement benefits	Sediment trapping
				Phosphate assimilation
				Nitrate assimilation
				Toxicant assimilation
				Erosion control
				Carbon storage
				Biodiversity maintenance
	Direct benefits			*Provision of water for human use*
				Provision of harvestable resources[2]
				Provision of cultivated foods
				Cultural significance
				Tourism and recreation
				Education and research

Conservation importance of the individual wetlands was based on the following criteria:

- Habitat uniqueness;
- Species of conservation concern;
- Habitat fragmentation or rather, continuity or intactness with regards to ecological corridors; and
- Ecosystem service (social and ecological).

The presence of any or a combination of the above criteria would result in a HIGH conservation rating if the wetland was found in a near natural state (high PES). Should any of the habitats be found modified the conservation importance would rate as MEDIUM, unless a Species of Conservation Concern (SCC) was observed, in which case it would receive a HIGH rating. Any system that was highly modified (low PES) or had none of the above criteria, received a LOW conservation importance rating. Wetlands with HIGH and MEDIUM ratings should thus be excluded from development with incorporation into a suitable open space system, with the maximum possible buffer being applied. Natural wetlands or Wetlands that resemble some form of the past landscape but receive a LOW conservation importance rating could be included into stormwater management features and should not be developed to retain the function of any ecological corridors.

4.6 Relevant wetland legislation and policy

Locally the South African Constitution, seven (7) Acts and two (2) international treaties allow for the protection of wetlands and rivers. These systems are protected from destruction or pollution by the following:

- Section 24 of The Constitution of the Republic of South Africa, 1996;
- Agenda 21 – Action plan for sustainable development of the Department of Environmental Affairs and Tourism (DEAT) 1998;
- The Ramsar Convention, 1971 including the Wetland Conservation Programme (DEAT) and the National Wetland Rehabilitation Initiative (DEAT, 2000);
- National Environmental Management Act (NEMA), 1998 (Act No. 107 of 1998) inclusive of all amendments, as well as the NEM: Biodiversity Act;
- National Water Act, 1998 (Act No. 36 of 1998);
- Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983); and
- Minerals and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002).
- Nature and Environmental Conservation Ordinance, 1974 (No. 19 of 1974)
- National Forest Act, 1998 (No. 84 of 1998)
- National Heritage Resources Act, 1999 (No. 25 of 1999)

NEMA and the Conservation of Agricultural Resources Act (CARA), 1983 (Act No. 43 of 1983) would also apply to this project. These Acts have categorised many invasive plants together with associated obligations on the landowner.

4.7 Provincial legislation and policy

Currently riverine and wetland buffers distances are calculated using the model described by Macfarlane *&* Bredin (2017). Site specific information was collected during the visit and is used to determine site and development specific range of buffers. In short, the buffer distances are based on the current condition of the waterbody, the state of the remainder of the site, the potential impacts posed by the type and scale of the of development, as wells as the proposed alteration of hydrological flows. The model also takes cognisance of the level of mitigation possible, coupled to the reversibility of the impacts. Based then on the information known for the site the buffer model provided the following:

Channelled Valley Bottom Wetlands	65m
Pans and Depressions	105m
Rivers and Floodplains	95m
Seeps	65m
Minor watercourses	35m

Artificial dams were not buffered.

5. Description of the affected environment

This baseline description was based on a summer and winter survey of the study area that spanned a total of two weeks and conducted in February / March 2022 (late summer) and a site-specific assessment in April (Autumn) & September (Later winter) 2023. Additional site visits were conducted in February 2025, while working in the region to confirm any changes since the initial surveys.

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

- Mainstem Rivers: Floodplain dominated systems with floodplain wetlands (Plate 1). A few reaches did contain very narrow riparian zones, consisting mostly of a single row of willow trees associated with the Vaal River
- Valley Bottom Wetlands (Channelled and Unchanneled) (Plate 2)
- Endorheic pans (Plate 3)
- Seep wetlands (Plate 4)

The proposed Wind Energy Facility (WEF) is located in a portion of the Inkomati-Usuthu Water Management Area, within the upper catchment of the Mpama River (SQ W53) and the Sandspruit (SQ W53A) and the proposed grid connection options are located in the Upper Vaal River (SQ C11B) in the Vaal Water Management Area (Figure 4). Thus, several permanent rivers and a variety of wetland hydrogeomorphic types are anticipated both associated with the riverine valleys and bench or plateaux areas located between river valleys on higher lying areas (Figure 5).

The study region is further characterised by several National Biodiversity Assessment (2018) Wetland Clusters, National Freshwater Ecosystem Area (NFEPAs) and Strategic Water Resources Areas (Figure 6)

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

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

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

In terms of the National Freshwater Ecosystems Priority Areas (NFEPA) assessment, all the watercourses within the site have been assigned a condition score of C (Nel et al. 2011), indicating that they are Moderately Modified, but still have biological significance, while the NBA (2018). These scores were substantiated by observations made in the field within the study area, and due to the impacts or disturbance observed these scores would be upheld.

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

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

systems. This is large due to the presence of several important fish and aquatic invertebrate habitats that as well as the provision and maintenance of flows within the lower catchments.

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

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

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

Plant Taxon	Conservation Status
Agrostis continuata Stapf	Not evaluated
Andropogon eucomus Nees	Least concern
Andropogon lacunosus J.G.Anderson	Least concern
Arundinella nepalensis Trin.	Not evaluated
Berula thunbergii (DC.) H.Wolff	Least concern
Brachiaria bovonei (Chiov.) Robyns	Least concern
Carex rhodesiaca Nelmes	Least concern
Chironia purpurascens (E.Mey.) Benth. & Hook.fil.	Least concern
Crinum bulbispermum (Burm.f.) Milne-Redh. & Schweick.	Least concern
Cyperus denudatus L.f.	Least concern
Cyperus macranthus Boeckeler	Not evaluated
Cyperus melanospermus (Nees) Valck.Sur.	Not evaluated
Cyperus nitidus Lam.	Not evaluated
Denekia capensis Thunb.	Not evaluated
Drosera collinsae N.E.Br. ex BurttDavy	Least concern
Echinochloa jubata Stapf	Least concern
Eleocharis dregeana Steud.	Least concern
Eleocharis limosa (Schrad.) Schult.	Least concern
Festuca caprina Nees	Not evaluated
Fimbristylis complanata (Retz.) Link	Least concern
Fuirena pubescens (Poir.) Kunth	Least concern
Geranium multisectum N.E.Br.	Least concern
Geranium wakkerstroomianum R.Knuth	Least concern
Gladiolus papilio Hook.f.	Not evaluated
Gunnera perpensa L.	Least concern
Hesperantha hygrophila Hilliard & B.L.Burtt	Least concern
Isolepis costata Hochst. ex A.Rich.	Not evaluated
Juncus effusus L.	Least concern
Juncus oxycarpus E.Mey. ex Kunth	Least concern
Lagarosiphon muscoides Harv.	Least concern
Leersia hexandra Sw.	Least concern

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

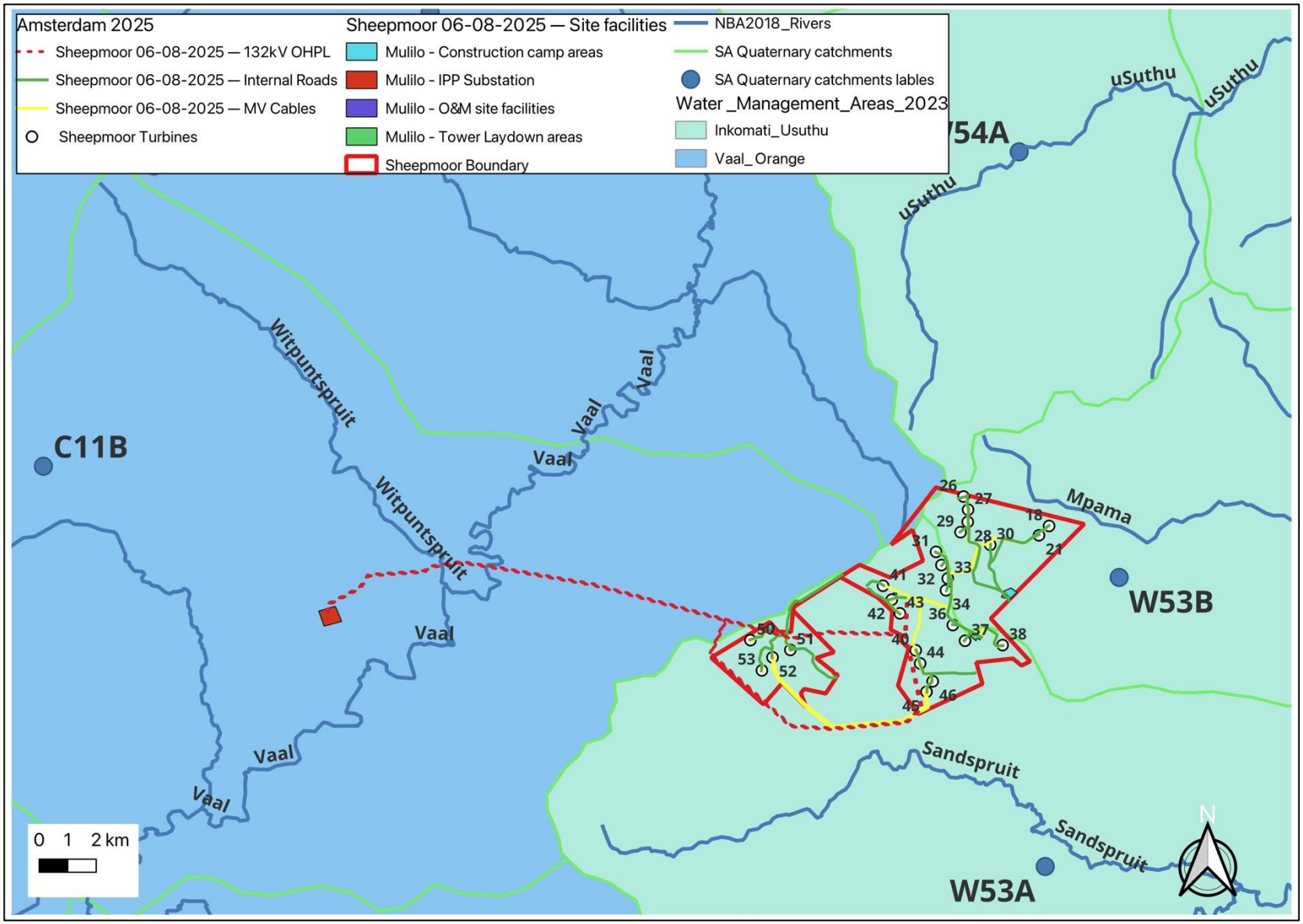


Figure 4: Project locality map indicating the various quaternary catchment boundaries (white lines) in relation to the study area (Source DWS and NGI).

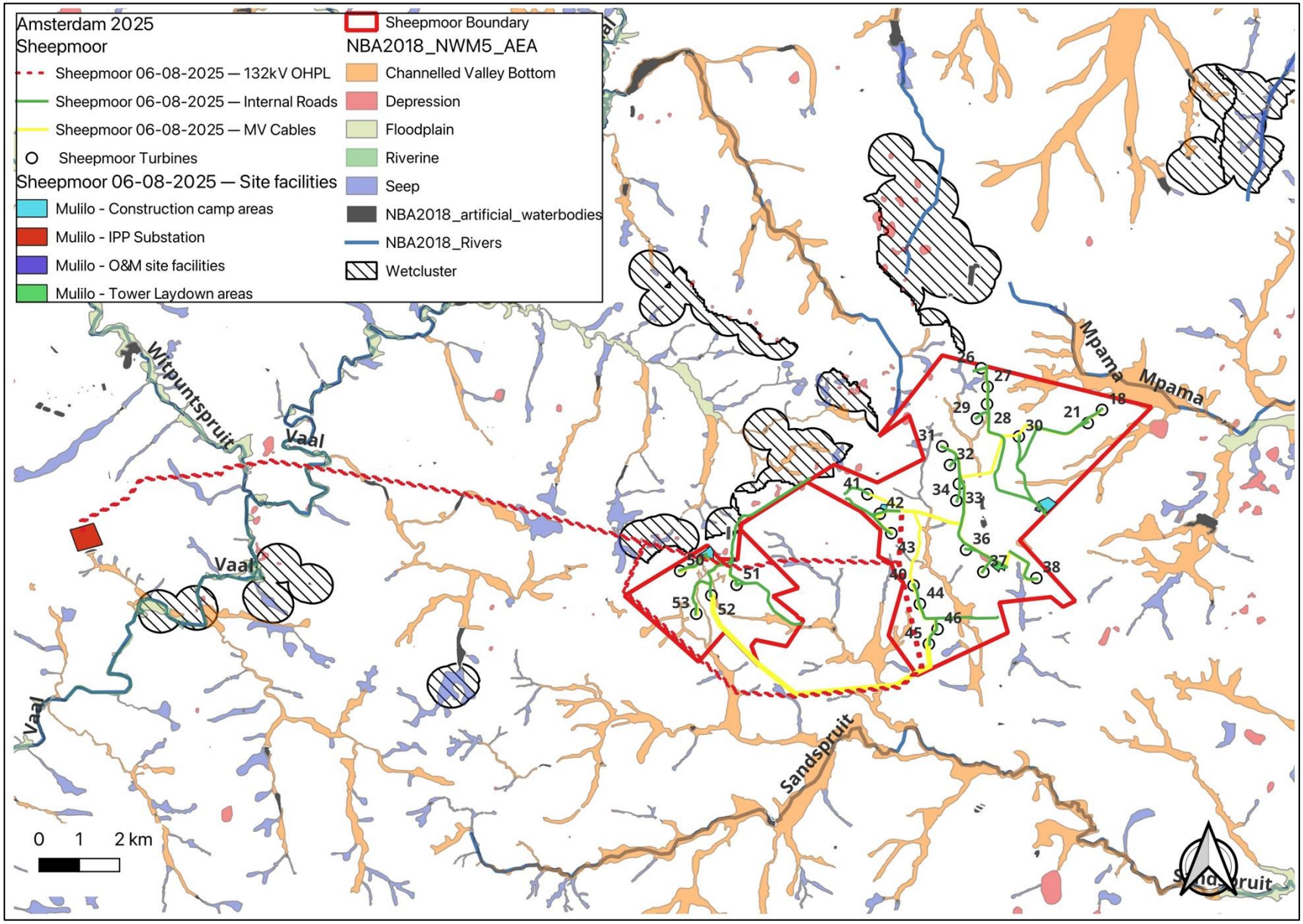


Figure 5: Various waterbodies identified in the National Wetland Inventory V5.2 (2020)

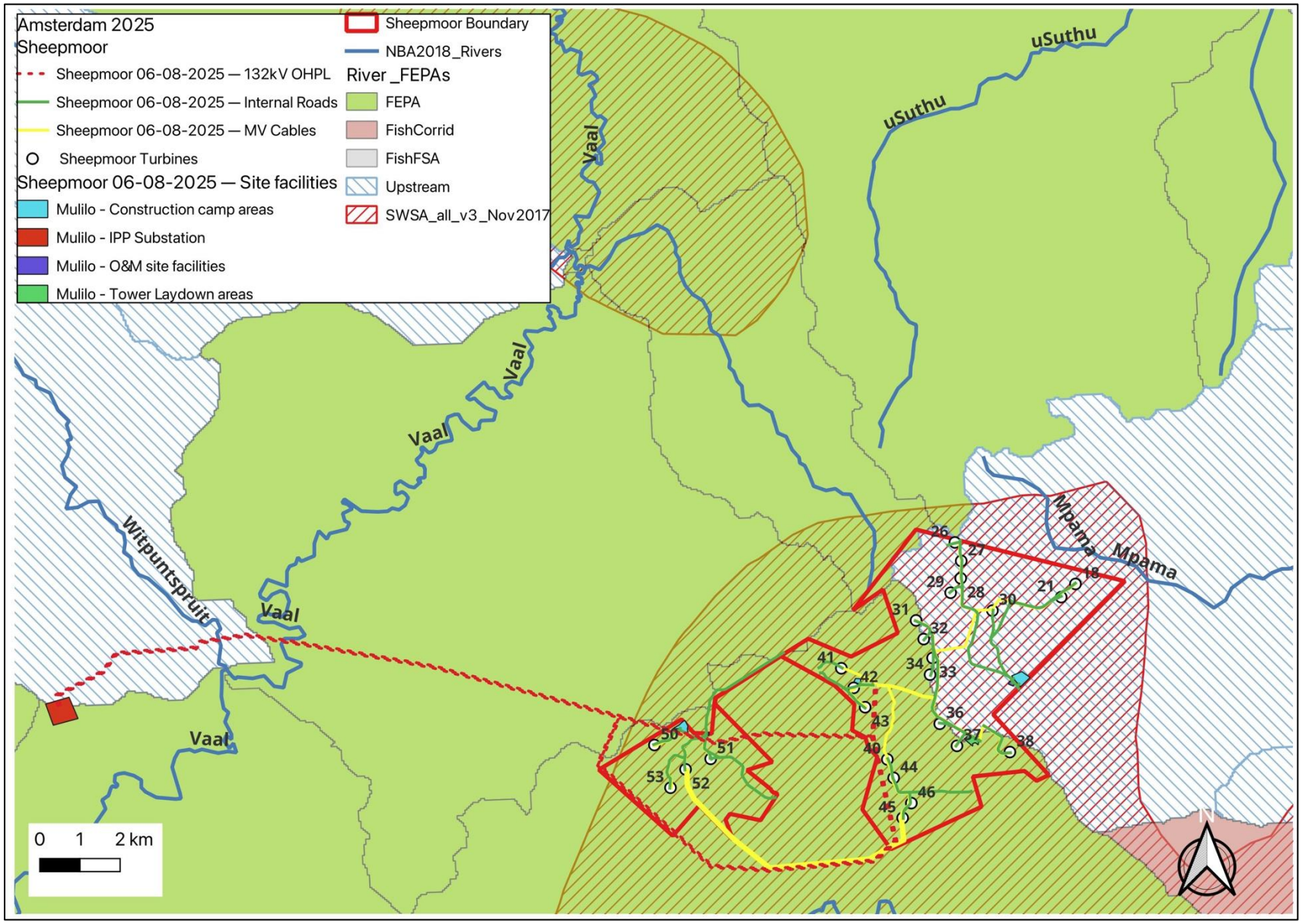


Figure 6: The respective Subquaternary catchments rated in terms of Freshwater Ecosystem Priority Areas (FEPAs) and Strategic Water Resource Areas in relation to the study area

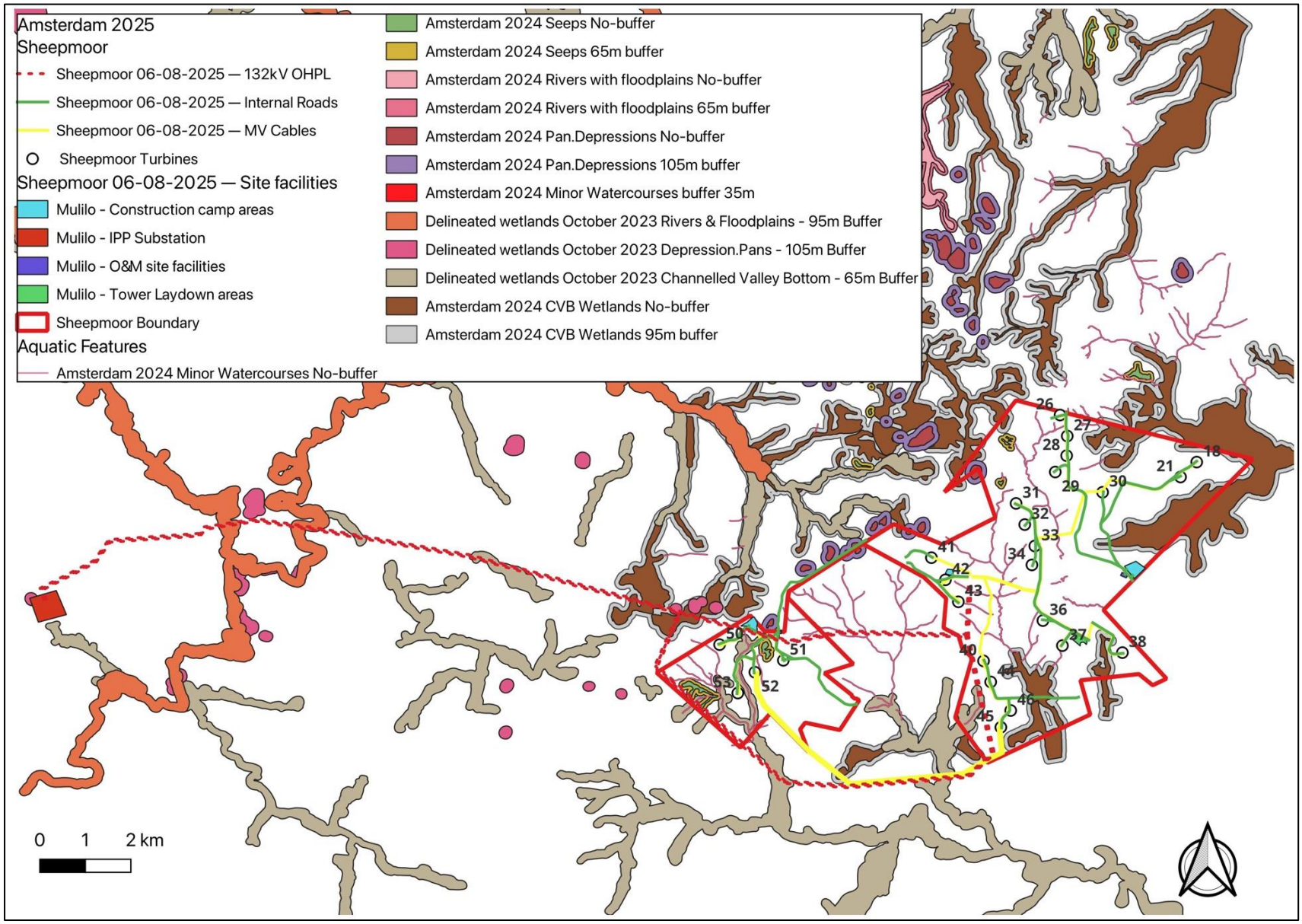


Figure 7: The confirmed watercourses and wetlands within the study area,



Plate 1: A view of a mainstem watercourse (tributary of the Vaal River), with transformed floodplain



Plate 2: A view of channelled valley bottom wetland within a transformed catchment (crop production & grazing)



Plate 3: One of the larger Endorheic Pans that is located near the OHL between the WEF and Ermelo



Plate 4: Seepage wetland in the headwater areas of the Vaal River / Usutu River catchment divide

6. Present Ecological State and conservation importance

The PES of a river represents the extent to which it has changed from the reference or near pristine condition (Category A) towards a highly impacted system where there has been an extensive loss of natural habit and biota, as well as ecosystem functioning (Category E).

The PES scores have been revised for the country and based on the current models, aspects of functional importance as well as direct and indirect impacts have been included (DWS, 2014). The current PES system also incorporates Ecological Importance (EI) and Ecological Sensitivity (ES) separately as opposed to Ecological Importance and Sensitivity (EIS) in the old model, although the new model is still heavily centred on rating rivers using broad fish, invertebrate, riparian vegetation and water quality indicators. The Recommended Ecological Category (REC) is still contained within the updated models, with the default REC being B, when little or no information is available to assess the system or when only one of the above-mentioned parameters are assessed or the overall PES is rated between a C or D.

The Present Ecological State scores (PES) for the main watercourses in the study area were rated as follows (DWS, 2014 – where B = Largely Natural and C = Moderately Modified):

Subquaternary Catchment Number	Present Ecological State	Ecological Importance	Ecological Sensitivity
1630	B	Moderate	High
1710	B	Moderate	High
1678	C	High	Moderate
1693	C	High	High
1770	C	High	High

These scores were substantiated by observations made in the field within the study area, and due to the overall lack of impacts or disturbance these scores for each of the watercourses within the site should be upheld.

This was further substantiated by the inclusion of study area catchments into Critical Biodiversity Areas (Type 1 and 2), i.e. the wetland areas near the alignment crossing the Brak River in particular and Ecological Support Area as shown in the Mpumalanga CBA MAP spatial data and Wetland Clusters (Figure 8).

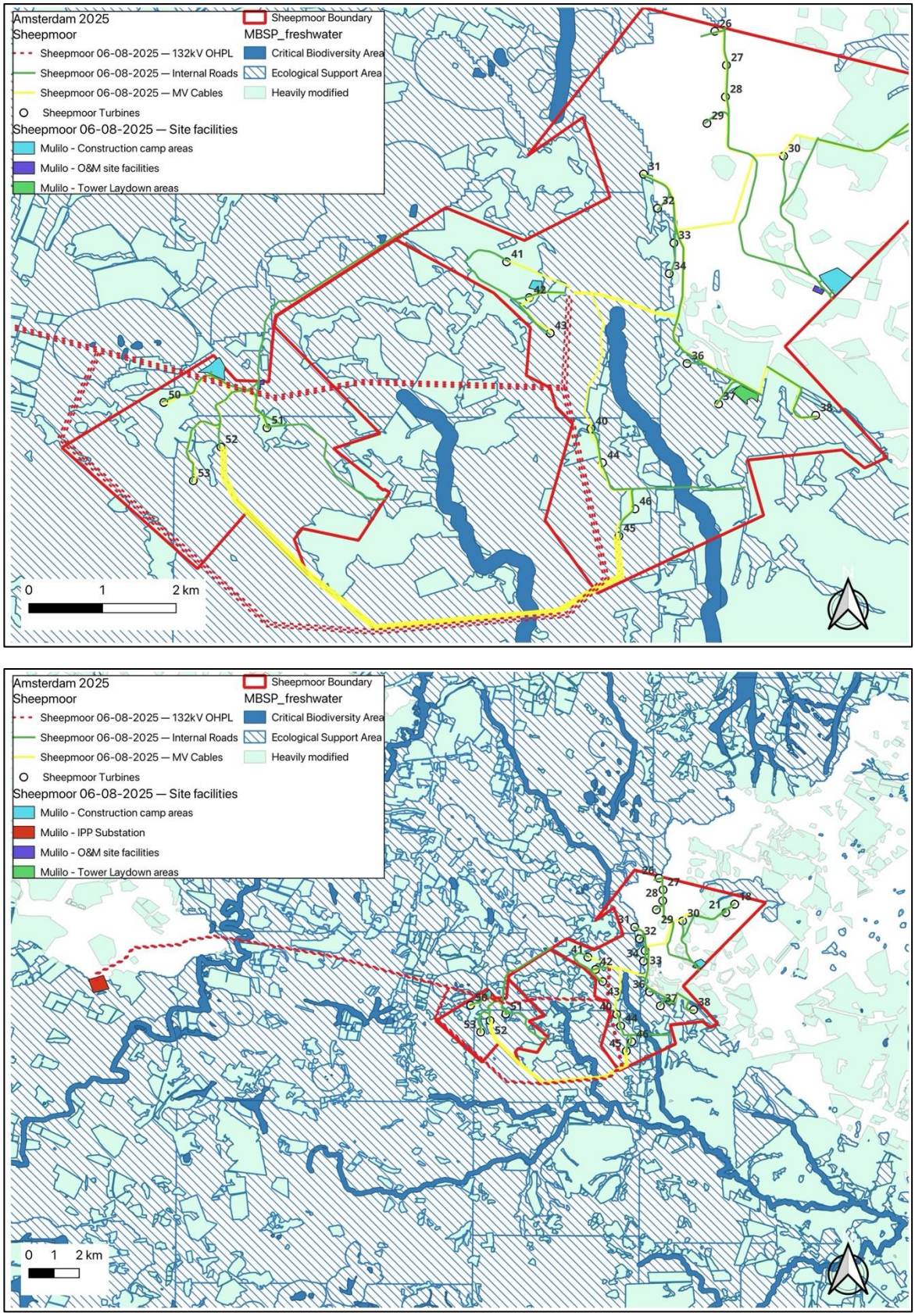


Figure 8: Critical Biodiversity Areas as per the Mpumalanga Biodiversity Spatial Plan, where the top map is for the project area and the bottom map is for the WEF

7. Permit requirements

Based on an assessment of the proposed activities and past engagement with DWS, the following WULs/ GA's could be required based on the following thresholds as listed in the following Government Notices, however ultimately the Department Water and Sanitation (DWS) will determine if a GA or full WULA will be required during the pre-application process (Phase 1):

	Water Use Activity	Applicable to this development proposal
S21(a)	Taking water from a water resource	Only water if water is abstracted from a local river or borehole
S21(b)	Storing water	If the total volume stored is greater than 40 000 m^3 then a full Water Use License will be required. This is however unlikely due to the scale of the project and the need for such large volumes.
S21(c)	Impeding or diverting the flow of water in a watercourse	Yes – several new crossings of watercourses (i.e. activities within 500m of a wetland or 100m of a watercourse will be required. A GA process can potentially be followed if Risk Assessment Matrix indicates all impacts are LOW.
S21(d)	Engaging in a stream flow reduction activity	Not applicable
S21(e)	Engaging in a controlled activity	Not applicable
S21(f)	Discharging waste or water containing waste into a water resource through a pipe, canal, sewer or other conduit	Not applicable
S21(g)	Disposing of waste in a manner which may detrimentally impact on a water resource	Not applicable – Only portable toilets will be required
S21(h)	Disposing in any manner of water which contains waste from, or which has been heated in, any industrial or power generation process	Not applicable
S21(i)	Altering the bed, banks, course or characteristics of a watercourse	Yes – several new crossings of watercourses (i.e. activities within 500m of a wetland or 100m of a watercourse will be required. A GA process can potentially be followed if Risk Assessment Matrix indicates all impacts are LOW.
S21(j)	Removing, discharging or disposing of water found underground for the continuation of an activity or for the safety of persons	Not applicable
S21(k)	Using water for recreational purposes	Not applicable

8. Sensitivity Assessment

Using the baseline description and field data while considering the current disturbances and site characteristics, the following features were identified, then categorised into one of number pre-determined sensitivity categories to provide protect and/or guide the layout planning:

High = No Go	"No go" areas or setbacks and areas or features that are considered of such significance that impacting them may be regarded as fatal flaw or strongly influence the project impact significance profile Therefore areas or features that are considered to have a high sensitivity or where project infrastructure would be highly constrained and should be avoided as far as possible. Infrastructure located in these areas are likely to drive up impact significance ratings and mitigations
Medium	Buffer areas and or areas that are deemed to be of medium sensitivity but should still be avoid as this would minimise impacts and or the need for additional Water Use Authorisation
Low	Areas of low sensitivity or constraints, such as artificial systems with little to no biological value or would not result in any future licensing requirements e.g. dry earth wall farm dams
Neutral	Unconstrained areas (left blank in mapping)

Table 4 below provides an overview of the sensitivity of various aquatic features (with buffers distances included) as it relates to the main project component types for the project. The features are shown spatially in Figure 7 above.

The sensitivity ratings of High No-go and Low were determined through an assessment of the aquatic habitat sensitivity and related constraints. However, these No-Go areas (with buffers) relate in general terms to the project and there are areas where encroachment on these areas would occur (i.e. existing road crossings within systems, but this is considered acceptable since these areas have already been impacted.

These proposed constraints / buffers do not include bird and or bat specialist buffers / constraints as theirs buffers along aquatic features are at times far larger around aquatic features, than those required for the known aquatic species within this region.

Table 4: Results of the sensitivity rating / constraints assessment

Development Component	Habitat type	Sensitivity rating of the respective habitat type against the development type	Buffer distance (m)	Development acceptability	Sensitivity rating override if an impact such as a road or other disturbance already occurs within the proposed footprint and confirmed by the specialist
WTG towers	Channelled Valley Bottom Wetlands	No-Go	105m	No WTGs should be placed in any of these areas, regardless of the state, type and functionality of the respective aquatic ecosystem	None
	Pans and Depressions		95m		
	Rivers and Floodplains		65m		
	Seeps		65m		
	Minor watercourses		35m		
Hardstands, Buildings / Substations & BESS	Channelled Valley Bottom Wetlands	No-Go	105m	None of these types of infrastructure should be placed in any of these areas	None
	Pans and Depressions		95m		
	Rivers and Floodplains		65m		
	Seeps		65m		
	Minor watercourses		35m		
Roads & Underground cables alignment roads	Channelled Valley Bottom Wetlands	High	105m	New roads and underground cables would not be deem appropriate within any of these areas, unless some form of disturbance already occurs, such as an existing track or bridge	Only existing tracks or disturbed areas maybe used
	Pans and Depressions		95m		
	Rivers and Floodplains				
	Seeps		65m		
	Minor watercourses		35m		
OHL	Channelled Valley Bottom Wetlands	High	105m	OHL towers must be placed outside of these area so that only the cables span these systems. The exception being that Pans & Depression inclusive of buffers must be avoided completely	
	Pans and Depressions		95m		
	Rivers and Floodplains		65m		
	Seeps		65m		
	Minor watercourses		35m		

9. Impact assessment

During the impact assessment several potential key issues / impacts were identified and these were assessed based on the methodology supplied by ERM.

9.1 Alternatives Assessment

The 2014 EIA Regulations require that any feasible and reasonable activity, location and technology alternatives considered must be described and comparatively assessed.

9.2 No-Go Option

With regard the No-Go option it is assumed that the site would continue to degrade due to the prevalence of grazing and or erosion within the water courses. This would continue into the long-term with a Low intensity that would impact on the regional scale due to loss of important habitat. Little in the way of mitigation could be proposed due to the social needs of the surrounding residents and or landowners, coupled to the need for access.

10. Potential aquatic ecosystems impacts

- Impact 1: Loss of habitat containing protected species or Species of Special Concern
- Impact 2: Loss of any critical corridors, important catchment areas and connected habitats that are linked to any Critical Biodiversity Areas or Ecological Support Areas
- Impact 3: The potential spread of alien vegetation
- Impact 4: Loss of riparian and or wetland habitat
- Impact 5: Changes to the hydrological regime and increased potential for erosion
- Impact 6: Changes to water quality
- Impact 7: Cumulative Impacts

The Tables 5 – 11 below assesses the impact significance for each impact. It was determined that the impacts upon aquatic biodiversity associated with the project are of Low significance, after mitigation. This assumes that the mitigations listed below are considered coupled to the fact that the overall layouts have avoid any of the High / No-Go areas, unless making use of areas with impacts such as existing farm roads. However, it is assumed that the final layout will orientate the hardstands, crane pads, blade laydowns camps outside any of the No-Go areas.

The loss of irreplaceable aquatic habitat and/or important aquatic obligate biota is therefore highly unlikely. The impacts are easily mitigated (provided the mitigation measures and monitoring plan within the EMP and this report are implemented and adhered to during all future phases of the project).

Table 5: Impact assessment summary for Impact 1 – Loss of habitat containing protected species or Species of Special Concern

Impact Phase: Construction and Decommissioning					
Nature of the impact: Loss of vegetation and in particular species / habitats that could contain listed as Critically Endangered and or Vulnerable species (direct)					
Description of Impact: Activities resulting in physical disturbance of aquatic systems which provide ecosystem services, especially where new crossings are made, or large hard engineered surfaces are placed within the buffer zones. Loss can also include a functional loss, through change in vegetation type via alien encroachment, reducing aquatic biodiversity. However no aquatic vegetation with conservation concern were observed during this assessment, coupled to the fact that any sensitive areas will be avoided.					
Impact Status: Negative					
	E	D	R	M	P
Without Mitigation	Local	Long Term	Irreversible	Medium	Probable
Score	2	4	5	2	3
With Mitigation	Site	Short Term	Recoverable	Low	Low Probability
Score	1	2	3	1	2
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	Moderate Negative Impact (39)			Low Negative Impact (14)	
Was public comment received? Not yet					
Has public comment been included in mitigation measures? Note still in the draft phase and that comment will be obtained during the NEMA comment periods					
Mitigation measures to reduce residual risk or enhance opportunities: • The development of the stormwater management plan and Aquatic Rehabilitation and Monitoring plan, coupled to confirmation of the final layout prior to construction is made by the aquatic specialist. • Where large cut and fill areas are required, these must be stabilised and rehabilitated during the construction process, to minimise erosion and sedimentation. • Suitable stormwater management systems must be installed along roads and other areas and monitored during the first few months of use. Any erosion / sedimentation must be resolved through whatever additional interventions maybe necessary (i.e., extension, energy dissipaters, spreaders, etc). To minimise the impact of the access roads: • Use existing roads or upgrade existing tracks rather than constructing entirely new roads wherever possible and has been included in the proposed layout.					

- Use the smallest possible working corridor. Outside the working corridor, all watercourses are to be considered no go areas. Where intrusion is required, the working corridor must be kept to a minimum and demarcated clearly before any construction commences.
- Removal of vegetation must only be when essential for the continuation of the project. Do not allow any disturbance to the adjoining natural vegetation cover or soils.
- Where required, all pipe culverts must be removed and replaced with suitable sized box culverts, where road levels are raised. Crossings that are installed below the natural ground level are to be constructed with an appropriate drop inlet structure on the upstream side to ensure that head cut erosion does not develop because of the gradient change from the natural ground level to the invert level of the culvert.
- The channel profile, regardless of the current state of the river / water course, will be reinstated thus preventing any impoundments from being formed. The related designs must be assessed by an aquatic specialist, with a preference for low level drifts where possible.
- Water diversions must be temporary in nature and no permanent walls, berms or dams may be installed within a watercourse. Sandbags used in any diversion or for any other activity within a watercourse must be in a good condition, so that they do not burst and empty sediment into the watercourse. Upon completion of the construction at the site, the diversions shall be removed to restore natural flow patterns. Under no circumstance shall a new channel or drainage canals be excavated to divert water away from construction activities.
- Any fauna (frogs, snakes, etc.) that are found within the construction area must be moved to the closest point of similar habitat type outside of the areas to be impacted.
- All disturbed areas beyond the construction site that are intentionally or accidentally disturbed during the construction phase must be rehabilitated.

It is the contractor's responsibility to continuously monitor the area for newly established alien species during the contract and establishment period, which if present must be removed. Removal of these species shall be undertaken in a way which prevents any damage to the remaining indigenous species and inhibits the re-infestation of the cleaned areas.

Table 6: Impact assessment summary for Impact 2 – Loss of CBAs or potential areas with conservation potential or linked to any important catchments and strategic water resource areas

Impact Phase: Construction and Decommissioning					
Nature of the impact: Loss of any critical corridors and connect habitats that are linked to any future conservation plans (direct) is not expected as these can been avoided, coupled to the fact that hydrological connections will be retained through avoidance or the inclusion of ecological buffers.					
Description of Impact: Activities resulting in physical disturbance of aquatic systems which provide ecosystem services, especially where new crossings are made, or large hard engineered surfaces are placed within the buffer zones and have been included in any Critical Biodiversity Areas. it is assumed that the final layout will orientate the hardstands, crane pads, blade laydowns and construction camps outside of any of the No-Go areas.					
Impact Status: Negative					
	E	D	R	M	P
Without Mitigation	Local	Long Term	Irreversible	Medium	Probable
Score	2	4	5	2	3
With Mitigation	Site	Short Term	Recoverable	Low	Low Probability
Score	1	2	3	1	2
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	Moderate Negative Impact (39)			Low Negative Impact (14)	
Was public comment received? Not yet					
Has public comment been included in mitigation measures? Note still in the draft phase and that comment will be obtained during the NEMA comment periods					
Mitigation measures to reduce residual risk or enhance opportunities: • The aquatic systems have been mapped to a finer scale and have taken cognizance of any potential CBAs. As High / No-Go have been avoided by the major infrastructure such as turbines, the aquatic zones associated within the CBA / ESAs have also been avoided. Roads will need to traverse these areas, thus it is important to try and select existing areas with impacts / crossings where possible, coupled to the assumptions above • The development of the stormwater management plan and Aquatic Rehabilitation and Monitoring plan, coupled to confirmation of the final layout prior to construction is made by the aquatic specialist. • Where large cut and fill areas are required, these must be stabilised and rehabilitated during the construction process, to minimise erosion and sedimentation. • Suitable stormwater management systems must be installed along roads and other areas and monitored during the first few months of use. Any erosion / sedimentation must be resolved through whatever additional interventions maybe necessary (i.e., extension, energy dissipaters, spreaders, etc). To minimise the impact of the access roads: • Use existing roads or upgrade existing tracks rather than constructing entirely new roads wherever possible and has been included in the proposed layout. • Use the smallest possible working corridor. Outside the working corridor, all watercourses are to be considered no go areas. Where intrusion is required, the working corridor must be kept to a minimum and demarcated clearly, before any construction commences.					

• Removal of vegetation must only be when essential for the continuation of the project. Do not allow any disturbance to the adjoining natural vegetation cover or soils. • Where required, all pipe culverts must be removed and replaced with suitable sized box culverts, where road levels are raised. Crossings that are installed below the natural ground level are to be constructed with an appropriate drop inlet structure on the upstream side to ensure that head cut erosion does not develop as a result of the gradient change from the natural ground level to the invert level of the culvert. • The channel profile, regardless of the current state of the river / water course, will be reinstated thus preventing any impoundments from being formed. The related designs must be assessed by an aquatic specialist, with a preference for low level drifts where possible. • Water diversions must be temporary in nature and no permanent walls, berms or dams may be installed within a watercourse. Sandbags used in any diversion or for any other activity within a watercourse must be in a good condition, so that they do not burst and empty sediment into the watercourse. Upon completion of the construction at the site, the diversions shall be removed to restore natural flow patterns. Under no circumstance shall a new channel or drainage canals be excavated to divert water away from construction activities. • Any fauna (frogs, snakes, etc.) that are found within the construction area must be moved to the closest point of similar habitat type outside of the areas to be impacted. • All disturbed areas beyond the construction site that are intentionally or accidentally disturbed during the construction phase must be rehabilitated. It is the contractor's responsibility to continuously monitor the area for newly established alien species during the contract and establishment period, which if present must be removed. Removal of these species shall be undertaken in a way which prevents any damage to the remaining indigenous species and inhibits the re-infestation of the cleaned areas.	
Residual impact	Very low and acceptable with adoption of mitigation measures

Table 7: Impact assessment summary for Impact 3 – Potential spread of alien vegetation

Impact Phase: Construction and Operation					
Nature of the impact: Any physical disturbance could result in the spread of alien vegetation (direct)					
Description of Impact: During construction, complete clearing of the roads and turbine areas, as well any ancillary structures (offices and substations) will be required. This disturbance then allows for the alien species to colonise the soils, if left unmanaged.					
Impact Status: Negative					
	E	D	R	M	P
Without Mitigation	Local	Long Term	Irreversible	Medium	Probable
Score	2	4	5	2	3
With Mitigation	Site	Short Term	Recoverable	Low	Low Probability
Score	1	2	3	1	2
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	Moderate Negative Impact (39)			Low Negative Impact (14)	
Was public comment received? Not yet					
Has public comment been included in mitigation measures? Note still in the draft phase and that comment will be obtained during the NEMA comment periods					

Mitigation measures to reduce residual risk or enhance opportunities: • Alien vegetation management must be initiated at the beginning of the construction period and must extend into any remaining areas into the operation phase on the facility • The revegetation of any temporary sites as well as any previously degraded areas must begin from the onset of the project, with the involvement of a botanist to assist with the revegetation specifications Regeneration of alien vegetation must be monitored once all areas have been cleared, forming part of a long-term alien vegetation management plan	
Residual impact	Very low and acceptable, with adoption of mitigation measures and monitoring

Table 8: Impact assessment summary for Impact 4 – Loss of riparian and or wetland habitat

Impact Phase: Construction and Decommissioning					
Nature of the impact: It was recommended that all wetlands / riverine systems as well as the inclusive of buffers, be avoided. it is assumed that the final layout will orientate the hardstands, crane pads, blade laydowns and construction camps outside of any of the No-Go areas.					
Description of Impact: During construction, complete clearing of the roads and turbine areas, as well any ancillary structures (offices and substations) will be required, which may impact the aquatic function or any corridors or connections between aquatic systems. However, all Very High Sensitivity / No-Go areas have been avoided by the proposed layout by also making use of existing road crossings or considering any of the proposed buffers.					
Impact Status: Negative					
	E	D	R	M	P
Without Mitigation	Local	Long Term	Irreversible	Medium	Probable
Score	2	4	5	2	3
With Mitigation	Site	Short Term	Recoverable	Low	Low Probability
Score	1	2	3	1	2
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	Moderate Negative Impact (39)			Low Negative Impact (14)	
Was public comment received? Not yet					
Has public comment been included in mitigation measures? Note still in the draft phase and that comment will be obtained during the NEMA comment periods					
Mitigation measures to reduce residual risk or enhance opportunities: • The development of the stormwater management plan and Aquatic Rehabilitation and Monitoring plan, coupled to confirmation of the final layout prior to construction is made by the aquatic specialist. • Where large cut and fill areas are required these must be stabilised and rehabilitated during the construction process, to minimise erosion and sedimentation. • Suitable stormwater management systems must be installed along roads and other areas and monitored during the first few months of use. Any erosion / sedimentation must be resolved through whatever additional interventions maybe necessary (i.e., extension, energy dissipaters, spreaders, etc). To minimise the impact of the access roads: • Use existing roads or upgrade existing tracks rather than constructing entirely new roads wherever possible and has been included in the proposed layout.					

• Use the smallest possible working corridor. Outside the working corridor, all watercourses are to be considered no go areas. Where intrusion is required, the working corridor must be kept to a minimum and demarcated clearly, before any construction commences. • Removal of vegetation must only be when essential for the continuation of the project. Do not allow any disturbance to the adjoining natural vegetation cover or soils. • Where required, all pipe culverts must be removed and replaced with suitable sized box culverts, where road levels are raised. Crossings that are installed below the natural ground level are to be constructed with an appropriate drop inlet structure on the upstream side to ensure that head cut erosion does not develop as a result of the gradient change from the natural ground level to the invert level of the culvert. • The channel profile, regardless of the current state of the river / water course, will be reinstated thus preventing any impoundments from being formed. The related designs must be assessed by an aquatic specialist, with a preference for low level drifts where possible. • Water diversions must be temporary in nature and no permanent walls, berms or dams may be installed within a watercourse. Sandbags used in any diversion or for any other activity within a watercourse must be in a good condition, so that they do not burst and empty sediment into the watercourse. Upon completion of the construction at the site, the diversions shall be removed to restore natural flow patterns. Under no circumstance shall a new channel or drainage canals be excavated to divert water away from construction activities. • Any fauna (frogs, snakes, etc.) that are found within the construction area must be moved to the closest point of similar habitat type outside of the areas to be impacted. • All disturbed areas beyond the construction site that are intentionally or accidentally disturbed during the construction phase must be rehabilitated. It is the contractor's responsibility to continuously monitor the area for newly established alien species during the contract and establishment period, which if present must be removed. Removal of these species shall be undertaken in a way which prevents any damage to the remaining indigenous species and inhibits the re-infestation of the cleaned areas.	
Residual impact	Very low and acceptable with adoption of mitigation measures

Table 9: Impact assessment summary for Impact 5 – Changes to the hydrological regime and increase potential for erosion

Impact Phase: Construction and Decommissioning					
Nature of the impact: Increased hard surfaces can result in increases in runoff generated by the site, thereby resulting in changes to localised hydrological regimes.					
Description of Impact: During construction, complete clearing of the roads and turbine areas, as well any ancillary structures (offices and substations) will be required, which may impact the aquatic function or any corridors or connections between aquatic systems. However, these areas must be by the proposed layout by also making use of existing road crossings or by considering any of the proposed buffers.					
Impact Status: Negative					
	E	D	R	M	P
Without Mitigation	Local	Long Term	Irreversible	Medium	Probable
Score	2	4	5	2	3
With Mitigation	Site	Short Term	Recoverable	Low	Low Probability

<table>
<tr><td>Score</td><td>1</td><td>2</td><td>3</td><td>1</td><td>2</td></tr>
<tr><td>Significance Calculation</td><td colspan="3">Without Mitigation</td><td colspan="2">With Mitigation</td></tr>
<tr><td>S=(E+D+R+M)*P</td><td colspan="3">Moderate Negative Impact (39)</td><td colspan="2">Low Negative Impact (14)</td></tr>
<tr><td colspan="6">Was public comment received? Not yet</td></tr>
<tr><td colspan="6">Has public comment been included in mitigation measures? Note still in the draft phase and that comment will be obtained during the NEMA comment periods</td></tr>
<tr><td colspan="6">Mitigation measures to reduce residual risk or enhance opportunities:
• No stormwater discharged may be directed to delineated aquatic zones or the associated buffers.
• A stormwater management plan finalised prior to construction, detailing the structures and actions that must be installed to prevent the increase of surface water flows directly into any natural systems.
• Effective stormwater management must include measures to slow, spread and deplete the energy of concentrated flows thorough effective stabilisation (gabions and Reno mattresses) and the re-vegetation of any disturbed areas
To minimise the impact of the access roads:
• Use existing roads or upgrade existing tracks rather than constructing entirely new roads wherever possible and has been included in the proposed layout.
• Use the smallest possible working corridor. Outside the working corridor, all watercourses are to be considered no go areas.. Where intrusion is required, the working corridor must be kept to a minimum and demarcated clearly, before any construction commences.
• Removal of vegetation must only be when essential for the continuation of the project. Do not allow any disturbance to the adjoining natural vegetation cover or soils.
• Where required, all pipe culverts must be removed and replaced with suitable sized box culverts, where road levels are raised. Crossings that are installed below the natural ground level are to be constructed with an appropriate drop inlet structure on the upstream side to ensure that head cut erosion does not develop as a result of the gradient change from the natural ground level to the invert level of the culvert.
• The channel profile, regardless of the current state of the river / water course, will be reinstated thus preventing any impoundments from being formed. The related designs must be assessed by an aquatic specialist, with a preference for low level drifts where possible.
• Water diversions must be temporary in nature and no permanent walls, berms or dams may be installed within a watercourse. Sandbags used in any diversion or for any other activity within a watercourse must be in a good condition, so that they do not burst and empty sediment into the watercourse. Upon completion of the construction at the site, the diversions shall be removed to restore natural flow patterns. Under no circumstance shall a new channel or drainage canals be excavated to divert water away from construction activities.
• Any fauna (frogs, snakes, etc.) that are found within the construction area must be moved to the closest point of similar habitat type outside of the areas to be impacted.
• All disturbed areas beyond the construction site that are intentionally or accidentally disturbed during the construction phase must be rehabilitated.
It is the contractor's responsibility to continuously monitor the area for newly established alien species during the contract and establishment period, which if present must be removed. Removal of these species shall be undertaken in a way which prevents any damage to the remaining indigenous species and inhibits the re-infestation of the cleaned areas.</td></tr>
<tr><td>Residual impact</td><td colspan="5">Very low and acceptable with adoption of mitigation measures</td></tr>
</table>

Table 10: Impact assessment summary for Impact 6 –Changes to surface water quality characteristics

Impact Phase: Construction and Decommissioning					
Nature of the impact: Potential impact on localised surface water quality (indirect)					
Description of Impact: During construction or decommissioning, earthworks will expose and mobilise earth materials, and a number of materials as well as chemicals will be imported and used on site and may end up in the surface water, including soaps, oils, grease and fuels, human wastes, cementitious wastes, paints and solvents, etc. Any spills during transport or while works area conducted in proximity to a watercourse has the potential to affect the surrounding biota. This can result in possible deterioration in aquatic ecosystem integrity and species diversity.					
Impact Status: Negative					
	E	D	R	M	P
Without Mitigation	Local	Long Term	Irreversible	Medium	Probable
Score	2	4	5	2	3
With Mitigation	Site	Short Term	Recoverable	Low	Low Probability
Score	1	2	3	1	2
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	Moderate Negative Impact (39)			Low Negative Impact (14)	
Was public comment received? Not yet					
Has public comment been included in mitigation measures? Note still in the draft phase and that comment will be obtained during the NEMA comment periods					
Mitigation measures to reduce residual risk or enhance opportunities: • All liquid chemicals including fuels and oil, including for the BESS, must be stored in with secondary containment (bunds or containers or berms) that can contain a leak or spill. Such facilities must be inspected routinely and must have the suitable PPE and spill kits needed to contain likely worst-case scenario leak or spill in that facility, safely. • Washing and cleaning of equipment must be done in designated wash bays, where rinse water is contained in evaporation/sedimentation ponds (to capture oils, grease cement and sediment). • Mechanical plant and bowsers must not be refueled or serviced within 100m of a river channel or wetland. • All construction camps, lay down areas, wash bays, batching plants or areas and any stores should be beyond any demarcated water courses and their respective buffers. • Littering and contamination associated with construction activity must be avoided through effective construction camp management. • No stockpiling should take place within or near a water course. • All stockpiles must be protected and located in flat areas where run-off will be minimised and sediment recoverable.					

ECO monitors the site on a daily basis to ensure plant is in working order (minimise leaks), spills are prevented and if they do occur, are quickly rectified.	
Residual impact	Low risk and acceptable, with adoption of mitigation measures and monitoring

Table 11: Impact assessment summary for Impact 7 - Cumulative impact assessment for aquatic biodiversity

Cumulative Impact: Cumulative impacts on the aquatic resources of the area					
Description of Cumulative Impact: The cumulative impact assessment considers the combined impact of the remaining and other renewable projects within a 30km radius, that are also in the development phase and the associated grid lines on the aquatic resources. The rating below is based on the premise that important or sensitive features will be avoided by the various projects, while the mitigations proposed will ensure that the form and or function of downstream areas remain intact.					
Impact Status: Negative					
	E	D	R	M	P
Without Mitigation	Local	Long Term	Irreversible	Medium	Probable
Score	2	4	5	2	3
With Mitigation	Site	Short Term	Recoverable	Low	Low Probability
Score	1	2	3	1	2
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	Moderate Negative Impact (39)			Low Negative Impact (14)	
Can Impacts be Enhanced?	No				
Enhancement: The project should share roads and infrastructure where possible to reduce the overall footprint and reduce stormwater and erosion and sedimentation related impacts The projects should collaborate with provincial roads authority to upgrade the main access routes and improve the crossings and stormwater controls					
Residual impact	Low				

11. Draft Specialists Recommendations for the EA

The DFFE Screening Tool identified two sensitivity ratings within the development footprint, namely, Low and Very High. There is overlap with the findings on site and the Screening Tool's outcome, thus the development footprint must be developed with cognisance of these sensitivities.

Therefore, environmental sensitivity input received from the aquatic ecology specialist was taken forward and considered within the EIA process and the impact to these areas assessed. Appropriate layout and development restrictions were implemented within the development footprint to ensure that the impact to aquatic ecology is deemed acceptable by the aquatic ecologist. However, it is assumed that the final layout will orientate the hardstands, crane pads, blade laydowns and construction camps outside of any of the No-Go areas.

The specialist has no objection to the authorisation of the proposed activities assuming that all mitigations and buffer zones are implemented.

Mitigation should focus on these areas and include measures to halt erosion and rehabilitate habitat in the sections affected by the construction. Without the implementation of mitigation measures, the project has potential to cause a Low cumulative impact upon aquatic biodiversity. However, with the adoption of mitigation, the proposed project will have a Very Low impact upon aquatic biodiversity.

12. Monitoring and Management Actions

The following are key recommendations, which are also critical to the proposed mitigations:

- Any of the activities, should also be monitored by the appointed Environmental Officer /Environmental Control Officer (EO/ECO) on a daily basis, especially during periods of river flow during construction.
- Any points of erosion should be stabilised immediately (sand bags in the short term) using gabions and reno mattress as required. No activities should take place outside of the demarcated servitude, to prevent additional cumulative impacts on these systems.
- The EMPr, must include a Construction Specific Monitoring and Rehabilitation Plan related to the water course and wetland crossings, and specifically to the prevention of erosion and sedimentation as these systems are prone to scour, with rehabilitation options being limited due to the sparse nature of the vegetation.
- Monitoring should occur on a monthly basis for 6 months post construction and where any unstable soils occur, these must be protected with temporary stabilisation dependent on the scale of the impact i.e. sand bags - hay bales) until areas become revegetated. If any areas require permanent erosion protection (e.g. gabions or stone pitching) then the WULA/GA must be amended to include these areas.

13.Conclusion and Recommendations

During this assessment, several sensitive aquatic habitats were observed and are shown in the maps provided in this report. Noteworthy areas, were then avoided by the required infrastructure, and include the main riverine and wetland systems, while the access roads will make use of existing roads thus previously disturbed areas as far as possible, especially near or when need to span aquatic systems.

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

Mitigation should focus on these areas and include measures to halt erosion and rehabilitate habitat in the sections affected by the construction. Without the implementation of mitigation measures, the project has potential to cause a Moderate cumulative impact upon aquatic biodiversity. However, with the adoption of mitigation, the proposed project will have a Low impact upon aquatic biodiversity.

As the proposed activities have the potential to create erosion the following recommendations are reiterated:

- Vegetation clearing should occur in a phased manner in accordance with the construction programme to minimise erosion and/or run-off. Large tracts of bare soil will either cause dust pollution or quickly erode and then cause sedimentation in the lower portions of the catchment, and suitable dust and erosion control mitigation measures should be included in the generic EMPr, if not included already to mitigate.

- All construction materials including fuels and oil should be stored in demarcated areas that are contained within berms / bunds to avoid spread of any contamination / leaks. Washing and cleaning of equipment should also be done in berms or bunds, to trap any cement / hazardous substances and prevent excessive soil erosion. Mechanical plant and bowsers must not be refuelled or serviced within or directly adjacent to

any channel. It is therefore suggested that all construction camps, lay down areas, batching plants or areas and any stores should be located more than 50 m from any demarcated watercourses.

- It is also advised that an Environmental Control Officer (ECO), with a good understanding of the local flora be appointed during the construction phase. The ECO should be able to make clear recommendations with regards to the re-vegetation of the newly completed / disturbed areas along aquatic features, using selected species detailed in this report.
- All alien plant re-growth must be monitored and should these alien plants reoccur these plants should be re-eradicated. The scale of the operation does however not warrant the use of a Landscape Architect and / or Landscape Contractor.

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

14.References

Agenda 21 – Action plan for sustainable development of the Department of Environmental Affairs and Tourism (DEAT) 1998.

Agricultural Resources Act, 1983 (Act No. 43 of 1983).

Department of Water Affairs and Forestry - DWAF (2005). A practical field procedure for identification and delineation of wetland and riparian areas Edition 1. Department of Water Affairs and Forestry, Pretoria. Updated with amendments in 2007.

Department of Water and Sanitation. 2014. A Desktop Assessment of the Present Ecological State, Ecological Importance and Ecological Sensitivity per Sub Quaternary Reaches for Secondary Catchments in South Africa. Secondary: [W5 (for example)]. Compiled by RQIS-RDM: https://www.dwa.gov.za/iwqs/rhp/eco/peseismodel.aspx

Germishuizen, G. and Meyer, N.L. (eds) (2003). Plants of southern Africa: an annotated checklist. Strelitzia 14, South African National Biodiversity Institute, Pretoria.

Holness, S & Oosthuysen, E. 2016. Northern Cape Critical Biodiversity Area map, SANBI BGIS.

Kleynhans C.J., Thirion C. and Moolman J. (2005). A Level 1 Ecoregion Classification System for South Africa, Lesotho and Swaziland. Report No. N/0000/00/REQ0104. Resource Quality Services, Department of Water Affairs and Forestry, Pretoria.

Macfarlane, D.M. & Bredin, I.P. 2017. Buffer Zone Guidelines for Rivers, Wetlands and Estuaries Buffer Zone Guidelines for Rivers, Wetlands and Estuaries. WRC Report No TT 715/1/17 Water Research Commission, Pretoria.

Minerals and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002), as amended.

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

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

Nel, J.L., Murray, K.M., Maherry, A.M., Petersen, C.P., Roux, D.J., Driver, A., Hill, L., Van Deventer, H., Funke, N., Swartz, E.R., Smith-Adao, L.B., Mbona, N., Downsborough, L. and Nienaber, S. (2011). Technical Report for the National Freshwater Ecosystem Priority Areas project. WRC Report No. K5/1801.

12. Appendix 1 - Specialist CV

CURRICULUM VITAE
Dr Brian Michael Colloty
[redacted]

1 Rossini Rd
Pari Park
Port Elizabeth, 6070
b.colloty@gmail.com
[redacted]

Profession: Ecologist & Environmental Assessment Practitioner (Pr. Sci. Nat. 400268/07)
Member of the South African Wetland Society
Specialisation: Ecology and conservation importance rating of terrestrial habitats, wetlands, rivers & estuaries
Years experience: 25 years

SKILLS BASE AND CORE COMPETENCIES

- 25 years experience in environmental sensitivity and conservation assessment of aquatic and terrestrial systems inclusive of Index of Habitat Integrity (IHI), WET Tools, Riparian Vegetation Response Assessment Index (VEGRAI) for Reserve Determinations, estuarine and wetland delineation throughout Africa. Experience also includes biodiversity and ecological assessments with regard sensitive fauna and flora, within the marine, coastal and inland environments. Countries include Mozambique, Kenya, Namibia, Central African Republic, Zambia, Eritrea, Mauritius, Madagascar, Angola, Ghana, Guinea-Bissau and Sierra Leone. Current projects also span all nine provinces in South Africa.
- 15 years experience in the coordination and management of multi-disciplinary teams, such as specialist teams for small to large scale EIAs and environmental monitoring programmes, throughout Africa and inclusive of marine, coastal and inland systems. This includes project and budget management, specialist team management, client and stakeholder engagement and project reporting.
- GIS mapping and sensitivity analysis

TERTIARY EDUCATION

- 1994: B Sc Degree (Botany & Zoology) - NMU
- 1995: B Sc Hon (Zoology) - NMU
- 1996: M Sc (Botany - Rivers) - NMU
- 2000: Ph D (Botany – Estuaries & Mangroves) – NMU

EMPLOYMENT HISTORY

- 1996 – 2000 Researcher at Nelson Mandela University – SAB institute for Coastal Research & Management. Funded by the WRC to develop estuarine importance rating methods for South African Estuaries
- 2001 – January 2003 Training development officer AVK SA (reason for leaving – sought work back in the environmental field rather than engineering sector)
- February 2003- June 2005 Project manager & Ecologist for Strategic Environmental Focus (Pretoria) – (reason for leaving – sought work related more to experience in the coastal environment)
- July 2005 – June 2009 Principal Environmental Consultant Coastal & Environmental Services (reason for leaving – company restructuring)
- June 2009 – August 2018 Owner / Ecologist of Scherman Colloty & Associates cc
- August 2018 Owner / Ecologist - EnviroSci (Pty) Ltd

SELECTED RELEVANT PROJECT EXPERIENCE

World Bank IFC Standards

- Kenmare Mining Pilivilli, Mozambique - wetland (mangroves, peatlands and estuarine) assessment and biodiversity offset analysis - current
- Botswana South Africa 400kv transmission line (400km) biodiversity assessment on behalf of Aurecon - current
- Farim phosphate mine and port development, Guinea Bissau – biodiversity and estuarine assessment on behalf of Knight Piesold Canada – 2016.
- Tema LNG offshore pipeline EIA – marine and estuarine assessment for Quantum Power (2015).
- Colluli Potash South Boulder, Eritrea, SEIA marine baseline and hydrodynamic surveys co-ordinator and coastal vegetation specialist (coastal lagoon and marine) (on-going).
- Wetland, estuarine and riverine assessment for Addax Biofeuls Sierra Leone, Makeni for Coastal & Environmental Services: 2009
- ESHIA Project manager and long-term marine monitoring phase coordinator with regards the dredge works required in Luanda bay, Angola. Monitoring included water quality and biological changes in the bay and at the offshore disposal outfall site, 2005-2011

South African

- Plant and animal search and rescue for the Karusa, Soetwater, Nxuba, Oyster Bay and Garob Wind Farms on behalf of Enel Green Power, 2018 - 2019
- Plant and Animal Search and Rescue for the Port of Ngqura, Transnet Landside infrastructure Project, with development and management of on site nursery (Current).
- Plant and Animal Search and Rescue for the Port of Ngqura, OTGC Tank Farm Project (2019)
- Plant search and rescue, for NMBM (Driftsands sewer, Glen Hurd Drive), Department of Social Development (Military veterans housing, Despatch) and Nxuba Wind Farm, - current
- Wetland specialist appointed to update the Eastern Cape Biodiversity Conservation Plan, for the Province on behalf of EOH CES appointment by SANBI – current. This includes updating the National Wetland Inventory for the province, submitting the new data to CSIR/SANBI.
- CDC IDZ Alien eradication plans for three renewable projects Coega Wind Farm, Sonop Wind Farm and Coega PV, on behalf of JG Afrika (2016 – 2017).
- Nelson Mandela Bay Municipality Baakens River Integrated Wetland Assessment (Inclusive of Rehabilitation and Monitoring Plans) for CEN IEM Unit - Current
- Rangers Biomass Gasification Project (Uitenhage), biodiversity and wetland assessment and wetland rehabilitation / monitoring plans for CEM IEM Unit – current.
- Gibson Bay Wind Farm implementation of the wetland management plan during the construction and operation of the wind farm (includes surface / groundwater as well wetland rehabilitation & monitoring plan) on behalf of Enel Green Power - current
- Gibson Bay Wind Farm 133kV Transmission Line wetland management plan during the construction of the transmission line (includes wetland rehabilitation & monitoring plan) on behalf of Eskom – 2016.
- Tsitsikamma Community Wind Farm implementation of the wetland management plan during the construction of the wind farm (includes surface / biomonitoring, as well wetland rehabilitation & monitoring plan) on behalf of Cennergi – completed May 2016.
- Alicedale bulk sewer pipeline for Cacadu District, wetland and water quality assessment, 2016
- Mogalakwena 33kv transmission line in the Limpopo Province, on behlaf of Aurecon, 2016
- Cape St Francis WWTW expansion wetland and passive treatment system for the Kouga Municipality, 2015
- Macindane bulk water and sewer pipelines wetland and wetland rehabilitation plan 2015
- Eskom Prieska to Copperton 132kV transmission line aquatic assessment, Northern Cape on behalf of Savannah Environmental 2015.
- Joe Slovo sewer pipeline upgrade wetland assessment for Nelson Mandela Bay Municipality 2014
- Cape Recife Waste Water Treatment Works expansion and pipeline aquatic assessment for Nelson Mandela Bay Municipality 2013
- Pola park bulk sewer line upgrade aquatic assessment for Nelson Mandela Bay Municipality 2013
- Transnet Freight Rail – Swazi Rail Link (Current) wetland and ecological assessment on behalf of Aurecon for the proposed rail upgrade from Ermelo to Richards Bay
- Eskom Transmission wetland and ecological assessment for the proposed transmission line between Pietermaritzburg and Richards Bay on behalf of Aurecon (2012).
- Port Durnford Exarro Sands biodiversity assessment for the proposed mineral sands mine on behalf of Exxaro (2009)
- Fairbreeze Mine Exxaro (Mtunzini) wetland assessment on behalf of Strategic Environmental Services (2007).
- Wetland assessment for Richards Bay Minerals (2013) – Zulti North haul road on behalf of RBM.
- Biodiversity and aquatic assessments for 101 renewable projects in the past 8 years in the Western, Eastern, Northern Cape, KwaZulu-Natal and Free State provinces. Clients included RES-SA, Red Cap, ACED Renewables, Mainstream Renewable, GDF Suez, Globeleq, ENEL, Abengoa amongst others. Particular aquatic sensitivity assessment and Water Use License Applications on behalf of Mainstream Renewable Energy (8 wind farms and 3 PV facilities.), Cennergi / Exxaro (2 Wind farms), WKN Wind current (2 wind farms & 2 PV facilities), ACED (6 wind farms) and Windlab (3 Wind farms) were also conducted. Several of these projects also required the assessment of the proposed transmission lines and switching stations, which were conducted on behalf of Eskom.
- Vegetation assessments on the Great Brak rivers for Department of Water and Sanitation, 2006 and the Gouritz Water Management Area (2014)
- Proposed FibreCo fibre optic cable vegetation assessment along the PE to George, George to Graaf Reinet, PE to Colesburg, and East London to Bloemfontein on behalf of SRK (2013-2015).

15.Appendix 2 - Site Sensitivity Verification Report

Site verification report – Aquatic Ecology

Government Notice No. 645, dated 10 May 2019, includes the requirement that an Initial Site Sensitivity Verification Report must be produced for a development footprint. As per Part 1, Section 2.3, the outcome of the Initial Site Verification must be recorded in the form of a report that-

(a) Confirms or disputes the current use of the land and environmental sensitivity as identified by the national web based environmental screening tool;
(b) Contains a motivation and evidence of either the verified or different use of the land and environmental sensitivity;
(c) Is submitted together with the relevant reports prepared in accordance with the requirements of the Environmental Impact Assessment Regulations.

This report has been produced specifically to consider the aquatic ecology theme and addresses the content requirements of (a) and (b) above. The report will be appended to the respective specialist study included in the Basic Assessment Report produced for the project.

Site sensitivity based on the aquatic biodiversity theme included in the Screening Tool and specialist assessment

Based on the DFFE Screening Tool, the WEF and Grid Connection falls within areas of very high sensitivity (Figure 1).

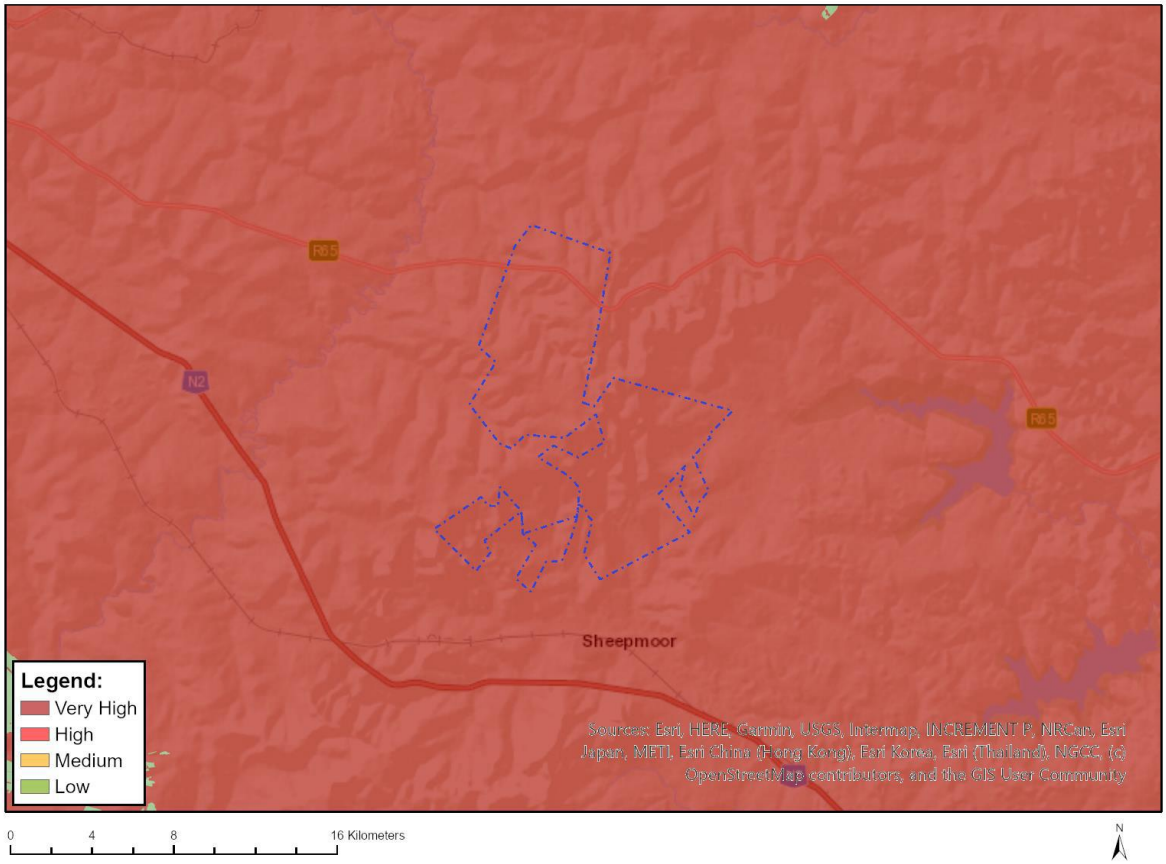


Figure 1a. DFFE Screening Tool outcome for the aquatic biodiversity theme for the WEF site

Figure 1b. DFFE Screening Tool outcome for the aquatic biodiversity theme for the Preferred Grid alignment

Based on the above outcomes, the specialist agrees the environmental sensitivities identified on site. However, disputes the exact extent of the systems, as the Screening Tool shows a catchment wide representation of the aquatic waterbodies that were rated as sensitive.

The specialist findings were informed by a site visits undertaken by Dr Brian Colloty over the course of several years. This information was then compared to current wetland inventories, 1: 50 000 topocadastral surveys mapping and the site. A baseline map was then developed which was refined, noting that due to the complex of the topography and geology, some of the river lines were digitised at a scale of 1:2000.

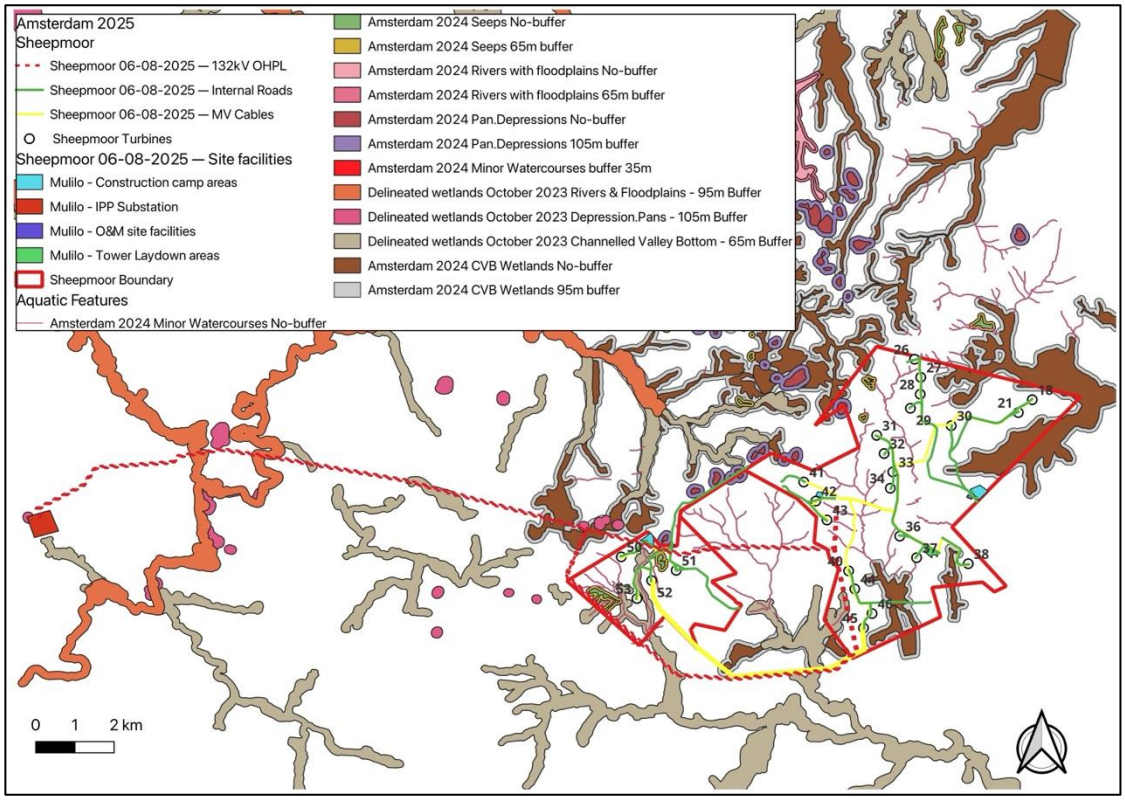


Figure 2. Environmental sensitivity map produced by the aquatic specialist

Motivation of the outcomes of the sensitivity map and key conclusions

In conclusion, the DFFE Screening Tool identified one sensitivity rating within the development footprint, namely, Very High.

Although there is some overlap with the findings on site and the Screening Tool's outcome, the development footprint contains various sensitivities (Very High and Low) that were identified following the undertaking of several site visits and spatial input considerations.

The environmental sensitivity input received from the aquatic ecology specialist wase taken forward and considered within the formal EA process and the impact to these areas assessed. Appropriate layout and development restrictions were implemented within the development footprint to ensure that the impact to aquatic ecology is deemed acceptable by the aquatic ecologist.

16. Appendix 3: Compliance with the Aquatic Biodiversity Protocol (GN 320, 20 March 2020)

Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Aquatic Biodiversity	*Section where this has been addressed in the Specialist Report*
2.3. The assessment must provide a baseline description of the site which includes, as a minimum, the following aspects: *2.3.1. a description of the aquatic biodiversity and ecosystems on the site, including;* *a) aquatic ecosystem types; and* *b) presence of aquatic species, and composition of aquatic species communities, their habitat, distribution, and movement patterns;*	*Section 5 & 6 of this report*
2.3.2. the threat status of the ecosystem and species as identified by the screening tool;	*Section 5 & 6 of this report*
2.3.3. an indication of the national and provincial priority status of the aquatic ecosystem, including a description of the criteria for the given status (i.e., if the site includes a wetland or a river freshwater ecosystem priority area or sub catchment, a strategic water source area, a priority estuary, whether or not they are free -flowing rivers, wetland clusters, a critical biodiversity or ecologically sensitivity area); and	*Section 5 & 6 of this report*
2.3.4. a description of the ecological importance and sensitivity of the aquatic ecosystem including: *a) the description (spatially, if possible) of the ecosystem processes that operate in relation to the aquatic ecosystems on and immediately adjacent to the site (e.g., movement of surface and subsurface water, recharge, discharge, sediment transport, etc.); and* *b) the historic ecological condition (reference) as well as present ecological state of rivers (in- stream, riparian, and floodplain habitat), wetlands and/or estuaries in terms of possible changes to the channel and flow regime (surface and groundwater).*	*Section 5 & 6 of this report*
2.4. The assessment must identify alternative development footprints within the preferred site which would be of a "low" sensitivity as identified by the screening tool and verified through the site sensitivity verification and which were not considered appropriate.	*Section 9 of this report*
2.5. Related to impacts, a detailed assessment of the potential impacts of the proposed development on the following aspects must be undertaken to answer the following questions: *2.5.1. Is the proposed development consistent with maintaining the priority aquatic ecosystem in its current state and according to the stated goal?* *2.5.2. Is the proposed development consistent with maintaining the resource quality objectives for the aquatic ecosystems present?* *2.5.3. How will the proposed development impact on fixed and dynamic ecological processes that operate within or across the site? This must include:* *a) impacts on hydrological functioning at a landscape level and across the site which can arise from changes to flood regimes (e.g., suppression of floods, loss of flood attenuation*	*Section 9 of this report*

Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Aquatic Biodiversity	*Section where this has been addressed in the Specialist Report*
capacity, unseasonal flooding or destruction of floodplain processes); *b) will the proposed development change the sediment regime of the aquatic ecosystem and its sub -catchment (e.g. sand movement, meandering river mouth or estuary, flooding or sedimentation patterns);* *c) what will the extent of the modification in relation to the overall aquatic ecosystem be (e.g., at the source, upstream or downstream portion, in the temporary I seasonal I permanent zone of a wetland, in the riparian zone or within the channel of a watercourse, etc.); and* *d) to what extent will the risks associated with water uses and related activities change;*	
2.5.4. how will the proposed development impact on the functioning of the aquatic feature? This must include: *a) base flows (e.g., too little or too much water in terms of characteristics and requirements of the system);* *b) quantity of water including change in the hydrological regime or hydroperiod of the aquatic ecosystem (e.g., seasonal to temporary or permanent; impact of over - abstraction or instream or off stream impoundment of a wetland or river);* *c) change in the hydrogeomorphic typing of the aquatic ecosystem (e.g., change from an unchannelled valley-bottom wetland to a channelled valley -bottom wetland);* *d) quality of water (e.g., due to increased sediment load, contamination by chemical and/or organic effluent, and/or eutrophication);* *e) fragmentation (e.g., road or pipeline crossing a wetland) and loss of ecological connectivity (lateral and longitudinal); and* *f) the loss or degradation of all or part of any unique or important features associated with or within the aquatic ecosystem (e.g., waterfalls, springs, oxbow lakes, meandering or braided channels, peat soils, etc.);*	*Section 9 of this report*
2.5.5. how will the proposed development impact on key ecosystems regulating and supporting services especially: *a) flood attenuation;* *b) streamflow regulation;* *c) sediment trapping;* *d) phosphate assimilation;* *e) nitrate assimilation;* *f) toxicant assimilation;* *g) erosion control; and* *h) carbon storage?*	*Section 9 of this report*
2.5.6. how will the proposed development impact community composition (numbers and density of species) and integrity (condition, viability, predator - prey ratios, dispersal rates, etc.) of the faunal and vegetation communities inhabiting the site?	*Section 9 of this report*
2.6. In addition to the above, where applicable, impacts to the frequency of estuary mouth closure should be considered, in relation to:	*N/A*

Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Aquatic Biodiversity	*Section where this has been addressed in the Specialist Report*
a) size of the estuary; *b) availability of sediment;* *c) wave action in the mouth;* *d) protection of the mouth;* *e) beach slope;* *f) volume of mean annual runoff; and* *g) extent of saline intrusion (especially relevant to permanently open systems).*	
2.7. The findings of the specialist assessment must be written up in an Aquatic Biodiversity Specialist Assessment Report that contains, as a minimum, the following information:	*This report*
2.7.1. contact details of the specialist, their SACNASP registration number, their field of expertise and a curriculum vitae;	*Appendix 1*
2.7.2. a signed statement of independence by the specialist;	*Attached to EIA / BAR*
2.7.3. a statement on the duration, date and season of the site inspection and the relevance of the season to the outcome of the assessment;	*Section 5 & 6 of this report*
2.7.4. the methodology used to undertake the site inspection and the specialist assessment, including equipment and modelling used, where relevant;	*Section 4*
2.7.5. a description of the assumptions made any uncertainties or gaps in knowledge or data;	*Section 1*
2.7.6. the location of areas not suitable for development, which are to be avoided during construction and operation, where relevant;	*Section 8*
2.7.7. additional environmental impacts expected from the proposed development;	*Section 9*
2.7.8. any direct, indirect, and cumulative impacts of the proposed development on site;	*Section 9*
2.7.9. the degree to which impacts, and risks can be mitigated;	*Section 9*
2.7.10. the degree to which the impacts and risks can be reversed;	*Section 9*
2.7.11. the degree to which the impacts and risks can cause loss of irreplaceable resources;	*Section 9*
2.7.12. a suitable construction and operational buffer for the aquatic ecosystem, using the accepted methodologies;	*Section 4*
2.7.13. proposed impact management actions and impact management outcomes for inclusion in the Environmental Management Programme (EMPr);	*Section 10, 11 & 12*
2.7.14. a motivation must be provided if there were development footprints identified as per paragraph 2.4 above that were identified as having a "low" aquatic biodiversity sensitivity and that were not considered appropriate;	*Section 9*
2.7.15. a substantiated statement, based on the findings of the specialist assessment, regarding the acceptability or not of the proposed development and if the proposed development should receive approval or not; and	*Section 13*
2.7.16. any conditions to which this statement is subjected.	*Section 11*
2.8. The findings of the Aquatic Biodiversity Specialist Assessment must be incorporated into the Basic Assessment Report or the Environmental Impact Assessment Report including the mitigation	*Yes*

Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Aquatic Biodiversity	*Section where this has been addressed in the Specialist Report*
and monitoring measures as identified, that are to be included in the EMPr.	
2.9. A signed copy of the assessment must be appended to the Basic Assessment Report or Environmental Impact Assessment Report.	*Yes*

EIA PHASE FOR THE PROPOSED MULILO CLUSTER WEF, NEAR ERMELO, MPUMALANGA PROVINCE

Emvelo Wind Energy Facility

AQUATIC IMPACT ASSESSMENT

FOR

ERM Southern Africa (Pty) Ltd

BY

EnviroSci (Pty) Ltd

Dr Brian Colloty

1 Rossini Rd
Pari Park
Gqeberha
6070

DATE

15 August 2025

REVISION 1

Executive Summary

ERM Southern Africa (Pty) Ltd appointed EnviroSci (Pty) Ltd to conduct an aquatic assessment of the proposed Mulilo Amsterdam Wind Energy Facility cluster between Ermelo and Amsterdam in the Mpumalanga Province. This report is focused on assessing the Emvelo Wind Energy Facility and its associated Overhead Line alignment

This assessment includes delineating any natural waterbodies, as well as assessing the potential consequences of the proposed project – The study area) on the surrounding wetlands and or watercourses. This was based on information collected during various site visits conducted within the region from March 2022 and a site-specific assessment in April & September 2023. Substantiated by the National Wetland Inventory v5.2 spatial data (NWI). Additional site visits were conducted in February 2025, while working in the region to confirm any changes since the initial surveys.

These surveys adhered to the assessment criteria contained in the DWAF 2005 / 2008 delineation manuals and the National Wetland Classification System. This report will inform the Environmental Authorisation process, as well as the required Water Use License Application that will be initiated, once the final project layout is available, i.e. once all the constraints, if any from this and other specialists have been considered in the design process.

The PROTOCOL FOR SPECIALIST ASSESSMENT AND MINIMUM REPORT CONTENT REQUIREMENTS FOR THE ENVIRONMENTAL IMPACTS ON AQUATIC BIODIVERSITY (Government Gazette 43110, 20 March 2020), superseding the Appendix 6 NEMA requirements, was also adhered to as results of the DFFE Screening tool indicated that portions of the study area are located within a VERY HIGH SENSITIVITY area, requiring this assessment. This is due to following being highlighted by the DFFE Screening Tool Results:

- Very High CBA: Aquatic rivers
- Very High CBA: Wetlands
- Very High ESA: Important sub catchments
- Very High ESA: Strategic Water Source Area (SWSA)
- Very High ESA: Wetland clusters
- Very High ESA: Wetlands
- Very High FEPA Subcatchment
- Very High Rivers_AB
- Very High Rivers_B
- Very High Rivers_C
- Very High SWSA (Surface Water) _Upper Usutu
- Very High SWSA (Surface Water) _Upper Vaal
- Very High Wetlands_Mesic Highveld Grassland Bioregion (Seep)
- Very High Wetlands_Mesic Highveld Grassland Bioregion (Valley-bottom)
- Very High Wetlands_Mesic (Riverine)
- Very High Wetlands_Mesic Highveld Grassland Bioregion (Depression)
- Very High Wetlands_Mesic Highveld Grassland Bioregion (Floodplain)
- Very High Wetlands_Mesic Highveld Grassland Bioregion (Seep)

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

The study region is further characterised by several National Biodiversity Assessment (2018) Wetland Clusters, National Freshwater Ecosystem Area (NFEPAs), Threatened Ecosystems and Strategic Water Resources Areas.

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

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

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

In terms of the National Freshwater Ecosystems Priority Areas (NFEPA) assessment, all the watercourses within the site have been assigned a condition score of C (Nel et al. 2011), indicating that they are Moderately Modified, but still have biological significance, while the NBA (2018) data indicated that most mainstem system near the WEF, had a River Conservation Score of B (Usuthu) and B on the Vaal River. These scores were substantiated by observations made in the field within the study area, and due to the impacts or disturbance observed these scores would be upheld.

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

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

This report also indicates the significant watercourses and wetlands delineated within the study area, inclusive of the respective buffers. Any activities within these areas and or the 100m (riverine) 500m (wetland) regulated zones will require a Water Use license under Section 21 c & i of the National Water Act (Act 36 of 1998). The respective Water Use Licenses must be finalised once the preferred layout has been determined especially if any access roads will need to cross these areas, but it is advised that any new crossing over watercourses and wetlands areas are avoided.

Using the baseline description, aquatic features were identified, then categorised into one of number pre-determined sensitivity categories to provide protection and/or guide the layout planning processes. The sensitivity ratings of High (No-Go) to Low were determined through an assessment of the habitat sensitivity and related constraints. However, these No-Go areas (with buffers) relate in general terms to the project and there are areas where encroachment on these areas would occur (i.e. existing road crossings within systems) and this is considered acceptable since these areas are already disturbed.

These proposed constraints / buffers do not include bird buffers / constraints as theirs buffers along aquatic features are at times far larger around aquatic features, than those required for the known aquatic species within this region.

Development Component	Habitat type	Sensitivity rating of the respective habitat type against the development type	Buffer distance (m)	Development acceptability	Sensitivity rating override if an impact such as a road or other disturbance already occurs within the proposed footprint and confirmed by the specialist
WTG towers	Channelled Valley Bottom Wetlands	No-Go	105m	No WTGs should be placed in any of these areas, regardless of the state, type and functionality of the respective aquatic ecosystem	None
	Pans and Depressions		95m		
	Rivers and Floodplains		65m		
	Seeps		65m		
	Minor watercourses		35m		
Hardstands, Buildings / Substations & BESS	Channelled Valley Bottom Wetlands	No-Go	105m	None of these types of infrastructure should be placed in any of these areas	None
	Pans and Depressions		95m		
	Rivers and Floodplains		65m		
	Seeps		65m		
	Minor watercourses		35m		
Roads & Underground cables alignment roads	Channelled Valley Bottom Wetlands	High	105m	New roads and underground cables would not be deem appropriate within any of these areas, unless some form of disturbance already occurs, such as an existing track or bridge	Only existing tracks or disturbed areas may be used
	Pans and Depressions		95m		
	Rivers and Floodplains				
	Seeps		65m		
	Minor watercourses		35m		

Development Component	Habitat type	Sensitivity rating of the respective habitat type against the development type	Buffer distance (m)	Development acceptability	Sensitivity rating override if an impact such as a road or other disturbance already occurs within the proposed footprint and confirmed by the specialist
OHL	Channelled Valley Bottom Wetlands	High	105m	OHL towers must be placed outside of these area so that only the cables span these systems. The exception being that Pans & Depression inclusive of buffers must be avoided completely	
	Pans and Depressions		95m		
	Rivers and Floodplains		65m		
	Seeps		65m		
	Minor watercourses		35m		

In summary, any structures such as turbines/towers, crane pads, hardstands, buildings, substations and BESS, have been placed outside of the observed Very High Sensitivity watercourses, while any remaining structures (Roads and transmission lines) could cross or span the other sensitivity areas. Noting Low Sensitivity = Moderate areas but with existing impacts e.g., current roads, farm tracks of previously disturbed areas

The following direct impacts were assessed with regard the aquatic systems in this impact assessment phase based on the assumptions that any of the delineated Very High no-Go sensitivity areas shown in this assessment will either be avoided by the WEF components or spanned by the grid connections, noting that some access roads must cross some of these areas, but should preferably be within previously disturbed areas:

- Impact 1: Loss of habitat containing protected species or Species of Special Concern
- Impact 2: Loss of any critical corridors, important catchment areas and connected habitats that are linked to any Critical Biodiversity Areas or Ecological Support Areas
- Impact 3: The potential spread of alien vegetation
- Impact 4: Loss of riparian and or wetland habitat
- Impact 5: Changes to the hydrological regime and increased potential for erosion
- Impact 6: Changes to water quality
- Impact 7: Cumulative Impacts

During this assessment, several sensitive aquatic habitats were observed and are shown in the maps provided in this report. Noteworthy areas, were then avoided by the required infrastructure, and include the main riverine and wetland systems, while the access roads could will make use of existing roads thus previously disturbed areas.

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

Mitigation should focus on these areas and include measures to halt erosion and rehabilitate habitat in the sections affected by the construction. Without the implementation of mitigation measures, the project has potential to cause a Moderate cumulative impact upon aquatic biodiversity. However, with the adoption of mitigation, the proposed project will have a Low impact upon aquatic biodiversity.

As the proposed activities have the potential to create erosion the following recommendations are reiterated:

- Vegetation clearing should occur in a phased manner in accordance with the construction programme to minimise erosion and/or run-off. Large tracts of bare soil will either cause dust pollution or quickly erode and then cause sedimentation in the lower portions of the catchment, and suitable dust and erosion control mitigation measures should be included in the generic EMPr, if not included already to mitigate.
- All construction materials including fuels and oil should be stored in demarcated areas that are contained within berms / bunds to avoid spread of any contamination / leaks. Washing and cleaning of equipment should also be done in berms or bunds, to trap any cement / hazardous substances and prevent excessive soil erosion. Mechanical plant and bowsers must not be refuelled or serviced within or directly adjacent to any channel. It is therefore suggested that all construction camps, lay down areas, batching plants or areas and any stores should be located more than 50 m from any demarcated watercourses.
- It is also advised that an Environmental Control Officer (ECO), with a good understanding of the local flora be appointed during the construction phase. The ECO should be able to make clear recommendations with regards to the re-vegetation of the newly completed / disturbed areas along aquatic features, using selected species detailed in this report.
- All alien plant re-growth must be monitored and should these alien plants reoccur these plants should be re-eradicated. The scale of the operation does however not warrant the use of a Landscape Architect and / or Landscape Contractor.
- It is further recommended from the project onset that all watercourse areas (inclusive of buffers) are included into any existing EMPr as reference, this to ensure a net benefit to the aquatic environment. This should from part of the suggested walk down as part of the final EMP preparation.

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ACRONYMS

CARA	Conservation of Agricultural Resources Act
CBA	Critical Biodiversity Area
CSIR	Council for Scientific and Industrial Research
DWS	Department of Water and Sanitation formerly the Department of Water Affairs
EIA	Environmental Impact Assessment
EIS	Ecological Importance and Sensitivity
ESA	Ecological Support Area
GIS	Geographic Information System
NFEPA	National Freshwater Ecosystem Priority Atlas (Nel, *et al*. 2011).
PES	Present Ecological State
SANBI	South African National Biodiversity Institute
SQ	Subquaternary catchment
WUL	Water Use License
WULA	Water Use License Application

SPECIALIST REPORT DETAILS

Report prepared by: Dr. Brian Colloty Pr.Sci.Nat. (Ecology) / Member SAEIES.

Expertise / Field of Study: BSc (Hons) Zoology, MSc Botany (Rivers), Ph. D Botany Conservation Importance rating (Estuaries) and interior wetland / riverine assessment consultant from 1996 to present.

I, Dr. Brian Michael Colloty declare that this report has been prepared independently of any influence or prejudice as may be specified by the National Department of Environmental Affairs and or Department of Human Settlement, Water and Sanitation.



Signed: ..... Date:15 August 2025.....

Appendix 1 of this report contains a detailed CV

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1. Introduction

ERM Southern Africa (Pty) Ltd appointed EnviroSci (Pty) Ltd to conduct an aquatic assessment of the proposed Mulilo Amsterdam Wind Energy Facility cluster between Ermelo and Amsterdam in the Mpumalanga Province. This report is focused on assessing the Emvelo Wind Energy Facility and its associated Overhead Line alternative corridors (Figure 1).

This assessment includes delineating any natural waterbodies, as well as assessing the potential consequences of the proposed project – The study area) on the surrounding wetlands and or watercourses. This was based on information collected during various site visits conducted within the region from March 2022 and a site-specific assessment in April & September 2023. Substantiated by the National Wetland Inventory v5.2 spatial data (NWI). Additional site visits were conducted in February 2025, while working in the region to confirm any changes since the initial surveys.

These surveys adhered to the assessment criteria contained in the DWAF 2005 / 2008 delineation manuals and the National Wetland Classification System. This report will inform the Environmental Authorisation process, as well as the required Water Use License Application that will be initiated, once the final project layout is available, i.e. once all the constraints, if any from this and other specialists have been considered in the design process.

The PROTOCOL FOR SPECIALIST ASSESSMENT AND MINIMUM REPORT CONTENT REQUIREMENTS FOR THE ENVIRONMENTAL IMPACTS ON AQUATIC BIODIVERSITY (Government Gazette 43110, 20 March 2020), superseding the Appendix 6 NEMA requirements, was also adhered to as results of the DFFE Screening tool indicated that portions of the study area are located within a VERY HIGH SENSITIVITY area, requiring this assessment. This is due to following being highlighted by the DFFE Screening Tool Results for the WEF study area and OHL assessment corridors:

- Very High CBA: Aquatic rivers
- Very High CBA: Wetlands
- Very High ESA: Important sub catchments
- Very High ESA: Strategic Water Source Area (SWSA)
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- Very High ESA: Wetlands
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- Very High SWSA (Surface Water) _Upper Vaal
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- Very High Wetlands_Mesic (Riverine)
- Very High Wetlands_Mesic Highveld Grassland Bioregion (Depression)
- Very High Wetlands_Mesic Highveld Grassland Bioregion (Floodplain)
- Very High Wetlands_Mesic Highveld Grassland Bioregion (Seep)

Several important national, provincial and municipal scale conservation plans were also reviewed, with the results of those studies being included in this report. Most conservation plans are produced at a high level, so it is therefore important to verify the actual status of the study area during this initial phase, prior to the final layout plan being produced.

1.1 Aims and objectives

The aim of this report is to firstly provide a summary of the aquatic baseline and identify any No-Go areas. The report also makes recommendations with regard to further management and mitigation, to further reduce, avoid or mitigate the potential impacts and ultimately ensure the responsible and sustainable use of South

Africa's aquatic resources. The proposed layout was then assessed with regard the potential impacts and mitigations later in this report.

Certain aspects of the development could trigger the need for Section 21, Water Use License Applications (WULAs) (or general authorisation [GA] applications) such as river crossings or any activities within 500m of a wetland. Once the final layout receives Environmental Authorisation, these applications must then be submitted to the Department of Water and Sanitation (DWS).

Information regarding the state and function of the observed water bodies, including suitable no-go buffers areas is thus also provided. Information with regard to the state and function of the observed water bodies, suitable no-go buffers and assessment of the potential impacts are also provided, but it is the intent that where possible sensitive areas such as the wetlands will be avoided or spanned (OHL).

1.2 Assumptions and Limitation

To obtain a comprehensive understanding of the dynamics of both the flora and fauna of the aquatic communities within a study site, as well as the status of endemic, rare or threatened species in any area, assessments should always consider investigations at different time scales (across seasons/years) and through replication. No baseline long-term monitoring was undertaken as part of this assessment. However, a concerted effort was made to assess as much of the potential site, as well as make use of any available literature, species distribution data and aerial photography. Furthermore, based on the previous assessments undertaken between 2003 and 2023 in the area and this was not foreseen as a huge limiting factor. Detailed site visits conducted within the region from March 2022 and a site-specific assessment in April & September 2023 were also conducted. The level of investigation undertaken is sufficient to inform this assessment. Additional site visits were conducted in February 2025, while working in the region to confirm any changes since the initial surveys.

It should be emphasised that information, as presented in this document, only has reference to the study area as indicated on the accompanying maps. Therefore, this information cannot be applied to any other area without detailed investigation.

For the purposes of this report, it is assumed that any existing roads and tracks will be used, while structures will be placed outside the wetlands and or watercourses. A further assumption is that water will be sourced from a licensed resource and not illegally abstracted from any surrounding watercourses, particularly if dust suppression is required for example at the laydown areas or along main / district roads.

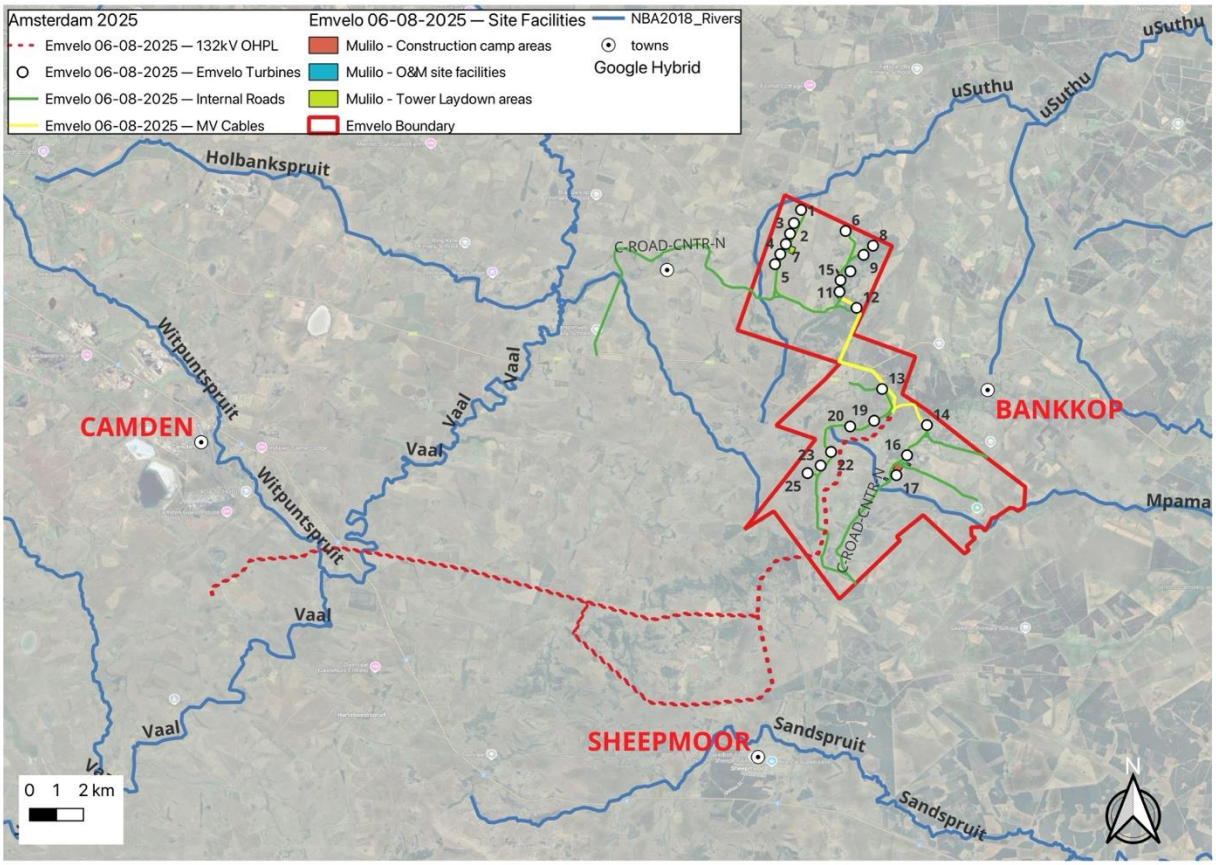


Figure 1: The proposed Wind Energy Facility (WEF) site boundaries, possible infrastructure layout (excluding hardstand and crane pads) and the potential OHL alignment

2. Terms of Reference

The proposed methods used in this assessment have been developed with the renewable industry in mind, coupled to the minimum requirements stipulated by DFFE and the Department of Water and Sanitation. These have been successful in assessing the direct, indirect and cumulative impacts of ca 200 renewable energy projects (2010 – 2023), of which 28 have been constructed:

- Desktop analysis
- Site investigation
- Compilation of one draft and one final site screening / sensitivity report for the project which adheres to the following (this list is not exhaustive):
    - The Initial Site Sensitivity Verification reporting requirements for environmental themes set out in Government Gazette No. 43110 which was promulgated on 20 March 2020 in terms of section 24(5)(a) and (h) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA).
    - Identification and mapping of any discrepancies with the environmental sensitivity as identified on the national web based environmental screening tool.
    - Identification of sensitive areas to be avoided (including corresponding spatial data) and the determination of the respective buffers (if applicable) for each site.
    - Initial recommendations for the layout and allowable development footprint from a surface water and aquatic biodiversity perspective (including corresponding spatial data).
    - Recommendations regarding the areas to be utilised for solar technologies within the project site from a surface water and aquatic biodiversity perspective (including corresponding spatial data)
- Assess the potential impacts, based on a supplied methodology, including cumulative impacts and for pre-construction, construction, operations and decommissioning phases.

- Provide mitigations regarding project related impacts, including engineering services that could negatively affect demarcated wetland areas.
- Supply the client with geo-referenced GIS shape files of the wetland / riverine areas.
- Provide one draft report for comment, with a maximum of two rounds of comments addressed per project phase (max of 2).

3. Project Description

The following information was provided by the client:

Emvelo WEF is proposed to comprise up to 45 turbines with a maximum output capacity of up to 200 MW. The WEF will be located on nineteen (19) land parcels and will have an anticipated lifespan of 20 – 25 years. The final design which will be requested for approval in the EA, will be determined based on the outcome of the specialist studies undertaken for the EIA phase of the development. The proposed turbine footprints and associated facility infrastructure will cover an area of up to 180 ha after rehabilitation, depending on final layout design.

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

Emvelo WEF			
Landowner	Farm Name	Farm No.	Portion No.
DC Geldenhuys Family Trust	Remainder of the Farm Schiedam No. 274	274	RE
Randell's Ranch Trust (Philip Randall)	Portion 2 of the Farm Schiedam No. 274	274	2
Antonette Swart	Remainder Portion 1 of the Farm Schiedam No. 274	274	1
Henry Goodwin Geldenhuys	Portion 6 of the Farm Schiedam No. 274	274	6
Loufried Testamentere Trust	Portion 5 of the Farm Schiedam No. 274	274	5
Josef & Merinda Loraine Benjamin van Tonder	Remaining Extent Ptn 1 of the Farm Vaalbank No. 285	285	1
Josef & Merinda Loraine Benjamin van Tonder	Portion 5 of the Farm Vaalbank No. 285	285	5
Johan Saaiman Trust	Portion 9 of the Farm Waaihoek No. 286	286	9
Johannes Stephanus Roberts	Remainder Portion 2 of the Farm Waaihoek No. 286	286	2
Johannes Stephanus Roberts	Remainder Portion 6 of the Farm Waaihoek No. 286	286	6
Johannes Stephanus Roberts	Remainder Portion 13 of the Farm Waaihoek No. 286	286	13
JMJ Trust	Portion 7 of the Farm Waaihoek No. 286	286	7
JMJ Trust	Portion 10 of the Farm Waaihoek No. 286	286	10
JMJ Trust	Portion 5 of the Farm Waaihoek No. 286	286	5
Josua Meyer Trust	Waaihoek	286	14
Josua Meyer Trust	Waaihoek	286	3

Emvelo WEF			
Landowner	Farm Name	Farm No.	Portion No.
Josua Meyer Trust	Waaihoek	286	12
NWJ Vorster Trust	Remaining Extent of the Farm Klipfontein No. 283	283	RE
Josua Meyer Trust	Bosjesspruit	291	7
Emvelo WEF Grid Connection			
Randell's Ranch Trust (Philip Randall)	Schiedam	274	2
National Government - of the Republic of South Africa	Onverwacht	273	1
Shammah Trust	Portion 7 of the Farm Onverwacht No. 273	273	7
Harrob Beleggings Pty Ltd (Jan Roberts)	Portion 8 of the Farm Onverwacht No. 273	273	8
Harrob Beleggings Pty Ltd (Jan Roberts)	Portion 3 of the Farm Onverwacht No. 287	287	3
Van Der Merwe Broers Trust	Portion 9 of the Farm Zwartwater No. 288	288	9
Merwe Johannes Jacobus Van Der	Portion 10 of the Farm Zwartwater No. 288	288	10
Kansvat Beleggings Pty Ltd	Zwartwater	288	2
National Government of SA	Zwartwater	288	1
Dream World Inv 450 Pty Ltd	Weltevreden	289	10
Dream World Inv 450 Pty Ltd	Weltevreden	289	11
Dream World Inv 450 Pty Ltd	Weltevreden	289	6
Van Der Merwe Broers Trust	Weltevreden	289	RE/3
National Government of SA	Witpunt	267	RE/7
National Government of SA	Mooiplaats	290	7
National Government of SA	Mooiplaats	290	8
Kayipheli Trust	Witpunt	267	29
Eskom Holdings Ltd	Camden Power Station	329	RE

4. Methodology

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

Current water resource classification systems make use of the Hydrogeomorphic (HGM) approach, and for this reason, the National Wetland Classification System (NWCS) approach will be used in this study. It is also important to understand wetland definition, means of assessing wetland conservation and importance as well as understanding the pertinent legislation with regards to protecting wetlands. These aspects will be discussed in greater depth in this section of the report, as they form the basis of the study approach to assessing wetland impacts.

4.1 Waterbody classification systems

Since the late 1960's, wetland classification systems have undergone a series of international and national revisions. These revisions allowed for the inclusion of additional wetland types, ecological and conservation rating metrics, together with a need for a system that would allude to the functional requirements of any given wetland (Ewart-Smith *et al*., 2006). Wetland function is a consequence of biotic and abiotic factors, and wetland classification should strive to capture these aspects. Coupled to this was the inclusion of other criteria within the classification systems to differentiate between river, riparian and wetland systems, as well as natural versus artificial waterbodies.

The South African National Biodiversity Institute (SANBI) in collaboration with several specialists and stakeholders developed the newly revised and now accepted National Wetland Classification Systems (NWCS) (Ollis *et al*., 2013). This system comprises a hierarchical classification process of defining a wetland based on the principles of the hydrogeomorphic (HGM) approach at higher levels, with including structural features at the finer or lower levels of classification (Ollis *et al*., 2013).

Wetlands develop in a response to elevated water tables, linked either to rivers, groundwater flows or seepage from aquifers (Parsons, 2004). These water levels or flows then interact with localised geology and soil forms, which then determines the form and function of the respective wetlands. Water is thus the common driving force, in the formation of wetlands (DWAF, 2005). It is significant that the HGM approach has now been included in the wetland classifications as the HGM approach has been adopted throughout the water resources management realm with regards to the determination of the Present Ecological State (PES) and Ecological Importance and Sensitivity (EIS) and WET-Health assessments for aquatic environments. All these systems are then easily integrated using the HGM approach in line with the Eco-classification process of river and wetland reserve determinations used by the Department of Human Settlement, Water and Sanitation (DHSWS). The Ecological Reserve of a wetland or river is used by DHSWS to assess the water resource allocations when assessing WULAs.

The National Wetland Classification System process is provided in more detail in the methods section of the report, but some of the terms and definitions used in this document are presented below:

Definition Box

Present Ecological State is a term for the current ecological condition of the resource. This is assessed relative to the deviation from the Reference State. Reference State/Condition is the natural or pre-impacted condition of the system. The reference state is not a static condition but refers to the natural dynamics (range and rates of change or flux) prior to development. The PES is determined per component - for rivers and wetlands this would be for the drivers: flow, water quality and geomorphology; and the biotic response indicators: fish, macroinvertebrates, riparian vegetation and diatoms. PES categories for every component would be integrated into an overall PES for the river reach or wetland being investigated. This integrated PES is called the EcoStatus of the reach or wetland.

EcoStatus is the overall PES or current state of the resource. It represents the totality of the features and characteristics of a river and its riparian areas or wetland that bear upon its ability to support an appropriate natural flora and fauna and its capacity to provide a variety of goods and services. The EcoStatus value is an integrated ecological state made up of a combination of various PES findings from component EcoStatus assessments (such as for invertebrates, fish, riparian vegetation, geomorphology, hydrology and water quality).

Reserve: The quantity and quality of water needed to sustain basic *human needs* and *ecosystems* (e.g. estuaries, rivers, lakes, groundwater and wetlands) to ensure ecologically sustainable development and utilisation of a water resource. The *Ecological Reserve* pertains specifically to aquatic ecosystems.

Reserve requirements: The quality, quantity and reliability of water needed to satisfy the requirements of basic human needs and the Ecological Reserve (inclusive of instream requirements).

Ecological Reserve determination study: The study undertaken to determine Ecological Reserve requirements.

Licensing applications: Water users are required (by legislation) to apply for licenses prior to extracting water resources from a water catchment.

Ecological Water Requirements: This is the quality and quantity of water flowing through a natural stream course that is needed to sustain instream functions and ecosystem integrity at an acceptable level as determined during an EWR study. These then form part of the conditions for managing achievable water quantity and quality conditions as stipulated in the Reserve Template

Water allocation process (compulsory licensing): This is a process where all existing and new water users are requested to reapply for their licenses, particularly in stressed catchments where there is an over-allocation of water or an inequitable distribution of entitlements.

Ecoregions are geographic regions that have been delineated in a top-down manner on the basis of physical/abiotic factors. • NOTE: For purposes of the classification system, the 'Level I Ecoregions' for South Africa, Lesotho and Swaziland (Kleynhans *et al.* 2005), which have been specifically developed by the Department of Water Affairs & Forestry (DWAF) for rivers but are used for the management of inland aquatic ecosystems more generally, are applied at Level 2A of the classification system. These Ecoregions are based on physiography, climate, geology, soils and potential natural vegetation.

4.2 Wetland definition

Although the National Wetland Classification System (NWCS) (Ollis *et al*., 2013) is used to classify wetland types, it is still necessary to understand the definition of a wetland. Terminology currently strives to characterise a wetland not only on its structure (visible form), but also to relate this to the function and value of any given wetland.

The Ramsar Convention definition of a wetland is widely accepted as "areas of marsh, fen, peatland or water, whether natural or artificial, permanent or temporary, with water that is static or flowing, fresh, brackish or salt, including areas of marine water the depth of which at low tide does not exceed six metres" (Davis 1994). South Africa is a signatory to the Ramsar Convention and therefore its extremely broad definition of wetlands has been adopted for the proposed NWCS, with a few modifications.

Whereas the Ramsar Convention included marine water to a depth of six metres, the definition used for the NWCS extends to a depth of ten metres at low tide, as this is recognised as the seaward boundary of the shallow photic zone (Lombard et al., 2005). An additional minor adaptation of the definition is the removal of the term

'fen' as fens are considered a type of peatland. The adapted definition for the NWCS is, therefore, as follows (Ollis *et al*., 2013):

WETLAND: an area of marsh, peatland or water, whether natural or artificial, permanent or temporary, with water that is static or flowing, fresh, brackish or salt, including areas of marine water the depth of which at low tide does not exceed ten metres.

This definition encompasses all ecosystems characterised by the permanent or periodic presence of water other than marine waters deeper than ten metres. The only legislated definition of wetlands in South Africa, however, is contained within the National Water Act (Act No. 36 of 1998) (NWA), where wetlands are defined as "land which is transitional between terrestrial and aquatic systems, where the water table is usually at, or near the surface, or the land is periodically covered with shallow water and which land in normal circumstances supports, or would support, vegetation adapted to life in saturated soil." This definition is consistent with more precise working definitions of wetlands and therefore includes only a subset of ecosystems encapsulated in the Ramsar definition. It should be noted that the NWA definition is not concerned with marine systems and clearly distinguishes wetlands from estuaries, classifying the latter as a watercourse (Ollis *et al*., 2013). Table 1 below provides a comparison of the various wetlands included within the main sources of wetland definitions used in South Africa.

Although a subset of Ramsar-defined wetlands was used as a starting point for the compilation of the first version of the National Wetland Inventory (i.e. "wetlands", as defined by the NWA, together with open waterbodies), it is understood that subsequent versions of the Inventory include the full suite of Ramsar-defined wetlands in order to ensure that South Africa meets its wetland inventory obligations as a signatory to the Convention (Ollis *et al.*, 2013).

Wetlands must therefore have one or more of the following attributes to meet the above definition (DWAF, 2005):

- A high-water table that results in the saturation at or near the surface, leading to anaerobic conditions developing in the top 50 cm of the soil.
- Wetland or hydromorphic soils that display characteristics resulting from prolonged saturation, i.e. mottling or grey soils
- The presence of, at least occasionally, hydrophilic plants, i.e. hydrophytes (water loving plants).

It should be noted that riparian systems that are not permanently or periodically inundated are not considered true wetlands, i.e. those associated with the drainage lines and rivers.

Table 1: Comparison of ecosystems considered to be 'wetlands' as defined by the proposed NWCS, the NWA and ecosystems included in DWAF's (2005) delineation manual.

Ecosystem	NWCS "wetland"	National Water Act wetland	DWAF (2005) delineation manual
Marine	YES	NO	NO
Estuarine	YES	NO	NO
Waterbodies deeper than 2 m (i.e. limnetic habitats often described as lakes or dams)	YES	NO	NO
Rivers, channels and canals	YES	NO[1]	NO
Inland aquatic ecosystems that are not river channels and are less than 2 m deep	YES	YES	YES
Riparian[2] areas that are permanently / periodically inundated or saturated with water within 50 cm of the surface	YES	YES	YES[3]
Riparian [3] areas that are not permanently / periodically inundated or saturated with water within 50 cm of the surface	NO	NO	YES[3]

[1] Although river channels and canals would generally not be regarded as wetlands in terms of the National Water Act, they are included as a 'watercourse' in terms of the Act

[2] According to the National Water Act and Ramsar, riparian areas are those areas that are saturated or flooded for prolonged periods and would be considered riparian wetlands, as opposed to non –wetland riparian areas that are only periodically inundated and the riparian vegetation persists due to having deep root systems drawing on water many meters below the surface.

[3] The delineation of 'riparian areas' (including both wetland and non-wetland components) is treated separately to the delineation of wetlands in DWAF's (2005) delineation manual.

4.3 National Wetland Classification System method

During this study, due to the nature of the wetlands and watercourses observed, it was determined that the newly accepted NWCS be adopted. This classification approach has integrated aspects of the HGM approach used in the WET-Health system as well as the widely accepted eco-classification approach used for rivers.

The NWCS (Ollis *et al*., 2013) as stated previously, uses hydrological and geomorphological traits to distinguish the primary wetland units, i.e. direct factors that influence wetland function. Other wetland assessment techniques, such as the DWAF (2005) delineation method, only infer wetland function based on abiotic and biotic descriptors (size, soils & vegetation) stemming from the Cowardin approach (Ollis *et al.,* 2013).

The classification system used in this study is thus based on Ollis *et al*. (2013) and is summarised below:

The NWCS has a six-tiered hierarchical structure, with four spatially nested primary levels of classification (Figure 2). The hierarchical system firstly distinguishes between Marine, Estuarine and Inland ecosystems (Level 1), based on the degree of connectivity the particular system has with the open ocean (greater than 10 m in depth). Level 2 then categorises the regional wetland setting using a combination of biophysical attributes at the landscape level, which operate at a broad bioregional scale.

This is opposed to specific attributes such as soils and vegetation. Level 2 has adopted the following systems:

- Inshore bioregions (marine)
- Biogeographic zones (estuaries)
- Ecoregions (Inland)

Level 3 of the NWCS assess the topographical position of inland wetlands as this factor broadly defines certain hydrological characteristics of the inland systems. Four landscape units based on topographical position are used in distinguishing between Inland systems at this level. No subsystems are recognised for Marine systems, but estuaries are grouped according to their periodicity of connection with the marine environment, as this would affect the biotic characteristics of the estuary.

Level 4 classifies the hydrogeomorphic (HGM) units discussed earlier. The HGM units are defined as follows:

- Landform – shape and localised setting of wetland
- Hydrological characteristics – nature of water movement into, through and out of the wetland
- Hydrodynamics – the direction and strength of flow through the wetland

These factors characterise the geomorphological processes within the wetland, such as erosion and deposition, as well as the biogeochemical processes.

Level 5 of the assessment pertains to the classification of the tidal regime within the marine and estuarine environments, while the hydrological and inundation depth classes are determined for inland wetlands. Classes are based on frequency and depth of inundation, which are used to determine the functional unit of the wetlands and are considered secondary discriminators within the NWCS.

Level 6 uses six descriptors to characterise the wetland types based on biophysical features. As with Level 5, these are non-hierarchal in relation to each other and are applied in any order, dependent on the availability of information. The descriptors include:

- Geology;
- Natural vs. Artificial;
- Vegetation cover type;
- Substratum;
- Salinity; and
- Acidity or Alkalinity.

It should be noted that where sub-categories exist within the above descriptors, hierarchical systems are employed, and these are thus nested in relation to each other.

The HGM unit (Level 4) is the focal point of the NWCS, with the upper levels (Figure 3 – Inland systems only) providing means to classify the broad bio-geographical context for grouping functional wetland units at the HGM level, while the lower levels provide more descriptive detail on the particular wetland type characteristics of a particular HGM unit. Therefore Level 1 – 5 deals with functional aspects, while Level 6 classifies wetlands on structural aspects.

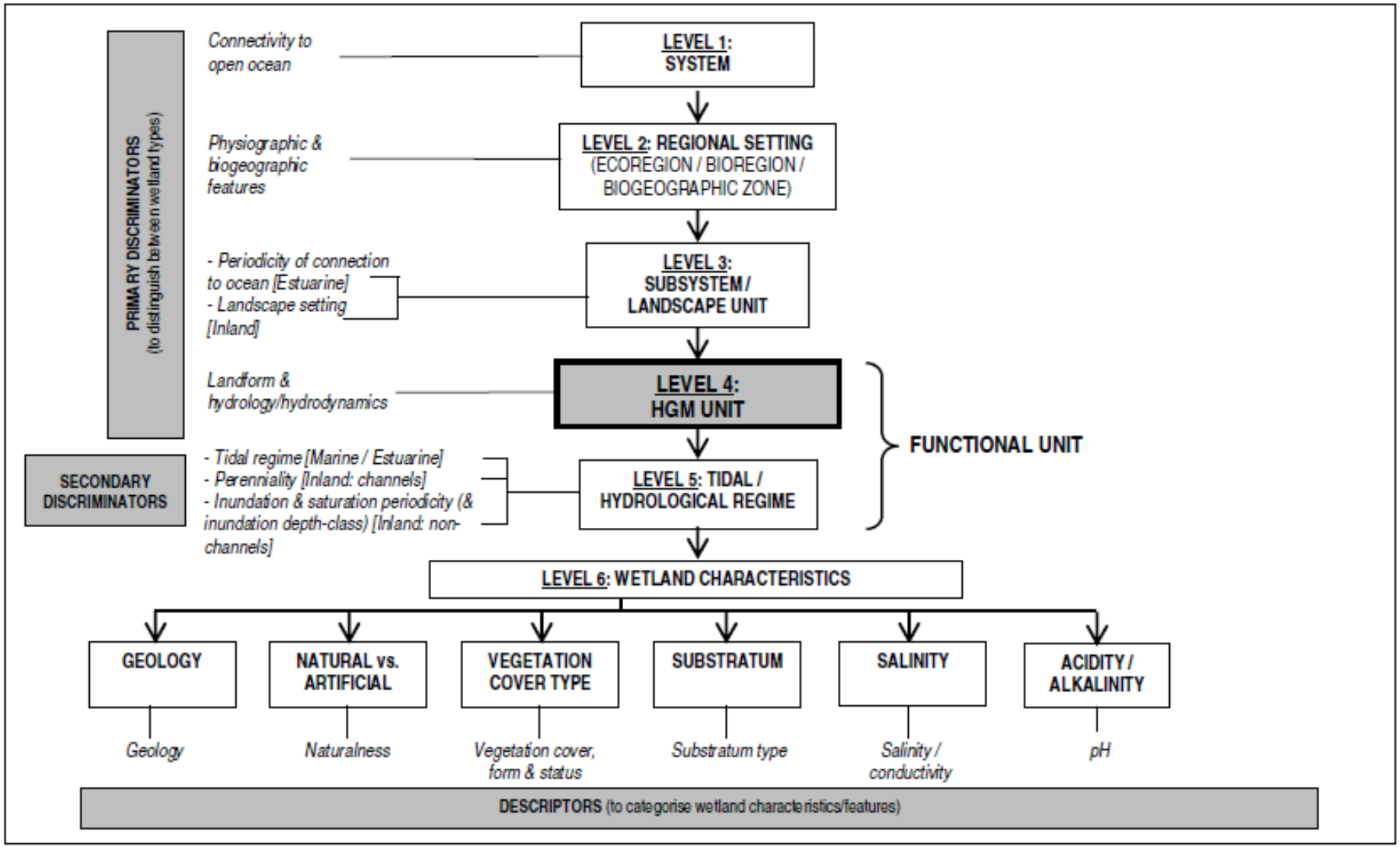


Figure 2: Basic structure of the NWCS, showing how 'primary discriminators' are applied up to Level 4 to classify Hydrogeomorphic (HGM) Units, with 'secondary discriminators' applied at Level 5 to classify the tidal/hydrological regime, and 'descriptors' applied at Level 6 to categorise the characteristics of wetlands classified up to Level 5 (From Ollis *et al*., 2013).

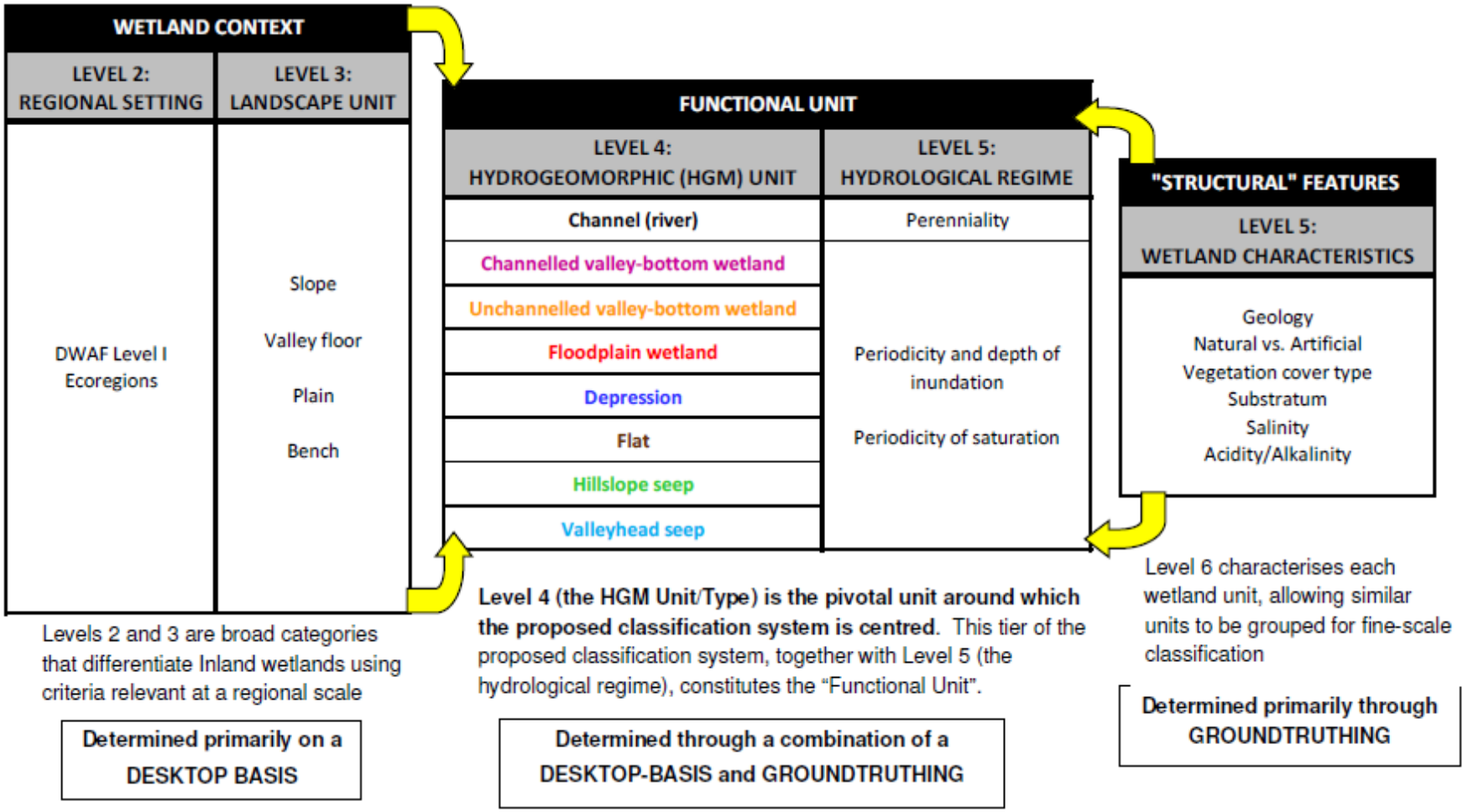


Figure 3: Illustration of the conceptual relationship of HGM Units (at Level 4) with higher and lower levels (relative sizes of the boxes show the increasing spatial resolution and level of detail from the higher to the lower levels) for Inland Systems (from Ollis *et al*., 2013).

4.4 Waterbody condition

To assess the PES or condition of the observed wetlands, a modified Wetland Index of Habitat Integrity (DWAF, 2007) was used. The Wetland Index of Habitat Integrity (WETLAND-IHI) is a tool developed for use in the National Aquatic Ecosystem Health Monitoring Programme (NAEHMP), formerly known as the River Health Programme (RHP). The output scores from the WETLAND-IHI model are presented in the standard DWAF A-F ecological categories (Table 2) and provide a score of the PES of the habitat integrity of the wetland system being examined. The author has included additional criteria into the model-based system to include additional wetland types. This system is preferred when compared to systems such as WET-Health – wetland management series (WRC 2009), as WET-Health (Level 1) was developed with wetland rehabilitation in mind and is not always suitable for impact assessments. This coupled with the degraded state of the wetlands in the study area, indicated that a complex study approach was not warranted, i.e. conduct a Wet-Health Level 2 and WET-Ecosystems Services study required for an impact assessment.

Table 2: Description of A – F ecological categories based on Kleynhans *et al*., (2005)

ECOLOGICAL CATEGORY	ECOLOGICAL DESCRIPTION	MANAGEMENT PERSPECTIVE
A	Unmodified, natural.	Protected systems; relatively untouched by human hands; no discharges or impoundments allowed
B	Largely natural with few modifications. A small change in natural habitats and biota may have taken place but the ecosystem functions are essentially unchanged.	Some human-related disturbance, but mostly of low impact potential
C	Moderately modified. Loss and change of natural habitat and biota have occurred, but the basic ecosystem functions are still predominantly unchanged.	Multiple disturbances associated with need for socio-economic development, e.g. impoundment, habitat modification and water quality degradation
D	Largely modified. A large loss of natural habitat, biota and basic ecosystem functions has occurred.	
E	Seriously modified. The loss of natural habitat, biota and basic ecosystem functions is extensive.	Often characterized by high human densities or extensive resource exploitation. Management intervention is needed to improve health, e.g. to restore flow patterns, river habitats or water quality
F	Critically / Extremely modified. Modifications have reached a critical level and the system has been modified completely with an almost complete loss of natural habitat and biota. In the worst instances the basic ecosystem functions have been destroyed and the changes are irreversible.	

The WETLAND-IHI model is composed of four modules. The "Hydrology", "Geomorphology" and "Water Quality" modules all assess the contemporary driving processes behind wetland formation and maintenance. The last module, "Vegetation Alteration", provides an indication of the intensity of human land use activities on the wetland surface itself and how these may have modified the condition of the wetland. The integration of the scores from these 4 modules provides an overall PES score for the wetland system being examined. The WETLAND-IHI model is an MS Excel-based model, and the data required for the assessment are generated during a site visit.

Additional data may be obtained from remotely sensed imagery (aerial photos; maps and/or satellite imagery) to assist with the assessment. The interface of the WETLAND-IHI has been developed in a format which is similar to DWA's River EcoStatus models which are currently used for the assessment of PES in riverine environments.

4.5 Aquatic ecosystem importance and function

South Africa is a Contracting Party to the Ramsar Convention on Wetlands, signed in Ramsar, Iran, in 1971, and has thus committed itself to this intergovernmental treaty, which provides the framework for the national protection of wetlands and the resources they could provide. Wetland conservation is now driven by the South African National Biodiversity Institute, a requirement under the National Environmental Management: Biodiversity Act (No 10 of 2004).

Wetlands are among the most valuable and productive ecosystems on earth, providing important opportunities for sustainable development (Davies and Day, 1998). However, wetlands in South Africa are still rapidly being lost or degraded through direct human induced pressures (Nel *et al.,* 2004).

The most common attributes or goods and services provided by wetlands include:

- Improve water quality;
- Impede flow and reduce the occurrence of floods;
- Reeds and sedges used in construction and traditional crafts;
- Bulbs and tubers, a source of food and natural medicine;
- Store water and maintain base flow of rivers;
- Trap sediments; and
- Reduce the number of water-borne diseases.

In terms of this study, the wetlands provide ecological (environmental) value to the area acting as refugia for various wetland associated plants, butterflies and birds.

In the past wetland conservation has focused on biodiversity as a means of substantiating the protection of wetland habitat. However not all wetlands provide such motivation for their protection, thus wetland managers and conservationists began assessing the importance of wetland function within an ecosystem.

Table 3 below summarises the importance of wetland function when related to ecosystem services or ecoservices (Kotze *et al*., 2008). One such example is emergent reed bed wetlands that function as transformers converting inorganic nutrients into organic compounds (Mitsch and Gosselink, 2000).

Table 3: Summary of direct and indirect ecoservices provided by wetlands from Kotze *et al*., 2008

Ecosystem services supplied by wetlands	Indirect benefits	Hydro-geochemical benefits		Flood attenuation
				Stream flow regulation
			Water quality enhancement benefits	Sediment trapping
				Phosphate assimilation
				Nitrate assimilation
				Toxicant assimilation
				Erosion control
				Carbon storage
		Biodiversity maintenance		
	Direct benefits	*Provision of water for human use*		
		Provision of harvestable resources[2]		
		Provision of cultivated foods		
		Cultural significance		
		Tourism and recreation		
		Education and research		

Conservation importance of the individual wetlands was based on the following criteria:

- Habitat uniqueness;
- Species of conservation concern;
- Habitat fragmentation or rather, continuity or intactness with regards to ecological corridors; and
- Ecosystem service (social and ecological).

The presence of any or a combination of the above criteria would result in a HIGH conservation rating if the wetland was found in a near natural state (high PES). Should any of the habitats be found modified the conservation importance would rate as MEDIUM, unless a Species of Conservation Concern (SCC) was observed, in which case it would receive a HIGH rating. Any system that was highly modified (low PES) or had none of the above criteria, received a LOW conservation importance rating. Wetlands with HIGH and MEDIUM ratings should thus be excluded from development with incorporation into a suitable open space system, with the maximum possible buffer being applied. Natural wetlands or Wetlands that resemble some form of the past landscape but receive a LOW conservation importance rating could be included into stormwater management features and should not be developed to retain the function of any ecological corridors.

4.6 Relevant wetland legislation and policy

Locally the South African Constitution, seven (7) Acts and two (2) international treaties allow for the protection of wetlands and rivers. These systems are protected from destruction or pollution by the following:

- Section 24 of The Constitution of the Republic of South Africa, 1996;
- Agenda 21 – Action plan for sustainable development of the Department of Environmental Affairs and Tourism (DEAT) 1998;
- The Ramsar Convention, 1971 including the Wetland Conservation Programme (DEAT) and the National Wetland Rehabilitation Initiative (DEAT, 2000);
- National Environmental Management Act (NEMA), 1998 (Act No. 107 of 1998) inclusive of all amendments, as well as the NEM: Biodiversity Act;
- National Water Act, 1998 (Act No. 36 of 1998);
- Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983); and
- Minerals and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002).
- Nature and Environmental Conservation Ordinance, 1974 (No. 19 of 1974)
- National Forest Act, 1998 (No. 84 of 1998)
- National Heritage Resources Act, 1999 (No. 25 of 1999)

NEMA and the Conservation of Agricultural Resources Act (CARA), 1983 (Act No. 43 of 1983) would also apply to this project. These Acts have categorised many invasive plants together with associated obligations on the landowner.

4.7 Provincial legislation and policy

Currently riverine and wetland buffers distances are calculated using the model described by Macfarlane *&* Bredin (2017). Site specific information was collected during the visit and is used to determine site and development specific range of buffers. In short, the buffer distances are based on the current condition of the waterbody, the state of the remainder of the site, the potential impacts posed by the type and scale of the of development, as wells as the proposed alteration of hydrological flows. The model also takes cognisance of the level of mitigation possible, coupled to the reversibility of the impacts. Based then on the information known for the site the buffer model provided the following:

Channelled Valley Bottom Wetlands	65m
Pans and Depressions	105m
Rivers and Floodplains	95m
Seeps	65m
Minor watercourses	35m

Artificial dams were not buffered.

5. Description of the affected environment

This baseline description was a summer and winter survey of the study area that spanned a total of two weeks and conducted in February / March 2022 (late summer) and a site-specific assessment in April (Autumn) & September (Later winter) 2023. Additional site visits were conducted in February 2025, while working in the region to confirm any changes since the initial surveys.

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

- Mainstem Rivers: Floodplain dominated systems with floodplain wetlands (Plate 1). A few reaches did contain very narrow riparian zones, consisting mostly of a single row of willow trees associated with the Vaal River
- Valley Bottom Wetlands (Channelled and Unchanneled) (Plate 2)
- Endorheic pans (Plate 3)
- Seep wetlands (Plate 4)

The proposed Wind Energy Facility (WEF) is located in the Inkomati-Usuthu Water Management Area, within the upper catchment of the Usuthu River (SQ W54A) and Mpama Rivers (SQ W53B), while the proposed grid connection options are located in the Upper Vaal River (SQ C11B) in the Vaal Water Management Area (Figure 4). Thus, several permanent rivers and a variety of wetland hydrogeomorphic types are anticipated both associated with the riverine valleys and bench or plateaux areas located between river valleys on higher lying areas (Figure 5).

The study region is further characterised by several National Biodiversity Assessment (2018) Wetland Clusters, National Freshwater Ecosystem Area (NFEPAs) and Strategic Water Resources Areas (Figure 6)

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

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

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

In terms of the National Freshwater Ecosystems Priority Areas (NFEPA) assessment, all the watercourses within the site have been assigned a condition score of C (Nel et al. 2011), indicating that they are Moderately Modified, but still have biological significance, while the NBA (2018) data indicated that most mainstem system near the WEF, had a River Conservation Score of B (Usuthu) and B on the Vaal River. These scores were substantiated by observations made in the field within the study area, and due to the impacts or disturbance observed these scores would be upheld.

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

The National Freshwater Ecosystems Priority Areas (NFEPA) (Nel *et al*., 2011), also earmarked sub-quaternaries, based either on the presence of important biota (e.g. rare or endemic fish species) or conversely the degree of riverine degradation, i.e. the greater the catchment degradation the lower the priority to conserve the catchment. The important catchments areas are then classified as Freshwater Ecosystems Priority Areas (FEPAs).

The study area falls within several FEPA and Upstream FEPA catchments associated with the Usuthu & Vaal river systems. This is large due to the presence of several important fish and aquatic invertebrate habitats that as well as the provision and maintenance of flows within the lower catchments.

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

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

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

Plant Taxon	Conservation Status
Agrostis continuata Stapf	Not evaluated
Andropogon eucomus Nees	Least concern
Andropogon lacunosus J.G.Anderson	Least concern
Arundinella nepalensis Trin.	Not evaluated
Berula thunbergii (DC.) H.Wolff	Least concern
Brachiaria bovonei (Chiov.) Robyns	Least concern
Carex rhodesiaca Nelmes	Least concern
Chironia purpurascens (E.Mey.) Benth. & Hook.fil.	Least concern
Crinum bulbispermum (Burm.f.) Milne-Redh. & Schweick.	Least concern
Cyperus denudatus L.f.	Least concern
Cyperus macranthus Boeckeler	Not evaluated
Cyperus melanospermus (Nees) Valck.Sur.	Not evaluated
Cyperus nitidus Lam.	Not evaluated
Denekia capensis Thunb.	Not evaluated
Drosera collinsae N.E.Br. ex BurttDavy	Least concern
Echinochloa jubata Stapf	Least concern
Eleocharis dregeana Steud.	Least concern
Eleocharis limosa (Schrad.) Schult.	Least concern
Festuca caprina Nees	Not evaluated
Fimbristylis complanata (Retz.) Link	Least concern
Fuirena pubescens (Poir.) Kunth	Least concern
Geranium multisectum N.E.Br.	Least concern
Geranium wakkerstroomianum R.Knuth	Least concern
Gladiolus papilio Hook.f.	Not evaluated
Gunnera perpensa L.	Least concern
Hesperantha hygrophila Hilliard & B.L.Burtt	Least concern
Isolepis costata Hochst. ex A.Rich.	Not evaluated
Juncus effusus L.	Least concern
Juncus oxycarpus E.Mey. ex Kunth	Least concern
Lagarosiphon muscoides Harv.	Least concern

Leersia hexandra Sw.	Least concern
Limosella major Diels	Least concern
Miscanthus junceus (Stapf) Pilg.	Least concern
Nymphoides thunbergiana (Griseb.) Kuntze	Least concern
Odontelytrum abyssinicum Hack.	Least concern
Ornithogalum flexuosum (Thunb.) U.Müll.-Doblies & D.Müll.-Doblies	Not evaluated
Pennisetum macrourum Trin.	Least concern
Persicaria decipiens (R.Br.) K.L.Wilson	Least concern
Persicaria madagascariensis (Meisn.) S.Ortiz & Paiva	Not evaluated
Pterygodium nigrescens (Sond.) Schltr.	Least concern
Ranunculus multifidus Forssk.	Least concern
Rhynchospora brownii Roem. & Schult.	Least concern
Rorippa nudiuscula (E.Mey. ex Sond.) Thell.	Least concern
Sacciolepis typhura (Stapf) Stapf	Least concern
Schoenoplectus muriculatus (Kük.) Browning	Not evaluated
Schoenoplectus paludicola (Kunth) J.Raynal, 1976	Least concern
Typha capensis (Rohrb.) N.E.Br.	Not evaluated
Veronica anagallis-aquatica L.	Not evaluated
Xyris gerrardii N.E.Br.	Least concern

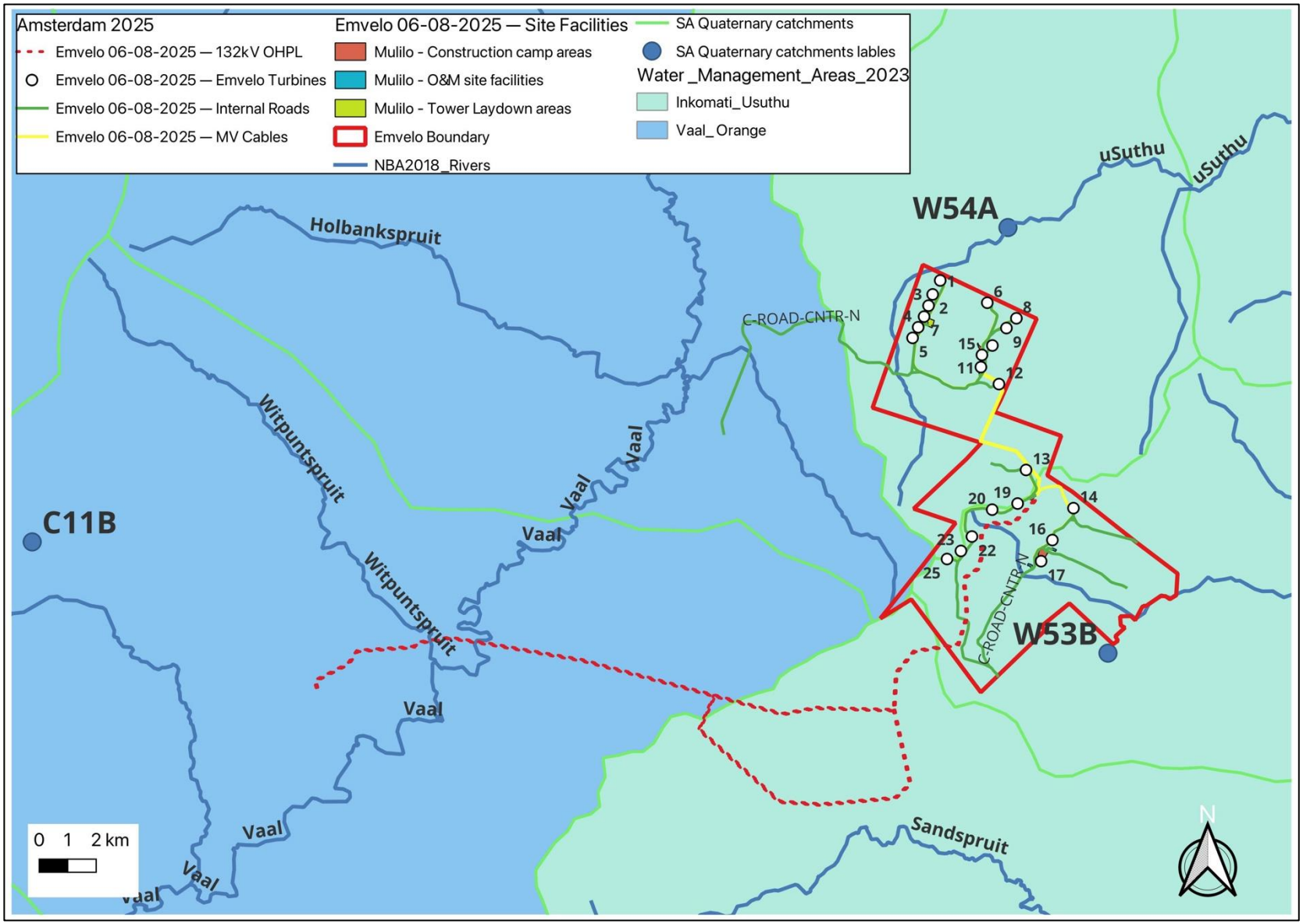


Figure 4: Project locality map indicating the various quaternary catchment boundaries (white lines) in relation to the study area (Source DWS and NGI).

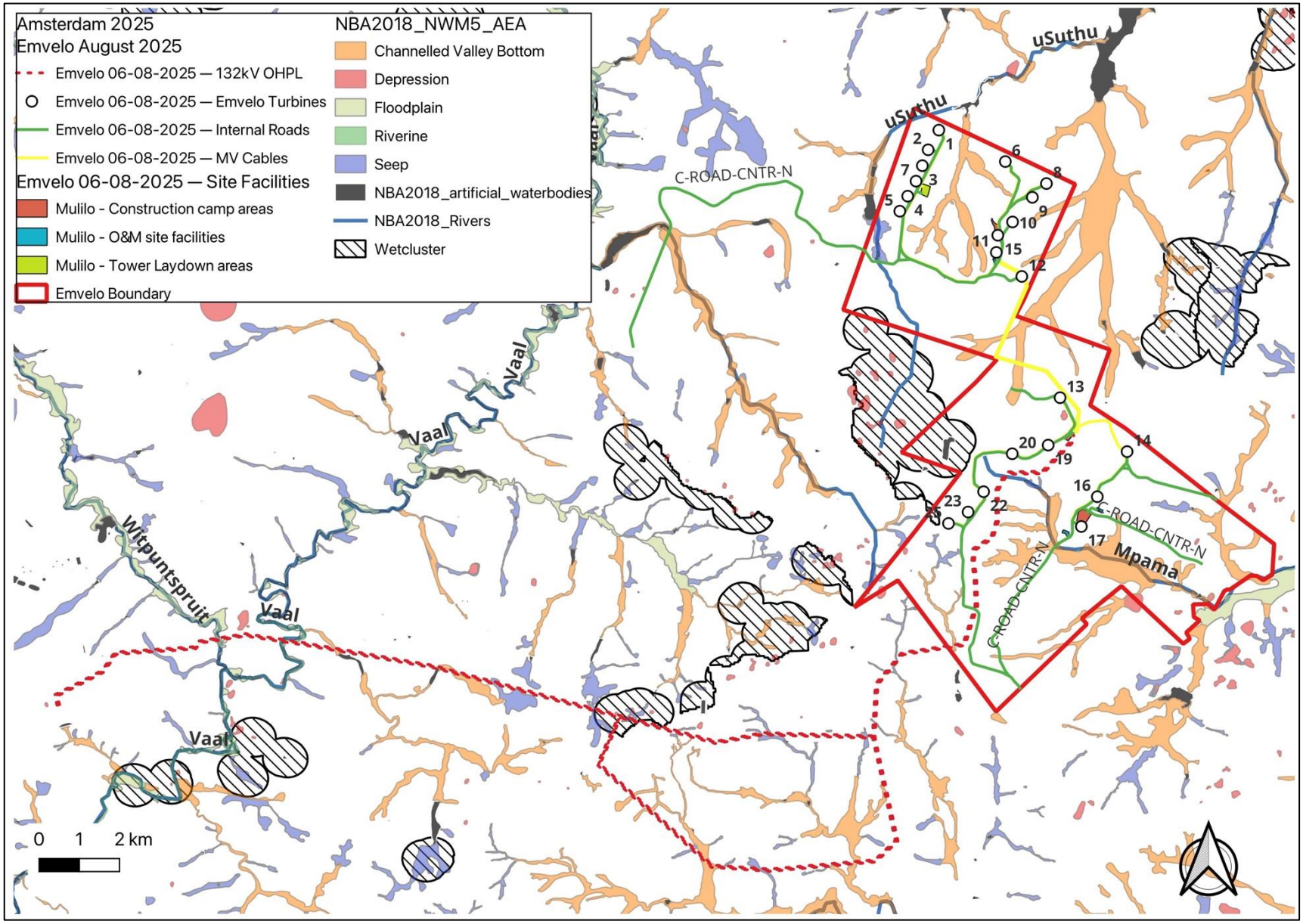


Figure 5: Various waterbodies identified in the National Wetland Inventory V5.2 (2020)

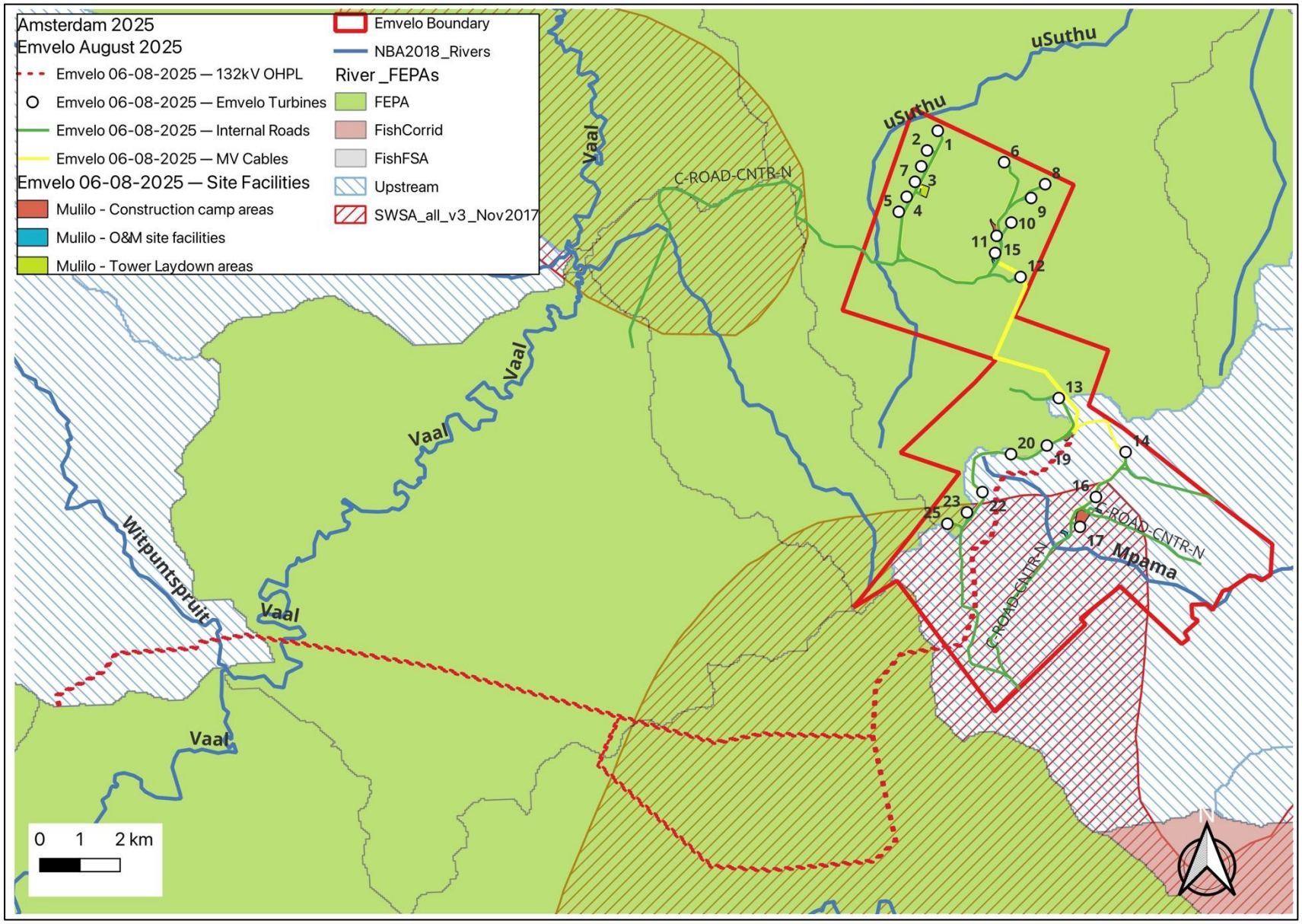


Figure 6: The respective Subquaternary catchments rated in terms of Freshwater Ecosystem Priority Areas (FEPAs) and Strategic Water Resource Areas in relation to the study area

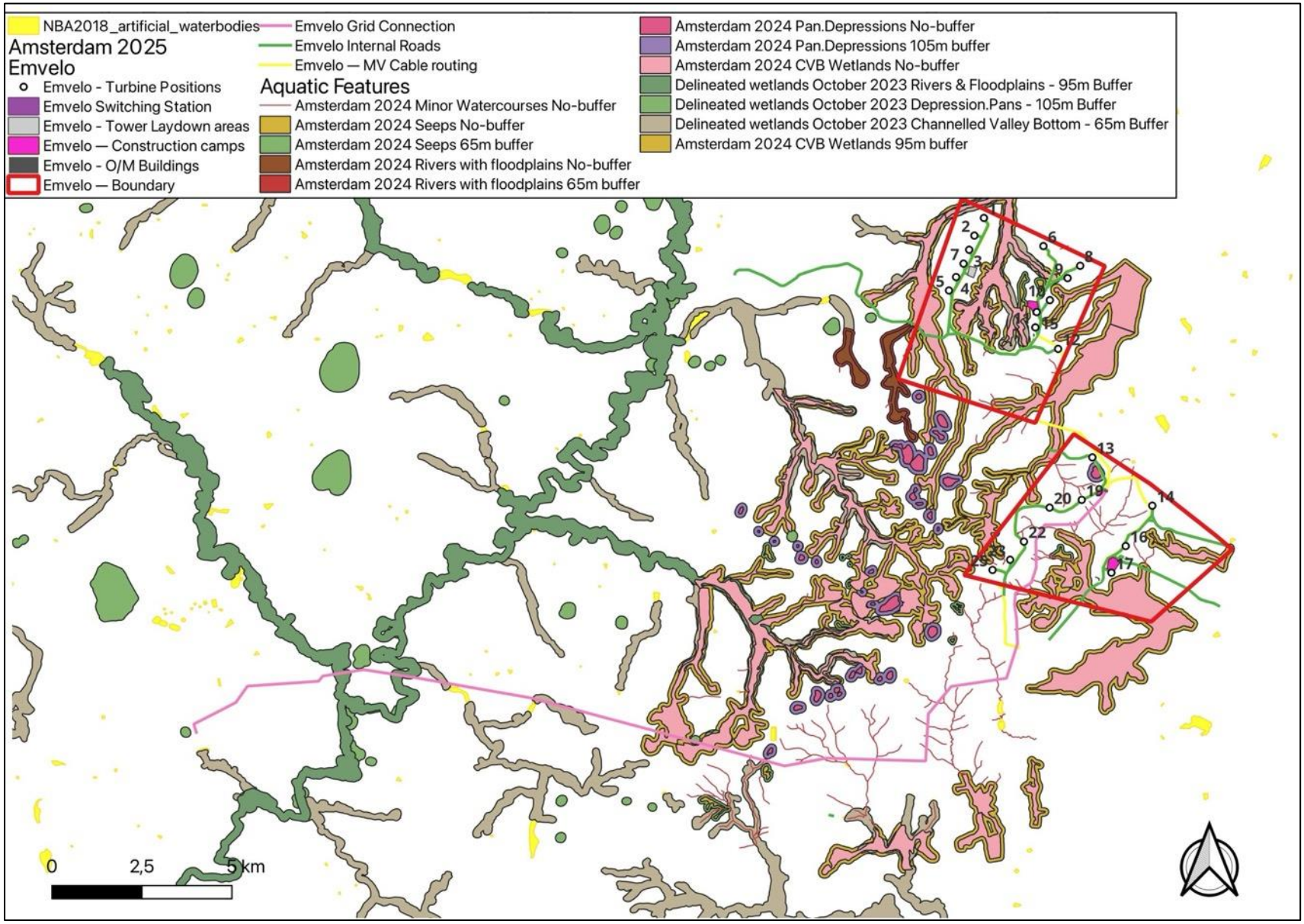


Figure 7: The confirmed watercourses and wetlands within the study area



Plate 1: A view of a mainstem watercourse (tributary of the Mpama River), with transformed floodplain



Plate 2: A view of channelled valley bottom wetland within a transformed catchment (crop production & grazing)



Plate 3: One of the smaller Endorheic Pans that is located near the OHL between the WEF and Ermelo



Plate 4: Seepage wetland in the headwater areas of the Vaal River / Usutu River catchment divide

6. Present Ecological State and conservation importance

The PES of a river represents the extent to which it has changed from the reference or near pristine condition (Category A) towards a highly impacted system where there has been an extensive loss of natural habit and biota, as well as ecosystem functioning (Category E).

The PES scores have been revised for the country and based on the current models, aspects of functional importance as well as direct and indirect impacts have been included (DWS, 2014). The current PES system also incorporates Ecological Importance (EI) and Ecological Sensitivity (ES) separately as opposed to Ecological Importance and Sensitivity (EIS) in the old model, although the new model is still heavily centred on rating rivers using broad fish, invertebrate, riparian vegetation and water quality indicators. The Recommended Ecological Category (REC) is still contained within the updated models, with the default REC being B, when little or no information is available to assess the system or when only one of the above-mentioned parameters are assessed or the overall PES is rated between a C or D.

The Present Ecological State scores (PES) for the main watercourses in the study area were rated as follows (DWS, 2014 – where B = Largely Natural and C = Moderately Modified):

Subquaternary Catchment Number	Present Ecological State	Ecological Importance	Ecological Sensitivity
1630	B	Moderate	High
1710	B	Moderate	High
1678	C	High	Moderate
1693	C	High	High
1770	C	High	High

These scores were substantiated by observations made in the field within the study area, and due to the overall lack of impacts or disturbance these scores for each of the watercourses within the site should be upheld.

This was further substantiated by the inclusion of study area catchments into Critical Biodiversity Areas (Type 1 and 2), i.e. the wetland areas near the alignment crossing the Brak River in particular and Ecological Support Area as shown in the Mpumalanga CBA MAP spatial data and Wetland Clusters (Figure 8).

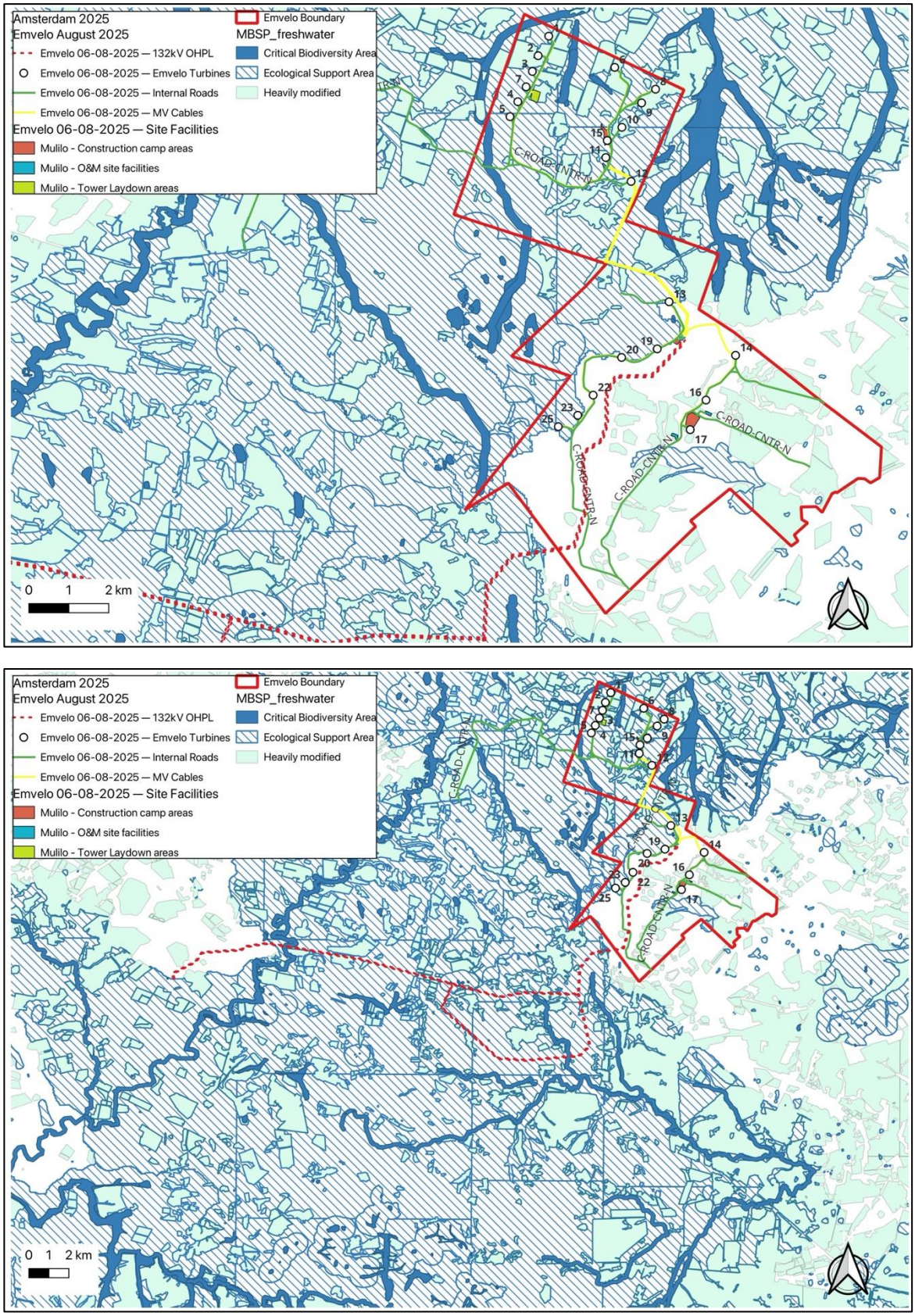


Figure 8: Critical Biodiversity Areas as per the Mpumalanga Biodiversity Spatial Plan, where the top map is for the project area and the bottom map is for the WEF

7. Permit requirements

Based on an assessment of the proposed activities and past engagement with DWS, the following WULs/ GA's could be required based on the following thresholds as listed in the following Government Notices, however ultimately the Department Water and Sanitation (DWS) will determine if a GA or full WULA will be required during the pre-application process (Phase 1):

	Water Use Activity	Applicable to this development proposal
S21(a)	Taking water from a water resource	Only water if water is abstracted from a local river or borehole
S21(b)	Storing water	If the total volume stored is greater than 40 000 m^3 then a full Water Use License will be required. This is however unlikely due to the scale of the project and the need for such large volumes.
S21(c)	Impeding or diverting the flow of water in a watercourse	Yes – several new crossings of watercourses (i.e. activities within 500m of a wetland or 100m of a watercourse will be required. A GA process can potentially be followed if Risk Assessment Matrix indicates all impacts are LOW.
S21(d)	Engaging in a stream flow reduction activity	Not applicable
S21(e)	Engaging in a controlled activity	Not applicable
S21(f)	Discharging waste or water containing waste into a water resource through a pipe, canal, sewer or other conduit	Not applicable
S21(g)	Disposing of waste in a manner which may detrimentally impact on a water resource	Not applicable – Only portable toilets will be required
S21(h)	Disposing in any manner of water which contains waste from, or which has been heated in, any industrial or power generation process	Not applicable
S21(i)	Altering the bed, banks, course or characteristics of a watercourse	Yes – several new crossings of watercourses (i.e. activities within 500m of a wetland or 100m of a watercourse will be required. A GA process can potentially be followed if Risk Assessment Matrix indicates all impacts are LOW.
S21(j)	Removing, discharging or disposing of water found underground for the continuation of an activity or for the safety of persons	Not applicable
S21(k)	Using water for recreational purposes	Not applicable

8. Sensitivity Assessment

Using the baseline description and field data while considering the current disturbances and site characteristics, the following features were identified, then categorised into one of number pre-determined sensitivity categories to provide protect and/or guide the layout planning:

High = No Go	"No go" areas or setbacks and areas or features that are considered of such significance that impacting them may be regarded as fatal flaw or strongly influence the project impact significance profile Therefore areas or features that are considered to have a high sensitivity or where project infrastructure would be highly constrained and should be avoided as far as possible. Infrastructure located in these areas are likely to drive up impact significance ratings and mitigations
Medium	Buffer areas and or areas that are deemed to be of medium sensitivity but should still be avoid as this would minimise impacts and or the need for additional Water Use Authorisation
Low	Areas of low sensitivity or constraints, such as artificial systems with little to no biological value or would not result in any future licensing requirements e.g. dry earth wall farm dams
Neutral	Unconstrained areas (left blank in mapping)

Table 4 below provides an overview of the sensitivity of various aquatic features (with buffers distances included) as it relates to the main project component types for the project. The features are shown spatially in Figure 7 above.

The sensitivity ratings of High No-go and Low were determined through an assessment of the aquatic habitat sensitivity and related constraints. However, these No-Go areas (with buffers) relate in general terms to the project and there are areas where encroachment on these areas would occur (i.e. existing road crossings within systems, but this is considered acceptable since these areas have already been impacted.

These proposed constraints / buffers do not include bird and or bat specialist buffers / constraints as theirs buffers along aquatic features are at times far larger around aquatic features, than those required for the known aquatic species within this region.

Table 4: Results of the sensitivity rating / constraints assessment

Development Component	Habitat type	Sensitivity rating of the respective habitat type against the development type	Buffer distance (m)	Development acceptability	Sensitivity rating override if an impact such as a road or other disturbance already occurs within the proposed footprint and confirmed by the specialist
WTG towers	Channelled Valley Bottom Wetlands	No-Go	105m	No WTGs should be placed in any of these areas, regardless of the state, type and functionality of the respective aquatic ecosystem	None
	Pans and Depressions		95m		
	Rivers and Floodplains		65m		
	Seeps		65m		
	Minor watercourses		35m		
Hardstands, Buildings / Substations & BESS	Channelled Valley Bottom Wetlands	No-Go	105m	None of these types of infrastructure should be placed in any of these areas	None
	Pans and Depressions		95m		
	Rivers and Floodplains		65m		
	Seeps		65m		
	Minor watercourses		35m		
Roads & Underground cables alignment roads	Channelled Valley Bottom Wetlands	High	105m	New roads and underground cables would not be deem appropriate within any of these areas, unless some form of disturbance already occurs, such as an existing track or bridge	Only existing tracks or disturbed areas maybe used
	Pans and Depressions		95m		
	Rivers and Floodplains				
	Seeps		65m		
	Minor watercourses		35m		
OHL	Channelled Valley Bottom Wetlands	High	105m	OHL towers must be placed outside of these area so that only the cables span these systems. The exception being that Pans & Depression inclusive of buffers must be avoided completely	
	Pans and Depressions		95m		
	Rivers and Floodplains		65m		
	Seeps		65m		
	Minor watercourses		35m		

9. Impact assessment

During the impact assessment several potential key issues / impacts were identified and these were assessed based on the methodology supplied by ERM.

9.1 Alternatives Assessment

The 2014 EIA Regulations require that any feasible and reasonable activity, location and technology alternatives considered must be described and comparatively assessed.

9.2 No-Go Option

With regard the No-Go option it is assumed that the site would continue to degrade due to the prevalence of grazing and or erosion within the water courses. This would continue into the long-term with a Low intensity that would impact on the regional scale due to loss of important habitat. Little in the way of mitigation could be proposed due to the social needs of the surrounding residents and or landowners, coupled to the need for access.

10. Potential aquatic ecosystems impacts

- Impact 1: Loss of habitat containing protected species or Species of Special Concern
- Impact 2: Loss of any critical corridors, important catchment areas and connected habitats that are linked to any Critical Biodiversity Areas or Ecological Support Areas
- Impact 3: The potential spread of alien vegetation
- Impact 4: Loss of riparian and or wetland habitat
- Impact 5: Changes to the hydrological regime and increased potential for erosion
- Impact 6: Changes to water quality
- Impact 7: Cumulative Impacts

The Tables 5 – 11 below assesses the impact significance for each impact. It was determined that the impacts upon aquatic biodiversity associated with the project are of Low significance, after mitigation. This assumes that the mitigations listed below are considered coupled to the fact that the overall layouts have avoid any of the High / No-Go areas, unless making use of areas with impacts such as existing farm roads. However, it is assumed that the final layout will orientate the hardstands, crane pads, blade laydowns and construction camps outside of any of the No-Go areas.

The loss of irreplaceable aquatic habitat and/or important aquatic obligate biota is therefore highly unlikely. The impacts are easily mitigated (provided the mitigation measures and monitoring plan within the EMP and this report are implemented and adhered to during all phases of the project).

Table 5: Impact assessment summary for Impact 1 – Loss of habitat containing protected species or Species of Special Concern

Impact Phase: Construction and Decommissioning					
Nature of the impact: Loss of vegetation and in particular species / habitats that could contain listed as Critically Endangered and or Vulnerable species (direct)					
Description of Impact: Activities resulting in physical disturbance of aquatic systems which provide ecosystem services, especially where new crossings are made, or large hard engineered surfaces are placed within the buffer zones. Loss can also include a functional loss, through change in vegetation type via alien encroachment, reducing aquatic biodiversity. However no aquatic vegetation with conservation concern were observed during this assessment, coupled to the fact that any sensitive areas will be avoided.					
Impact Status: Negative					
	E	D	R	M	P
Without Mitigation	Local	Long Term	Irreversible	Medium	Probable
Score	2	4	5	2	3
With Mitigation	Site	Short Term	Recoverable	Low	Low Probability
Score	1	2	3	1	2
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	Moderate Negative Impact (39)			Low Negative Impact (14)	
Was public comment received? Not yet					
Has public comment been included in mitigation measures? Note still in the draft phase and that comment will be obtained during the NEMA comment periods					
Mitigation measures to reduce residual risk or enhance opportunities: • The development of the stormwater management plan and Aquatic Rehabilitation and Monitoring plan, coupled to confirmation of the final layout prior to construction is made by the aquatic specialist. • Where large cut and fill areas are required, these must be stabilised and rehabilitated during the construction process, to minimise erosion and sedimentation. • Suitable stormwater management systems must be installed along roads and other areas and monitored during the first few months of use. Any erosion / sedimentation must be resolved through whatever additional interventions maybe necessary (i.e., extension, energy dissipaters, spreaders, etc). To minimise the impact of the access roads: • Use existing roads or upgrade existing tracks rather than constructing entirely new roads wherever possible and has been included in the proposed layout.					

- Use the smallest possible working corridor. Outside the working corridor, all watercourses are to be considered no go areas. Where intrusion is required, the working corridor must be kept to a minimum and demarcated clearly before any construction commences.
- Removal of vegetation must only be when essential for the continuation of the project. Do not allow any disturbance to the adjoining natural vegetation cover or soils.
- Where required, all pipe culverts must be removed and replaced with suitable sized box culverts, where road levels are raised. Crossings that are installed below the natural ground level are to be constructed with an appropriate drop inlet structure on the upstream side to ensure that head cut erosion does not develop because of the gradient change from the natural ground level to the invert level of the culvert.
- The channel profile, regardless of the current state of the river / water course, will be reinstated thus preventing any impoundments from being formed. The related designs must be assessed by an aquatic specialist, with a preference for low level drifts where possible.
- Water diversions must be temporary in nature and no permanent walls, berms or dams may be installed within a watercourse. Sandbags used in any diversion or for any other activity within a watercourse must be in a good condition, so that they do not burst and empty sediment into the watercourse. Upon completion of the construction at the site, the diversions shall be removed to restore natural flow patterns. Under no circumstance shall a new channel or drainage canals be excavated to divert water away from construction activities.
- Any fauna (frogs, snakes, etc.) that are found within the construction area must be moved to the closest point of similar habitat type outside of the areas to be impacted.
- All disturbed areas beyond the construction site that are intentionally or accidentally disturbed during the construction phase must be rehabilitated.

It is the contractor's responsibility to continuously monitor the area for newly established alien species during the contract and establishment period, which if present must be removed. Removal of these species shall be undertaken in a way which prevents any damage to the remaining indigenous species and inhibits the re-infestation of the cleaned areas.

Table 6: Impact assessment summary for Impact 2 – Loss of CBAs or potential areas with conservation potential or linked to any important catchments and strategic water resource areas

Impact Phase: Construction and Decommissioning					
Nature of the impact: Loss of any critical corridors and connect habitats that are linked to any future conservation plans (direct) is not expected as these can been avoided, coupled to the fact that hydrological connections will be retained through avoidance or the inclusion of ecological buffers.					
Description of Impact: Activities resulting in physical disturbance of aquatic systems which provide ecosystem services, especially where new crossings are made, or large hard engineered surfaces are placed within the buffer zones and have been included in any Critical Biodiversity Areas. it is assumed that the final layout will orientate the hardstands, crane pads, blade laydowns and construction camps outside of any of the No-Go areas.					
Impact Status: Negative					
	E	D	R	M	P
Without Mitigation	Local	Long Term	Irreversible	Medium	Probable
Score	2	4	5	2	3
With Mitigation	Site	Short Term	Recoverable	Low	Low Probability
Score	1	2	3	1	2
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	Moderate Negative Impact (39)			Low Negative Impact (14)	
Was public comment received? Not yet					
Has public comment been included in mitigation measures? Note still in the draft phase and that comment will be obtained during the NEMA comment periods					
Mitigation measures to reduce residual risk or enhance opportunities: • The aquatic systems have been mapped to a finer scale and have taken cognizance of any potential CBAs. As High / No-Go have been avoided by the major infrastructure such as turbines, the aquatic zones associated within the CBA / ESAs have also been avoided. Roads will need to traverse these areas, thus it is important to try and select existing areas with impacts / crossings where possible, coupled to the assumptions above • The development of the stormwater management plan and Aquatic Rehabilitation and Monitoring plan, coupled to confirmation of the final layout prior to construction is made by the aquatic specialist. • Where large cut and fill areas are required, these must be stabilised and rehabilitated during the construction process, to minimise erosion and sedimentation. • Suitable stormwater management systems must be installed along roads and other areas and monitored during the first few months of use. Any erosion / sedimentation must be resolved through whatever additional interventions maybe necessary (i.e., extension, energy dissipaters, spreaders, etc). To minimise the impact of the access roads: • Use existing roads or upgrade existing tracks rather than constructing entirely new roads wherever possible and has been included in the proposed layout. • Use the smallest possible working corridor. Outside the working corridor, all watercourses are to be considered no go areas. Where intrusion is required, the working corridor must be kept to a minimum and demarcated clearly, before any construction commences.					

• Removal of vegetation must only be when essential for the continuation of the project. Do not allow any disturbance to the adjoining natural vegetation cover or soils. • Where required, all pipe culverts must be removed and replaced with suitable sized box culverts, where road levels are raised. Crossings that are installed below the natural ground level are to be constructed with an appropriate drop inlet structure on the upstream side to ensure that head cut erosion does not develop as a result of the gradient change from the natural ground level to the invert level of the culvert. • The channel profile, regardless of the current state of the river / water course, will be reinstated thus preventing any impoundments from being formed. The related designs must be assessed by an aquatic specialist, with a preference for low level drifts where possible. • Water diversions must be temporary in nature and no permanent walls, berms or dams may be installed within a watercourse. Sandbags used in any diversion or for any other activity within a watercourse must be in a good condition, so that they do not burst and empty sediment into the watercourse. Upon completion of the construction at the site, the diversions shall be removed to restore natural flow patterns. Under no circumstance shall a new channel or drainage canals be excavated to divert water away from construction activities. • Any fauna (frogs, snakes, etc.) that are found within the construction area must be moved to the closest point of similar habitat type outside of the areas to be impacted. • All disturbed areas beyond the construction site that are intentionally or accidentally disturbed during the construction phase must be rehabilitated. It is the contractor's responsibility to continuously monitor the area for newly established alien species during the contract and establishment period, which if present must be removed. Removal of these species shall be undertaken in a way which prevents any damage to the remaining indigenous species and inhibits the re-infestation of the cleaned areas.	
Residual impact	Very low and acceptable with adoption of mitigation measures

Table 7: Impact assessment summary for Impact 3 – Potential spread of alien vegetation

Impact Phase: Construction and Operation					
Nature of the impact: Any physical disturbance could result in the spread of alien vegetation (direct)					
Description of Impact: During construction, complete clearing of the roads and turbine areas, as well any ancillary structures (offices and substations) will be required. This disturbance then allows for the alien species to colonise the soils, if left unmanaged.					
Impact Status: Negative					
	E	D	R	M	P
Without Mitigation	Local	Long Term	Irreversible	Medium	Probable
Score	2	4	5	2	3
With Mitigation	Site	Short Term	Recoverable	Low	Low Probability
Score	1	2	3	1	2
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	Moderate Negative Impact (39)			Low Negative Impact (14)	
Was public comment received? Not yet					
Has public comment been included in mitigation measures? Note still in the draft phase and that comment will be obtained during the NEMA comment periods					

Mitigation measures to reduce residual risk or enhance opportunities: • Alien vegetation management must be initiated at the beginning of the construction period and must extend into any remaining areas into the operation phase on the facility • The revegetation of any temporary sites as well as any previously degraded areas must begin from the onset of the project, with the involvement of a botanist to assist with the revegetation specifications Regeneration of alien vegetation must be monitored once all areas have been cleared, forming part of a long-term alien vegetation management plan	
Residual impact	Very low and acceptable, with adoption of mitigation measures and monitoring

Table 8: Impact assessment summary for Impact 4 – Loss of riparian and or wetland habitat

Impact Phase: Construction and Decommissioning					
Nature of the impact: It was recommended that all wetlands / riverine systems as well as the inclusive of buffers, be avoided. it is assumed that the final layout will orientate the hardstands, crane pads, blade laydowns and construction camps outside of any of the No-Go areas.					
Description of Impact: During construction, complete clearing of the roads and turbine areas, as well any ancillary structures (offices and substations) will be required, which may impact the aquatic function or any corridors or connections between aquatic systems. However, all Very High Sensitivity / No-Go areas have been avoided by the proposed layout by also making use of existing road crossings or considering any of the proposed buffers.					
Impact Status: Negative					
	E	D	R	M	P
Without Mitigation	Local	Long Term	Irreversible	Medium	Probable
Score	2	4	5	2	3
With Mitigation	Site	Short Term	Recoverable	Low	Low Probability
Score	1	2	3	1	2
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	Moderate Negative Impact (39)			Low Negative Impact (14)	
Was public comment received? Not yet					
Has public comment been included in mitigation measures? Note still in the draft phase and that comment will be obtained during the NEMA comment periods					
Mitigation measures to reduce residual risk or enhance opportunities: • The development of the stormwater management plan and Aquatic Rehabilitation and Monitoring plan, coupled to confirmation of the final layout prior to construction is made by the aquatic specialist. • Where large cut and fill areas are required these must be stabilised and rehabilitated during the construction process, to minimise erosion and sedimentation. • Suitable stormwater management systems must be installed along roads and other areas and monitored during the first few months of use. Any erosion / sedimentation must be resolved through whatever additional interventions maybe necessary (i.e., extension, energy dissipaters, spreaders, etc). To minimise the impact of the access roads: • Use existing roads or upgrade existing tracks rather than constructing entirely new roads wherever possible and has been included in the proposed layout.					

• Use the smallest possible working corridor. Outside the working corridor, all watercourses are to be considered no go areas. Where intrusion is required, the working corridor must be kept to a minimum and demarcated clearly, before any construction commences. • Removal of vegetation must only be when essential for the continuation of the project. Do not allow any disturbance to the adjoining natural vegetation cover or soils. • Where required, all pipe culverts must be removed and replaced with suitable sized box culverts, where road levels are raised. Crossings that are installed below the natural ground level are to be constructed with an appropriate drop inlet structure on the upstream side to ensure that head cut erosion does not develop as a result of the gradient change from the natural ground level to the invert level of the culvert. • The channel profile, regardless of the current state of the river / water course, will be reinstated thus preventing any impoundments from being formed. The related designs must be assessed by an aquatic specialist, with a preference for low level drifts where possible. • Water diversions must be temporary in nature and no permanent walls, berms or dams may be installed within a watercourse. Sandbags used in any diversion or for any other activity within a watercourse must be in a good condition, so that they do not burst and empty sediment into the watercourse. Upon completion of the construction at the site, the diversions shall be removed to restore natural flow patterns. Under no circumstance shall a new channel or drainage canals be excavated to divert water away from construction activities. • Any fauna (frogs, snakes, etc.) that are found within the construction area must be moved to the closest point of similar habitat type outside of the areas to be impacted. • All disturbed areas beyond the construction site that are intentionally or accidentally disturbed during the construction phase must be rehabilitated. It is the contractor's responsibility to continuously monitor the area for newly established alien species during the contract and establishment period, which if present must be removed. Removal of these species shall be undertaken in a way which prevents any damage to the remaining indigenous species and inhibits the re-infestation of the cleaned areas.	
Residual impact	Very low and acceptable with adoption of mitigation measures

Table 9: Impact assessment summary for Impact 5 – Changes to the hydrological regime and increase potential for erosion

Impact Phase: Construction and Decommissioning					
Nature of the impact: Increased hard surfaces can result in increases in runoff generated by the site, thereby resulting in changes to localised hydrological regimes.					
Description of Impact: During construction, complete clearing of the roads and turbine areas, as well any ancillary structures (offices and substations) will be required, which may impact the aquatic function or any corridors or connections between aquatic systems. However, these areas must be by the proposed layout by also making use of existing road crossings or by considering any of the proposed buffers.					
Impact Status: Negative					
	E	D	R	M	P
Without Mitigation	Local	Long Term	Irreversible	Medium	Probable
Score	2	4	5	2	3
With Mitigation	Site	Short Term	Recoverable	Low	Low Probability

Score	1	2	3	1	2
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	Moderate Negative Impact (39)			Low Negative Impact (14)	
Was public comment received? Not yet					
Has public comment been included in mitigation measures? Note still in the draft phase and that comment will be obtained during the NEMA comment periods					

Mitigation measures to reduce residual risk or enhance opportunities:

- No stormwater discharged may be directed to delineated aquatic zones or the associated buffers.
- A stormwater management plan finalised prior to construction, detailing the structures and actions that must be installed to prevent the increase of surface water flows directly into any natural systems.
- Effective stormwater management must include measures to slow, spread and deplete the energy of concentrated flows thorough effective stabilisation (gabions and Reno mattresses) and the re-vegetation of any disturbed areas

To minimise the impact of the access roads:

- Use existing roads or upgrade existing tracks rather than constructing entirely new roads wherever possible and has been included in the proposed layout.
- Use the smallest possible working corridor. Outside the working corridor, all watercourses are to be considered no go areas.. Where intrusion is required, the working corridor must be kept to a minimum and demarcated clearly, before any construction commences.
- Removal of vegetation must only be when essential for the continuation of the project. Do not allow any disturbance to the adjoining natural vegetation cover or soils.
- Where required, all pipe culverts must be removed and replaced with suitable sized box culverts, where road levels are raised. Crossings that are installed below the natural ground level are to be constructed with an appropriate drop inlet structure on the upstream side to ensure that head cut erosion does not develop as a result of the gradient change from the natural ground level to the invert level of the culvert.
- The channel profile, regardless of the current state of the river / water course, will be reinstated thus preventing any impoundments from being formed. The related designs must be assessed by an aquatic specialist, with a preference for low level drifts where possible.
- Water diversions must be temporary in nature and no permanent walls, berms or dams may be installed within a watercourse. Sandbags used in any diversion or for any other activity within a watercourse must be in a good condition, so that they do not burst and empty sediment into the watercourse. Upon completion of the construction at the site, the diversions shall be removed to restore natural flow patterns. Under no circumstance shall a new channel or drainage canals be excavated to divert water away from construction activities.
- Any fauna (frogs, snakes, etc.) that are found within the construction area must be moved to the closest point of similar habitat type outside of the areas to be impacted.
- All disturbed areas beyond the construction site that are intentionally or accidentally disturbed during the construction phase must be rehabilitated.

It is the contractor's responsibility to continuously monitor the area for newly established alien species during the contract and establishment period, which if present must be removed. Removal of these species shall be undertaken in a way which prevents any damage to the remaining indigenous species and inhibits the re-infestation of the cleaned areas.

Residual impact	Very low and acceptable with adoption of mitigation measures

Table 10: Impact assessment summary for Impact 6 –Changes to surface water quality characteristics

Impact Phase: Construction and Decommissioning					
Nature of the impact: Potential impact on localised surface water quality (indirect)					
Description of Impact: During construction or decommissioning, earthworks will expose and mobilise earth materials, and a number of materials as well as chemicals will be imported and used on site and may end up in the surface water, including soaps, oils, grease and fuels, human wastes, cementitious wastes, paints and solvents, etc. Any spills during transport or while works area conducted in proximity to a watercourse has the potential to affect the surrounding biota. This can result in possible deterioration in aquatic ecosystem integrity and species diversity.					
Impact Status: Negative					
	E	D	R	M	P
Without Mitigation	Local	Long Term	Irreversible	Medium	Probable
Score	2	4	5	2	3
With Mitigation	Site	Short Term	Recoverable	Low	Low Probability
Score	1	2	3	1	2
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	Moderate Negative Impact (39)			Low Negative Impact (14)	
Was public comment received? Not yet					
Has public comment been included in mitigation measures? Note still in the draft phase and that comment will be obtained during the NEMA comment periods					
Mitigation measures to reduce residual risk or enhance opportunities: • All liquid chemicals including fuels and oil, including for the BESS, must be stored in with secondary containment (bunds or containers or berms) that can contain a leak or spill. Such facilities must be inspected routinely and must have the suitable PPE and spill kits needed to contain likely worst-case scenario leak or spill in that facility, safely. • Washing and cleaning of equipment must be done in designated wash bays, where rinse water is contained in evaporation/sedimentation ponds (to capture oils, grease cement and sediment). • Mechanical plant and bowsers must not be refueled or serviced within 100m of a river channel or wetland. • All construction camps, lay down areas, wash bays, batching plants or areas and any stores should be beyond any demarcated water courses and their respective buffers. • Littering and contamination associated with construction activity must be avoided through effective construction camp management. • No stockpiling should take place within or near a water course. • All stockpiles must be protected and located in flat areas where run-off will be minimised and sediment recoverable.					

ECO monitors the site on a daily basis to ensure plant is in working order (minimise leaks), spills are prevented and if they do occur, are quickly rectified.	
Residual impact	Low risk and acceptable, with adoption of mitigation measures and monitoring

Table 11: Impact assessment summary for Impact 7 - Cumulative impact assessment for aquatic biodiversity

Cumulative Impact: Cumulative impacts on the aquatic resources of the area					
Description of Cumulative Impact: The cumulative impact assessment considers the combined impact of the remaining and other renewable projects within a 30km radius, that are also in the development phase and the associated grid lines on the aquatic resources. The rating below is based on the premise that important or sensitive features will be avoided by the various projects, while the mitigations proposed will ensure that the form and or function of downstream areas remain intact.					
Impact Status: Negative					
	E	D	R	M	P
Without Mitigation	Local	Long Term	Irreversible	Medium	Probable
Score	2	4	5	2	3
With Mitigation	Site	Short Term	Recoverable	Low	Low Probability
Score	1	2	3	1	2
Significance Calculation	Without Mitigation			With Mitigation	
S=(E+D+R+M)*P	Moderate Negative Impact (39)			Low Negative Impact (14)	
Can Impacts be Enhanced?	No				
Enhancement: The project should share roads and infrastructure where possible to reduce the overall footprint and reduce stormwater and erosion and sedimentation related impacts The projects should collaborate with provincial roads authority to upgrade the main access routes and improve the crossings and stormwater controls					
Residual impact	Low				

11. Draft Specialists Recommendations for the EA

The DFFE Screening Tool identified two sensitivity ratings within the development footprint, namely, Low and Very High. There is overlap with the findings on site and the Screening Tool's outcome, thus the development footprint must be developed with cognisance of these sensitivities.

Therefore, environmental sensitivity input received from the aquatic ecology specialist was taken forward and considered within the EIA process and the impact to these areas assessed. Appropriate layout and development restrictions were implemented within the development footprint to ensure that the impact to aquatic ecology is deemed acceptable by the aquatic ecologist. However, it is assumed that the final layout will orientate the hardstands, crane pads, blade laydowns outside of any of the No-Go areas.

The specialist has no objection to the authorisation of the proposed activities assuming that all mitigations and buffer zones are implemented.

Mitigation should focus on these areas and include measures to halt erosion and rehabilitate habitat in the sections affected by the construction. Without the implementation of mitigation measures, the project has potential to cause a Low cumulative impact upon aquatic biodiversity. However, with the adoption of mitigation, the proposed project will have a Very Low impact upon aquatic biodiversity.

12. Monitoring and Management Actions

The following are key recommendations, which are also critical to the proposed mitigations:

- Any of the activities, should also be monitored by the appointed Environmental Officer /Environmental Control Officer (EO/ECO) on a daily basis, especially during periods of river flow during construction.
- Any points of erosion should be stabilised immediately (sand bags in the short term) using gabions and reno mattress as required. No activities should take place outside of the demarcated servitude, to prevent additional cumulative impacts on these systems.
- The EMPr, must include a Construction Specific Monitoring and Rehabilitation Plan related to the water course and wetland crossings, and specifically to the prevention of erosion and sedimentation as these systems are prone to scour, with rehabilitation options being limited due to the sparse nature of the vegetation.
- Monitoring should occur on a monthly basis for 6 months post construction and where any unstable soils occur, these must be protected with temporary stabilisation dependent on the scale of the impact i.e. sand bags - hay bales) until areas become revegetated. If any areas require permanent erosion protection (e.g. gabions or stone pitching) then the WULA/GA must be amended to include these areas.

13.Conclusion and Recommendations

During this assessment, several sensitive aquatic habitats were observed and are shown in the maps provided in this report. Noteworthy areas, were then avoided by the required infrastructure, and include the main riverine and wetland systems, while the access roads could will make use of existing roads thus previously disturbed areas.

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

Mitigation should focus on these areas and include measures to halt erosion and rehabilitate habitat in the sections affected by the construction. Without the implementation of mitigation measures, the project has potential to cause a Moderate cumulative impact upon aquatic biodiversity. However, with the adoption of mitigation, the proposed project will have a Low impact upon aquatic biodiversity.

As the proposed activities have the potential to create erosion the following recommendations are reiterated:

- Vegetation clearing should occur in a phased manner in accordance with the construction programme to minimise erosion and/or run-off. Large tracts of bare soil will either cause dust pollution or quickly erode and then cause sedimentation in the lower portions of the catchment, and suitable dust and erosion control mitigation measures should be included in the generic EMPr, if not included already to mitigate.
- All construction materials including fuels and oil should be stored in demarcated areas that are contained within berms / bunds to avoid spread of any contamination / leaks. Washing and cleaning of equipment should also be done in berms or bunds, to trap any cement / hazardous substances and prevent excessive soil erosion. Mechanical plant and bowsers must not be refuelled or serviced within or directly adjacent to any channel. It is therefore suggested that all construction camps, lay down areas, batching plants or areas and any stores should be located more than 50 m from any demarcated watercourses.

- It is also advised that an Environmental Control Officer (ECO), with a good understanding of the local flora be appointed during the construction phase. The ECO should be able to make clear recommendations with regards to the re-vegetation of the newly completed / disturbed areas along aquatic features, using selected species detailed in this report.
- All alien plant re-growth must be monitored and should these alien plants reoccur these plants should be re-eradicated. The scale of the operation does however not warrant the use of a Landscape Architect and / or Landscape Contractor.

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

14.References

Agenda 21 – Action plan for sustainable development of the Department of Environmental Affairs and Tourism (DEAT) 1998.

Agricultural Resources Act, 1983 (Act No. 43 of 1983).

Department of Water Affairs and Forestry - DWAF (2005). A practical field procedure for identification and delineation of wetland and riparian areas Edition 1. Department of Water Affairs and Forestry, Pretoria. Updated with amendments in 2007.

Department of Water and Sanitation. 2014. A Desktop Assessment of the Present Ecological State, Ecological Importance and Ecological Sensitivity per Sub Quaternary Reaches for Secondary Catchments in South Africa. Secondary: [W5 (for example)]. Compiled by RQIS-RDM: https://www.dwa.gov.za/iwqs/rhp/eco/peseismodel.aspx

Germishuizen, G. and Meyer, N.L. (eds) (2003). Plants of southern Africa: an annotated checklist. Strelitzia 14, South African National Biodiversity Institute, Pretoria.

Holness, S & Oosthuysen, E. 2016. Northern Cape Critical Biodiversity Area map, SANBI BGIS.

Kleynhans C.J., Thirion C. and Moolman J. (2005). A Level 1 Ecoregion Classification System for South Africa, Lesotho and Swaziland. Report No. N/0000/00/REQ0104. Resource Quality Services, Department of Water Affairs and Forestry, Pretoria.

Macfarlane, D.M. & Bredin, I.P. 2017. Buffer Zone Guidelines for Rivers, Wetlands and Estuaries Buffer Zone Guidelines for Rivers, Wetlands and Estuaries. WRC Report No TT 715/1/17 Water Research Commission, Pretoria.

Minerals and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002), as amended.

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

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

Nel, J.L., Murray, K.M., Maherry, A.M., Petersen, C.P., Roux, D.J., Driver, A., Hill, L., Van Deventer, H., Funke, N., Swartz, E.R., Smith-Adao, L.B., Mbona, N., Downsborough, L. and Nienaber, S. (2011). Technical Report for the National Freshwater Ecosystem Priority Areas project. WRC Report No. K5/1801.

12. Appendix 1 - Specialist CV

CURRICULUM VITAE
Dr Brian Michael Colloty

1 Rossini Rd
Pari Park
Port Elizabeth, 6070
b.colloty@gmail.com

Profession: Ecologist & Environmental Assessment Practitioner (Pr. Sci. Nat. 400268/07)
Member of the South African Wetland Society
Specialisation: Ecology and conservation importance rating of terrestrial habitats, wetlands, rivers & estuaries
Years experience: 25 years

SKILLS BASE AND CORE COMPETENCIES

- 25 years experience in environmental sensitivity and conservation assessment of aquatic and terrestrial systems inclusive of Index of Habitat Integrity (IHI), WET Tools, Riparian Vegetation Response Assessment Index (VEGRAI) for Reserve Determinations, estuarine and wetland delineation throughout Africa. Experience also includes biodiversity and ecological assessments with regard sensitive fauna and flora, within the marine, coastal and inland environments. Countries include Mozambique, Kenya, Namibia, Central African Republic, Zambia, Eritrea, Mauritius, Madagascar, Angola, Ghana, Guinea-Bissau and Sierra Leone. Current projects also span all nine provinces in South Africa.
- 15 years experience in the coordination and management of multi-disciplinary teams, such as specialist teams for small to large scale EIAs and environmental monitoring programmes, throughout Africa and inclusive of marine, coastal and inland systems. This includes project and budget management, specialist team management, client and stakeholder engagement and project reporting.
- GIS mapping and sensitivity analysis

TERTIARY EDUCATION

- 1994: B Sc Degree (Botany & Zoology) - NMU
- 1995: B Sc Hon (Zoology) - NMU
- 1996: M Sc (Botany - Rivers) - NMU
- 2000: Ph D (Botany – Estuaries & Mangroves) – NMU

EMPLOYMENT HISTORY

- 1996 – 2000 Researcher at Nelson Mandela University – SAB institute for Coastal Research & Management. Funded by the WRC to develop estuarine importance rating methods for South African Estuaries
- 2001 – January 2003 Training development officer AVK SA (reason for leaving – sought work back in the environmental field rather than engineering sector)
- February 2003- June 2005 Project manager & Ecologist for Strategic Environmental Focus (Pretoria) – (reason for leaving – sought work related more to experience in the coastal environment)
- July 2005 – June 2009 Principal Environmental Consultant Coastal & Environmental Services (reason for leaving – company restructuring)
- June 2009 – August 2018 Owner / Ecologist of Scherman Colloty & Associates cc
- August 2018 Owner / Ecologist - EnviroSci (Pty) Ltd

SELECTED RELEVANT PROJECT EXPERIENCE

World Bank IFC Standards

- Kenmare Mining Pilivilli, Mozambique - wetland (mangroves, peatlands and estuarine) assessment and biodiversity offset analysis - current
- Botswana South Africa 400kv transmission line (400km) biodiversity assessment on behalf of Aurecon - current
- Farim phosphate mine and port development, Guinea Bissau – biodiversity and estuarine assessment on behalf of Knight Piesold Canada – 2016.
- Tema LNG offshore pipeline EIA – marine and estuarine assessment for Quantum Power (2015).
- Colluli Potash South Boulder, Eritrea, SEIA marine baseline and hydrodynamic surveys co-ordinator and coastal vegetation specialist (coastal lagoon and marine) (on-going).
- Wetland, estuarine and riverine assessment for Addax Biofeuls Sierra Leone, Makeni for Coastal & Environmental Services: 2009
- ESHIA Project manager and long-term marine monitoring phase coordinator with regards the dredge works required in Luanda bay, Angola. Monitoring included water quality and biological changes in the bay and at the offshore disposal outfall site, 2005-2011

South African

- Plant and animal search and rescue for the Karusa, Soetwater, Nxuba, Oyster Bay and Garob Wind Farms on behalf of Enel Green Power, 2018 - 2019
- Plant and Animal Search and Rescue for the Port of Ngqura, Transnet Landside infrastructure Project, with development and management of on site nursery (Current).
- Plant and Animal Search and Rescue for the Port of Ngqura, OTGC Tank Farm Project (2019)
- Plant search and rescue, for NMBM (Driftsands sewer, Glen Hurd Drive), Department of Social Development (Military veterans housing, Despatch) and Nxuba Wind Farm, - current
- Wetland specialist appointed to update the Eastern Cape Biodiversity Conservation Plan, for the Province on behalf of EOH CES appointment by SANBI – current. This includes updating the National Wetland Inventory for the province, submitting the new data to CSIR/SANBI.
- CDC IDZ Alien eradication plans for three renewable projects Coega Wind Farm, Sonop Wind Farm and Coega PV, on behalf of JG Afrika (2016 – 2017).
- Nelson Mandela Bay Municipality Baakens River Integrated Wetland Assessment (Inclusive of Rehabilitation and Monitoring Plans) for CEN IEM Unit - Current
- Rangers Biomass Gasification Project (Uitenhage), biodiversity and wetland assessment and wetland rehabilitation / monitoring plans for CEM IEM Unit – current.
- Gibson Bay Wind Farm implementation of the wetland management plan during the construction and operation of the wind farm (includes surface / groundwater as well wetland rehabilitation & monitoring plan) on behalf of Enel Green Power - current
- Gibson Bay Wind Farm 133kV Transmission Line wetland management plan during the construction of the transmission line (includes wetland rehabilitation & monitoring plan) on behalf of Eskom – 2016.
- Tsitsikamma Community Wind Farm implementation of the wetland management plan during the construction of the wind farm (includes surface / biomonitoring, as well wetland rehabilitation & monitoring plan) on behalf of Cennergi – completed May 2016.
- Alicedale bulk sewer pipeline for Cacadu District, wetland and water quality assessment, 2016
- Mogalakwena 33kv transmission line in the Limpopo Province, on behlaf of Aurecon, 2016
- Cape St Francis WWTW expansion wetland and passive treatment system for the Kouga Municipality, 2015
- Macindane bulk water and sewer pipelines wetland and wetland rehabilitation plan 2015
- Eskom Prieska to Copperton 132kV transmission line aquatic assessment, Northern Cape on behalf of Savannah Environmental 2015.
- Joe Slovo sewer pipeline upgrade wetland assessment for Nelson Mandela Bay Municipality 2014
- Cape Recife Waste Water Treatment Works expansion and pipeline aquatic assessment for Nelson Mandela Bay Municipality 2013
- Pola park bulk sewer line upgrade aquatic assessment for Nelson Mandela Bay Municipality 2013
- Transnet Freight Rail – Swazi Rail Link (Current) wetland and ecological assessment on behalf of Aurecon for the proposed rail upgrade from Ermelo to Richards Bay
- Eskom Transmission wetland and ecological assessment for the proposed transmission line between Pietermaritzburg and Richards Bay on behalf of Aurecon (2012).
- Port Durnford Exarro Sands biodiversity assessment for the proposed mineral sands mine on behalf of Exxaro (2009)
- Fairbreeze Mine Exxaro (Mtunzini) wetland assessment on behalf of Strategic Environmental Services (2007).
- Wetland assessment for Richards Bay Minerals (2013) – Zulti North haul road on behalf of RBM.
- Biodiversity and aquatic assessments for 101 renewable projects in the past 8 years in the Western, Eastern, Northern Cape, KwaZulu-Natal and Free State provinces. Clients included RES-SA, Red Cap, ACED Renewables, Mainstream Renewable, GDF Suez, Globeleq, ENEL, Abengoa amongst others. Particular aquatic sensitivity assessment and Water Use License Applications on behalf of Mainstream Renewable Energy (8 wind farms and 3 PV facilities.), Cennergi / Exxaro (2 Wind farms), WKN Wind current (2 wind farms & 2 PV facilities), ACED (6 wind farms) and Windlab (3 Wind farms) were also conducted. Several of these projects also required the assessment of the proposed transmission lines and switching stations, which were conducted on behalf of Eskom.
- Vegetation assessments on the Great Brak rivers for Department of Water and Sanitation, 2006 and the Gouritz Water Management Area (2014)
- Proposed FibreCo fibre optic cable vegetation assessment along the PE to George, George to Graaf Reinet, PE to Colesburg, and East London to Bloemfontein on behalf of SRK (2013-2015).

15.Appendix 2 - Site Sensitivity Verification Report

Site verification report – Aquatic Ecology

Government Notice No. 645, dated 10 May 2019, includes the requirement that an Initial Site Sensitivity Verification Report must be produced for a development footprint. As per Part 1, Section 2.3, the outcome of the Initial Site Verification must be recorded in the form of a report that-

(a) Confirms or disputes the current use of the land and environmental sensitivity as identified by the national web based environmental screening tool;
(b) Contains a motivation and evidence of either the verified or different use of the land and environmental sensitivity;
(c) Is submitted together with the relevant reports prepared in accordance with the requirements of the Environmental Impact Assessment Regulations.

This report has been produced specifically to consider the aquatic ecology theme and addresses the content requirements of (a) and (b) above. The report will be appended to the respective specialist study included in the Basic Assessment Report produced for the project.

Site sensitivity based on the aquatic biodiversity theme included in the Screening Tool and specialist assessment

Based on the DFFE Screening Tool, the WEF and Grid Connection falls within areas of very high sensitivity (Figure 1).

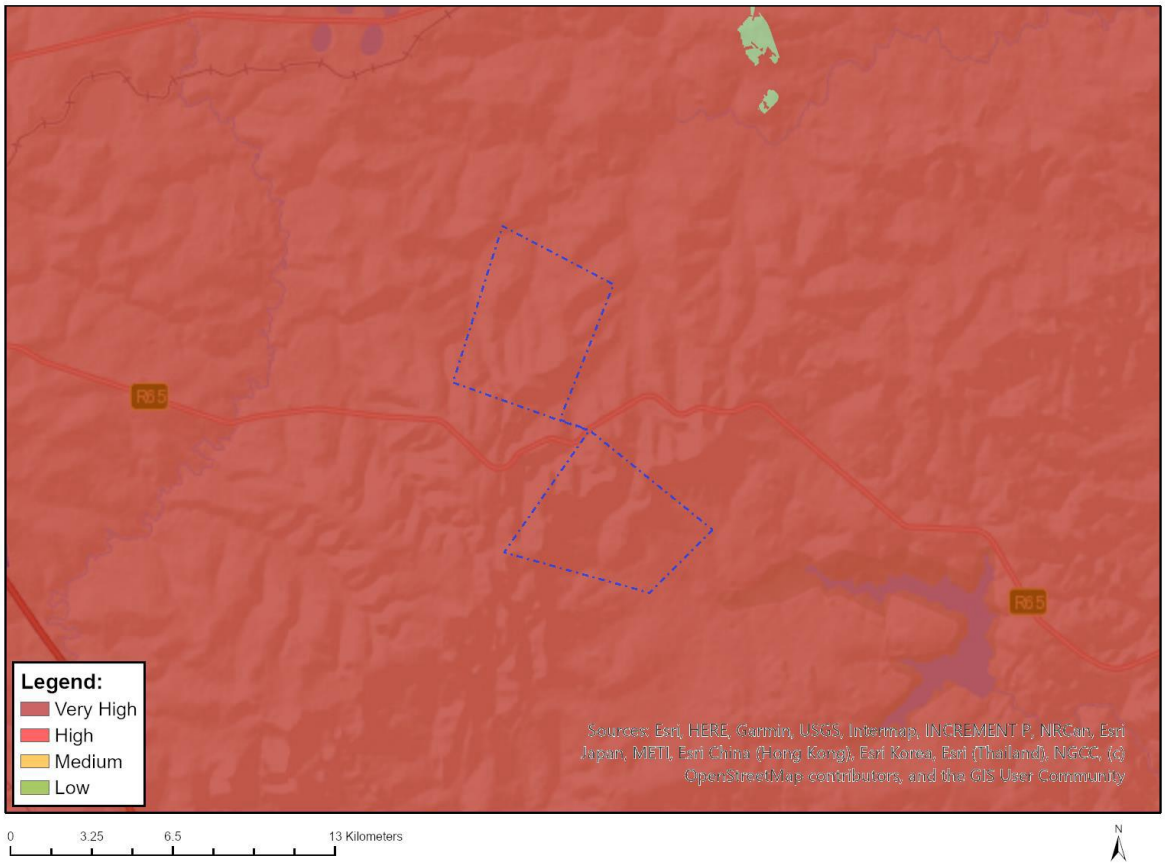


Figure 1a. DFFE Screening Tool outcome for the aquatic biodiversity theme for the WEF site

Figure 1b. DFFE Screening Tool outcome for the aquatic biodiversity theme for the Preferred Grid option

Based on the above outcomes, the specialist agrees the environmental sensitivities identified on site. However, disputes the exact extent of the systems, as the Screening Tool shows a catchment wide representation of the aquatic waterbodies that were rated as sensitive.

The specialist findings were informed by a site visits undertaken by Dr Brian Colloty over the course of several years. This information was then compared to current wetland inventories, 1: 50 000 topocadastral surveys mapping and the site. A baseline map was then developed which was refined, noting that due to the complex of the topography and geology, some of the river lines were digitised at a scale of 1:2000.

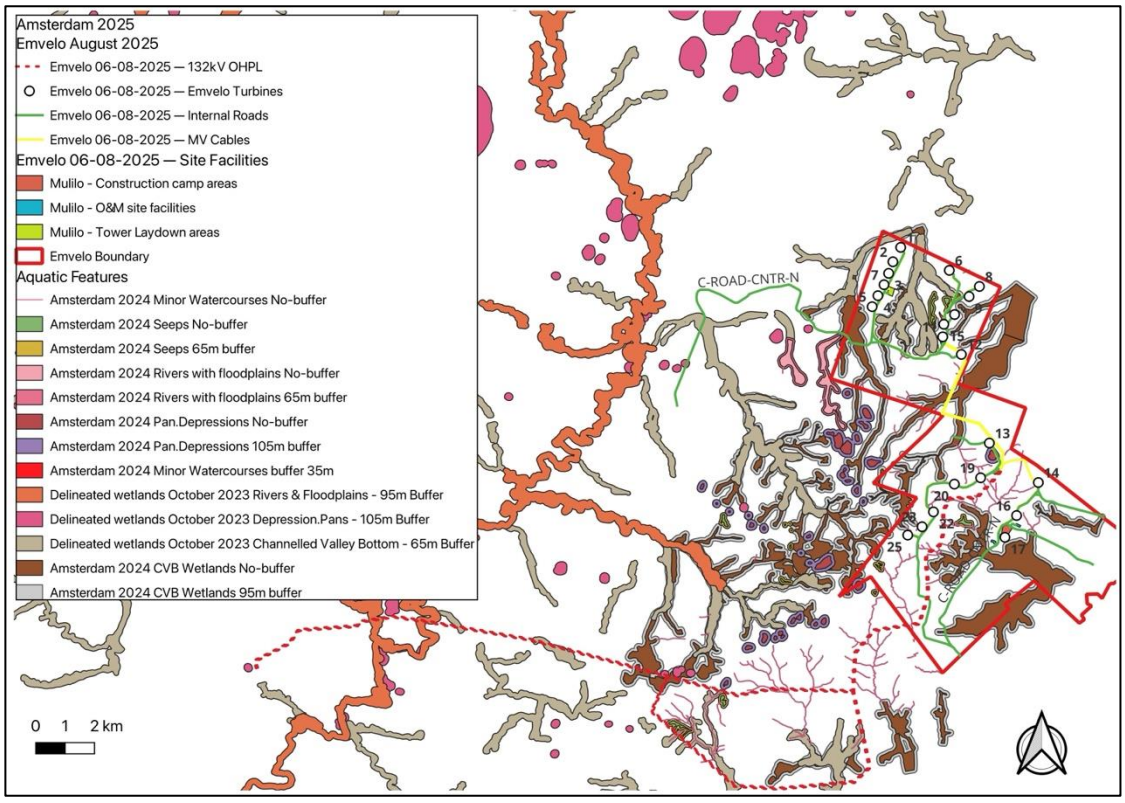


Figure 2. Environmental sensitivity map produced by the aquatic specialist

Motivation of the outcomes of the sensitivity map and key conclusions

In conclusion, the DFFE Screening Tool identified one sensitivity rating within the development footprint, namely, Very High.

Although there is some overlap with the findings on site and the Screening Tool's outcome, the development footprint contains various sensitivities (Very High and Low) that were identified following the undertaking of several site visits and spatial input considerations.

The environmental sensitivity input received from the aquatic ecology specialist wase taken forward and considered within the formal EA process and the impact to these areas assessed. Appropriate layout and development restrictions were implemented within the development footprint to ensure that the impact to aquatic ecology is deemed acceptable by the aquatic ecologist.

16. Appendix 3: Compliance with the Aquatic Biodiversity Protocol (GN 320, 20 March 2020)

Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Aquatic Biodiversity	*Section where this has been addressed in the Specialist Report*
2.3. The assessment must provide a baseline description of the site which includes, as a minimum, the following aspects: *2.3.1. a description of the aquatic biodiversity and ecosystems on the site, including;* *a) aquatic ecosystem types; and* *b) presence of aquatic species, and composition of aquatic species communities, their habitat, distribution, and movement patterns;*	*Section 5 & 6 of this report*
2.3.2. the threat status of the ecosystem and species as identified by the screening tool;	*Section 5 & 6 of this report*
2.3.3. an indication of the national and provincial priority status of the aquatic ecosystem, including a description of the criteria for the given status (i.e., if the site includes a wetland or a river freshwater ecosystem priority area or sub catchment, a strategic water source area, a priority estuary, whether or not they are free -flowing rivers, wetland clusters, a critical biodiversity or ecologically sensitivity area); and	*Section 5 & 6 of this report*
2.3.4. a description of the ecological importance and sensitivity of the aquatic ecosystem including: *a) the description (spatially, if possible) of the ecosystem processes that operate in relation to the aquatic ecosystems on and immediately adjacent to the site (e.g., movement of surface and subsurface water, recharge, discharge, sediment transport, etc.); and* *b) the historic ecological condition (reference) as well as present ecological state of rivers (in- stream, riparian, and floodplain habitat), wetlands and/or estuaries in terms of possible changes to the channel and flow regime (surface and groundwater).*	*Section 5 & 6 of this report*
2.4. The assessment must identify alternative development footprints within the preferred site which would be of a "low" sensitivity as identified by the screening tool and verified through the site sensitivity verification and which were not considered appropriate.	*Section 9 of this report*
2.5. Related to impacts, a detailed assessment of the potential impacts of the proposed development on the following aspects must be undertaken to answer the following questions: *2.5.1. Is the proposed development consistent with maintaining the priority aquatic ecosystem in its current state and according to the stated goal?* *2.5.2. Is the proposed development consistent with maintaining the resource quality objectives for the aquatic ecosystems present?* *2.5.3. How will the proposed development impact on fixed and dynamic ecological processes that operate within or across the site? This must include:* *a) impacts on hydrological functioning at a landscape level and across the site which can arise from changes to flood regimes (e.g., suppression of floods, loss of flood attenuation*	*Section 9 of this report*

Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Aquatic Biodiversity	*Section where this has been addressed in the Specialist Report*
capacity, unseasonal flooding or destruction of floodplain processes); *b) will the proposed development change the sediment regime of the aquatic ecosystem and its sub -catchment (e.g. sand movement, meandering river mouth or estuary, flooding or sedimentation patterns);* *c) what will the extent of the modification in relation to the overall aquatic ecosystem be (e.g., at the source, upstream or downstream portion, in the temporary I seasonal I permanent zone of a wetland, in the riparian zone or within the channel of a watercourse, etc.); and* *d) to what extent will the risks associated with water uses and related activities change;*	
2.5.4. how will the proposed development impact on the functioning of the aquatic feature? This must include: *a) base flows (e.g., too little or too much water in terms of characteristics and requirements of the system);* *b) quantity of water including change in the hydrological regime or hydroperiod of the aquatic ecosystem (e.g., seasonal to temporary or permanent; impact of over - abstraction or instream or off stream impoundment of a wetland or river);* *c) change in the hydrogeomorphic typing of the aquatic ecosystem (e.g., change from an unchannelled valley-bottom wetland to a channelled valley -bottom wetland);* *d) quality of water (e.g., due to increased sediment load, contamination by chemical and/or organic effluent, and/or eutrophication);* *e) fragmentation (e.g., road or pipeline crossing a wetland) and loss of ecological connectivity (lateral and longitudinal); and* *f) the loss or degradation of all or part of any unique or important features associated with or within the aquatic ecosystem (e.g., waterfalls, springs, oxbow lakes, meandering or braided channels, peat soils, etc.);*	*Section 9 of this report*
2.5.5. how will the proposed development impact on key ecosystems regulating and supporting services especially: *a) flood attenuation;* *b) streamflow regulation;* *c) sediment trapping;* *d) phosphate assimilation;* *e) nitrate assimilation;* *f) toxicant assimilation;* *g) erosion control; and* *h) carbon storage?*	*Section 9 of this report*
2.5.6. how will the proposed development impact community composition (numbers and density of species) and integrity (condition, viability, predator - prey ratios, dispersal rates, etc.) of the faunal and vegetation communities inhabiting the site?	*Section 9 of this report*
2.6. In addition to the above, where applicable, impacts to the frequency of estuary mouth closure should be considered, in relation to:	*N/A*

Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Aquatic Biodiversity	*Section where this has been addressed in the Specialist Report*
a) size of the estuary; *b) availability of sediment;* *c) wave action in the mouth;* *d) protection of the mouth;* *e) beach slope;* *f) volume of mean annual runoff; and* *g) extent of saline intrusion (especially relevant to permanently open systems).*	
2.7. The findings of the specialist assessment must be written up in an Aquatic Biodiversity Specialist Assessment Report that contains, as a minimum, the following information:	*This report*
2.7.1. contact details of the specialist, their SACNASP registration number, their field of expertise and a curriculum vitae;	*Appendix 1*
2.7.2. a signed statement of independence by the specialist;	*Attached to EIA / BAR*
2.7.3. a statement on the duration, date and season of the site inspection and the relevance of the season to the outcome of the assessment;	*Section 5 & 6 of this report*
2.7.4. the methodology used to undertake the site inspection and the specialist assessment, including equipment and modelling used, where relevant;	*Section 4*
2.7.5. a description of the assumptions made any uncertainties or gaps in knowledge or data;	*Section 1*
2.7.6. the location of areas not suitable for development, which are to be avoided during construction and operation, where relevant;	*Section 8*
2.7.7. additional environmental impacts expected from the proposed development;	*Section 9*
2.7.8. any direct, indirect, and cumulative impacts of the proposed development on site;	*Section 9*
2.7.9. the degree to which impacts, and risks can be mitigated;	*Section 9*
2.7.10. the degree to which the impacts and risks can be reversed;	*Section 9*
2.7.11. the degree to which the impacts and risks can cause loss of irreplaceable resources;	*Section 9*
2.7.12. a suitable construction and operational buffer for the aquatic ecosystem, using the accepted methodologies;	*Section 4*
2.7.13. proposed impact management actions and impact management outcomes for inclusion in the Environmental Management Programme (EMPr);	*Section 10, 11 & 12*
2.7.14. a motivation must be provided if there were development footprints identified as per paragraph 2.4 above that were identified as having a "low" aquatic biodiversity sensitivity and that were not considered appropriate;	*Section 9*
2.7.15. a substantiated statement, based on the findings of the specialist assessment, regarding the acceptability or not of the proposed development and if the proposed development should receive approval or not; and	*Section 13*
2.7.16. any conditions to which this statement is subjected.	*Section 11*
2.8. The findings of the Aquatic Biodiversity Specialist Assessment must be incorporated into the Basic Assessment Report or the Environmental Impact Assessment Report including the mitigation	*Yes*

Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Aquatic Biodiversity	*Section where this has been addressed in the Specialist Report*
and monitoring measures as identified, that are to be included in the EMPr.	
2.9. A signed copy of the assessment must be appended to the Basic Assessment Report or Environmental Impact Assessment Report.	*Yes*

From: Lucien Barbeau
Sent on: Monday, 18 August 2025 13:44:34
To: Brian EnviroSci
CC: ERM Arcus Amsterdam
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Thanks Brian, reports received. I will apply those correction thanks

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Brian EnviroSci <brianc@envirosci.co.za>
Sent: Monday, August 18, 2025 1:37 PM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]

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EXTERNAL MESSAGE

HI

Please see attached my revised reports - note the sections in yellow - need the updated information i.e. project descriptions and the STR maps

Thanks

Brian

> On 06 Aug 2025, at 16:26, Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:
>
> Dear Specialist,
>
> I trust you are well.
>
> Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by Monday, 12 August 2025.
>
> If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.
>
> Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.
>
> Kind regards,
>
> <image001.png>
>
> **Lucien Barbeau**

Senior Consultant

Cape Town [redacted] **erm.com**

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<Sheepmoor 06-08-2025.kmz><Sheepmoor Boundary.kmz><Emvelo 06-08-2025.kmz><Emvelo Boundary.kmz>

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From: Lucien Barbeau
Sent on: Monday, 18 August 2025 13:53:08
To: ERM Arcus Amsterdam; Anton Lohse
CC: Lloyd Barnes; Stephen Burton; Stephanie Gopaul; Mpho Malema
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Anton,

I am just following up with the below.

Regards

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Thursday, August 14, 2025 1:30 PM
To: Anton Lohse <anton@mulilo.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Anton,

Kindly see attached correspondence from the IAP Lawyer

Regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Riaan Meintjes <riaan@themis.co.za>
Sent: Thursday, August 14, 2025 12:58 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Mpho Malema <mpho.malema@erm.com>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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EXTERNAL MESSAGE

Dear Lucien

Please see the attached.

We look forward to receiving the information requested in our email of 7 August 2025 without further delay.

Regards
Riaan Meintjes
Director

BusinessDay Best Lawyers for 2025: Arbitration and Mediation; Litigation; Real Estate Law

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Corner of Roeland Street and Drury Lane
Cape Town, 8001

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---

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Date: Thursday, 14 August 2025 at 10:20
To: Riaan Meintjes <riaan@themis.co.za>, ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Mpho Malema <mpho.malema@erm.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Riaan Meintjes,

Thank you for providing comment, we will return with responses shortly.

May I please request the name and CAA Registration number for the aerodrome in question.

Your prompt attention to this request would be greatly appreciated.

Regards

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Riaan Meintjes <riaan@themis.co.za>
Sent: Thursday, August 7, 2025 1:48 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

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EXTERNAL MESSAGE

Dear Sir/Madam

We have briefly perused the draft EIA report and have been unable to find any reference to the comment submitted by us on the instructions of our client, a copy of which is attached to this email.

Kindly refer us to the relevant pages of the draft report which deal with our client's comments?

We further note from the draft report that a formal application has been lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted. Kindly furnish us with a copy of this application and all communications to and from ATNS relating thereto.

We look forward to hearing from you as a matter of urgency.

Regards
Riaan Meintjes
Director

BusinessDay Best Lawyers for 2025: Arbitration and Mediation; Litigation; Real Estate Law

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W: www.themislawchambers.co.za

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Cape Town, 8001

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---

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Date: Wednesday, 16 July 2025 at 13:55
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Interested and Affected Party,

Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.

The revised comment period now ends on 15 August 2025.

All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.

Thank you for your continued participation.

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Lucien Barbeau
Senior Consultant

Cape Town
+[redacted]

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From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Lloyd Barnes
Sent on: Monday, 18 August 2025 15:08:25
To: Lucien Barbeau; ERM Arcus Amsterdam; Anton Lohse
CC: Stephen Burton; Stephanie Gopaul; Mpho Malema
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Good day Lucien,

Please note that we are awaiting external legal advise on this matter.

Anton will revert.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
www.mulilo.com
21st Floor, Portside, 5 Buitengracht Street, Cape Town, 8001

mulilo

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, 18 August 2025 13:53
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Anton Lohse <Anton@mulilo.com>
Cc: Lloyd Barnes <Lloyd@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Mpho Malema <mpho.malema@erm.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Anton,

I am just following up with the below.

Regards

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
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Cc: Lloyd Barnes <lloyd@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Anton,

Kindly see attached correspondence from the IAP Lawyer

Regards,

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

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EXTERNAL MESSAGE

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We look forward to receiving the information requested in our email of 7 August 2025 without further delay.

Regards
Riaan Meintjes
Director

BusinessDay Best Lawyers for 2025: Arbitration and Mediation; Litigation; Real Estate Law

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Lucien Barbeau
Senior Consultant

Sustainability is our business

Cape Town [redacted] **erm.com**

From: Riaan Meintjes <riaan@themis.co.za>
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Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

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Director

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Date: Wednesday, 16 July 2025 at 13:55
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

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To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Lucien Barbeau
Senior Consultant

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From: Anton Lohse
Sent on: Monday, 18 August 2025 15:31:21
To: Lucien Barbeau; ERM Arcus Amsterdam
CC: Lloyd Barnes; Stephen Burton; Stephanie Gopaul; Mpho Malema
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,
We referred this to external counsel for advice and will revert once same has been received.
Regards

Anton Lohse
Legal Advisor
[redacted]
www.mulilo.com
[redacted]

mulilo

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, August 18, 2025 1:53 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Anton Lohse <Anton@mulilo.com>
Cc: Lloyd Barnes <Lloyd@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Mpho Malema <mpho.malema@erm.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Anton,

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Regards

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Thursday, August 14, 2025 1:30 PM
To: Anton Lohse <anton@mulilo.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Anton,

Kindly see attached correspondence from the IAP Lawyer

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Riaan Meintjes <riaan@themis.co.za>
Sent: Thursday, August 14, 2025 12:58 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Mpho Malema <mpho.malema@erm.com>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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

EXTERNAL MESSAGE

Dear Lucien

Please see the attached.

We look forward to receiving the information requested in our email of 7 August 2025 without further delay.

Regards
Riaan Meintjes
Director

BusinessDay Best Lawyers for 2025: Arbitration and Mediation; Litigation; Real Estate Law

HAYES EST H 2005 INCORPORATED

[redacted]
W: www.themislawchambers.co.za

Unit 1, Roeland Square
Corner of Roeland Street and Drury Lane
Cape Town, 8001

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Date: Thursday, 14 August 2025 at 10:20
To: Riaan Meintjes <riaan@themis.co.za>, ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Mpho Malema <mpho.malema@erm.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Riaan Meintjes,

Thank you for providing comment, we will return with responses shortly.

May I please request the name and CAA Registration number for the aerodrome in question.

Your prompt attention to this request would be greatly appreciated.

Regards

Lucien Barbeau
Senior Consultant

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Cape Town [redacted] **erm.com**

From: Riaan Meintjes <riaan@themis.co.za>
Sent: Thursday, August 7, 2025 1:48 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

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EXTERNAL MESSAGE

Dear Sir/Madam

We have briefly perused the draft EIA report and have been unable to find any reference to the comment submitted by us on the instructions of our client, a copy of which is attached to this email.

Kindly refer us to the relevant pages of the draft report which deal with our client's comments?

We further note from the draft report that a formal application has been lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted. Kindly furnish us with a copy of this application and all communications to and from ATNS relating thereto.

We look forward to hearing from you as a matter of urgency.

Regards
Riaan Meintjes
Director

BusinessDay Best Lawyers for 2025: Arbitration and Mediation; Litigation; Real Estate Law

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Date: Wednesday, 16 July 2025 at 13:55
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Interested and Affected Party,

Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.

The revised comment period now ends on 15 August 2025.

All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.

Thank you for your continued participation.

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Lucien Barbeau
Senior Consultant

Sustainability is our business

Cape Town
[redacted]

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OFFICE OF BIODIVERSITY CONSERVATION

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

Ref : LUA 25/3966(4)
Unit : LUA/SS
Enquiries: F.N. Krige & Dr. M Lötter
E-mail: frans@mtpa.co.za
[redacted]

Ms. S. Gopaul
Environmental Resource Management Southern Africa (Pty) Ltd.
The Great Westerford
240 Main Road
Rondebosch
Cape Town
7700

[redacted]
E-mail: stephanie.gopaul@erm.com

Dear Ms. Gopaul

SUBJECT: MTPA'S COMMENTS ON THE DRAFT ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE REVISED EMVELO WIND ENERGY FACILITY COMPRISING OF 24 WIND TURBINES AND AUXILIARY INFRASTRUCTURE. PROJECT FOR EMVELO WIND ENERGY FACILITY (PTY) LTD, MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE. DFFE REFERENCE NUMBER: 14/12/16/3/3/2/2611.

1. INTRODUCTION

The Mpumalanga Tourism and Parks Agency (MTPA) has reviewed the application for the proposed Emvelo Wind Energy Facility (WEF) and associated infrastructure (Reference: 14/12/16/3/3/2/2611), dated 14 July 2025.

The MTPA notes the changes made, such as a revised layout with a reduced number of turbines (now up to 22) and a lower maximum output capacity of up to 240 MW. While these revisions were informed by additional studies identifying sensitive areas requiring avoidance, the modifications often merely shifted turbines into partially transformed areas, with blades and footprints still encroaching on sensitive habitats. These changes are not substantial enough to address our concerns, and the MTPA does not support the current proposed layout.

Key areas of concern include potential impacts on critical habitats such as intact grassland patches, Critical Biodiversity Areas, Important Bird Areas (IBA), climate change corridors, and National Protected Area Expansion Strategy (NPAES) zones; risks to avifauna, including numerous species of conservation concern; perceived shortcomings in specialist assessments and statistical methods; insufficiently tested mitigation measures, especially with respect to buffer zones; and the cumulative impacts within a region already facing significant development pressure.

2. CORE CONCERNS

2.1 Impacts on Sensitive Habitats

Intact Grassland Patches

Intact grassland patches allow species to thrive and to support species that may need to move in response to climate change, enabling the normal functioning of natural ecological processes such as fire regimes or pollination. These patches are typically larger than 100 ha, with little or no gaps and minimal edge effects, and occur in close proximity to other intact grassland patches. They function as "source areas" in metapopulation dynamics where birth rates exceed death rates. No significant impacts should be allowed that would change a source area into a sink area (where death rates exceed birth rates). Mpumalanga has only 1,039 intact grassland patches, covering 15% of the province. These areas have been prioritised for their connectivity importance and must be avoided by wind energy facilities.

The intact patches on Emvelo are critical for maintaining connectivity with other grasslands. Despite MTPA raising concerns, specialist reports were largely silent on their importance. Using over 80,000 bird observations, the MTPA confirmed that intact grasslands have a 22% higher likelihood of hosting birds of conservation concern, 49% more birds of conservation concern, and 98% more individual bird observations than non-intact grasslands. These patches make up 23% of the Emvelo WEF footprint, and six turbines (13, 19, 20, 22, 23, and 25) are located within them. These turbines should be removed.

The MTPA feels strongly that the establishment of wind farms in intact grassland patches should not be allowed as it may turn a "source" area into a "sink" area. Even Pages 3 and 4 of the Faunal assessment within the DEIA recognises that "*Faunal integrity relies on inter-connected grassland habitats across landscapes*." and "*…any contiguous areas of intact grassland are considered as high conservation importance*."



Figure 1: 3D map showing the location of the current turbines. Intact grassland patches are shown in green. Nest sites of threatened birds in red. In the current layout, there are still many turbines in the intact grassland patches.

Other Sensitive Spatial Areas:

Climate Change Corridors

The MBSP's climate change corridor network was designed to enable species and ecosystems to adapt to a changing environment. The corridor network considered a single-best (least-cost) corridor connecting up the climate change refugia with the climate change corridors from adjacent provinces. Additional fine-scale corridors were then identified using Circuitscape, finding alternative pathways and identifying pinch points in the corridors and thereby building resilience into the corridor network.

As can be seen from Figure 2, climate change corridor runs predominantly north-south through the project area, linking the climate change focal areas (as well as coincidentally the Grassland IBA with the Chrissies Pans IBA). Given that large birds do not fly in narrow, predictable lines, a flight corridor would need to be functionally broader than the MTPA provided fine-scale corridor. A broader macro-scaled corridor would be required for avifauna to ensure safe passage along the corridors. Maintaining this linkage is essential for long-term ecological resilience under climate change. The following turbines are within 500m of the climate change corridors and should be removed: 1, 4, 5, 7, and 25, as they would compromise this corridor.

The risk from the proposed wind farm on the corridor network is that the wind farm is unfortunately located along an important north-south macro regional flyway/corridor (also supported by vulture tracking data, Figure 9) which will result in increased collisions and electrocution, and habitat displacement. It stands to disrupt movement along the corridor and result in increased mortalities.

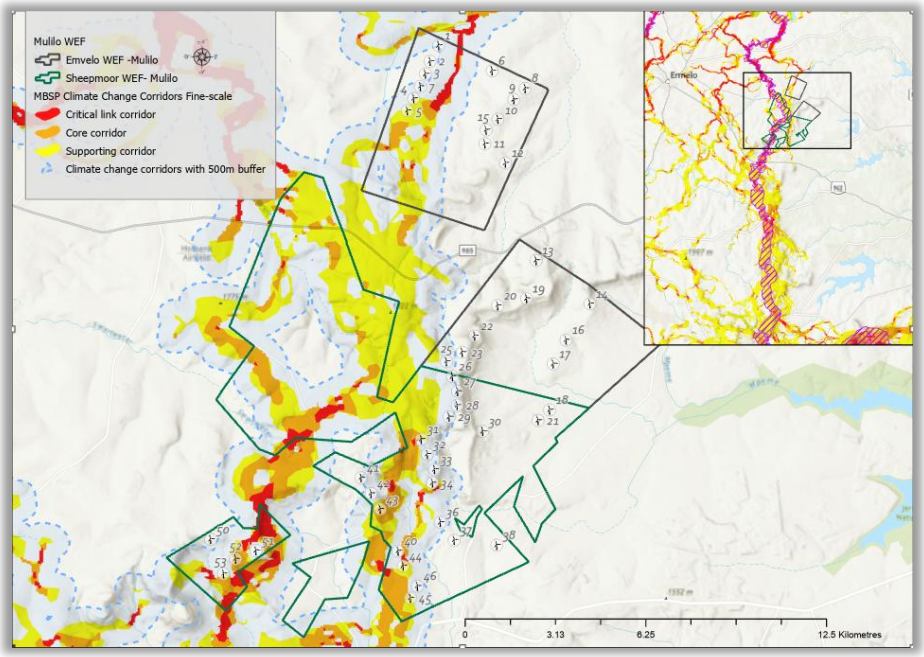


Figure 2: MBSP Climate Change Corridor network that links up climate change priorities with refugia and national climate change corridors. A 500m buffer has been added to the fine-scale corridors due to the need to accommodate mobile avifauna along a macro-scale corridor.

National Protected Area Expansion Strategy (NPAES 2018)

Over 70% of the proposed WEF falls within NPAES spatial priority areas, with 25% of turbines directly on focal areas. These sites are nationally significant for conservation expansion. Currently, seven turbines (13, 14, 19, 20, 22, 23, and 25) are located in NPAES zones and should be removed.

2.2 Avifaunal Risks and Buffer Zones

The site's recognised avian biodiversity, including numerous sensitive and threatened species, necessitates a highly precautionary approach to impact assessment and mitigation. Many of the proposed mitigation measures are novel, untested, and costly. We don't believe the developer has adequately considered the costs of implementing all the recommended mitigation (and curtailment) measures on the success of this project, nor the chances of their efficient implementation (as they rely on models, people, expertise, budgets, and commitment).

Important Bird Areas (IBAs) and IUCN Key Biodiversity Araes (KBAs)

The proposed WEF falls in an area rich in bird species, particularly birds of conservation concern. Thirty-two priority bird species for wind energy development have been recorded within the WEF and broader area. An additional seventy-six species have been recorded which are powerline sensitive. Of particular concern are the occurrence of African Grass Owl (VU), African Marsh-Harrier (EN), Black Harrier (EN), Blue Crane (VU), Blue Korhaan (NT), Cape Vulture (EN), Denham's Bustard (VU), Grey Crowned Crane (EN), Lanner Falcon (VU), Martial Eagle (EN), Secretarybird (EN), Southern Bald Ibis (VU), White-bellied Bustard (VU), and Yellow-breasted Pipit (VU). These are all threatened bird species at risk of extinction, over various timeframes. This rich avifaunal biodiversity is recognised regionally and globally through its inclusion within IBAs and KBAs. IBAs make up 49% and KBAs 65% of the Emvelo WEF.

At the heart of the MTPA's concerns, resulting in our objection, is the rich avifaunal diversity that is at risk of continual loss of mature individuals through collisions and electrocutions.

The avifaunal specialist report acknowledges that collision can be reduced from a high to a medium impact following post-mitigation. However, **with 14 threatened bird species occurring on site**, reducing the impact to a medium level is still significant (if at all possible), as any loss of large individuals may impact the conservation status of these species, particularly in light of cumulative impacts from the 302 planned or approved, and 82 approved wind turbines within 35 km of Emvelo WEF. Additionally, the avifaunal specialist report assessed the cumulative impact of Emvelo WEF to be moderate to high.

BirdLife monitoring report of 2025 states that on average, for every turbine, there are 4.25 bird fatalities per year, and that 10% of these were species of conservation concern. With every turbine added, the risk of collisions increases.

White-winged Flufftail **(**Critically Endangered**)**

- Collision risk modelling results for White-winged Flufftail yielded a mean annual fatality rate of 1.54 birds/year with the original wind turbine layout, which was reduced to 0.45 birds/year with implemented avoidance of core (highly suitable) habitats. For a Critically Endangered species, with only a handful of known localities in South

Africa, we cannot afford to lose 1 bird every 2 years for the next 25 years. This would certainly push this species closer to extinction. This risk is too high.

- The February reports explicitly states a 250 m buffer around White-winged Flufftail habitat, defined through detailed habitat modelling. The July reports mention that White-winged Flufftail habitat is "appropriately buffered" and that "movement corridors were determined and buffered," but the report does not explicitly state a numerical value for this buffer.
- The developer commits to implementing dynamic, real-time nocturnal curtailment i.e., from dawn to dusk for the duration of the summer season, for all wind turbines located within the modelled medium risk zone and traversing White-winged Flufftail habitat connectivity corridors. The following turbines are affected: 26, 27, 28, 29, 31, 44 and 45.
- Of greater concern is the fact that **White-winged Flufftail has been recorded on site although there is scant mention of it**. There is reference to being recorded in the Avifaunal assessment on Page ii, 19, and 21. Its occurrence on site is significant and a fatal flaw.
- BirdLife (Lloyd et al. 2025) distinguishes between *habitat buffer* zones and *species buffer* zones for White-winged Flufftail. Habitat buffer zones maintain ecosystem functions and processes that the species rely on, while species buffer zones protect and maintain the biological needs of a particular species.
- BirdLife published a guideline (Lloyd et al. 2025) for developments with collision risks, like wind turbines, **with buffer zones of at least 5 km between the development and wetlands suitable for the White-winged Flufftail**, with buffer zones of at least 1 km for delineated wetland inputs (habitat buffers). Importantly, the buffers proposed in the avifaunal report equate to the habitat buffers while the species buffer was not implemented. This is a fatal flaw.
- The occurrence of White-winged Flufftail on Emvelo is also confirmed within the Draft REDZ layer on nests, tracking data, roosts and sightings. These points were buffered for the REDZ project, but one can easily find the wetlands within this buffer. This point won't be provided here, to protect the locality, but I buffered this point, and an adjacent one, by 5 km and the result excludes a significant amount of the Emvelo WEF. See Figure 3 below.

African Grass Owl

- African Grass Owl (*Tyto capensis*), a regionally Vulnerable species, has been recorded on Emvelo WEF in the east. These endemic and range-restricted owls have a very small home range of 423 ha (Pretorius 2019). To avoid any impacts to these sites, Pretorius *pers. comm.* recommends this home range be converted to a radius of a circle of 423 ha in size. This equates to a 1160 m buffer. By applying these to the known observations on Emvelo, it affects the placement of turbines 17 (Emvelo) and 18 (Sheepmoor). These localities are buffered and mapped in Figure 4.

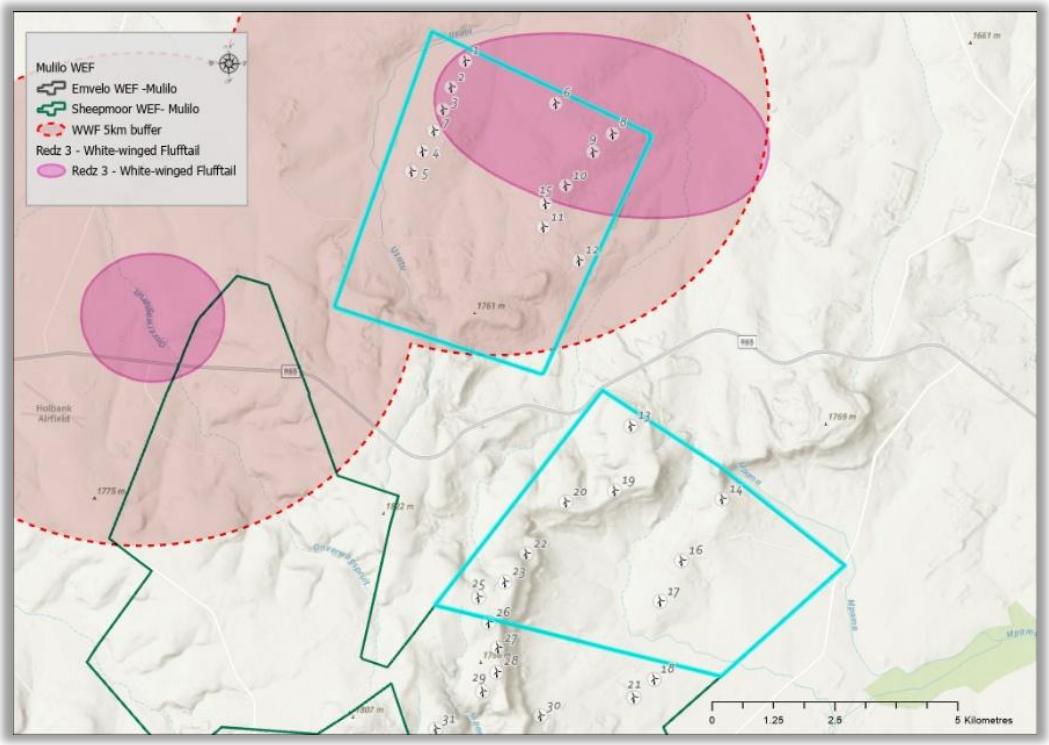


Figure 3: Confirmed White-winged Flufftail within Emvelo WEF, with REDZ 3 locality from Avifaunal risk layer and with point locality buffered by 5 km as a no go to development zone (Lloyd et al. 2025).

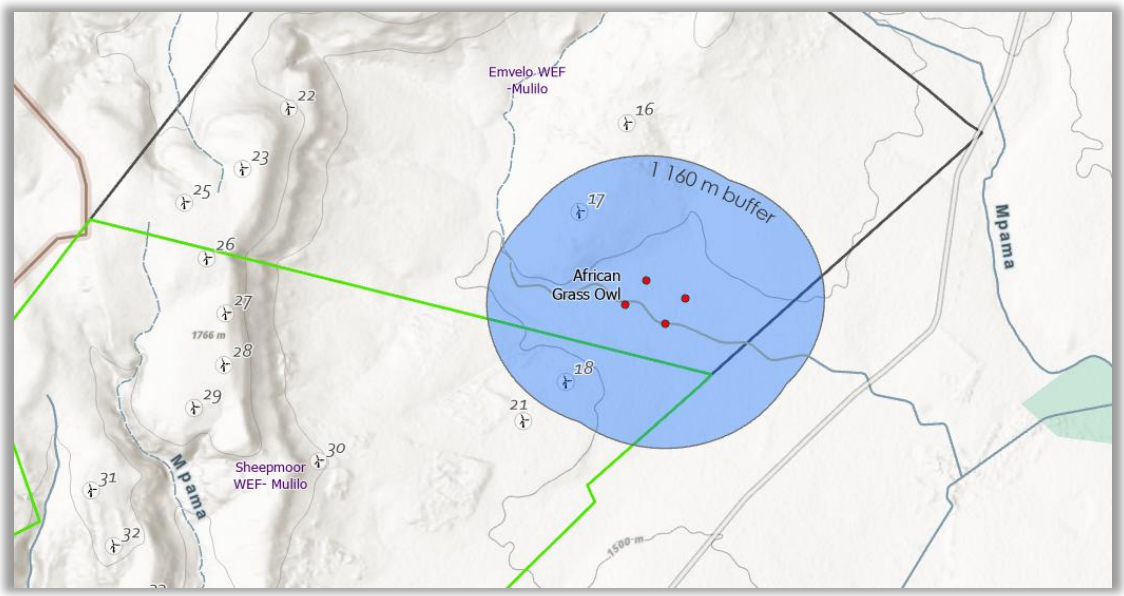


Figure 4: African Grass Own (Vulnerable) localities with the recommended 1160 m buffer to cover their strict home range of 423 ha.

Avifaunal assessment for draft Strategic Environmental Assessment for Phase 3 For Wind and Solar Photovoltaic Energy

The MTPA received the REDZ datasets from the CSIR in May for comment. These datasets may still be refined, but they represent the best available avifaunal data that will eventually inform the DFFE screening tool. Although still a draft product, the dataset is based off actual data and the MTPA believe it to be a significant improvement in the data currently available to evaluate renewable energy applications. Querying this dataset, besides the Critically Endangered White-winged Flufftail being present within the Emvelo footprint, the following important avifaunal datasets cover Emvelo (Table 1). The spatial extent these features is mapped in Figure 5.

Table 1: List of REDZ species and their risk and conservation status occurring over Emvelo and Sheepmoor WEFs.

Species	Risk	RDL Status
African Grass Owl	High	Vulnerable
Cape Vulture	Medium	Endangered (Regionally)
Grey Crowned Crane	High	Endangered
Rudds Lark	High	Endangered
Secretarybird	Very High	Endangered (globally)
Southern Bald Ibis	Very High	Vulnerable
White-winged Flufftail	Very High	Critically Endangered
Wattled Crane	High	Critically Endangered
Yellow breasted Pipit	Very High	Vulnerable

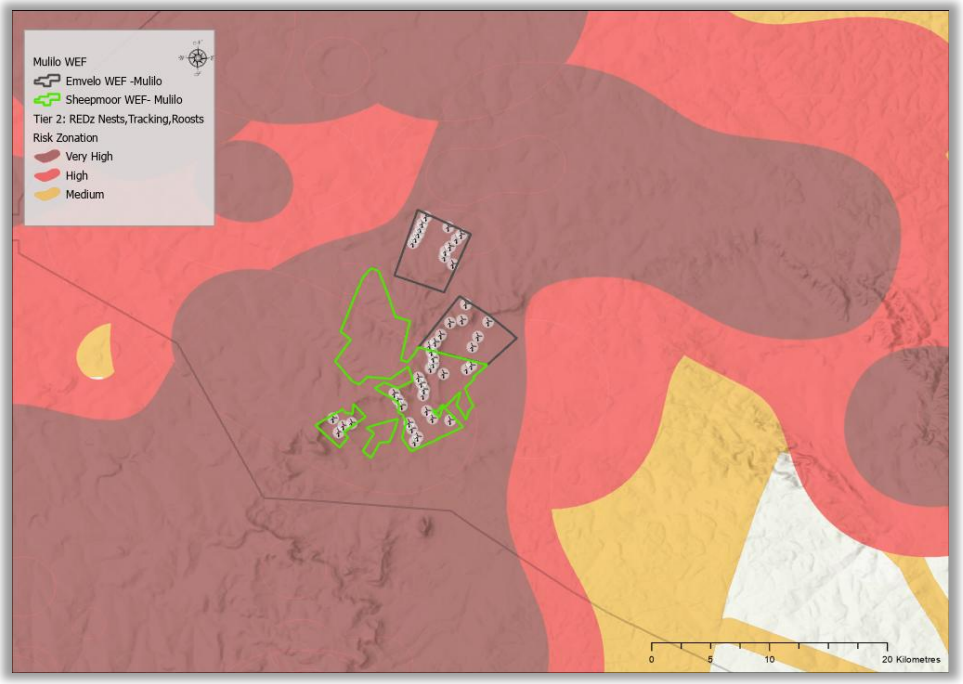


Figure 5: Spatial extent of the Tier 2 draft SEA REDZ 3 avian sensitivity layer covering Emovelo and Sheepmoor WEFs.

Buffers: Martial Eagle

The MTPA has significant concerns regarding the use and modelling of Martial Eagle collar data. The MTPA obtained a copy of the flight data containing 13,111 observation points, compared to the 13,680 observations used by AfriAvian. We used GIS to confirm key findings in the avifaunal assessment, focusing only on data from juvenile and adult tracking collars around the Emvelo and Sheepmoor sites, excluding the Free State male.

EWT previously advised using a 5-6 km buffer around nest sites. More recently, BirdLife (2025) recommended a 6 km buffer around nesting sites. This recommendation aligns with preliminary outputs from the National Martial Eagle Risk Assessment (MERA) tool led by the University of Cape Town, which supports applying a circular buffer of approximately 5 km to include core ranges heavily utilised by resident breeding Martial Eagles, rather than applying bespoke buffers based on tracking and observational flight path data. Given 40 individual collared Martial Eagle tracking datasets, researchers could not build a reliable model to guide wind farm development, as Martial Eagles appear particularly difficult to model for flight patterns.

Against this backdrop, it is concerning that AfriAvian claimed they could accurately model flight risk for Martial Eagles and were confident enough to reduce the nationally recommended buffer by more than 50% (to 2.5 km for the High Risk zone). Such confidence in model output would be required to make this bold decision, as any failure may result in the loss of both parents and the entire breeding pair.

AfriAvian's Approach: AfriAvian combined all GPS tracking data with fine-resolution field monitoring data (37+ hours of observations) to develop a Flight Risk Model. The output was processed to identify High and Medium risk zones. The High risk zone encompassed approximately 79 km², comparable to the area covered by a 5 km circular buffer (78.5 km²) recommended by BirdLife and EWT. However, AfriAvian then extracted from the High risk zone a "Very High risk zone" as their no-go area, relying on Martial Eagle tracking and observational data showing approximately 75% of recorded flight activity within 3 km of the nest. This was not only a subjective decision lacking scientific rigour, but as demonstrated below, the approach is fatally flawed.

Statistical Flaws in the Model: The flight risk model created using machine learning combined coarse-scaled GPS data across a wide area with fine-scaled, dense flight path data from a very limited area (majority within 2 km of nest) (see Figure 18 in the avifaunal assessment). Incorporating detailed, fine-scaled observational flight paths from such a limited area introduces spatial bias, where model output is disproportionately influenced by the more detailed sampling from the fine-resolution area, leading to overrepresentation of that smaller region.

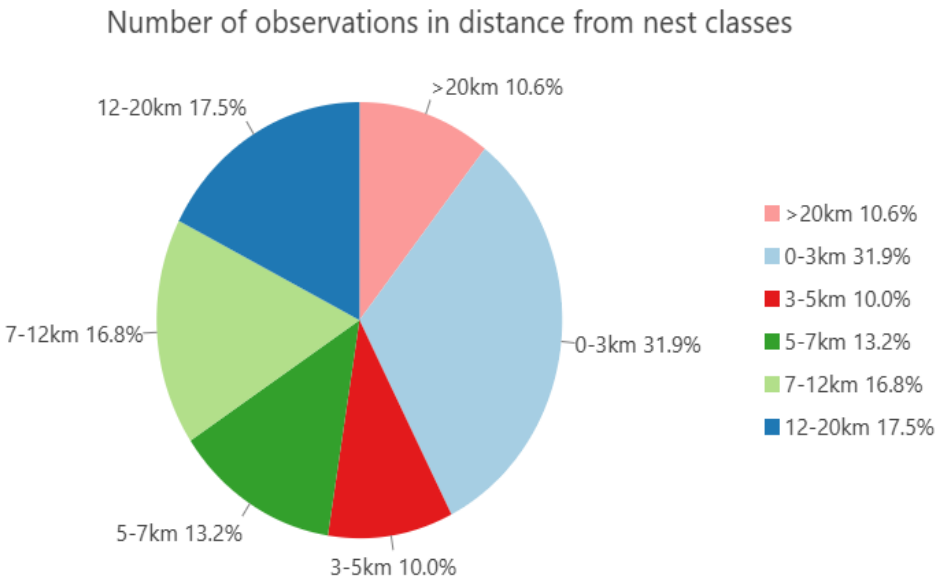
This approach is statistically flawed when differences in spatial area, resolution, sampling intensity, and density are not properly accounted for. This violates spatial statistical assumptions, resulting in inconsistent variance estimates, inaccurate predictions, and biased interpretations that do not accurately reflect broader spatial patterns.

MTPA Analysis and Findings: The MTPA used the same GPS tracking data to verify whether Martial Eagles spent 75% of their recorded flight activity within 3 km of the nest but could not replicate this statistic. We calculated the distance between each GPS observation (n=7266) and the nest, we then categorised each observation into the same distance classes that AfrAvian used in Figure 22 of their report. We used only flight data from the adult female and juvenile in this area, discarding Free State data (nest location unknown).

Importantly, we separated data into two types: (1) the complete dataset covering flying and stationary periods, and (2) a subset including only flying periods (>0.2 km/h). The second dataset was considerably smaller. Although collar tracking was programmed not to record locations between 19:00 and 4:00, 20% of observations were still recorded at before sunrise or after sunset. For flight risk modelling, only observations when birds are flying and at collision risk should be included, not when roosting, nesting, or perched.

We calculated the distance within which 75% of all observations occurred for the full dataset (including evening and nesting periods), finding a distance threshold of 5.6 km. For the flying-only dataset, this distance increased to 13.5 km (see Figures 6 and 7).

For AfriAvian to get to a value of 75% for all observations within 3km of the nest, they must have (1) used all the flight data, including the datasets that were only recorded at the nest (introducing spatial bias and a statistical flaw), (2) they must have used all the observational data, including when the bird was stationary and sitting on a nest, and (3) a different statistical approach to analysing the data. Regardless, our analysis provides a markedly different outcome, aligned with the 5-6 km buffer recommended by EWT and BirdLife, and invalidates the 2.5 km buffer proposed by Mulilo for the High Risk zone. This High Risk zone should be removed as there is no statistical confidence in its delineation, potentially putting birds at collision risk.



Distance from nest class	Flying only localities	Flying / Stationary localities
0-3km	31.9%	58.6%
3-5km	41.9%	60.8%
5-7km	55.1%	77.9%
7-12km	71.9%	85.3%
12-20km	89.4%	95.3%
>20km	100.0%	100.0%

Figure 6: Pie chart showing the number of Martial Eagle observations/points within distance classes from Martial Eagle nest. The table on the right presents the cumulative value of the distance classes, for the entire combined dataset, or with only the localities where the Martial Eagle were flying (>0.2 km/h). Results show that for the entire dataset of 7 266 points, 75% of the observations were within 5.6 km of the nest, while for the flying Martial Eagles, 75% of the records were within 13.5 km of the nest.



Figure 7: Bar-chart showing the number of observations from the collar tracking data in distance classes as used in Figure 22 of avifaunal report. Top-most chart presents all the observations (n=7266) for the adult and juvenile Martial Eagles. The middle chart presents only the observations where the Martial Eagles were flying (n=1122) in distance classes from nest. Bottom chart presents the combined datasets for both juvenile and adult birds in distance classes from nest. Bar chart bars are labelled with actual number of records in each class.

Breeding Cycle Considerations: Martial Eagles display significant differences between breeding and non-breeding periods. They typically breed every second year; therefore, a minimum of two years of data is essential when considering range use to capture both intensive breeding seasons and "sabbatical" periods when Martial Eagles often utilise larger ranges away from nesting sites. The GPS records for both birds covered 1 year and 1 month (10 April 2024 to 9 May 2025), meaning AfriAvian's analysed data did not cover a full two-year cycle.

Adult female Martial Eagles utilise home ranges differently than males, who spend considerable time hunting and provisioning for incubating partners and developing nestlings. During core breeding periods, females exhibit much higher nest site fidelity while males forage extensively over larger ranges. Females typically do not fly as far as males during core breeding seasons; therefore, the exclusion and lack of buffers considering male Martial Eagle range use is concerning. The conclusions did not factor in male flight activity, range use, and flight paths over the Mulilo project area.

Mitigation Concerns: Proposed mitigation measures include curtailment for Martial Eagle flights. However, the avifaunal report found that Martial Eagles are most active at moderate wind speeds of 5.5-10 m/s. Curtailment would significantly impact turbine power generation capacity, and we believe these costs were not considered in assessing the viability of proposed mitigation measures.

With the 5.5 km circular buffer being the current recommended buffer around Martial Eagle nests, the application of a 5.5 km buffer will result in the removal of 16 turbines, namely: 4, 5, 7, 9, 10, 11, 12, 13, 14, 15, 16, 19, 20, 22, 23, and 25. See Figure 8 below.

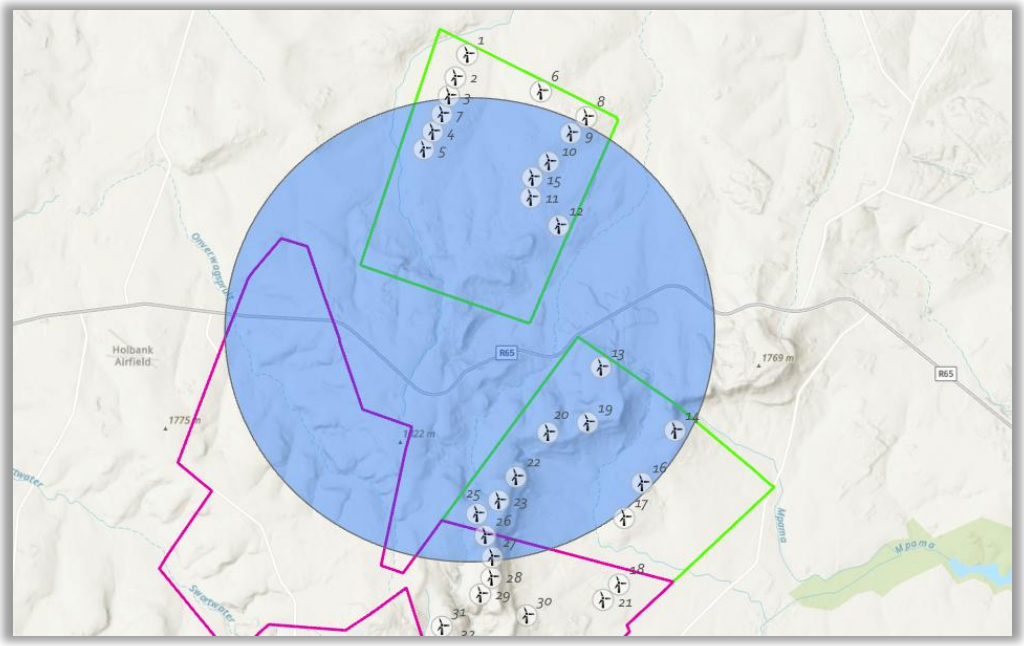


Figure 8: Application of a 5.5 km buffer around the Martial Eagle nest site and the impacted wind turbines.

Avifaunal Assessment: 2 -year of vantage point monitoring required and overreliance of models

Given the site's avifaunal sensitivity, two years of comprehensive avifaunal monitoring would be required. While we understand an additional year was added to monitor the Martial Eagle, this did not include visiting all vantage points as required by BirdLife guidelines. Figure 19 in the Avifaunal assessment shows the limited extent of this additional monitoring, which was confined to the Martial Eagle nest site. Such sensitive and vulnerable avifauna requires more comprehensive monitoring to properly understand and assess potential impacts.

Modelling is used throughout the project sites, from the identification of suitable habitat to avoid, through to predicting where Southern Bald Ibis is likely to fly once leaving a roost, to mitigating impacts. AfriAvian's flamingo model for Leghoya WEF was found to miss 50% of the important pans supporting flamingos (based on actual sightings). We highlight above the spatial bias that was introduced into the Martial Eagle Flight Risk Model, and the inability to replicate and confirm that 75% of the recorded flight activity is within 75% of the nest. George P. Box famously once said "*All models are wrong, but some are useful*". We need to be careful on our reliance on models.

There is an increasing tendency to over rely on models, perhaps because they sound to sophisticated, to mitigate and minimise all possible impacts to acceptable levels. This is wrong. Unless models can be validated with data that was withheld, or gathered afterwards, we need to approach models with caution. Models may be acceptable when they refine boundaries of established circular buffers, but they become problematic when they result in 50% reductions in buffer boundaries without validation or peer review. Our detailed analysis of the Martial Eagle model revealed several critical flaws, as discussed above.

As a result of these repeated issues with model accuracy and validation, the MTPA has become increasingly distrustful of models as primary decision-making tools for sensitive environmental assessments. Robust field monitoring and established precautionary guidelines must take precedence over unvalidated modelling outputs.

Cape Vulture flyways

Cape Vultures are globally vulnerable and regionally endangered. The specialist assessment did observe Cape Vultures over the project area for 48 minutes over 756 hours, and within the rotor swept zone. This amounts to 1 vulture visit every 2 weeks. According to the vantage point priority bird monitoring statistics, Cape Vultures were the 7th most observed priority species (out of 23) over the 1 year of observation.

In the recent Birdlife summary report from monitoring operational wind energy facilities (2025), it provides a case study of a wind farm that recorded a very low numbers of Cape Vultures during pre-construction monitoring (recorded in less than 1% of total vantage point surveys), yet later in the year, once operational, the wind farm had shutdowns involving 384 Cape Vultures. This highlights the need for impact assessments to incorporate all sources of information, and to be careful of initial low observations during pre-construction monitoring.

The MTPA queried the Cape Vulture flight paths on Movebank.org early in April 2025 – See Figure 9 (Kruger NP Raptors E-obs (n=18); Vulpro (Rehab & Captive bred) (n=123); & EWT SigFox Vultures (n=18)) to create the below map showing Cape Vulture flight paths based on density of observations in Movebank.org. This data in Figure 9 clearly shows a north-south flightpath that connects the northern Mpumalanga Escarpment with KwaZulu Natal in the south. And with the

specialist reported observation that the vultures fly within the rotor swept zone, we are very concerned about the risk that the wind farm may pose to vultures as they fly through this corridor. This corridor impacts all the proposed wind turbines.

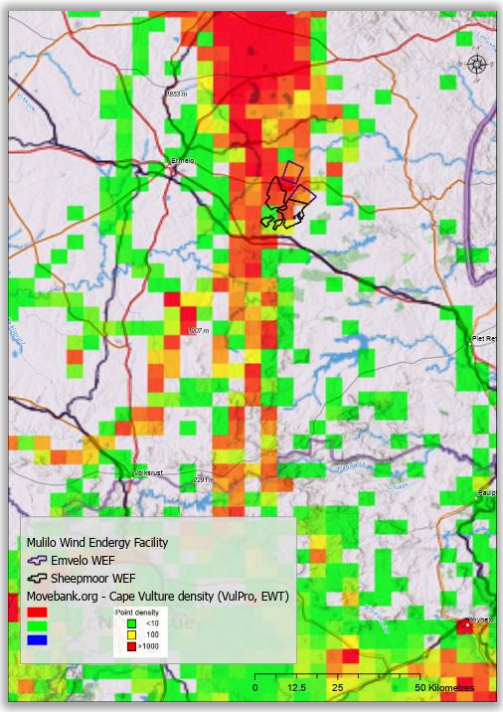


Figure 9: Tracking data from Cape Vultures flying over the Emvelo and Mulilo WEFs. Data sourced from Movebank.org in April 2025. Data source VulPro, EWT. Symbology represents density of recorded points. Red = high density.

Vantage Point Monitoring

Based on the latest and current turbine layout, 5 out of the 22 turbines are not covered by the 2 km vantage point buffers, amounting to 23% of turbines not been covered.

2.3 Specialist Assessments - other

While extensive specialist work has been undertaken, MTPA notes areas where further information or methodological alignment could strengthen the overall environmental assessment.

General

Enhanced integration between the aquatic, faunal, bat, terrestrial and avifaunal assessments is recommended to better understand potential synergistic or cumulative biological impacts.

Faunal Specialist Assessment

Placement of infrastructure in high/very high sensitivity areas warrants careful justification given specialist recommendations to avoid these areas. While we acknowledge the inclusion of a detailed oribi management plan, no detailed oribi survey of this area has occurred, nor is a map of oribi habitat or oribi observations included. Its inclusion at this late stage is only in response to issues raised in the Draft EIA report. Although it is possible that an oribi management plan could improve the local status of the oribi within the footprint area, it can also be said that the failure to adequate survey for oribi since this was raised in the scoping report stage (meeting), means that the proposed development may have a significant negative impact on the oribi. How do we know that turbines, roads, or infrastructure will not be placed in core habitat for oribi? The MTPA has reached out to EWT and they do not know what impact wind turbines will have on this highly sensitive mammal. The developer should not be surveying for oribi after the development is approved, it should have happened during the EIA phase.

Terrestrial Biodiversity Assessment:

The MTPA has significant reservations regarding the Terrestrial Assessment. Key concerns include:

- The terrestrial biodiversity theme is still not aligned with SANBI's Species Environmental Assessment Guideline (2022) that the consultant is required to comply with in terms of Notice 1150 of Government Gazette 43855 of 2020.
- The author only allowed for 4 days to survey both the Sheepmoor and Emvelo WEF sites during the summer months, when most summer rainfall plants would be flowering and identifiable. Four days is certainly not enough to cover an area this size (12,543 ha for both WEFs). This report is the same report as submitted with previous DEIA.
- No plant species of conservation concern, or endemics, were recorded on site. This is not surprising given the lack of time to survey this large area. ERM also opted to appoint a botanist not familiar with the flora of this area. There are several endemics restricted to this area that would be unfamiliar to someone not from the area. It just makes it harder to confirm identification, particularly with limited time and coverage in the field. **The MTPA is confident that several species of conservation concern would occur on site; they were just not detected**.
- The failure to apply the SANBI Guidelines resulted in inadequate time being allowed to properly assess the terrestrial biodiversity (botany) and the determining of site ecological importance (SEI). The consultant did not follow the SEI methodology, as required in terms of the SANBI guidelines and the MTPA does not believe that the approach followed to identify sensitive areas would be able to adequately assess the environmental sensitivity for this area. There were a number of additional variables that could have been applied (site-specific species, CBAs and ESAs, climate change corridors, intact grasslands, rocky ridges, etc.), patch size, together with criteria and approach of that are required in the SANBI Species Environmental Assessment Guidelines.
- The approach followed resulted in some CBA Irreplaceable areas, that overlapped with intact grasslands and provincial climate change corridors, being designated **medium** sensitivity (as a maximum value because it did not ultimately fall within the Eastern Highveld Grassland). This is fundamentally wrong as there was no consideration for any species of conservation concern (like roosting areas) or other spatial priorities like CBAs to meet biodiversity targets. Applying the SANBI criteria could allow the montane grassland to be categorised as *high*, or even *very high* if species and additional data were considered.
- In terms of the terrestrial biodiversity assessment, the result is that the montane grassland (not degraded) is of *medium* sensitivity, but the degraded Highveld grassland has *high* sensitivity, and non-degraded a *very-high*

sensitivity. This does not make sense. We have significantly more threatened plant species recorded in the Wakkerstroom Montane Grassland than for the Eastern Highveld Grassland and consider far more sensitive.

- Ultimately, the MTPA does not agree with the vegetation sensitivity analysis that then fed into other planning processes, such as the offsets, as it did not apply SANBI's Species Environmental Assessment Guideline (2022).

2.4 Biodiversity Offset Report (BOR)

Firstly, the MTPA never requested a biodiversity offset report. When meeting with Mulilo many months ago, Mulilo mentioned they would offset their impacts, and even committed to developing an Oribi Biodiversity Management Plan. In reviewing the first DEAI, the MTPA merely commented that there were no BOR or Oribi management plans.

The MTPA appreciates the effort that has gone into compiling the draft Biodiversity Offset report, however the offset assessment and report only partly covers the residual biodiversity loss to sensitive areas, such as CBAs and Intact Grassland Areas, and not to the avifauna of conservation concern. The offset report should in fact explicitly assess whether any residual impacts affect irreplaceable biodiversity that cannot be offset, which will be a fatal flaw. In addition, the MTPA feel that the anticipated negative impacts to long-lived threatened bird species cannot be adequately quantified nor offset.

The proposed BOR sets specific hectare targets for offsetting the direct loss of natural terrestrial habitats, particularly for areas supporting Species of Conservation Concern (SCC). These targets are based on biodiversity offset ratios, with a total of 507.15 hectares designated for offset, broken down by vegetation type and Mpumalanga Biodiversity Sector Plan (MBSP) category. The core of the terrestrial offset involves restoration efforts on disturbed and transformed areas within the study area. These areas include cultivated lands, disturbed Montane Grassland, disturbed Highveld Grassland, and alien invasive plantations. The aim of the BOR is to create additional habitat for Species of Conservation Concern (SCC), such as the Oribi, by restoring degraded grasslands.

The proposed offset strategy is partly aligned with the national offset strategy, however the formal legal security of the offset sites is incomplete. The BOR is certainly not clear how the site security will be guaranteed over the long term. Mulilo have lease agreements, and mention that servitudes or protected areas declaration may be pursued, but that does not meet the requirement of the offset guideline to do so and secure them. Mulilo proposes several internal onsite areas as offsets. These may not meet the requirements for a protected environment in a wind farm where avifaunal collisions occur. The MTPA will only consider offsets away from areas with turbines as possible protected environments. Hence there is no guarantee that the selected offset areas can ever be secured. Offsite offsets should have been identified and assessed in the report.

Furthermore, the candidate portfolio of offset sites is not provided in any detail. This shortfall is important as it is required for the competent authorities to assess any risks that cannot be offset. In addition, Mulilo commits to monitoring and adaptive management but alignment with the national offset guidelines do require specific biodiversity outcomes, monitoring indicators, success thresholds, and reporting plans.

The long-term financing mechanism and governance of the offsets are not discussed in any detail. It is important to secure long-term management funding (via a trust, endowment, etc.) and the governance arrangements, such as who will manage the sites, who will audit performance, etc.

The BOR also relies on rehabilitating disturbed areas; however, offsets should ideally be in relatively good condition (except for wetlands, which can be disturbed). Once grassland has been ploughed or planted up with trees, the biodiversity does not recover in our lifetime and restoration of these areas do not meet the biodiversity offset requirements.

The BOR includes offsite actions for priority bird species and avifauna buffer concepts, however, these must be converted into measurable outcomes (e.g., collision mortality reduction targets, powerline design/marking standards, and monitoring). Alignment with the national offset strategy requires species-sensitive responses be explicitly built into offset design when species with specific habitat needs are affected.

2.5 Visual Impact

Page 134 in the DEIA states that the visual analysis of the Emvelo project was found to be fatally flawed.

2.6 Cumulative Impacts

The concentration of renewable energy projects in Mpumalanga (890 turbines approved, in process, or planned), particularly along this sensitive escarpment, necessitates careful consideration of cumulative impacts. Each additional project contributes incrementally to regional habitat fragmentation and potential impacts on species populations, especially avifauna. The avifaunal assessment states that the proposed Emvelo WEF, alongside three other renewable energy projects within a 35 km radius, would contribute to a total of 133 turbines in similar habitat. Emvelo's turbines represent approximately 18% of the total planned turbines, indicating a moderate to high cumulative impact. For Emvelo, the cumulative impacts on birds are rated as High pre-mitigation and Medium post-mitigation. Bearing in mind the very optimistic mitigation proposals, dependant on a multitude of models and processes, places the implementation at risk.

The MTPA queried its database on renewable energy projects and actual turbine locations to provide the following important statistics (based on approved, under-consideration, and planned wind farms). Please note that these numbers include the current proposed Emvelo project's turbines within the numbers that are presented.

- *10 km radius*: 57 turbines (none approved)
- *20 km radius*: 107 turbines (2 approved)
- *35 km radius*: 302 turbines (82 approved)

The actual number of turbines approved or in process of being approved is double that what the avifaunal specialist used in their calculations. Yes, the Emvelo addition would make up a smaller percentage but it adds to the threshold beyond which avifauna populations(and bats) may start crashing. With every turbine added, the risk of collisions increases. As these turbines have not been built, the renewable energy industry and government, do not fully comprehend the massive impact that the wind farms will have on the avifauna and bats and the need to preserve sensitive areas to ensure their long terms persistence.

2.7 Acknowledgement of recent change in landcover and impact on spatial mapping products

The delineation of the CBAs and intact grassland patches was based off a landcover map from 2010 and 2019 (but just for CBAs). Any subsequent loss or transformation is not a fault in the MBSP or intact grassland patches, but as a result of a legal or illegal change in land use. In the MBSP Handbook, the guidelines recommend that a site assessment is required to confirm the current land use. Any loss may require additional areas to meet targets (to be addressed in MBSP v2), while acknowledging that **the CBA status may no longer apply to these areas if they have been ploughed or developed** (where recovery is not possible within our lifetimes). Therefore, in terms of the Emvelo WEF, any change in land use from natural to cultivation or plantation would result in this particular area no longer being identified as a CBA or intact grassland patch.

The impact of this has been considered when commenting on turbine placement and those that need to be removed.

3. Summary of Turbine Locations Requiring Reconsideration

Should DFFE proceed towards authorisation, we strongly recommend the exclusion of the turbines identified in below.

- WT 1: KBA, Climate change corridor, within 5km of White-winged Flufftail,
- WT 2: KBA, Within 5km of White-winged Flufftail,
- WT 3: KBA, Within 5km of White-winged Flufftail,
- WT 4: KBA, Climate change corridor, within 5km of White-winged Flufftail, within 5.5 km of Martial Eagle nest.
- WT 5: KBA, within 5km of White-winged Flufftail, within 5.5 km of Martial Eagle nest
- WT 6: KBA, within 5km of White-winged Flufftail,
- WT 7: KBA, CBA, climate change corridor, within 5km of White-winged Flufftail, within 5.5 km of Martial Eagle nest
- WT 8: KBA, within 5km of White-winged Flufftail,
- WT 9: KBA, within 5km of White-winged Flufftail, within 5.5 km of Martial Eagle nest
- WT 10: KBA, within 5km of White-winged Flufftail, within 5.5 km of Martial Eagle nest
- WT 11: KBA, within 5km of White-winged Flufftail, within 5.5 km of Martial Eagle nest
- WT 12: KBA, within 5km of White-winged Flufftail, within 5.5 km of Martial Eagle nest
- WT 13: IBA, Intact grasslands, NPAES, within 5.5 km of Martial Eagle nest
- WT 14: IBA, NPAES, within 5.5 km of Martial Eagle nest
- WT 15: KBA, within 5km of White-winged Flufftail, within 5.5 km of Martial Eagle nest
- WT 16: KBA, IBA, Within 5.5 km of Martial Eagle nest
- WT 17: KBA, IBA, Within African Grass Owl buffer
- WT 19: IBA, Intact grasslands, NPAES, within 5.5 km of Martial Eagle nest
- WT 20: IBA, Intact grasslands, NPAES, within 5.5 km of Martial Eagle nest
- WT 22: IBA, Intact grasslands, NPAES, within 5.5 km of Martial Eagle nest
- WT 23: IBA, Intact grasslands, NPAES, within 5.5 km of Martial Eagle nest
- WT 25: IBA, Intact grasslands; climate change corridor, NPAES, within 5.5 km of Martial Eagle nest

4. Closing

In conclusion, the MTPA maintains a strong objection to the proposed Emvelo WEF in its current form. The site overlaps with highly sensitive and irreplaceable biodiversity features—including intact grassland patches, climate change corridors, Critical Biodiversity Areas, KBAs, IBAs, and NPAES priority expansion areas—supporting numerous threatened and endemic species. The avifaunal assemblage present, particularly threatened species such as the White-winged Flufftail, Martial Eagle,

Black Harrier, Denham's Bustard, Cape Vulture, and African Grass Owl, places this site among the most sensitive in the province for wind energy development.

Our review identifies substantial flaws in the baseline data, methodological approaches, and statistical analyses used in the supporting specialist studies, particularly in the avifaunal assessment. Several models relied upon for impact prediction and mitigation zone delineation are unvalidated, contain spatial biases, or deviate from nationally recognised guidelines. Critical surveys, such as comprehensive Oribi assessments and adequate botanical surveys aligned with SANBI protocols, were not completed. As a result, sensitivity mapping, buffer zones, and mitigation recommendations cannot be considered robust or defensible.

The proposed mitigation measures—many novel, untested, and potentially unfeasible—are unlikely to adequately reduce the high to very high pre-mitigation risks to acceptable levels. Given the cumulative turbine density in the broader landscape, the unquantifiable long-term impacts on species with slow reproductive rates, and the loss of ecological connectivity, residual effects are expected to be severe and potentially irreversible.

In light of these factors, the MTPA concludes that the current turbine layout and offset strategy are fatally flawed from both a biodiversity conservation and environmental authorisation perspective. We recommend that authorisation be withheld and that any future proposal for this site be preceded by at least two full years of comprehensive, guideline-aligned monitoring; complete botanical and faunal surveys; and a layout that entirely avoids intact grasslands, key corridors, and critical habitats for species of conservation concern. Only a precautionary, science-based approach can ensure the long-term persistence of the biodiversity assets of this region.

Please do not hesitate to contact this office if there are any enquiries.

Regards,



DR. M. LÖTTER
MANAGER BIODIVERSITY PLANNING
DATE: 15 August 2025

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References

- BirdLife South Africa 2025. Summary Bird Monitoring Reports from Operational Wind Energy Facilities in South Africa. BirdLife South Africa Occasional Report Series No. 3. BirdLife South Africa, Johannesburg, South Africa
- Lloyd KJ, Ralston-Paton S, Day KD, Retief E, Smit-Robinson HA. 2025. Guidelines for surveying and mitigating impacts on White-winged Flufftail in avifaunal assessments for development applications, Version 1. Johannesburg: BirdLife South Africa.
- South African National Biodiversity Institute, 2020. Species Environmental Assessment Guideline. Guidelines for the implementation of the Terrestrial Fauna and Terrestrial Flora Species Protocols for environmental impact assessments in South Africa. South African National Biodiversity Institute, Pretoria
- Pretorius, M.D. 2019. The ecological preferences of the African Grass Owl *Tyto capensis* on the highveld of South Africa. Master of Science. Tshwane University of Technology.

OFFICE OF BIODIVERSITY CONSERVATION

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Dear Ms. Gopaul

SUBJECT: MTPA COMMENTS ON THE DRAFT ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE REVISED SHEEPMOOR WIND ENERGY FACILITY (WEF) FOR SHEEPMOOR WIND ENERGY FACILITY (PTY) LTD, MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE. DFFE REFERENCE: 14/12/16/3/3/2/2613.

1. INTRODUCTION

The Mpumalanga Tourism and Parks Agency (MTPA) has reviewed the application for the proposed Sheepmoor Wind Energy Facility (WEF) and associated infrastructure (Reference: 14/12/16/3/3/2/2611), dated 14 July 2025.

The MTPA notes the changes made, such as a revised layout with a reduced number of turbines (now up to 25) and a lower maximum output capacity of up to 240 MW. While these revisions were informed by additional studies identifying sensitive areas requiring avoidance, the modifications often merely shifted turbines into partially transformed areas, with blades and footprints still encroaching on sensitive habitats. These changes are not substantial enough to address our concerns, and the MTPA does not support the current proposed layout.

Key areas of concern include potential impacts on critical habitats such as intact grassland patches, Critical Biodiversity Areas, Important Bird Areas (IBA), climate change corridors, and National Protected Area Expansion Strategy (NPAES) zones; risks to avifauna, including numerous species of conservation concern; perceived shortcomings in specialist assessments and statistical methods; insufficiently tested mitigation measures, especially with respect to buffer zones; and the cumulative impacts within a region already facing significant development pressure.

2. CORE CONCERNS

2.1 Impacts on Sensitive Habitats

Intact Grassland Patches

Intact grassland patches allow species to thrive and to support species that may need to move in response to climate change, enabling the normal functioning of natural ecological processes such as fire regimes or pollination. These patches are typically larger than 100 ha, with little or no gaps and minimal edge effects, and occur in close proximity to other intact grassland patches. They function as "source areas" in metapopulation dynamics where birth rates exceed death rates. No significant impacts should be allowed that would change a source area into a sink area (where death rates exceed birth rates). Mpumalanga has only 1,039 intact grassland patches, covering 15% of the province. These areas have been prioritised for their connectivity importance and must be avoided by wind energy facilities.

The intact patches on Sheepmoor are critical for maintaining connectivity with other grasslands. Despite MTPA raising concerns, specialist reports were largely silent on their importance. Using over 80,000 bird observations, the MTPA confirmed that intact grasslands have a 22% higher likelihood of hosting birds of conservation concern, 49% more birds of conservation concern, and 98% more individual bird observations than non-intact grasslands. These patches make up 23% of the Sheepmoor WEF footprint, and eight turbines (26, 27, 28, 29, 31, 32, 33, and 43) are located within them. These turbines should be removed. See Figure 1.

Therefore, the MTPA feels stronger than ever that the establishment of wind farms in intact grassland patches should not be allowed as it may turn a "source" area into a "sink" area. Even Page 3 and 4 of the Faunal assessment within the DEIA recognises that "*Faunal integrity relies on inter-connected grassland habitats across landscapes*." and "*…any contiguous areas of intact grassland are considered as high conservation importance*."



Figure 1: 3D map showing the location of the current turbines. Intact grassland patches are shown in green. Nest sites of threatened birds in red. In the current layout, there are still many turbines in the intact grassland patches.

Other Sensitive Spatial Areas:

Climate Change Corridors

The MBSP's climate change corridor network was designed to enable species and ecosystems to adapt to a changing environment. The corridor network considered a single-best (least-cost) corridor connecting up the climate change refugia with the climate change corridors from adjacent provinces. Additional fine-scale corridors were then identified using Circuitscape, finding alternative pathways and identifying pinch points in the corridors and thereby building resilience into the corridor network.

As can be seen from Figure 2, climate change corridor runs predominantly north-south through the project area, linking the climate change focal areas (as well as coincidentally the Grassland IBA with the Chrissies Pans IBA). Given that large birds do not fly in narrow, predictable lines, a flight corridor would need to be functionally broader than the MTPA provided fine-scale corridor. A broader macro-scaled corridor would be required for avifauna to ensure safe passage along the corridors. Maintaining this linkage is essential for long-term ecological resilience under climate change. The following turbines are within 500m of the climate change corridors and should be removed: 29, 31, 32, 33, 34, 36, 40, 42, 43, 44, 45, 46, 51, 52, and 53, as they would compromise this corridor.

The risk from the proposed wind farm on the corridor network is that the wind farm is unfortunately located along an important north-south macro regional flyway/corridor (also supported by vulture tracking data, Figure 9) which will result in increased collisions and electrocution, and habitat displacement. It stands to disrupt movement along the corridor and result in increased mortalities.

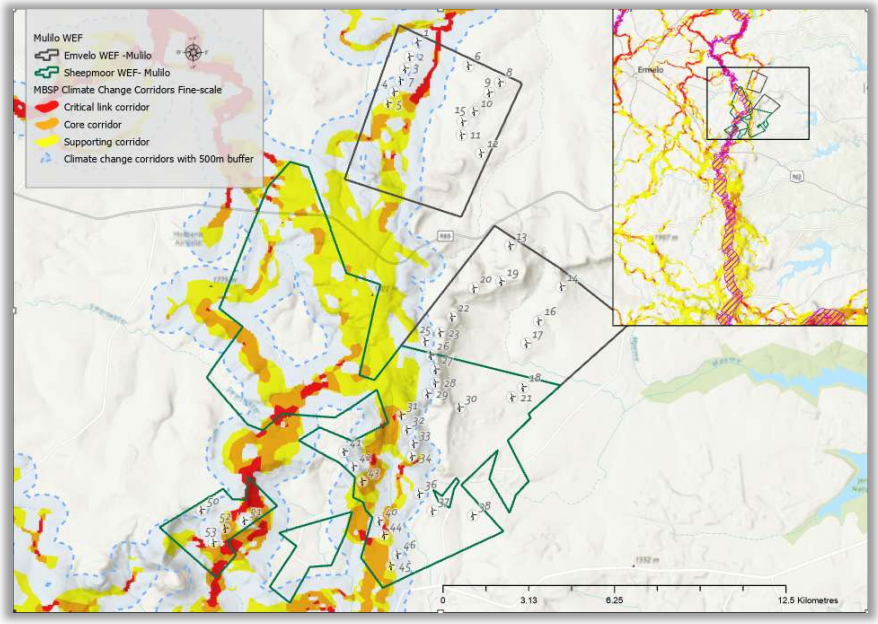


Figure 2: MBSP Climate Change Corridor network that links up climate change priorities with refugia and national climate change corridors. A 500m buffer has been added to the fine-scale corridors due to the need to accommodate mobile avifauna along a macro-scale corridor.

National Protected Area Expansion Strategy (NPAES 2018)

Over 60% of the proposed WEF falls within NPAES spatial priority areas, with 25% of turbines directly on focal areas. These sites are nationally significant for conservation expansion. Currently, 11 turbines (26, 27, 28, 29, 31, 33, 43, 44, 45, 52 and 53) are located in NPAES zones and should be removed.

2.2 Avifaunal Risks and Buffer Zones

The site's recognised avian biodiversity, including numerous sensitive and threatened species, necessitates a highly precautionary approach to impact assessment and mitigation. Many of the proposed mitigation measures are novel, untested, and costly. We don't believe the developer has adequately considered the costs of implementing all the recommended mitigation (and curtailment) measures on the success of this project, nor the chances of their efficient implementation (as they rely on models, people, expertise, budgets, and commitment).

Important Bird Areas (IBAs) and IUCN Key Biodiversity Araes (KBAs)

The proposed WEF falls in an area rich in bird species, particularly birds of conservation concern. Thirty-two priority bird species for wind energy development have been recorded within the WEF and broader area. An additional seventy-six species have been recorded which are powerline sensitive. Of particular concern are the occurrence of African Marsh-Harrier (EN), Black Harrier (EN), Blue Crane (VU), Blue Korhaan (NT), Cape Vulture (EN), Denham's Bustard (VU), Grey Crowned Crane (EN), Lanner Falcon (VU), Martial Eagle (EN), Secretarybird (EN), Southern Bald Ibis (VU), White-bellied Bustard (VU), and Yellow-breasted Pipit (VU). These are all threatened bird species at risk of extinction, over various timeframes. This rich avifaunal biodiversity is recognised regionally and globally through its inclusion within IBAs and KBAs. IBAs make up 55% and KBAs 12% of the Sheepmoor WEF.

At the heart of the MTPA's concerns, resulting in our objection, is the rich avifaunal diversity that is at risk of continual loss of mature individuals through collisions and electrocutions.

The avifaunal specialist report acknowledges that collision can be reduced from a high to a medium impact following post-mitigation. However, **with 14 threatened bird species occurring on site**, reducing the impact to a medium level is still significant (if at all possible), as any loss of large individuals may impact the conservation status of these species, particularly in light of cumulative impacts from the 359 planned or approved, and 127 approved wind turbines within 35 km of Sheepmoor WEF. Additionally, the avifaunal specialist report assessed the cumulative impact of Sheepmoor WEF to be moderate to high.

BirdLife monitoring report of 2025 states that on average, for every turbine, there are 4.25 bird fatalities per year, and that 10% of these were species of conservation concern. With every turbine added, the risk of collisions increases.

Avifaunal assessment for draft Strategic Environmental Assessment for Phase 3 For Wind and Solar Photovoltaic Energy

The MTPA received the REDZ datasets from the CSIR in May for comment. These datasets may still be refined, but they represent the best available avifaunal data that will eventually inform the DFFE screening tool. Although still a draft product, the dataset is based off actual data and the MTPA believe it to be a significant improvement in the data currently available to evaluate renewable energy applications. Querying this dataset the following important avifaunal datasets cover Sheepmoor (Table 1). The spatial extent these features is mapped in Figure 3.

Table 1: List of REDZ species and their risk and conservation status occurring over Emvelo and Sheepmoor WEFs.

Species	Risk	RDL Status
African Grass Owl	High	Vulnerable
Cape Vulture	Medium	Endangered (Regionally)
Grey Crowned Crane	High	Endangered
Rudds Lark	High	Endangered
Secretarybird	Very High	Endangered (globally)
Southern Bald Ibis	Very High	Vulnerable
White-winged Flufftail	Very High	Critically Endangered
Wattled Crane	High	Critically Endangered
Yellow breasted Pipit	Very High	Vulnerable

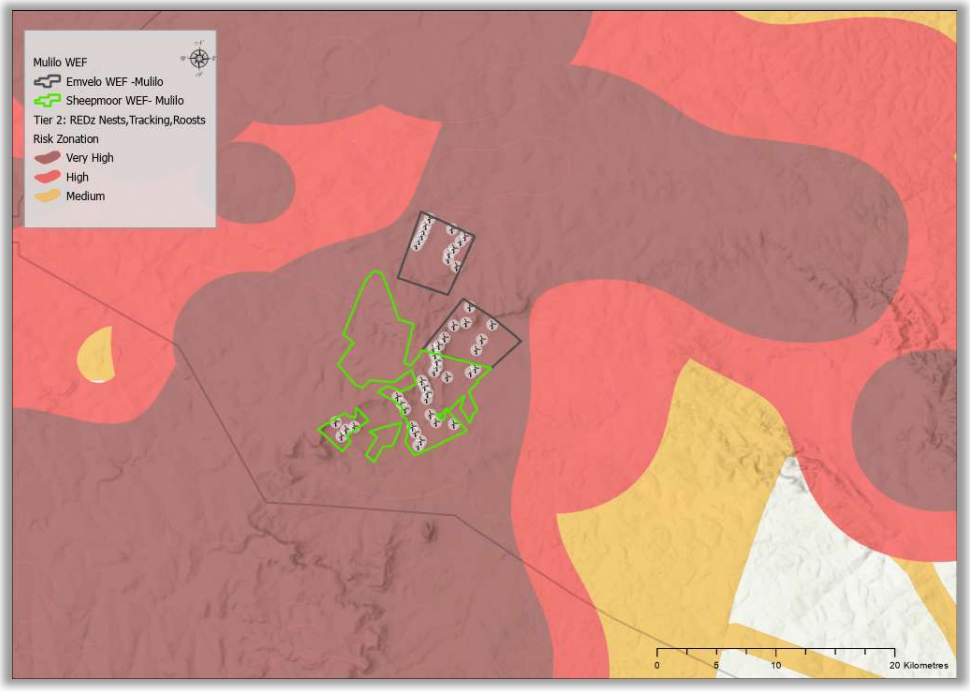


Figure 3: Spatial extent of the Tier 2 draft SEA REDZ 3 avian risk sensitivity layer covering Emovelo and Sheepmoor.

Buffers: Southern Bald Ibis

The specialist proposes shaped buffers based on modelled flight patterns, allowing turbines effectively within 506m (potentially as close as 100m) of roosts/nests. This represents a significant reduction from standard recommendations (1-2.5km) and appears inadequately precautionary, especially as it doesn't explicitly incorporate rotor overhang. Concern is raised about the accuracy and reliance of flight paths derived from observational vantage points. Confidence in these buffers is further reduced by the extremely limited flight path data used in their modelling. In the absence of a validated or peer-reviewed model, the MTPA recommends a minimum 1km buffer around these breeding colonies, which would require removal of turbines 28, 29, and 41. See Figure 4 for the 1km buffer zone and affected turbine locations.

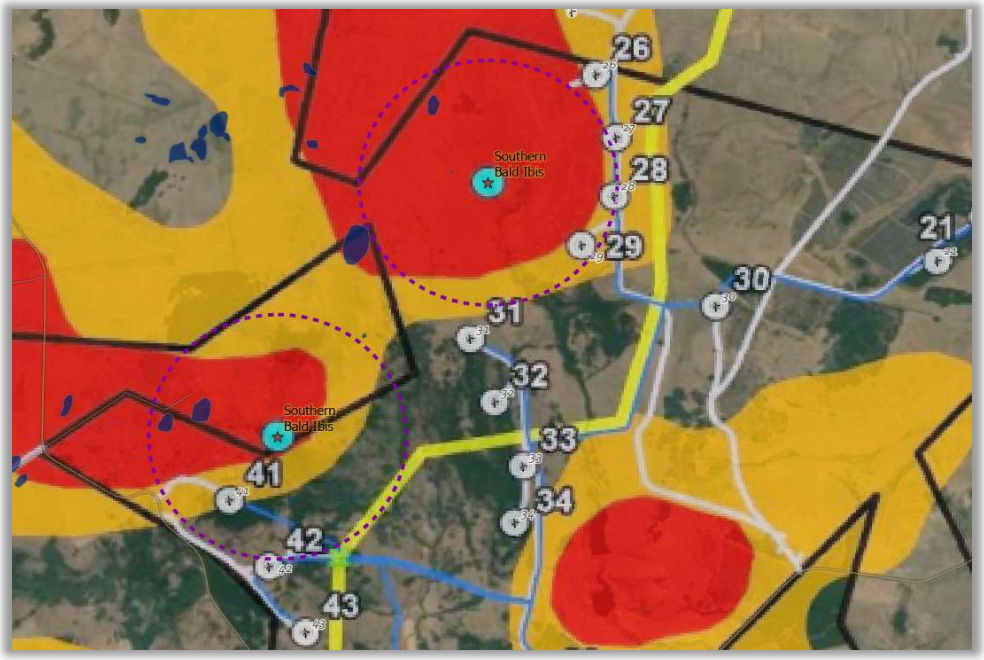


Figure 4: Map from avifaunal specialist report (July 2025) showing the Sheepmoor Southern Bald Ibis sensitivities and their proposed shaped buffer, a deviation from the standard 1km buffer. The purple dotted line represents a 1km buffer that then touches on several turbines.

African Grass Owl

African Grass Owl (*Tyto capensis*), a regionally Vulnerable species, has been recorded on Emvelo WEF in the east. These endemic and range-restricted owls have a very small home range of 423 ha (Pretorius 2019). To avoid any impacts to these sites, Pretorius *pers. comm.* recommends this home range be converted to a radius of a circle of 423 ha in size. This equates to a 1160 m buffer. By applying these to the known observations on Emvelo, it affects the placement of turbines 17 (Emvelo) and 18 (Sheepmoor). These localities are buffered and mapped in Figure 5.

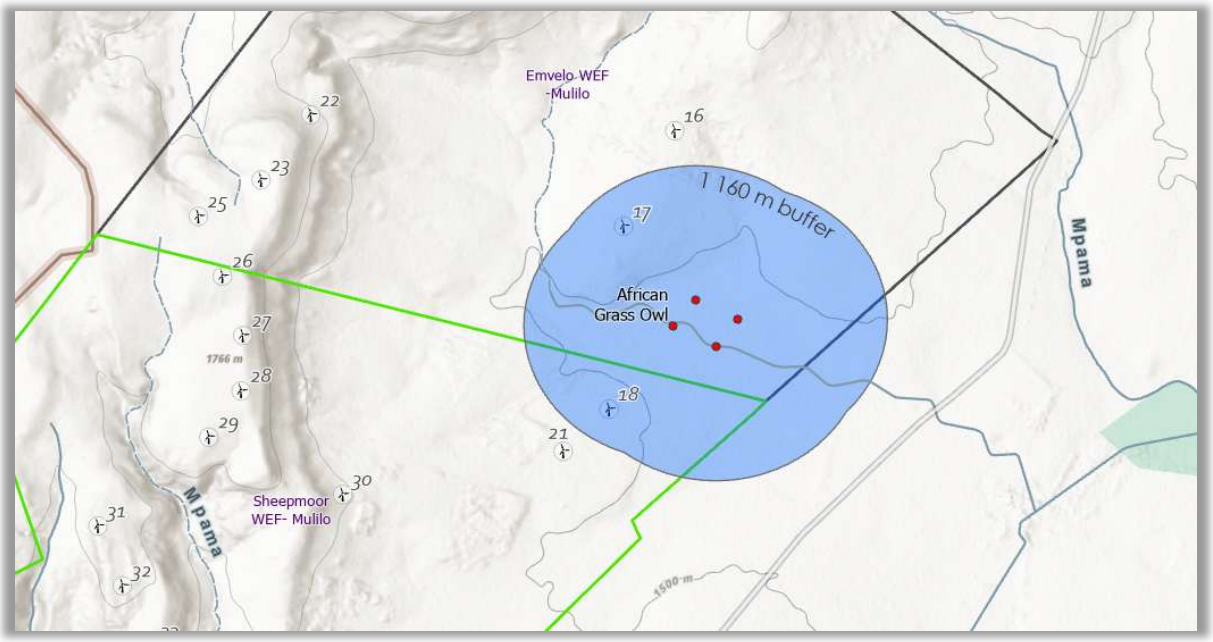


Figure 5: African Grass Own (Vulnerable) localities with the recommended 1160 m buffer to cover their strict home range of 423 ha.

Buffers: Martial Eagle

The MTPA has significant concerns regarding the use and modelling of Martial Eagle collar data. The MTPA obtained a copy of the flight data containing 13,111 observation points, compared to the 13,680 observations used by AfriAvian. We used GIS to confirm key findings in the avifaunal assessment, focusing only on data from juvenile and adult tracking collars around the Emvelo and Sheepmoor sites, excluding the Free State male.

EWT previously advised using a 5-6 km buffer around nest sites. More recently, BirdLife (2025) recommended a 6 km buffer around nesting sites. This recommendation aligns with preliminary outputs from the National Martial Eagle Risk Assessment (MERA) tool led by the University of Cape Town, which supports applying a circular buffer of approximately 5 km to include core ranges heavily utilised by resident breeding Martial Eagles, rather than applying bespoke buffers based on tracking and observational flight path data. Given 40 individual collared Martial Eagle tracking datasets, researchers could not build a reliable model to guide wind farm development, as Martial Eagles appear particularly difficult to model for flight patterns.

Against this backdrop, it is concerning that AfriAvian claimed they could accurately model flight risk for Martial Eagles and were confident enough to reduce the nationally recommended buffer by more than 50% (to 2.5 km for the High Risk zone). Such confidence in model output would be required to make this bold decision, as any failure may result in the loss of both parents and the entire breeding pair.

AfriAvian's Approach: AfriAvian combined all GPS tracking data with fine-resolution field monitoring data (37+ hours of observations) to develop a Flight Risk Model. The output was processed to identify High and Medium risk zones. The High risk zone encompassed approximately 79 km², comparable to the area covered by a 5 km circular buffer (78.5 km²) recommended by BirdLife and EWT. However, AfriAvian then extracted from the High risk zone a "Very High risk zone" as their no-go area, relying on Martial Eagle tracking and in-field observational data showing approximately 75% of recorded flight activity within 3 km of the nest. This was not only a subjective decision lacking scientific rigour, but as demonstrated below, the approach is fatally flawed.

Statistical Flaws in the Model: The flight risk model created using machine learning combined coarse-scaled GPS data across a wide area with fine-scaled, dense flight path data from a very limited area (majority within 2 km of nest) (see Figure 18 in the avifaunal assessment). Incorporating detailed, fine-scaled observational flight paths from such a limited area introduces spatial bias, where model output is disproportionately influenced by the more detailed sampling from the fine-resolution area, leading to overrepresentation of that smaller region.

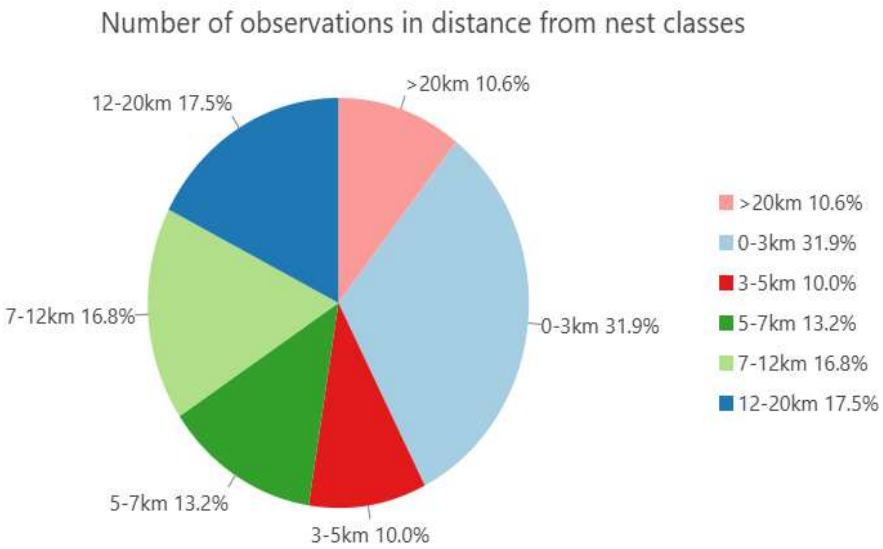
This approach is statistically flawed when differences in spatial area, resolution, sampling intensity, and density are not properly accounted for. This violates spatial statistical assumptions, resulting in inconsistent variance estimates, inaccurate predictions, and biased interpretations that do not accurately reflect broader spatial patterns.

MTPA Analysis and Findings: The MTPA used the same GPS tracking data to verify whether Martial Eagles spent 75% of their recorded flight activity within 3 km of the nest but could not replicate this statistic. We calculated the distance between each GPS observation (n=7266) and the nest, we then categorised each observation into the same distance classes that AfrAvian used in Figure 22 of their report. We used only flight data from the adult female and juvenile in this area, discarding Free State data (nest location unknown).

Importantly, we separated data into two types: (1) the complete dataset covering flying and stationary periods, and (2) a subset including only flying periods (>0.2 km/h). The second dataset was considerably smaller. Although collar tracking was programmed not to record locations between 19:00 and 4:00, 20% of observations were still recorded at before sunrise or after sunset. For flight risk modelling, only observations when birds are flying and at collision risk should be included, not when roosting, nesting, or perched.

We calculated the distance within which 75% of all observations occurred for the full dataset (including evening and nesting periods), finding a distance threshold of 5.6 km. For the flying-only dataset, this distance increased to 13.5 km (see Figures 6 and 7).

For AfriAvian to get to a value of 75% for all observations within 3km of the nest, they must have (1) used all the flight data, including the datasets that were only recorded at the nest (introducing spatial bias and a statistical flaw), (2) they must have used all the observational data, including when the bird was stationary and sitting on a nest, and (3) a different statistical approach to analysing the data. Regardless, our analysis provides a markedly different outcome, aligned with the 5-6 km buffer recommended by EWT and BirdLife, and invalidates the 2.5 km buffer proposed by Mulilo for the High Risk zone. This High Risk zone should be removed as there is no statistical confidence in its delineation, potentially putting birds at collision risk.



Distance from nest class	Flying only localities	Flying / Stationary localities
0-3km	31.9%	58.6%
3-5km	41.9%	60.8%
5-7km	55.1%	77.9%
7-12km	71.9%	85.3%
12-20km	89.4%	95.3%
>20km	100.0%	100.0%

Figure 6: Pie chart showing the number of Martial Eagle observations/points within distance classes from Martial Eagle nest. The table on the right presents the cumulative value of the distance classes, for the entire combined dataset, or with only the localities where the Martial Eagle were flying (>0.2 km/h). Results show that for the entire dataset of 7 266 points, 75% of the observations were within 5.6 km of the nest, while for the flying Martial Eagles, 75% of the records were within 13.5 km of the nest.

Breeding Cycle Considerations: Martial Eagles display significant differences between breeding and non-breeding periods. They typically breed every second year; therefore, a minimum of two years of data is essential when considering range use to capture both intensive breeding seasons and "sabbatical" periods when Martial Eagles often utilise larger ranges away from nesting sites. The GPS records for both birds covered 1 year and 1 month (10 April 2024 to 9 May 2025), meaning AfriAvian's analysed data did not cover a full two-year cycle.

Adult female Martial Eagles utilise home ranges differently than males, who spend considerable time hunting and provisioning for incubating partners and developing nestlings. During core breeding periods, females exhibit much higher nest site fidelity while males forage extensively over larger ranges. Females typically do not fly as far as males during core breeding seasons; therefore, the exclusion and lack of buffers considering male Martial Eagle range use is concerning. The conclusions did not factor in male flight activity, range use, and flight paths over the Mulilo project area.

Mitigation Concerns: Proposed mitigation measures include curtailment for Martial Eagle flights. However, the avifaunal report found that Martial Eagles are most active at moderate wind speeds of 5.5-10 m/s. Curtailment would significantly impact turbine power generation capacity, and we believe these costs were not considered in assessing the viability of proposed mitigation measures.

With the 5.5 km circular buffer being the current recommended buffer around Martial Eagle nests, the application of a 5.5 km buffer will result in the removal of 2 turbines, namely: 26 and 27. See Figure 8 below.

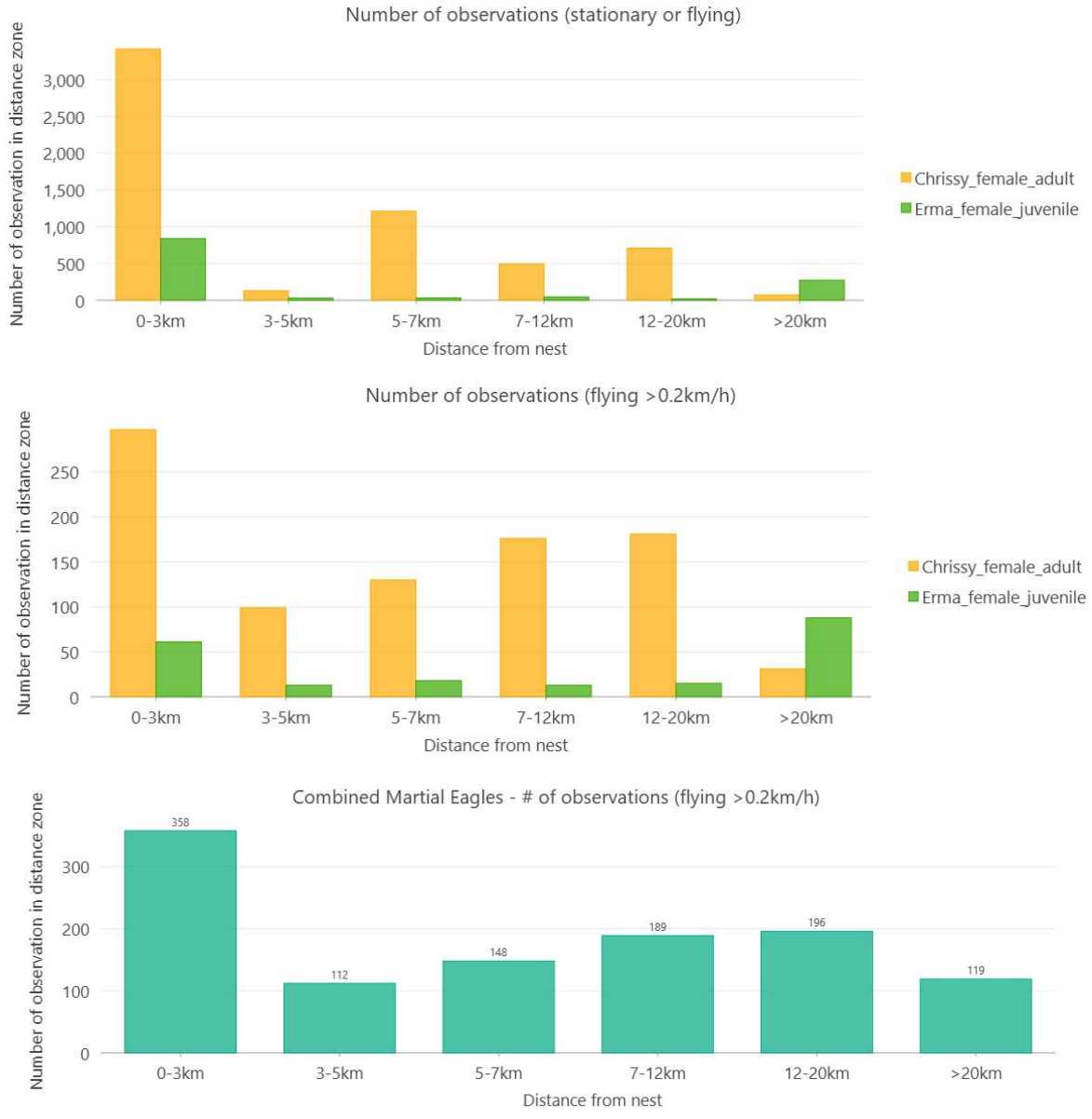


Figure 7: Bar-chart showing the number of observations from the collar tracking data in distance classes as used in Figure 22 of avifaunal report. Top-most chart presents all the observations (n=7266) for the adult and juvenile Martial Eagles. The middle chart presents only the observations where the Martial Eagles were flying (n=1122) in distance classes from nest. Bottom chart presents the combined datasets for both juvenile and adult birds in distance classes from nest. Bar chart bars are labelled with actual number of records in each class.

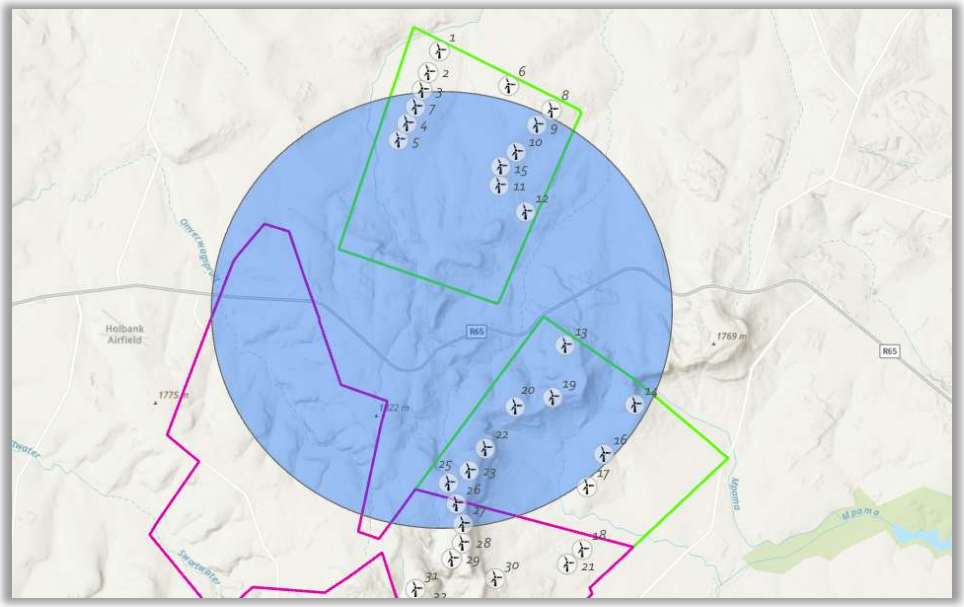


Figure 8: Application of a 5.5 km buffer around the Martial Eagle nest site and the impacted wind turbines.

Avifaunal Assessment: 2 -year of data gathering required and overreliance of models

Given the site's avifaunal sensitivity, two years of comprehensive avifaunal monitoring would be required. While we understand an additional year was added to monitor the Martial Eagle, this did not include visiting all vantage points as required by BirdLife guidelines. Figure 19 in the Avifaunal assessment shows the limited extent of this additional monitoring, which was confined to the Martial Eagle nest site. Such sensitive and vulnerable avifauna requires more comprehensive monitoring to properly understand and assess potential impacts.

Modelling is used throughout the project sites, from the identification of suitable habitat to avoid, through to predicting where Southern Bald Ibis is likely to fly once leaving a roost, to mitigating impacts. AfriAvian's flamingo model for Leghoya WEF was found to miss 50% of the important pans supporting flamingos (based on actual sightings). We highlight above the spatial bias that was introduced into the Martial Eagle Flight Risk Model, and the inability to replicate and confirm that 75% of the recorded flight activity is within 75% of the nest. George P. Box famously once said "*All models are wrong, but some are useful*".

There is an increasing tendency to over rely on models, perhaps because they sound to sophisticated, to mitigate and minimise all possible impacts to acceptable levels. This is wrong. Unless models can be validated with data that was withheld, or gathered afterwards, we need to approach models with caution. Models may be acceptable when they refine boundaries of established circular buffers, but they become problematic when they result in 50% reductions in buffer boundaries without validation or peer review. Our detailed analysis of the Martial Eagle model revealed several critical flaws, as discussed above.

As a result of these repeated issues with model accuracy and validation, the MTPA has become increasingly distrustful of models as primary decision-making tools for sensitive environmental assessments. Robust field monitoring and established precautionary guidelines must take precedence over unvalidated modelling outputs.

Cape Vulture flyways

Cape Vultures are globally vulnerable and regionally endangered. The specialist assessment did observe Cape Vultures over the project area for 48 minutes over 756 hours, and within the rotor swept zone. This amounts to 1 vulture visit every 2 weeks. According to the vantage point priority bird monitoring statistics, Cape Vultures were the 7th most observed priority species (out of 23) over the 1 year of observation.

In the recent Birdlife summary report from monitoring operational wind energy facilities (2025), it provides a case study of a wind farm that recorded a very low numbers of Cape Vultures during pre-construction monitoring (recorded in less than 1% of total vantage point surveys), yet later in the year, once operational, the wind farm had shutdowns involving 384 Cape Vultures. This highlights the need for impact assessments to incorporate all sources of information, and to be careful of initial low observations during pre-construction monitoring.

The MTPA queried the Cape Vulture flight paths on Movebank.org early in April 2025 – See Figure 9 (Kruger NP Raptors E-obs (n=18); Vulpro (Rehab & Captive bred) (n=123); & EWT SigFox Vultures (n=18)) to create the below map showing Cape Vulture flight paths based on density of observations in Movebank.org. This data in Figure 9 clearly shows a north-south flightpath that connects the northern Mpumalanga Escarpment with KwaZulu Natal in the south. And with the specialist reported observation that the vultures fly within the rotor swept zone, we are very concerned about the risk that the wind farm may pose to vultures as they fly through this corridor. This corridor impacts all the proposed wind turbines.

Vantage Point Monitoring

Based on the latest and current turbine layout, 3 of the 25 turbines are not covered by the 2km vantage point buffers, amounting to 12% of turbines not been covered.

2.3 Specialist Assessments

While extensive specialist work has been undertaken, MTPA notes areas where further information or methodological alignment could strengthen the overall environmental assessment.

General

Enhanced integration between the aquatic, faunal, bat, terrestrial and avifaunal assessments is recommended to better understand potential synergistic or cumulative biological impacts.

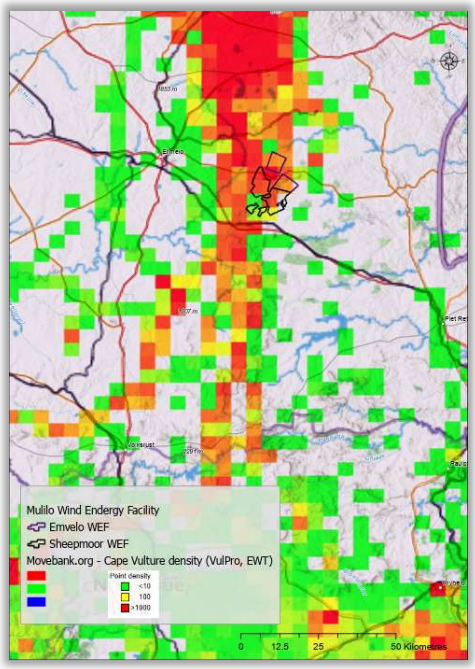


Figure 9: Tracking data from Cape Vultures flying over the Emvelo and Mulilo WEFs. Data sourced from Movebank.org in April 2025. Data source VulPro, EWT. Symbology represents density of recorded points. Red = high density.

Faunal Specialist Assessment

Placement of infrastructure in high/very high sensitivity areas warrants careful justification given specialist recommendations to avoid these areas. While we acknowledge the inclusion of a detailed oribi management plan, no detailed oribi survey of this area has occurred, nor is a map of oribi habitat or oribi observations included. Its inclusion at this late stage is only in response to issues raised in the Draft EIA report. Although it is possible that an oribi management plan could improve the local status of the oribi within the footprint area, it can also be said that the failure to adequate survey for oribi since this was raised in the scoping report stage (meeting), means that the proposed development may have a significant negative impact on the oribi. How do we know that turbines, roads, or infrastructure will not be placed in core habitat for oribi? The MTPA has reached out to EWT and they do not know what impact wind turbines will have on this highly sensitive mammal. The developer should not be surveying for oribi after the development is approved, it should have happened during the EIA phase.

Terrestrial Biodiversity Assessment:

The MTPA has significant reservations regarding the Terrestrial Assessment. Key concerns include:

- The terrestrial biodiversity theme is still not aligned with SANBI's Species Environmental Assessment Guideline (2022) that the consultant is required to comply with in terms of Notice 1150 of Government Gazette 43855 of 2020.

- The author only allowed for 4 days to survey both the Sheepmoor and Emvelo WEF sites during the summer months, when most summer rainfall plants would be flowering and identifiable. Four days is certainly not enough to cover an area this size (12,543 ha for both WEFs). This report is the same report as submitted with previous DEIA.
- No plant species of conservation concern, or endemics, were recorded on site. This is not surprising given the lack of time to survey this large area. ERM also opted to appoint a botanist not familiar with the flora of this area. There are several endemics restricted to this area that would be unfamiliar to someone not from the area. It just makes it harder to confirm identification, particularly with limited time and coverage in the field. **The MTPA is confident that several species of conservation concern would occur on site; they were just not detected**.
- The failure to apply the SANBI Guidelines resulted in inadequate time being allowed to properly assess the terrestrial biodiversity (botany) and the determining of site ecological importance (SEI). The consultant did not follow the SEI methodology, as required in terms of the SANBI guidelines and the MTPA does not believe that the approach followed to identify sensitive areas would be able to adequately assess the environmental sensitivity for this area. There were a number of additional variables that could have been applied (site-specific species, CBAs and ESAs, climate change corridors, intact grasslands, rocky ridges, etc.), patch size, together with criteria and approach of that are required in the SANBI Species Environmental Assessment Guidelines.
- The approach followed resulted in some CBA Irreplaceable areas, that overlapped with intact grasslands and provincial climate change corridors, being designated **medium** sensitivity (as a maximum value because it did not ultimately fall within the Eastern Highveld Grassland). This is fundamentally wrong as there was no consideration for any species of conservation concern (like roosting areas) or other spatial priorities like CBAs to meet biodiversity targets. Applying the SANBI criteria could allow the montane grassland to be categorised as *high*, or even *very high* if species and additional data were considered.
- In terms of the terrestrial biodiversity assessment, the result is that the montane grassland (not degraded) is of *medium* sensitivity, but the degraded Highveld grassland has *high* sensitivity, and non-degraded a *very-high* sensitivity. This does not make sense. We have significantly more threatened plant species recorded in the Wakkerstroom Montane Grassland than for the Eastern Highveld Grassland and consider far more sensitive.
- Ultimately, the MTPA does not agree with the vegetation sensitivity analysis that then fed into other planning processes, such as the offsets, as it did not apply SANBI's Species Environmental Assessment Guideline (2022).

2.4 Biodiversity Offset Report (BOR)

Firstly, the MTPA never requested a biodiversity offset report. When meeting with Mulilo many months ago, Mulilo mentioned they would offset their impacts, and even committed to developing an Oribi Biodiversity Management Plan. In reviewing the first DEIA, the MTPA merely commented that there were no BOR or Oribi management plans.

The MTPA appreciates the effort that has gone into compiling the draft Biodiversity Offset report, however the offset assessment and report only partly covers the residual biodiversity loss to sensitive areas, such as CBAs and Intact Grassland Areas, and not to the avifauna of conservation concern. The offset report should in fact explicitly assess whether any residual impacts affect irreplaceable biodiversity that cannot be offset, which will be a fatal flaw. In

addition, the MTPA feel that the anticipated negative impacts to long-lived threatened bird species cannot be adequately quantified nor offset.

The proposed BOR sets specific hectare targets for offsetting the direct loss of natural terrestrial habitats, particularly for areas supporting Species of Conservation Concern (SCC). These targets are based on biodiversity offset ratios, with a total of 507.15 hectares designated for offset, broken down by vegetation type and Mpumalanga Biodiversity Sector Plan (MBSP) category. The core of the terrestrial offset involves restoration efforts on disturbed and transformed areas within the study area. These areas include cultivated lands, disturbed Montane Grassland, disturbed Highveld Grassland, and alien invasive plantations. The aim of the BOR is to create additional habitat for Species of Conservation Concern (SCC), such as the Oribi, by restoring degraded grasslands.

The proposed offset strategy is partly aligned with the national offset strategy, however the formal legal security of the offset sites is incomplete. The BOR is certainly not clear how the site security will be guaranteed over the long term. Mulilo have lease agreements, and mention that servitudes or protected areas declaration may be pursued, but that does not meet the requirement of the offset guideline to do so and secure them. Mulilo proposes several internal onsite areas as offsets. These may not meet the requirements for a protected environment in a wind farm where avifaunal collisions occur. The MTPA will only consider offsets away from areas with turbines as possible protected environments. Hence there is no guarantee that the selected offset areas can ever be secured. Offsite offsets should have been identified and assessed in the report.

Furthermore, the candidate portfolio of offset sites is not provided in any detail. This shortfall is important as it is required for the competent authorities to assess any risks that cannot be offset. In addition, Mulilo commits to monitoring and adaptive management but alignment with the national offset guidelines do require specific biodiversity outcomes, monitoring indicators, success thresholds, and reporting plans.

The long-term financing mechanism and governance of the offsets are not discussed in any detail. It is important to secure long-term management funding (via a trust, endowment, etc.) and the governance arrangements, such as who will manage the sites, who will audit performance, etc.

The BOR also relies on rehabilitating disturbed areas; however, offsets should ideally be in relatively good condition (except for wetlands, which can be disturbed). Once grassland has been ploughed or planted up with trees, the biodiversity does not recover in our lifetime and restoration of these areas do not meet the biodiversity offset requirements.

The BOR includes offsite actions for priority bird species and avifauna buffer concepts, however, these must be converted into measurable outcomes (e.g., collision mortality reduction targets, powerline design/marking standards, and monitoring). Alignment with the national offset strategy requires species-sensitive responses be explicitly built into offset design when species with specific habitat needs are affected.

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2.5 Cumulative Impacts

The concentration of renewable energy projects in Mpumalanga (890 turbines approved, in process, or planned), particularly along this sensitive escarpment, necessitates careful consideration of cumulative impacts. Each additional project contributes incrementally to regional habitat fragmentation and potential impacts on species

populations, especially avifauna. The avifaunal assessment states that the proposed Mulilo WEF, alongside three other renewable energy projects within a 35 km radius, would contribute to a total of 131 (incl. Sheepmoor). Sheepmoor's turbines represent approximately 21% of the total planned turbines, indicating a moderate to high cumulative impact. For Sheepmoor, the cumulative impacts on birds are rated as High pre-mitigation and Medium post-mitigation. Bearing in mind the very optimistic mitigation proposals, dependant on a multitude of models and processes, places the implementation at risk.

The MTPA was able to query its database on renewable energy projects and actual turbine locations to provide the following important statistics (based on approved, under-consideration, and planned wind farms). Please note that these stats include the current proposed Sheepmoor project's turbines within the numbers presented.

- *10 km radius*: 70 turbines (3 approved)
- *20 km radius*: 216 turbines (65 approved)
- *35 km radius*: 359 turbines (127 approved)

The actual number of turbines approved or in process of being approved is double that what the avifaunal specialist used in their calculations. Yes, their addition makes up a smaller percentage but it adds to the threshold beyond which avifauna populations(and bats) may start crashing. With every turbine added, the risk of collisions increases. As these turbines have not been built, the renewable energy industry, and government, do not fully comprehend the massive impact that the wind farms will have on the avifauna and bats and the need to preserve sensitive areas to ensure their long terms persistence.

2.6 Acknowledgement of recent change in landcover and impact on results

The delineation of the CBAs and intact grassland patches was based off a landcover map from 2010 and 2019 (but just for CBAs). Any subsequent loss or transformation is not a fault in the MBSP or intact grassland patches, but as a result of a legal or illegal change in land use. In the MBSP Handbook, the guidelines recommend that a site assessment is required to confirm the current land use. Any loss may require additional areas to meet targets (to be addressed in MBSP v2), while acknowledging that **the CBA status may no longer apply to these areas if they have been ploughed or developed** (where recovery is not possible within our lifetimes). Therefore, in terms of the Sheepmoor WEF, any change in land use from natural to cultivation or plantation would result in this particular area no longer being identified as a CBA or intact grassland patch.

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3. Summary of Turbine Locations Requiring Reconsideration

Should DFFE proceed towards authorisation, we strongly recommend the exclusion of the turbines identified in below.

- WT 18: KBA, African Grass Owl buffer
- WT 21: KBA
- Wt 26: Intact Grassland Patch; NPAES, within 5.5km Martial Eagle buffer, IBA

- WT 27: Intact Grassland Patch, NPAES, within 5.5km Martial Eagle buffer, IBA
- WT 28: Intact Grassland Patch, NPAES, within Bald Ibis buffer, IBA
- WT 29: Intact Grassland Patch, Climate change corridor, NPAES, within Bald Ibis buffer, IBA
- WT 31: Intact Grassland Patch, Climate change corridor, NPAES
- WT 32: Intact Grassland Patch, Climate change corridor
- WT 33: Intact Grassland Patch, Climate change corridor, NPAES
- WT 34: Climate change corridor
- WT 36: Climate change corridor
- WT 40: Climate change corridor
- WT 41: Within Bald Ibis buffer
- WT 42: Climate change corridor
- WT 43: Intact Grassland Patch, Climate change corridor, NPAES,
- WT 44: Climate change corridor, NPAES
- WT 45: Climate change corridor, NPAES, CBA
- WT 46: Climate change corridor,
- WT 50: IBA
- WT 51: Climate change corridor, IBA,
- WT 52: Climate change corridor, NPAES, IBA
- WT 53: Climate change corridor, NPAES, IBA

4. Closing

In conclusion, **the MTPA maintains a strong objection to the proposed Sheepmoor WEF in its current form**. The site overlaps with highly sensitive and irreplaceable biodiversity features—including intact grassland patches, climate change corridors, Critical Biodiversity Areas, KBAs, IBAs, and NPAES priority expansion areas—supporting numerous threatened and endemic species. The avifaunal assemblage present, particularly threatened species such as the Martial Eagle, Black Harrier, Denham's Bustard, Cape Vulture, and African Grass Owl, places this site among the most sensitive in the province for wind energy development.

Our review identifies substantial flaws in the baseline data, methodological approaches, and statistical analyses used in the supporting specialist studies, particularly in the avifaunal assessment. Several models relied upon for impact prediction and mitigation zone delineation are unvalidated, contain spatial biases, or deviate from nationally recognised guidelines. Critical surveys, such as comprehensive Oribi assessments and adequate botanical surveys aligned with SANBI protocols, were not completed. As a result, sensitivity mapping, buffer zones, and mitigation recommendations cannot be considered robust or defensible.

The proposed mitigation measures—many novel, untested, and potentially unfeasible—are unlikely to adequately reduce the high to very high pre-mitigation risks to acceptable levels. Given the cumulative turbine density in the broader landscape, the unquantifiable long-term impacts on species with slow reproductive rates, and the loss of ecological connectivity, residual effects are expected to be severe and potentially irreversible.

In light of these factors, the MTPA concludes that the current turbine layout and offset strategy are fatally flawed from both a biodiversity conservation and environmental authorisation perspective. We recommend that authorisation be withheld and that any future proposal for this site be preceded by at least two full years of comprehensive, guideline-aligned monitoring; complete botanical and faunal surveys; and a layout that entirely avoids intact grasslands, key corridors, and critical habitats for species of conservation concern. Only a precautionary, science-based approach can ensure the long-term persistence of the biodiversity assets of this region.

Please do not hesitate to contact this office if there are any enquiries.



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MANAGER BIODIVERSITY PLANNING

DATE: 15 August 2025

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References

- BirdLife South Africa 2025. Summary Bird Monitoring Reports from Operational Wind Energy Facilities in South Africa. BirdLife South Africa Occasional Report Series No. 3. BirdLife South Africa, Johannesburg, South Africa
- Lloyd KJ, Ralston-Paton S, Day KD, Retief E, Smit-Robinson HA. 2025. Guidelines for surveying and mitigating impacts on White-winged Flufftail in avifaunal assessments for development applications, Version 1. Johannesburg: BirdLife South Africa.
- South African National Biodiversity Institute, 2020. Species Environmental Assessment Guideline. Guidelines for the implementation of the Terrestrial Fauna and Terrestrial Flora Species Protocols for environmental impact assessments in South Africa. South African National Biodiversity Institute, Pretoria
- Pretorius, M.D. 2019. The ecological preferences of the African Grass Owl *Tyto capensis* on the highveld of South Africa. Master of Science. Tshwane University of Technology.

From: Lucien Barbeau
Sent on: Monday, 18 August 2025 16:54:08
To: Jamie Pote; ERM Arcus Amsterdam
CC: Stephen Burton; Mpho Malema
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]
Attachments: LUA25-3966(4) MTPA obj Emvelo revised D EIA R WEF & Auxiliary infrastructure ERM.pdf (1.03 MB), LUA25-3967(4) MTPA obj Sheepmoor DEIA R WEF Auxiliary infrastructure ERM.pdf (1.78 MB)

Hi Jamie,

Over and above we have also received comment from MTPA which does require Terrestrial biodiversity input. Kindly see attached these comments for your attention.

I do apologize for the short notice we have on this project, but we do intend to submit the final by the end of the week on the 22 Aug. Please do let me know if you can accommodate us with these comment responses?

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town
+27105963488

erm.com

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, August 18, 2025 12:00 PM
To: Jamie Pote <jamiepote@live.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Jamie,

Thank you for your support and delivering these reports at short notice. If you feel that these report updates were out of your scope and you would like to submit a change order, the client is open to it so please do share that with me.

I have attached the DARDLEA comments for your attention, I kindly require assistance with the with regards to comments directed to your specialism, notably 18.3 and 18.5.

If I could kindly request your assistance to argue your point on these grassland comments.

Kind Regards

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From: Jamie Pote <jamiepote@live.co.za>
Sent: Friday, August 15, 2025 7:38 AM

To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Hi Lucien, here are the reports with the revised layouts replaced where applicable (the last few maps in the reports).

There is an overlap with the Emvelo/Sheepmoor boundary that was provided where a central area fall within both sites. I have not had time to figure out what's going on there or to scrutinise the layout to check if there are any changes that affect the outcome of the assessment.

Terr Bio Assess Report - Mulilo Emvelo WEF (Jamie Pote) 20250815) Final.docx

Terr Bio Assess Report - Mulilo Sheepmoor WEF (Jamie Pote) 20250815_Final.docx

Terr Bio Assess Report - Mulilo Sheepmoor WEF (Jamie Pote) 20250815_Final.pdf

Terr Bio Assess Report - Mulilo Emvelo WEF (Jamie Pote) 20250815) Final.pdf

Regards
Jamie

Mr Jamie Pote
Biodiversity – Environmental – GIS

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From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 06 August 2025 16:26
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Specialist,

I trust you are well.

Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by Monday, 12 August 2025.

If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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OFFICE OF BIODIVERSITY CONSERVATION

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

Ref : LUA 25/3966(4)
Unit : LUA/SS
Enquiries: F.N. Krige & Dr. M Lötter
E-mail: frans@mtpa.co.za
[redacted]

Ms. S. Gopaul
Environmental Resource Management Southern Africa (Pty) Ltd.
The Great Westerford
240 Main Road
Rondebosch
Cape Town
7700

[redacted]
E-mail: stephanie.gopaul@erm.com

Dear Ms. Gopaul

SUBJECT: MTPA'S COMMENTS ON THE DRAFT ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE REVISED EMVELO WIND ENERGY FACILITY COMPRISING OF 24 WIND TURBINES AND AUXILIARY INFRASTRUCTURE. PROJECT FOR EMVELO WIND ENERGY FACILITY (PTY) LTD, MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE. DFFE REFERENCE NUMBER: 14/12/16/3/3/2/2611.

1. INTRODUCTION

The Mpumalanga Tourism and Parks Agency (MTPA) has reviewed the application for the proposed Emvelo Wind Energy Facility (WEF) and associated infrastructure (Reference: 14/12/16/3/3/2/2611), dated 14 July 2025.

The MTPA notes the changes made, such as a revised layout with a reduced number of turbines (now up to 22) and a lower maximum output capacity of up to 240 MW. While these revisions were informed by additional studies identifying sensitive areas requiring avoidance, the modifications often merely shifted turbines into partially transformed areas, with blades and footprints still encroaching on sensitive habitats. These changes are not substantial enough to address our concerns, and the MTPA does not support the current proposed layout.

Key areas of concern include potential impacts on critical habitats such as intact grassland patches, Critical Biodiversity Areas, Important Bird Areas (IBA), climate change corridors, and National Protected Area Expansion Strategy (NPAES) zones; risks to avifauna, including numerous species of conservation concern; perceived shortcomings in specialist assessments and statistical methods; insufficiently tested mitigation measures, especially with respect to buffer zones; and the cumulative impacts within a region already facing significant development pressure.

2. CORE CONCERNS

2.1 Impacts on Sensitive Habitats

Intact Grassland Patches

Intact grassland patches allow species to thrive and to support species that may need to move in response to climate change, enabling the normal functioning of natural ecological processes such as fire regimes or pollination. These patches are typically larger than 100 ha, with little or no gaps and minimal edge effects, and occur in close proximity to other intact grassland patches. They function as "source areas" in metapopulation dynamics where birth rates exceed death rates. No significant impacts should be allowed that would change a source area into a sink area (where death rates exceed birth rates). Mpumalanga has only 1,039 intact grassland patches, covering 15% of the province. These areas have been prioritised for their connectivity importance and must be avoided by wind energy facilities.

The intact patches on Emvelo are critical for maintaining connectivity with other grasslands. Despite MTPA raising concerns, specialist reports were largely silent on their importance. Using over 80,000 bird observations, the MTPA confirmed that intact grasslands have a 22% higher likelihood of hosting birds of conservation concern, 49% more birds of conservation concern, and 98% more individual bird observations than non-intact grasslands. These patches make up 23% of the Emvelo WEF footprint, and six turbines (13, 19, 20, 22, 23, and 25) are located within them. These turbines should be removed.

The MTPA feels strongly that the establishment of wind farms in intact grassland patches should not be allowed as it may turn a "source" area into a "sink" area. Even Pages 3 and 4 of the Faunal assessment within the DEIA recognises that "*Faunal integrity relies on inter-connected grassland habitats across landscapes*." and "*…any contiguous areas of intact grassland are considered as high conservation importance*."



Figure 1: 3D map showing the location of the current turbines. Intact grassland patches are shown in green. Nest sites of threatened birds in red. In the current layout, there are still many turbines in the intact grassland patches.

Other Sensitive Spatial Areas:

Climate Change Corridors

The MBSP's climate change corridor network was designed to enable species and ecosystems to adapt to a changing environment. The corridor network considered a single-best (least-cost) corridor connecting up the climate change refugia with the climate change corridors from adjacent provinces. Additional fine-scale corridors were then identified using Circuitscape, finding alternative pathways and identifying pinch points in the corridors and thereby building resilience into the corridor network.

As can be seen from Figure 2, climate change corridor runs predominantly north-south through the project area, linking the climate change focal areas (as well as coincidentally the Grassland IBA with the Chrissies Pans IBA). Given that large birds do not fly in narrow, predictable lines, a flight corridor would need to be functionally broader than the MTPA provided fine-scale corridor. A broader macro-scaled corridor would be required for avifauna to ensure safe passage along the corridors. Maintaining this linkage is essential for long-term ecological resilience under climate change. The following turbines are within 500m of the climate change corridors and should be removed: 1, 4, 5, 7, and 25, as they would compromise this corridor.

The risk from the proposed wind farm on the corridor network is that the wind farm is unfortunately located along an important north-south macro regional flyway/corridor (also supported by vulture tracking data, Figure 9) which will result in increased collisions and electrocution, and habitat displacement. It stands to disrupt movement along the corridor and result in increased mortalities.

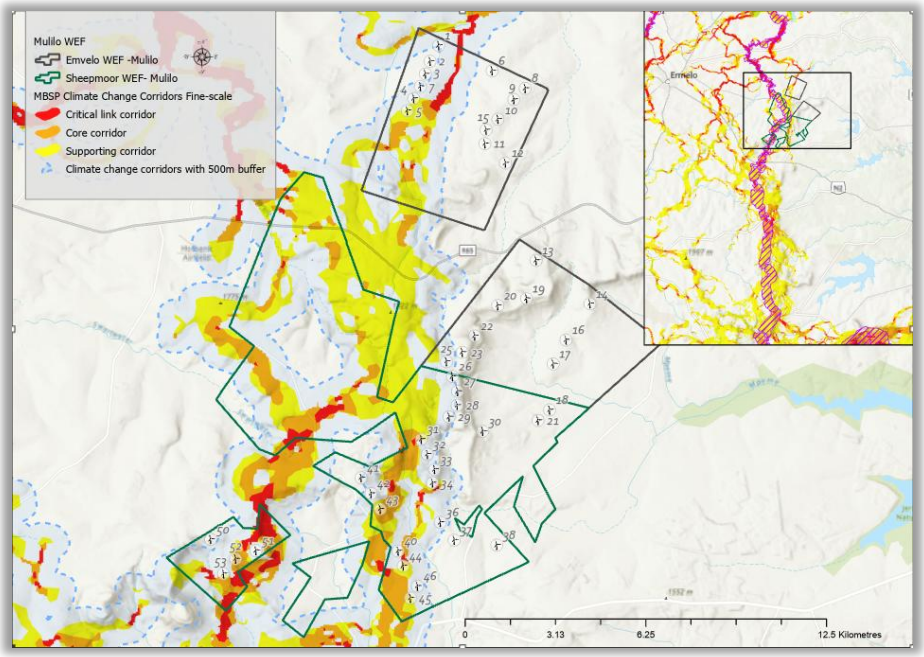


Figure 2: MBSP Climate Change Corridor network that links up climate change priorities with refugia and national climate change corridors. A 500m buffer has been added to the fine-scale corridors due to the need to accommodate mobile avifauna along a macro-scale corridor.

National Protected Area Expansion Strategy (NPAES 2018)

Over 70% of the proposed WEF falls within NPAES spatial priority areas, with 25% of turbines directly on focal areas. These sites are nationally significant for conservation expansion. Currently, seven turbines (13, 14, 19, 20, 22, 23, and 25) are located in NPAES zones and should be removed.

2.2 Avifaunal Risks and Buffer Zones

The site's recognised avian biodiversity, including numerous sensitive and threatened species, necessitates a highly precautionary approach to impact assessment and mitigation. Many of the proposed mitigation measures are novel, untested, and costly. We don't believe the developer has adequately considered the costs of implementing all the recommended mitigation (and curtailment) measures on the success of this project, nor the chances of their efficient implementation (as they rely on models, people, expertise, budgets, and commitment).

Important Bird Areas (IBAs) and IUCN Key Biodiversity Araes (KBAs)

The proposed WEF falls in an area rich in bird species, particularly birds of conservation concern. Thirty-two priority bird species for wind energy development have been recorded within the WEF and broader area. An additional seventy-six species have been recorded which are powerline sensitive. Of particular concern are the occurrence of African Grass Owl (VU), African Marsh-Harrier (EN), Black Harrier (EN), Blue Crane (VU), Blue Korhaan (NT), Cape Vulture (EN), Denham's Bustard (VU), Grey Crowned Crane (EN), Lanner Falcon (VU), Martial Eagle (EN), Secretarybird (EN), Southern Bald Ibis (VU), White-bellied Bustard (VU), and Yellow-breasted Pipit (VU). These are all threatened bird species at risk of extinction, over various timeframes. This rich avifaunal biodiversity is recognised regionally and globally through its inclusion within IBAs and KBAs. IBAs make up 49% and KBAs 65% of the Emvelo WEF.

At the heart of the MTPA's concerns, resulting in our objection, is the rich avifaunal diversity that is at risk of continual loss of mature individuals through collisions and electrocutions.

The avifaunal specialist report acknowledges that collision can be reduced from a high to a medium impact following post-mitigation. However, **with 14 threatened bird species occurring on site**, reducing the impact to a medium level is still significant (if at all possible), as any loss of large individuals may impact the conservation status of these species, particularly in light of cumulative impacts from the 302 planned or approved, and 82 approved wind turbines within 35 km of Emvelo WEF. Additionally, the avifaunal specialist report assessed the cumulative impact of Emvelo WEF to be moderate to high.

BirdLife monitoring report of 2025 states that on average, for every turbine, there are 4.25 bird fatalities per year, and that 10% of these were species of conservation concern. With every turbine added, the risk of collisions increases.

White-winged Flufftail **(**Critically Endangered**)**

- Collision risk modelling results for White-winged Flufftail yielded a mean annual fatality rate of 1.54 birds/year with the original wind turbine layout, which was reduced to 0.45 birds/year with implemented avoidance of core (highly suitable) habitats. For a Critically Endangered species, with only a handful of known localities in South

Africa, we cannot afford to lose 1 bird every 2 years for the next 25 years. This would certainly push this species closer to extinction. This risk is too high.

- The February reports explicitly states a 250 m buffer around White-winged Flufftail habitat, defined through detailed habitat modelling. The July reports mention that White-winged Flufftail habitat is "appropriately buffered" and that "movement corridors were determined and buffered," but the report does not explicitly state a numerical value for this buffer.
- The developer commits to implementing dynamic, real-time nocturnal curtailment i.e., from dawn to dusk for the duration of the summer season, for all wind turbines located within the modelled medium risk zone and traversing White-winged Flufftail habitat connectivity corridors. The following turbines are affected: 26, 27, 28, 29, 31, 44 and 45.
- Of greater concern is the fact that **White-winged Flufftail has been recorded on site although there is scant mention of it**. There is reference to being recorded in the Avifaunal assessment on Page ii, 19, and 21. Its occurrence on site is significant and a fatal flaw.
- BirdLife (Lloyd et al. 2025) distinguishes between *habitat buffer* zones and *species buffer* zones for White-winged Flufftail. Habitat buffer zones maintain ecosystem functions and processes that the species rely on, while species buffer zones protect and maintain the biological needs of a particular species.
- BirdLife published a guideline (Lloyd et al. 2025) for developments with collision risks, like wind turbines, **with buffer zones of at least 5 km between the development and wetlands suitable for the White-winged Flufftail**, with buffer zones of at least 1 km for delineated wetland inputs (habitat buffers). Importantly, the buffers proposed in the avifaunal report equate to the habitat buffers while the species buffer was not implemented. This is a fatal flaw.
- The occurrence of White-winged Flufftail on Emvelo is also confirmed within the Draft REDZ layer on nests, tracking data, roosts and sightings. These points were buffered for the REDZ project, but one can easily find the wetlands within this buffer. This point won't be provided here, to protect the locality, but I buffered this point, and an adjacent one, by 5 km and the result excludes a significant amount of the Emvelo WEF. See Figure 3 below.

African Grass Owl

- African Grass Owl (*Tyto capensis*), a regionally Vulnerable species, has been recorded on Emvelo WEF in the east. These endemic and range-restricted owls have a very small home range of 423 ha (Pretorius 2019). To avoid any impacts to these sites, Pretorius *pers. comm.* recommends this home range be converted to a radius of a circle of 423 ha in size. This equates to a 1160 m buffer. By applying these to the known observations on Emvelo, it affects the placement of turbines 17 (Emvelo) and 18 (Sheepmoor). These localities are buffered and mapped in Figure 4.

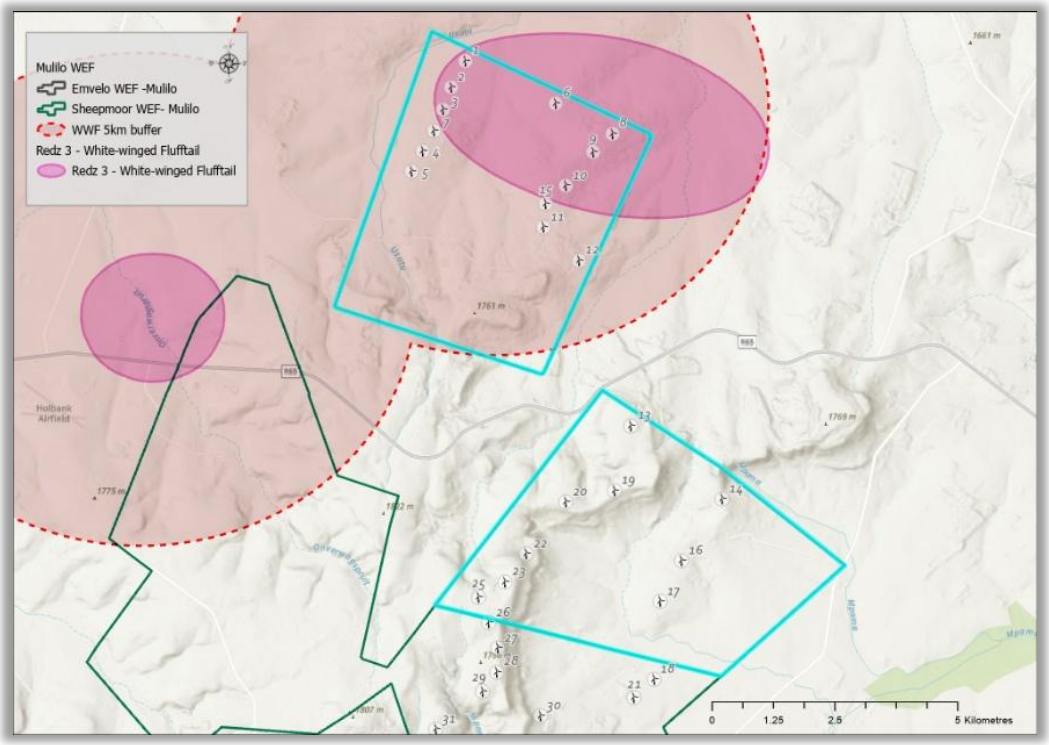


Figure 3: Confirmed White-winged Flufftail within Emvelo WEF, with REDZ 3 locality from Avifaunal risk layer and with point locality buffered by 5 km as a no go to development zone (Lloyd et al. 2025).

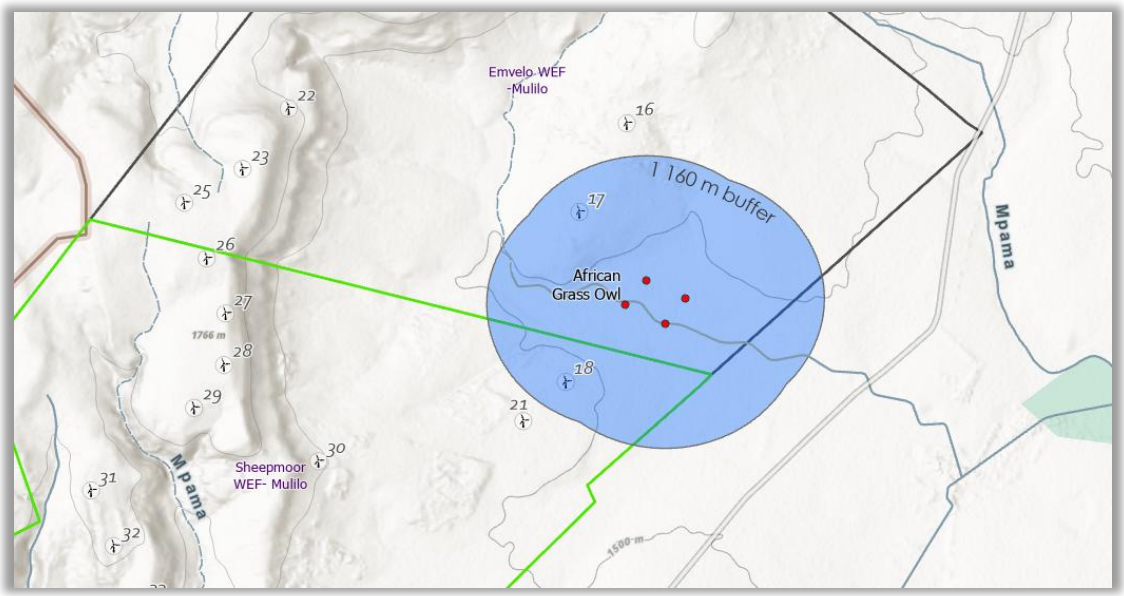


Figure 4: African Grass Own (Vulnerable) localities with the recommended 1160 m buffer to cover their strict home range of 423 ha.

Avifaunal assessment for draft Strategic Environmental Assessment for Phase 3 For Wind and Solar Photovoltaic Energy

The MTPA received the REDZ datasets from the CSIR in May for comment. These datasets may still be refined, but they represent the best available avifaunal data that will eventually inform the DFFE screening tool. Although still a draft product, the dataset is based off actual data and the MTPA believe it to be a significant improvement in the data currently available to evaluate renewable energy applications. Querying this dataset, besides the Critically Endangered White-winged Flufftail being present within the Emvelo footprint, the following important avifaunal datasets cover Emvelo (Table 1). The spatial extent these features is mapped in Figure 5.

Table 1: List of REDZ species and their risk and conservation status occurring over Emvelo and Sheepmoor WEFs.

Species	Risk	RDL Status
African Grass Owl	High	Vulnerable
Cape Vulture	Medium	Endangered (Regionally)
Grey Crowned Crane	High	Endangered
Rudds Lark	High	Endangered
Secretarybird	Very High	Endangered (globally)
Southern Bald Ibis	Very High	Vulnerable
White-winged Flufftail	Very High	Critically Endangered
Wattled Crane	High	Critically Endangered
Yellow breasted Pipit	Very High	Vulnerable

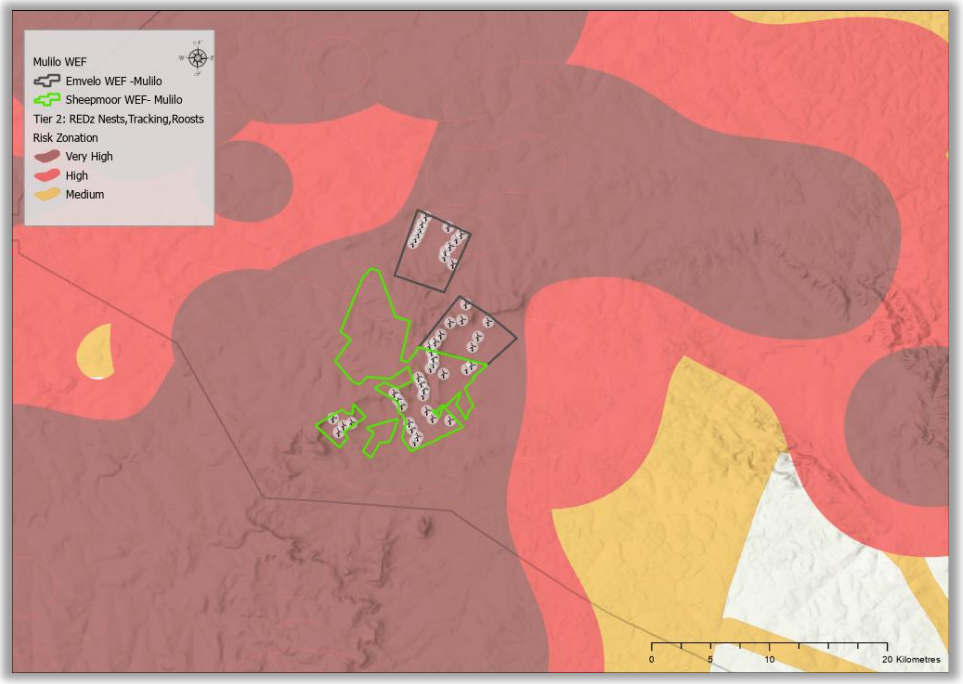


Figure 5: Spatial extent of the Tier 2 draft SEA REDZ 3 avian sensitivity layer covering Emovelo and Sheepmoor WEFs.

Buffers: Martial Eagle

The MTPA has significant concerns regarding the use and modelling of Martial Eagle collar data. The MTPA obtained a copy of the flight data containing 13,111 observation points, compared to the 13,680 observations used by AfriAvian. We used GIS to confirm key findings in the avifaunal assessment, focusing only on data from juvenile and adult tracking collars around the Emvelo and Sheepmoor sites, excluding the Free State male.

EWT previously advised using a 5-6 km buffer around nest sites. More recently, BirdLife (2025) recommended a 6 km buffer around nesting sites. This recommendation aligns with preliminary outputs from the National Martial Eagle Risk Assessment (MERA) tool led by the University of Cape Town, which supports applying a circular buffer of approximately 5 km to include core ranges heavily utilised by resident breeding Martial Eagles, rather than applying bespoke buffers based on tracking and observational flight path data. Given 40 individual collared Martial Eagle tracking datasets, researchers could not build a reliable model to guide wind farm development, as Martial Eagles appear particularly difficult to model for flight patterns.

Against this backdrop, it is concerning that AfriAvian claimed they could accurately model flight risk for Martial Eagles and were confident enough to reduce the nationally recommended buffer by more than 50% (to 2.5 km for the High Risk zone). Such confidence in model output would be required to make this bold decision, as any failure may result in the loss of both parents and the entire breeding pair.

AfriAvian's Approach: AfriAvian combined all GPS tracking data with fine-resolution field monitoring data (37+ hours of observations) to develop a Flight Risk Model. The output was processed to identify High and Medium risk zones. The High risk zone encompassed approximately 79 km², comparable to the area covered by a 5 km circular buffer (78.5 km²) recommended by BirdLife and EWT. However, AfriAvian then extracted from the High risk zone a "Very High risk zone" as their no-go area, relying on Martial Eagle tracking and observational data showing approximately 75% of recorded flight activity within 3 km of the nest. This was not only a subjective decision lacking scientific rigour, but as demonstrated below, the approach is fatally flawed.

Statistical Flaws in the Model: The flight risk model created using machine learning combined coarse-scaled GPS data across a wide area with fine-scaled, dense flight path data from a very limited area (majority within 2 km of nest) (see Figure 18 in the avifaunal assessment). Incorporating detailed, fine-scaled observational flight paths from such a limited area introduces spatial bias, where model output is disproportionately influenced by the more detailed sampling from the fine-resolution area, leading to overrepresentation of that smaller region.

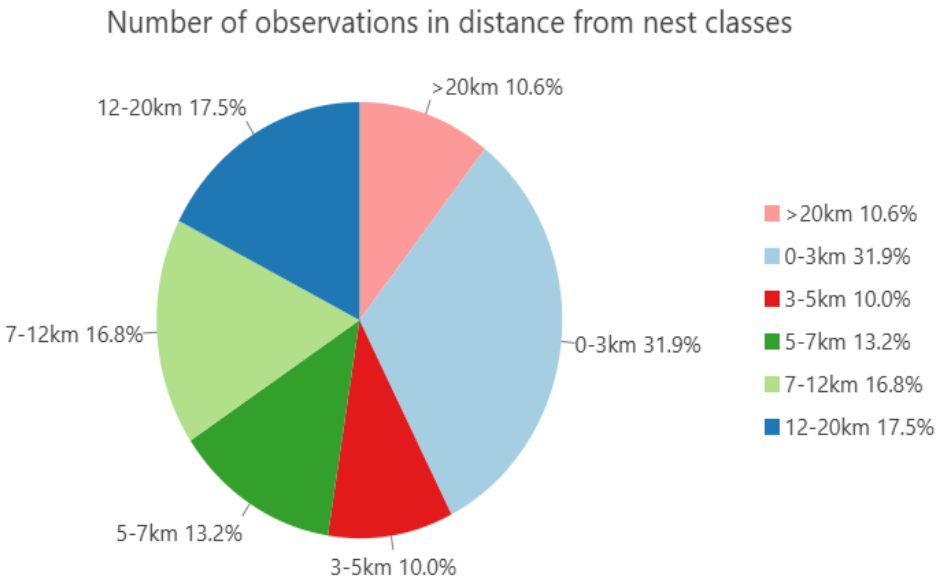
This approach is statistically flawed when differences in spatial area, resolution, sampling intensity, and density are not properly accounted for. This violates spatial statistical assumptions, resulting in inconsistent variance estimates, inaccurate predictions, and biased interpretations that do not accurately reflect broader spatial patterns.

MTPA Analysis and Findings: The MTPA used the same GPS tracking data to verify whether Martial Eagles spent 75% of their recorded flight activity within 3 km of the nest but could not replicate this statistic. We calculated the distance between each GPS observation (n=7266) and the nest, we then categorised each observation into the same distance classes that AfrAvian used in Figure 22 of their report. We used only flight data from the adult female and juvenile in this area, discarding Free State data (nest location unknown).

Importantly, we separated data into two types: (1) the complete dataset covering flying and stationary periods, and (2) a subset including only flying periods (>0.2 km/h). The second dataset was considerably smaller. Although collar tracking was programmed not to record locations between 19:00 and 4:00, 20% of observations were still recorded at before sunrise or after sunset. For flight risk modelling, only observations when birds are flying and at collision risk should be included, not when roosting, nesting, or perched.

We calculated the distance within which 75% of all observations occurred for the full dataset (including evening and nesting periods), finding a distance threshold of 5.6 km. For the flying-only dataset, this distance increased to 13.5 km (see Figures 6 and 7).

For AfriAvian to get to a value of 75% for all observations within 3km of the nest, they must have (1) used all the flight data, including the datasets that were only recorded at the nest (introducing spatial bias and a statistical flaw), (2) they must have used all the observational data, including when the bird was stationary and sitting on a nest, and (3) a different statistical approach to analysing the data. Regardless, our analysis provides a markedly different outcome, aligned with the 5-6 km buffer recommended by EWT and BirdLife, and invalidates the 2.5 km buffer proposed by Mulilo for the High Risk zone. This High Risk zone should be removed as there is no statistical confidence in its delineation, potentially putting birds at collision risk.



Distance from nest class	Flying only localities	Flying / Stationary localities
0-3km	31.9%	58.6%
3-5km	41.9%	60.8%
5-7km	55.1%	77.9%
7-12km	71.9%	85.3%
12-20km	89.4%	95.3%
>20km	100.0%	100.0%

Figure 6: Pie chart showing the number of Martial Eagle observations/points within distance classes from Martial Eagle nest. The table on the right presents the cumulative value of the distance classes, for the entire combined dataset, or with only the localities where the Martial Eagle were flying (>0.2 km/h). Results show that for the entire dataset of 7 266 points, 75% of the observations were within 5.6 km of the nest, while for the flying Martial Eagles, 75% of the records were within 13.5 km of the nest.



Figure 7: Bar-chart showing the number of observations from the collar tracking data in distance classes as used in Figure 22 of avifaunal report. Top-most chart presents all the observations (n=7266) for the adult and juvenile Martial Eagles. The middle chart presents only the observations where the Martial Eagles were flying (n=1122) in distance classes from nest. Bottom chart presents the combined datasets for both juvenile and adult birds in distance classes from nest. Bar chart bars are labelled with actual number of records in each class.

Breeding Cycle Considerations: Martial Eagles display significant differences between breeding and non-breeding periods. They typically breed every second year; therefore, a minimum of two years of data is essential when considering range use to capture both intensive breeding seasons and "sabbatical" periods when Martial Eagles often utilise larger ranges away from nesting sites. The GPS records for both birds covered 1 year and 1 month (10 April 2024 to 9 May 2025), meaning AfriAvian's analysed data did not cover a full two-year cycle.

Adult female Martial Eagles utilise home ranges differently than males, who spend considerable time hunting and provisioning for incubating partners and developing nestlings. During core breeding periods, females exhibit much higher nest site fidelity while males forage extensively over larger ranges. Females typically do not fly as far as males during core breeding seasons; therefore, the exclusion and lack of buffers considering male Martial Eagle range use is concerning. The conclusions did not factor in male flight activity, range use, and flight paths over the Mulilo project area.

Mitigation Concerns: Proposed mitigation measures include curtailment for Martial Eagle flights. However, the avifaunal report found that Martial Eagles are most active at moderate wind speeds of 5.5-10 m/s. Curtailment would significantly impact turbine power generation capacity, and we believe these costs were not considered in assessing the viability of proposed mitigation measures.

With the 5.5 km circular buffer being the current recommended buffer around Martial Eagle nests, the application of a 5.5 km buffer will result in the removal of 16 turbines, namely: 4, 5, 7, 9, 10, 11, 12, 13, 14, 15, 16, 19, 20, 22, 23, and 25. See Figure 8 below.

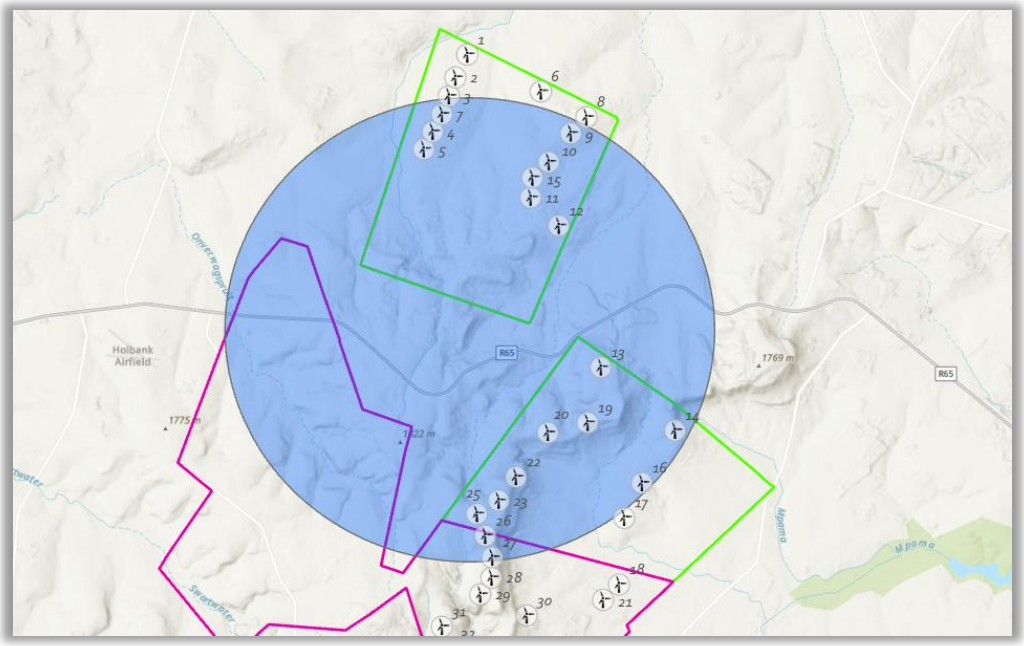


Figure 8: Application of a 5.5 km buffer around the Martial Eagle nest site and the impacted wind turbines.

Avifaunal Assessment: 2 -year of vantage point monitoring required and overreliance of models

Given the site's avifaunal sensitivity, two years of comprehensive avifaunal monitoring would be required. While we understand an additional year was added to monitor the Martial Eagle, this did not include visiting all vantage points as required by BirdLife guidelines. Figure 19 in the Avifaunal assessment shows the limited extent of this additional monitoring, which was confined to the Martial Eagle nest site. Such sensitive and vulnerable avifauna requires more comprehensive monitoring to properly understand and assess potential impacts.

Modelling is used throughout the project sites, from the identification of suitable habitat to avoid, through to predicting where Southern Bald Ibis is likely to fly once leaving a roost, to mitigating impacts. AfriAvian's flamingo model for Leghoya WEF was found to miss 50% of the important pans supporting flamingos (based on actual sightings). We highlight above the spatial bias that was introduced into the Martial Eagle Flight Risk Model, and the inability to replicate and confirm that 75% of the recorded flight activity is within 75% of the nest. George P. Box famously once said "*All models are wrong, but some are useful*". We need to be careful on our reliance on models.

There is an increasing tendency to over rely on models, perhaps because they sound to sophisticated, to mitigate and minimise all possible impacts to acceptable levels. This is wrong. Unless models can be validated with data that was withheld, or gathered afterwards, we need to approach models with caution. Models may be acceptable when they refine boundaries of established circular buffers, but they become problematic when they result in 50% reductions in buffer boundaries without validation or peer review. Our detailed analysis of the Martial Eagle model revealed several critical flaws, as discussed above.

As a result of these repeated issues with model accuracy and validation, the MTPA has become increasingly distrustful of models as primary decision-making tools for sensitive environmental assessments. Robust field monitoring and established precautionary guidelines must take precedence over unvalidated modelling outputs.

Cape Vulture flyways

Cape Vultures are globally vulnerable and regionally endangered. The specialist assessment did observe Cape Vultures over the project area for 48 minutes over 756 hours, and within the rotor swept zone. This amounts to 1 vulture visit every 2 weeks. According to the vantage point priority bird monitoring statistics, Cape Vultures were the 7th most observed priority species (out of 23) over the 1 year of observation.

In the recent Birdlife summary report from monitoring operational wind energy facilities (2025), it provides a case study of a wind farm that recorded a very low numbers of Cape Vultures during pre-construction monitoring (recorded in less than 1% of total vantage point surveys), yet later in the year, once operational, the wind farm had shutdowns involving 384 Cape Vultures. This highlights the need for impact assessments to incorporate all sources of information, and to be careful of initial low observations during pre-construction monitoring.

The MTPA queried the Cape Vulture flight paths on Movebank.org early in April 2025 – See Figure 9 (Kruger NP Raptors E-obs (n=18); Vulpro (Rehab & Captive bred) (n=123); & EWT SigFox Vultures (n=18)) to create the below map showing Cape Vulture flight paths based on density of observations in Movebank.org. This data in Figure 9 clearly shows a north-south flightpath that connects the northern Mpumalanga Escarpment with KwaZulu Natal in the south. And with the

specialist reported observation that the vultures fly within the rotor swept zone, we are very concerned about the risk that the wind farm may pose to vultures as they fly through this corridor. This corridor impacts all the proposed wind turbines.

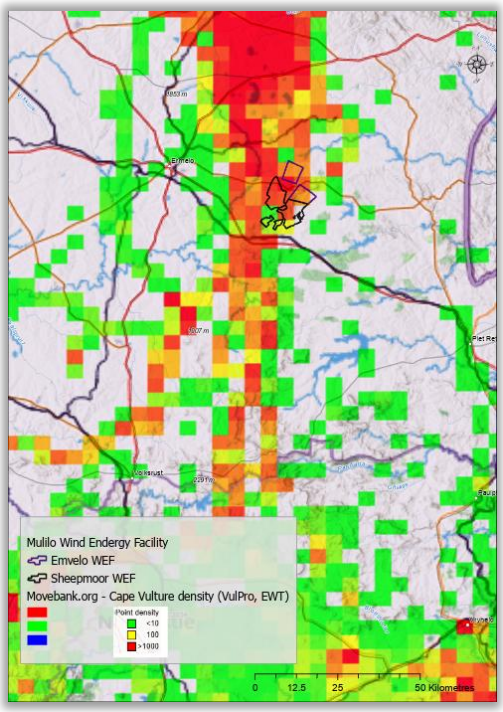


Figure 9: Tracking data from Cape Vultures flying over the Emvelo and Mulilo WEFs. Data sourced from Movebank.org in April 2025. Data source VulPro, EWT. Symbology represents density of recorded points. Red = high density.

Vantage Point Monitoring

Based on the latest and current turbine layout, 5 out of the 22 turbines are not covered by the 2 km vantage point buffers, amounting to 23% of turbines not been covered.

2.3 Specialist Assessments - other

While extensive specialist work has been undertaken, MTPA notes areas where further information or methodological alignment could strengthen the overall environmental assessment.

General

Enhanced integration between the aquatic, faunal, bat, terrestrial and avifaunal assessments is recommended to better understand potential synergistic or cumulative biological impacts.

Faunal Specialist Assessment

Placement of infrastructure in high/very high sensitivity areas warrants careful justification given specialist recommendations to avoid these areas. While we acknowledge the inclusion of a detailed oribi management plan, no detailed oribi survey of this area has occurred, nor is a map of oribi habitat or oribi observations included. Its inclusion at this late stage is only in response to issues raised in the Draft EIA report. Although it is possible that an oribi management plan could improve the local status of the oribi within the footprint area, it can also be said that the failure to adequate survey for oribi since this was raised in the scoping report stage (meeting), means that the proposed development may have a significant negative impact on the oribi. How do we know that turbines, roads, or infrastructure will not be placed in core habitat for oribi? The MTPA has reached out to EWT and they do not know what impact wind turbines will have on this highly sensitive mammal. The developer should not be surveying for oribi after the development is approved, it should have happened during the EIA phase.

Terrestrial Biodiversity Assessment:

The MTPA has significant reservations regarding the Terrestrial Assessment. Key concerns include:

- The terrestrial biodiversity theme is still not aligned with SANBI's Species Environmental Assessment Guideline (2022) that the consultant is required to comply with in terms of Notice 1150 of Government Gazette 43855 of 2020.
- The author only allowed for 4 days to survey both the Sheepmoor and Emvelo WEF sites during the summer months, when most summer rainfall plants would be flowering and identifiable. Four days is certainly not enough to cover an area this size (12,543 ha for both WEFs). This report is the same report as submitted with previous DEIA.
- No plant species of conservation concern, or endemics, were recorded on site. This is not surprising given the lack of time to survey this large area. ERM also opted to appoint a botanist not familiar with the flora of this area. There are several endemics restricted to this area that would be unfamiliar to someone not from the area. It just makes it harder to confirm identification, particularly with limited time and coverage in the field. **The MTPA is confident that several species of conservation concern would occur on site; they were just not detected**.
- The failure to apply the SANBI Guidelines resulted in inadequate time being allowed to properly assess the terrestrial biodiversity (botany) and the determining of site ecological importance (SEI). The consultant did not follow the SEI methodology, as required in terms of the SANBI guidelines and the MTPA does not believe that the approach followed to identify sensitive areas would be able to adequately assess the environmental sensitivity for this area. There were a number of additional variables that could have been applied (site-specific species, CBAs and ESAs, climate change corridors, intact grasslands, rocky ridges, etc.), patch size, together with criteria and approach of that are required in the SANBI Species Environmental Assessment Guidelines.
- The approach followed resulted in some CBA Irreplaceable areas, that overlapped with intact grasslands and provincial climate change corridors, being designated **medium** sensitivity (as a maximum value because it did not ultimately fall within the Eastern Highveld Grassland). This is fundamentally wrong as there was no consideration for any species of conservation concern (like roosting areas) or other spatial priorities like CBAs to meet biodiversity targets. Applying the SANBI criteria could allow the montane grassland to be categorised as *high*, or even *very high* if species and additional data were considered.
- In terms of the terrestrial biodiversity assessment, the result is that the montane grassland (not degraded) is of *medium* sensitivity, but the degraded Highveld grassland has *high* sensitivity, and non-degraded a *very-high*

sensitivity. This does not make sense. We have significantly more threatened plant species recorded in the Wakkerstroom Montane Grassland than for the Eastern Highveld Grassland and consider far more sensitive.

- Ultimately, the MTPA does not agree with the vegetation sensitivity analysis that then fed into other planning processes, such as the offsets, as it did not apply SANBI's Species Environmental Assessment Guideline (2022).

2.4 Biodiversity Offset Report (BOR)

Firstly, the MTPA never requested a biodiversity offset report. When meeting with Mulilo many months ago, Mulilo mentioned they would offset their impacts, and even committed to developing an Oribi Biodiversity Management Plan. In reviewing the first DEAI, the MTPA merely commented that there were no BOR or Oribi management plans.

The MTPA appreciates the effort that has gone into compiling the draft Biodiversity Offset report, however the offset assessment and report only partly covers the residual biodiversity loss to sensitive areas, such as CBAs and Intact Grassland Areas, and not to the avifauna of conservation concern. The offset report should in fact explicitly assess whether any residual impacts affect irreplaceable biodiversity that cannot be offset, which will be a fatal flaw. In addition, the MTPA feel that the anticipated negative impacts to long-lived threatened bird species cannot be adequately quantified nor offset.

The proposed BOR sets specific hectare targets for offsetting the direct loss of natural terrestrial habitats, particularly for areas supporting Species of Conservation Concern (SCC). These targets are based on biodiversity offset ratios, with a total of 507.15 hectares designated for offset, broken down by vegetation type and Mpumalanga Biodiversity Sector Plan (MBSP) category. The core of the terrestrial offset involves restoration efforts on disturbed and transformed areas within the study area. These areas include cultivated lands, disturbed Montane Grassland, disturbed Highveld Grassland, and alien invasive plantations. The aim of the BOR is to create additional habitat for Species of Conservation Concern (SCC), such as the Oribi, by restoring degraded grasslands.

The proposed offset strategy is partly aligned with the national offset strategy, however the formal legal security of the offset sites is incomplete. The BOR is certainly not clear how the site security will be guaranteed over the long term. Mulilo have lease agreements, and mention that servitudes or protected areas declaration may be pursued, but that does not meet the requirement of the offset guideline to do so and secure them. Mulilo proposes several internal onsite areas as offsets. These may not meet the requirements for a protected environment in a wind farm where avifaunal collisions occur. The MTPA will only consider offsets away from areas with turbines as possible protected environments. Hence there is no guarantee that the selected offset areas can ever be secured. Offsite offsets should have been identified and assessed in the report.

Furthermore, the candidate portfolio of offset sites is not provided in any detail. This shortfall is important as it is required for the competent authorities to assess any risks that cannot be offset. In addition, Mulilo commits to monitoring and adaptive management but alignment with the national offset guidelines do require specific biodiversity outcomes, monitoring indicators, success thresholds, and reporting plans.

The long-term financing mechanism and governance of the offsets are not discussed in any detail. It is important to secure long-term management funding (via a trust, endowment, etc.) and the governance arrangements, such as who will manage the sites, who will audit performance, etc.

The BOR also relies on rehabilitating disturbed areas; however, offsets should ideally be in relatively good condition (except for wetlands, which can be disturbed). Once grassland has been ploughed or planted up with trees, the biodiversity does not recover in our lifetime and restoration of these areas do not meet the biodiversity offset requirements.

The BOR includes offsite actions for priority bird species and avifauna buffer concepts, however, these must be converted into measurable outcomes (e.g., collision mortality reduction targets, powerline design/marking standards, and monitoring). Alignment with the national offset strategy requires species-sensitive responses be explicitly built into offset design when species with specific habitat needs are affected.

2.5 Visual Impact

Page 134 in the DEIA states that the visual analysis of the Emvelo project was found to be fatally flawed.

2.6 Cumulative Impacts

The concentration of renewable energy projects in Mpumalanga (890 turbines approved, in process, or planned), particularly along this sensitive escarpment, necessitates careful consideration of cumulative impacts. Each additional project contributes incrementally to regional habitat fragmentation and potential impacts on species populations, especially avifauna. The avifaunal assessment states that the proposed Emvelo WEF, alongside three other renewable energy projects within a 35 km radius, would contribute to a total of 133 turbines in similar habitat. Emvelo's turbines represent approximately 18% of the total planned turbines, indicating a moderate to high cumulative impact. For Emvelo, the cumulative impacts on birds are rated as High pre-mitigation and Medium post-mitigation. Bearing in mind the very optimistic mitigation proposals, dependant on a multitude of models and processes, places the implementation at risk.

The MTPA queried its database on renewable energy projects and actual turbine locations to provide the following important statistics (based on approved, under-consideration, and planned wind farms). Please note that these numbers include the current proposed Emvelo project's turbines within the numbers that are presented.

- *10 km radius*: 57 turbines (none approved)
- *20 km radius*: 107 turbines (2 approved)
- *35 km radius*: 302 turbines (82 approved)

The actual number of turbines approved or in process of being approved is double that what the avifaunal specialist used in their calculations. Yes, the Emvelo addition would make up a smaller percentage but it adds to the threshold beyond which avifauna populations(and bats) may start crashing. With every turbine added, the risk of collisions increases. As these turbines have not been built, the renewable energy industry and government, do not fully comprehend the massive impact that the wind farms will have on the avifauna and bats and the need to preserve sensitive areas to ensure their long terms persistence.

2.7 Acknowledgement of recent change in landcover and impact on spatial mapping products

The delineation of the CBAs and intact grassland patches was based off a landcover map from 2010 and 2019 (but just for CBAs). Any subsequent loss or transformation is not a fault in the MBSP or intact grassland patches, but as a result of a legal or illegal change in land use. In the MBSP Handbook, the guidelines recommend that a site assessment is required to confirm the current land use. Any loss may require additional areas to meet targets (to be addressed in MBSP v2), while acknowledging that **the CBA status may no longer apply to these areas if they have been ploughed or developed** (where recovery is not possible within our lifetimes). Therefore, in terms of the Emvelo WEF, any change in land use from natural to cultivation or plantation would result in this particular area no longer being identified as a CBA or intact grassland patch.

The impact of this has been considered when commenting on turbine placement and those that need to be removed.

3. Summary of Turbine Locations Requiring Reconsideration

Should DFFE proceed towards authorisation, we strongly recommend the exclusion of the turbines identified in below.

- WT 1: KBA, Climate change corridor, within 5km of White-winged Flufftail,
- WT 2: KBA, Within 5km of White-winged Flufftail,
- WT 3: KBA, Within 5km of White-winged Flufftail,
- WT 4: KBA, Climate change corridor, within 5km of White-winged Flufftail, within 5.5 km of Martial Eagle nest.
- WT 5: KBA, within 5km of White-winged Flufftail, within 5.5 km of Martial Eagle nest
- WT 6: KBA, within 5km of White-winged Flufftail,
- WT 7: KBA, CBA, climate change corridor, within 5km of White-winged Flufftail, within 5.5 km of Martial Eagle nest
- WT 8: KBA, within 5km of White-winged Flufftail,
- WT 9: KBA, within 5km of White-winged Flufftail, within 5.5 km of Martial Eagle nest
- WT 10: KBA, within 5km of White-winged Flufftail, within 5.5 km of Martial Eagle nest
- WT 11: KBA, within 5km of White-winged Flufftail, within 5.5 km of Martial Eagle nest
- WT 12: KBA, within 5km of White-winged Flufftail, within 5.5 km of Martial Eagle nest
- WT 13: IBA, Intact grasslands, NPAES, within 5.5 km of Martial Eagle nest
- WT 14: IBA, NPAES, within 5.5 km of Martial Eagle nest
- WT 15: KBA, within 5km of White-winged Flufftail, within 5.5 km of Martial Eagle nest
- WT 16: KBA, IBA, Within 5.5 km of Martial Eagle nest
- WT 17: KBA, IBA, Within African Grass Owl buffer
- WT 19: IBA, Intact grasslands, NPAES, within 5.5 km of Martial Eagle nest
- WT 20: IBA, Intact grasslands, NPAES, within 5.5 km of Martial Eagle nest
- WT 22: IBA, Intact grasslands, NPAES, within 5.5 km of Martial Eagle nest
- WT 23: IBA, Intact grasslands, NPAES, within 5.5 km of Martial Eagle nest
- WT 25: IBA, Intact grasslands; climate change corridor, NPAES, within 5.5 km of Martial Eagle nest

4. Closing

In conclusion, the MTPA maintains a strong objection to the proposed Emvelo WEF in its current form. The site overlaps with highly sensitive and irreplaceable biodiversity features—including intact grassland patches, climate change corridors, Critical Biodiversity Areas, KBAs, IBAs, and NPAES priority expansion areas—supporting numerous threatened and endemic species. The avifaunal assemblage present, particularly threatened species such as the White-winged Flufftail, Martial Eagle,

Black Harrier, Denham's Bustard, Cape Vulture, and African Grass Owl, places this site among the most sensitive in the province for wind energy development.

Our review identifies substantial flaws in the baseline data, methodological approaches, and statistical analyses used in the supporting specialist studies, particularly in the avifaunal assessment. Several models relied upon for impact prediction and mitigation zone delineation are unvalidated, contain spatial biases, or deviate from nationally recognised guidelines. Critical surveys, such as comprehensive Oribi assessments and adequate botanical surveys aligned with SANBI protocols, were not completed. As a result, sensitivity mapping, buffer zones, and mitigation recommendations cannot be considered robust or defensible.

The proposed mitigation measures—many novel, untested, and potentially unfeasible—are unlikely to adequately reduce the high to very high pre-mitigation risks to acceptable levels. Given the cumulative turbine density in the broader landscape, the unquantifiable long-term impacts on species with slow reproductive rates, and the loss of ecological connectivity, residual effects are expected to be severe and potentially irreversible.

In light of these factors, the MTPA concludes that the current turbine layout and offset strategy are fatally flawed from both a biodiversity conservation and environmental authorisation perspective. We recommend that authorisation be withheld and that any future proposal for this site be preceded by at least two full years of comprehensive, guideline-aligned monitoring; complete botanical and faunal surveys; and a layout that entirely avoids intact grasslands, key corridors, and critical habitats for species of conservation concern. Only a precautionary, science-based approach can ensure the long-term persistence of the biodiversity assets of this region.

Please do not hesitate to contact this office if there are any enquiries.

Regards,



DR. M. LÖTTER
MANAGER BIODIVERSITY PLANNING
DATE: 15 August 2025

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References

- BirdLife South Africa 2025. Summary Bird Monitoring Reports from Operational Wind Energy Facilities in South Africa. BirdLife South Africa Occasional Report Series No. 3. BirdLife South Africa, Johannesburg, South Africa
- Lloyd KJ, Ralston-Paton S, Day KD, Retief E, Smit-Robinson HA. 2025. Guidelines for surveying and mitigating impacts on White-winged Flufftail in avifaunal assessments for development applications, Version 1. Johannesburg: BirdLife South Africa.
- South African National Biodiversity Institute, 2020. Species Environmental Assessment Guideline. Guidelines for the implementation of the Terrestrial Fauna and Terrestrial Flora Species Protocols for environmental impact assessments in South Africa. South African National Biodiversity Institute, Pretoria
- Pretorius, M.D. 2019. The ecological preferences of the African Grass Owl *Tyto capensis* on the highveld of South Africa. Master of Science. Tshwane University of Technology.

OFFICE OF BIODIVERSITY CONSERVATION

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Dear Ms. Gopaul

SUBJECT: MTPA COMMENTS ON THE DRAFT ENVIRONMENTAL AUTHORISATION APPLICATION FOR THE REVISED SHEEPMOOR WIND ENERGY FACILITY (WEF) FOR SHEEPMOOR WIND ENERGY FACILITY (PTY) LTD, MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE. DFFE REFERENCE: 14/12/16/3/3/2/2613.

1. INTRODUCTION

The Mpumalanga Tourism and Parks Agency (MTPA) has reviewed the application for the proposed Sheepmoor Wind Energy Facility (WEF) and associated infrastructure (Reference: 14/12/16/3/3/2/2611), dated 14 July 2025.

The MTPA notes the changes made, such as a revised layout with a reduced number of turbines (now up to 25) and a lower maximum output capacity of up to 240 MW. While these revisions were informed by additional studies identifying sensitive areas requiring avoidance, the modifications often merely shifted turbines into partially transformed areas, with blades and footprints still encroaching on sensitive habitats. These changes are not substantial enough to address our concerns, and the MTPA does not support the current proposed layout.

Key areas of concern include potential impacts on critical habitats such as intact grassland patches, Critical Biodiversity Areas, Important Bird Areas (IBA), climate change corridors, and National Protected Area Expansion Strategy (NPAES) zones; risks to avifauna, including numerous species of conservation concern; perceived shortcomings in specialist assessments and statistical methods; insufficiently tested mitigation measures, especially with respect to buffer zones; and the cumulative impacts within a region already facing significant development pressure.

2. CORE CONCERNS

2.1 Impacts on Sensitive Habitats

Intact Grassland Patches

Intact grassland patches allow species to thrive and to support species that may need to move in response to climate change, enabling the normal functioning of natural ecological processes such as fire regimes or pollination. These patches are typically larger than 100 ha, with little or no gaps and minimal edge effects, and occur in close proximity to other intact grassland patches. They function as "source areas" in metapopulation dynamics where birth rates exceed death rates. No significant impacts should be allowed that would change a source area into a sink area (where death rates exceed birth rates). Mpumalanga has only 1,039 intact grassland patches, covering 15% of the province. These areas have been prioritised for their connectivity importance and must be avoided by wind energy facilities.

The intact patches on Sheepmoor are critical for maintaining connectivity with other grasslands. Despite MTPA raising concerns, specialist reports were largely silent on their importance. Using over 80,000 bird observations, the MTPA confirmed that intact grasslands have a 22% higher likelihood of hosting birds of conservation concern, 49% more birds of conservation concern, and 98% more individual bird observations than non-intact grasslands. These patches make up 23% of the Sheepmoor WEF footprint, and eight turbines (26, 27, 28, 29, 31, 32, 33, and 43) are located within them. These turbines should be removed. See Figure 1.

Therefore, the MTPA feels stronger than ever that the establishment of wind farms in intact grassland patches should not be allowed as it may turn a "source" area into a "sink" area. Even Page 3 and 4 of the Faunal assessment within the DEIA recognises that "*Faunal integrity relies on inter-connected grassland habitats across landscapes*." and "*…any contiguous areas of intact grassland are considered as high conservation importance*."



Figure 1: 3D map showing the location of the current turbines. Intact grassland patches are shown in green. Nest sites of threatened birds in red. In the current layout, there are still many turbines in the intact grassland patches.

Other Sensitive Spatial Areas:

Climate Change Corridors

The MBSP's climate change corridor network was designed to enable species and ecosystems to adapt to a changing environment. The corridor network considered a single-best (least-cost) corridor connecting up the climate change refugia with the climate change corridors from adjacent provinces. Additional fine-scale corridors were then identified using Circuitscape, finding alternative pathways and identifying pinch points in the corridors and thereby building resilience into the corridor network.

As can be seen from Figure 2, climate change corridor runs predominantly north-south through the project area, linking the climate change focal areas (as well as coincidentally the Grassland IBA with the Chrissies Pans IBA). Given that large birds do not fly in narrow, predictable lines, a flight corridor would need to be functionally broader than the MTPA provided fine-scale corridor. A broader macro-scaled corridor would be required for avifauna to ensure safe passage along the corridors. Maintaining this linkage is essential for long-term ecological resilience under climate change. The following turbines are within 500m of the climate change corridors and should be removed: 29, 31, 32, 33, 34, 36, 40, 42, 43, 44, 45, 46, 51, 52, and 53, as they would compromise this corridor.

The risk from the proposed wind farm on the corridor network is that the wind farm is unfortunately located along an important north-south macro regional flyway/corridor (also supported by vulture tracking data, Figure 9) which will result in increased collisions and electrocution, and habitat displacement. It stands to disrupt movement along the corridor and result in increased mortalities.

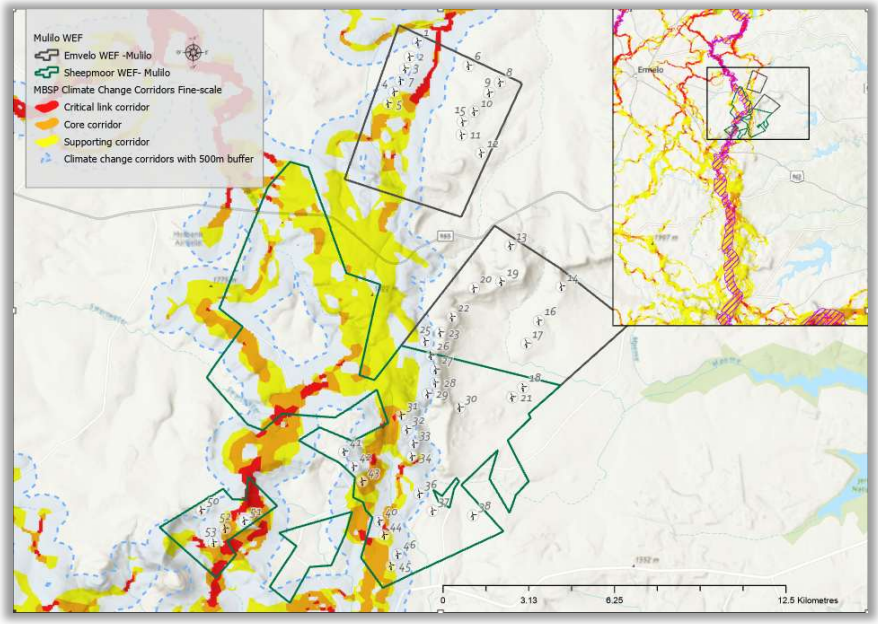


Figure 2: MBSP Climate Change Corridor network that links up climate change priorities with refugia and national climate change corridors. A 500m buffer has been added to the fine-scale corridors due to the need to accommodate mobile avifauna along a macro-scale corridor.

National Protected Area Expansion Strategy (NPAES 2018)

Over 60% of the proposed WEF falls within NPAES spatial priority areas, with 25% of turbines directly on focal areas. These sites are nationally significant for conservation expansion. Currently, 11 turbines (26, 27, 28, 29, 31, 33, 43, 44, 45, 52 and 53) are located in NPAES zones and should be removed.

2.2 Avifaunal Risks and Buffer Zones

The site's recognised avian biodiversity, including numerous sensitive and threatened species, necessitates a highly precautionary approach to impact assessment and mitigation. Many of the proposed mitigation measures are novel, untested, and costly. We don't believe the developer has adequately considered the costs of implementing all the recommended mitigation (and curtailment) measures on the success of this project, nor the chances of their efficient implementation (as they rely on models, people, expertise, budgets, and commitment).

Important Bird Areas (IBAs) and IUCN Key Biodiversity Araes (KBAs)

The proposed WEF falls in an area rich in bird species, particularly birds of conservation concern. Thirty-two priority bird species for wind energy development have been recorded within the WEF and broader area. An additional seventy-six species have been recorded which are powerline sensitive. Of particular concern are the occurrence of African Marsh-Harrier (EN), Black Harrier (EN), Blue Crane (VU), Blue Korhaan (NT), Cape Vulture (EN), Denham's Bustard (VU), Grey Crowned Crane (EN), Lanner Falcon (VU), Martial Eagle (EN), Secretarybird (EN), Southern Bald Ibis (VU), White-bellied Bustard (VU), and Yellow-breasted Pipit (VU). These are all threatened bird species at risk of extinction, over various timeframes. This rich avifaunal biodiversity is recognised regionally and globally through its inclusion within IBAs and KBAs. IBAs make up 55% and KBAs 12% of the Sheepmoor WEF.

At the heart of the MTPA's concerns, resulting in our objection, is the rich avifaunal diversity that is at risk of continual loss of mature individuals through collisions and electrocutions.

The avifaunal specialist report acknowledges that collision can be reduced from a high to a medium impact following post-mitigation. However, **with 14 threatened bird species occurring on site**, reducing the impact to a medium level is still significant (if at all possible), as any loss of large individuals may impact the conservation status of these species, particularly in light of cumulative impacts from the 359 planned or approved, and 127 approved wind turbines within 35 km of Sheepmoor WEF. Additionally, the avifaunal specialist report assessed the cumulative impact of Sheepmoor WEF to be moderate to high.

BirdLife monitoring report of 2025 states that on average, for every turbine, there are 4.25 bird fatalities per year, and that 10% of these were species of conservation concern. With every turbine added, the risk of collisions increases.

Avifaunal assessment for draft Strategic Environmental Assessment for Phase 3 For Wind and Solar Photovoltaic Energy

The MTPA received the REDZ datasets from the CSIR in May for comment. These datasets may still be refined, but they represent the best available avifaunal data that will eventually inform the DFFE screening tool. Although still a draft product, the dataset is based off actual data and the MTPA believe it to be a significant improvement in the data currently available to evaluate renewable energy applications. Querying this dataset the following important avifaunal datasets cover Sheepmoor (Table 1). The spatial extent these features is mapped in Figure 3.

Table 1: List of REDZ species and their risk and conservation status occurring over Emvelo and Sheepmoor WEFs.

Species	Risk	RDL Status
African Grass Owl	High	Vulnerable
Cape Vulture	Medium	Endangered (Regionally)
Grey Crowned Crane	High	Endangered
Rudds Lark	High	Endangered
Secretarybird	Very High	Endangered (globally)
Southern Bald Ibis	Very High	Vulnerable
White-winged Flufftail	Very High	Critically Endangered
Wattled Crane	High	Critically Endangered
Yellow breasted Pipit	Very High	Vulnerable

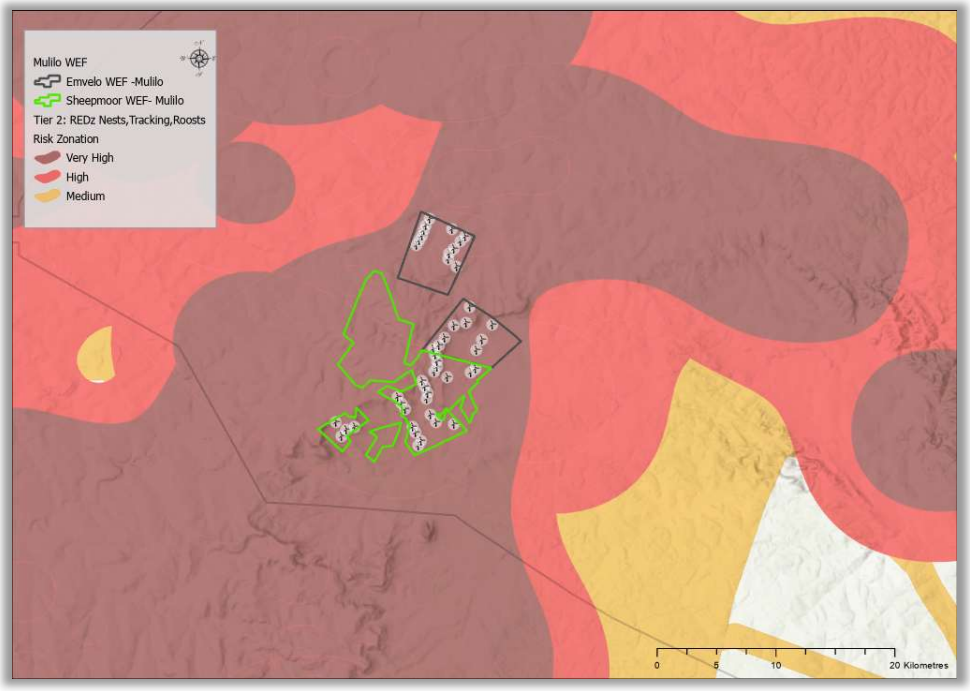


Figure 3: Spatial extent of the Tier 2 draft SEA REDZ 3 avian risk sensitivity layer covering Emovelo and Sheepmoor.

Buffers: Southern Bald Ibis

The specialist proposes shaped buffers based on modelled flight patterns, allowing turbines effectively within 506m (potentially as close as 100m) of roosts/nests. This represents a significant reduction from standard recommendations (1-2.5km) and appears inadequately precautionary, especially as it doesn't explicitly incorporate rotor overhang. Concern is raised about the accuracy and reliance of flight paths derived from observational vantage points. Confidence in these buffers is further reduced by the extremely limited flight path data used in their modelling. In the absence of a validated or peer-reviewed model, the MTPA recommends a minimum 1km buffer around these breeding colonies, which would require removal of turbines 28, 29, and 41. See Figure 4 for the 1km buffer zone and affected turbine locations.

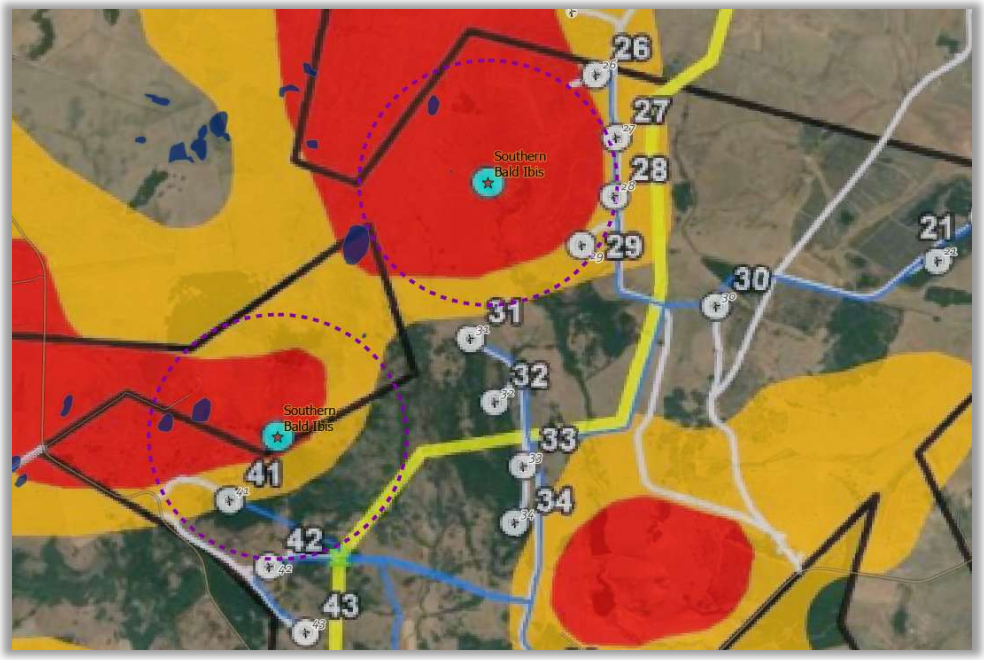


Figure 4: Map from avifaunal specialist report (July 2025) showing the Sheepmoor Southern Bald Ibis sensitivities and their proposed shaped buffer, a deviation from the standard 1km buffer. The purple dotted line represents a 1km buffer that then touches on several turbines.

African Grass Owl

African Grass Owl (*Tyto capensis*), a regionally Vulnerable species, has been recorded on Emvelo WEF in the east. These endemic and range-restricted owls have a very small home range of 423 ha (Pretorius 2019). To avoid any impacts to these sites, Pretorius *pers. comm.* recommends this home range be converted to a radius of a circle of 423 ha in size. This equates to a 1160 m buffer. By applying these to the known observations on Emvelo, it affects the placement of turbines 17 (Emvelo) and 18 (Sheepmoor). These localities are buffered and mapped in Figure 5.

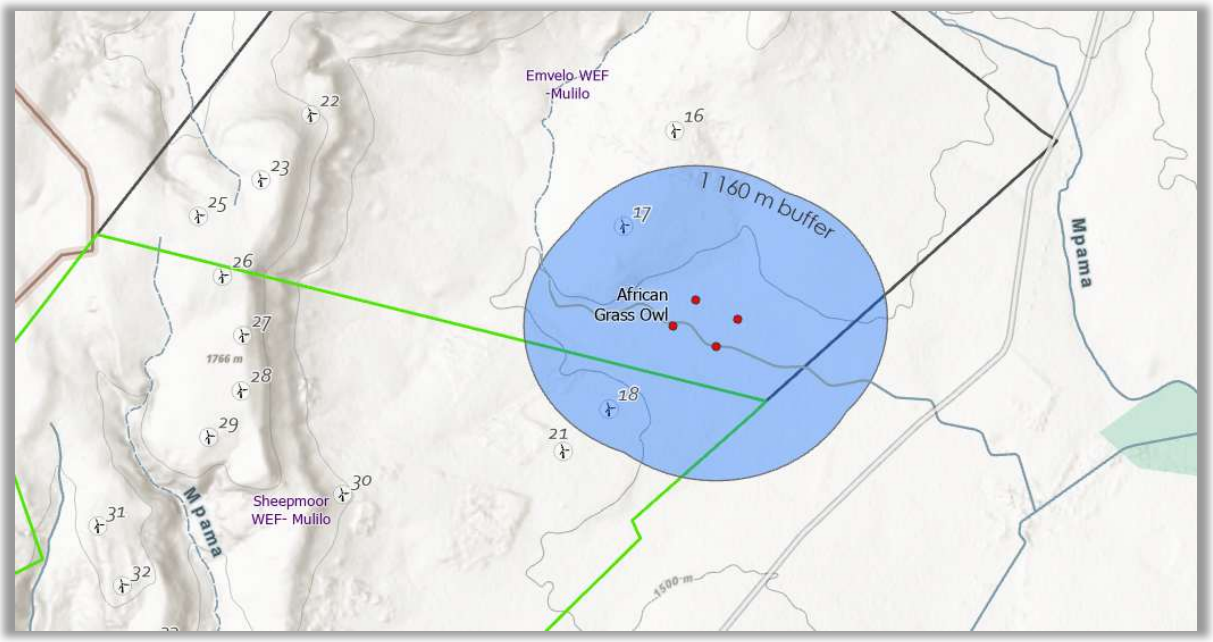


Figure 5: African Grass Own (Vulnerable) localities with the recommended 1160 m buffer to cover their strict home range of 423 ha.

Buffers: Martial Eagle

The MTPA has significant concerns regarding the use and modelling of Martial Eagle collar data. The MTPA obtained a copy of the flight data containing 13,111 observation points, compared to the 13,680 observations used by AfriAvian. We used GIS to confirm key findings in the avifaunal assessment, focusing only on data from juvenile and adult tracking collars around the Emvelo and Sheepmoor sites, excluding the Free State male.

EWT previously advised using a 5-6 km buffer around nest sites. More recently, BirdLife (2025) recommended a 6 km buffer around nesting sites. This recommendation aligns with preliminary outputs from the National Martial Eagle Risk Assessment (MERA) tool led by the University of Cape Town, which supports applying a circular buffer of approximately 5 km to include core ranges heavily utilised by resident breeding Martial Eagles, rather than applying bespoke buffers based on tracking and observational flight path data. Given 40 individual collared Martial Eagle tracking datasets, researchers could not build a reliable model to guide wind farm development, as Martial Eagles appear particularly difficult to model for flight patterns.

Against this backdrop, it is concerning that AfriAvian claimed they could accurately model flight risk for Martial Eagles and were confident enough to reduce the nationally recommended buffer by more than 50% (to 2.5 km for the High Risk zone). Such confidence in model output would be required to make this bold decision, as any failure may result in the loss of both parents and the entire breeding pair.

AfriAvian's Approach: AfriAvian combined all GPS tracking data with fine-resolution field monitoring data (37+ hours of observations) to develop a Flight Risk Model. The output was processed to identify High and Medium risk zones. The High risk zone encompassed approximately 79 km², comparable to the area covered by a 5 km circular buffer (78.5 km²) recommended by BirdLife and EWT. However, AfriAvian then extracted from the High risk zone a "Very High risk zone" as their no-go area, relying on Martial Eagle tracking and in-field observational data showing approximately 75% of recorded flight activity within 3 km of the nest. This was not only a subjective decision lacking scientific rigour, but as demonstrated below, the approach is fatally flawed.

Statistical Flaws in the Model: The flight risk model created using machine learning combined coarse-scaled GPS data across a wide area with fine-scaled, dense flight path data from a very limited area (majority within 2 km of nest) (see Figure 18 in the avifaunal assessment). Incorporating detailed, fine-scaled observational flight paths from such a limited area introduces spatial bias, where model output is disproportionately influenced by the more detailed sampling from the fine-resolution area, leading to overrepresentation of that smaller region.

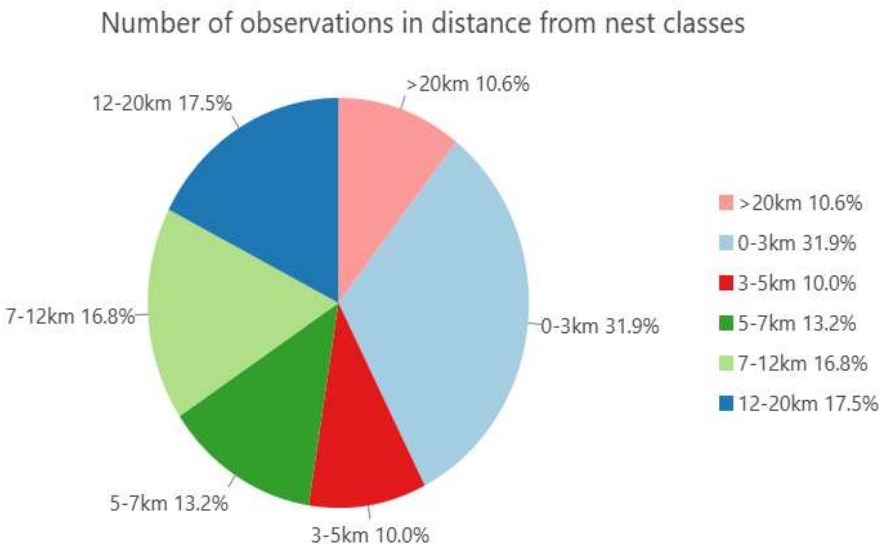
This approach is statistically flawed when differences in spatial area, resolution, sampling intensity, and density are not properly accounted for. This violates spatial statistical assumptions, resulting in inconsistent variance estimates, inaccurate predictions, and biased interpretations that do not accurately reflect broader spatial patterns.

MTPA Analysis and Findings: The MTPA used the same GPS tracking data to verify whether Martial Eagles spent 75% of their recorded flight activity within 3 km of the nest but could not replicate this statistic. We calculated the distance between each GPS observation (n=7266) and the nest, we then categorised each observation into the same distance classes that AfrAvian used in Figure 22 of their report. We used only flight data from the adult female and juvenile in this area, discarding Free State data (nest location unknown).

Importantly, we separated data into two types: (1) the complete dataset covering flying and stationary periods, and (2) a subset including only flying periods (>0.2 km/h). The second dataset was considerably smaller. Although collar tracking was programmed not to record locations between 19:00 and 4:00, 20% of observations were still recorded at before sunrise or after sunset. For flight risk modelling, only observations when birds are flying and at collision risk should be included, not when roosting, nesting, or perched.

We calculated the distance within which 75% of all observations occurred for the full dataset (including evening and nesting periods), finding a distance threshold of 5.6 km. For the flying-only dataset, this distance increased to 13.5 km (see Figures 6 and 7).

For AfriAvian to get to a value of 75% for all observations within 3km of the nest, they must have (1) used all the flight data, including the datasets that were only recorded at the nest (introducing spatial bias and a statistical flaw), (2) they must have used all the observational data, including when the bird was stationary and sitting on a nest, and (3) a different statistical approach to analysing the data. Regardless, our analysis provides a markedly different outcome, aligned with the 5-6 km buffer recommended by EWT and BirdLife, and invalidates the 2.5 km buffer proposed by Mulilo for the High Risk zone. This High Risk zone should be removed as there is no statistical confidence in its delineation, potentially putting birds at collision risk.



Distance from nest class	Flying only localities	Flying / Stationary localities
0-3km	31.9%	58.6%
3-5km	41.9%	60.8%
5-7km	55.1%	77.9%
7-12km	71.9%	85.3%
12-20km	89.4%	95.3%
>20km	100.0%	100.0%

Figure 6: Pie chart showing the number of Martial Eagle observations/points within distance classes from Martial Eagle nest. The table on the right presents the cumulative value of the distance classes, for the entire combined dataset, or with only the localities where the Martial Eagle were flying (>0.2 km/h). Results show that for the entire dataset of 7 266 points, 75% of the observations were within 5.6 km of the nest, while for the flying Martial Eagles, 75% of the records were within 13.5 km of the nest.

Breeding Cycle Considerations: Martial Eagles display significant differences between breeding and non-breeding periods. They typically breed every second year; therefore, a minimum of two years of data is essential when considering range use to capture both intensive breeding seasons and "sabbatical" periods when Martial Eagles often utilise larger ranges away from nesting sites. The GPS records for both birds covered 1 year and 1 month (10 April 2024 to 9 May 2025), meaning AfriAvian's analysed data did not cover a full two-year cycle.

Adult female Martial Eagles utilise home ranges differently than males, who spend considerable time hunting and provisioning for incubating partners and developing nestlings. During core breeding periods, females exhibit much higher nest site fidelity while males forage extensively over larger ranges. Females typically do not fly as far as males during core breeding seasons; therefore, the exclusion and lack of buffers considering male Martial Eagle range use is concerning. The conclusions did not factor in male flight activity, range use, and flight paths over the Mulilo project area.

Mitigation Concerns: Proposed mitigation measures include curtailment for Martial Eagle flights. However, the avifaunal report found that Martial Eagles are most active at moderate wind speeds of 5.5-10 m/s. Curtailment would significantly impact turbine power generation capacity, and we believe these costs were not considered in assessing the viability of proposed mitigation measures.

With the 5.5 km circular buffer being the current recommended buffer around Martial Eagle nests, the application of a 5.5 km buffer will result in the removal of 2 turbines, namely: 26 and 27. See Figure 8 below.

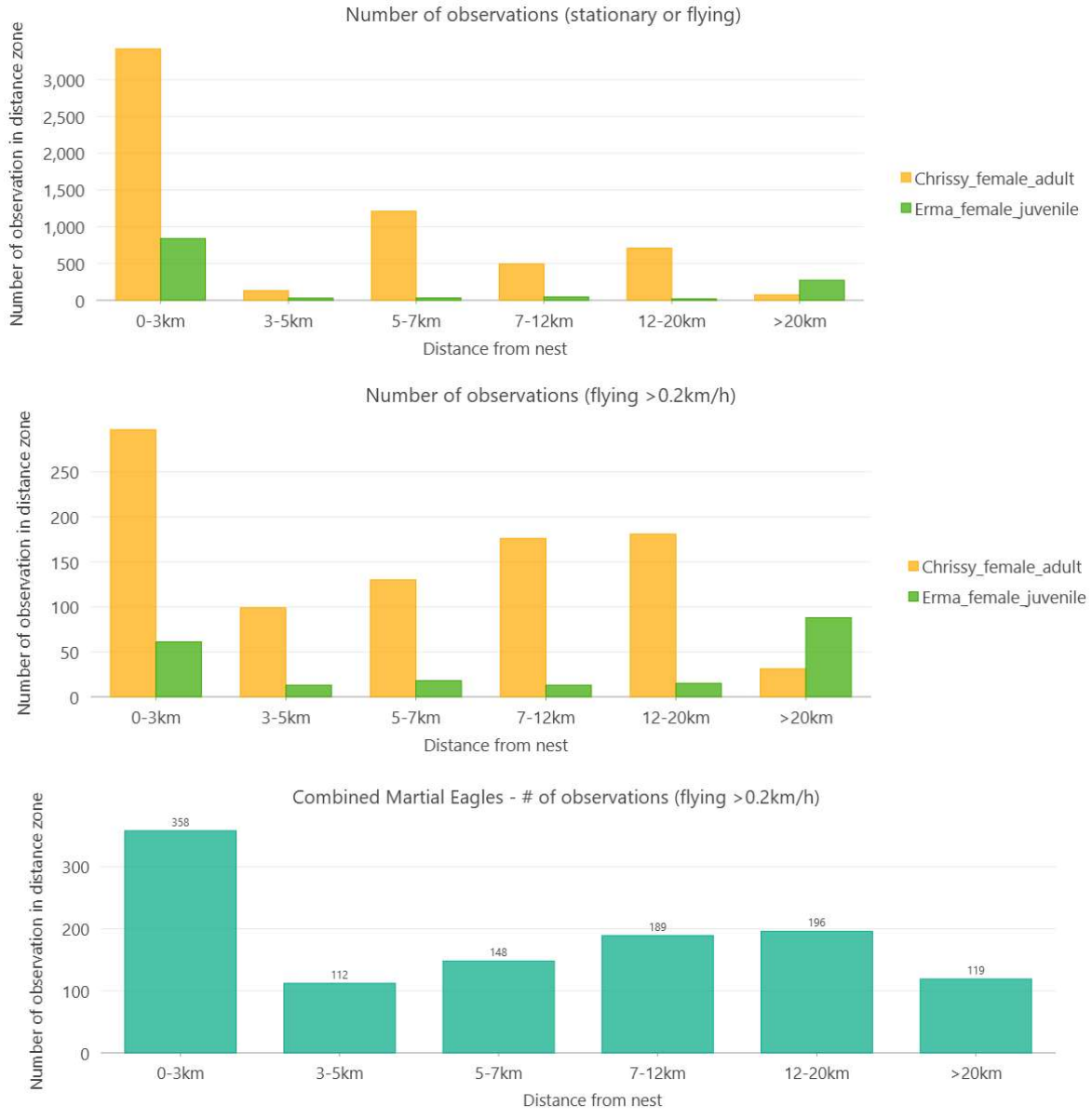


Figure 7: Bar-chart showing the number of observations from the collar tracking data in distance classes as used in Figure 22 of avifaunal report. Top-most chart presents all the observations (n=7266) for the adult and juvenile Martial Eagles. The middle chart presents only the observations where the Martial Eagles were flying (n=1122) in distance classes from nest. Bottom chart presents the combined datasets for both juvenile and adult birds in distance classes from nest. Bar chart bars are labelled with actual number of records in each class.

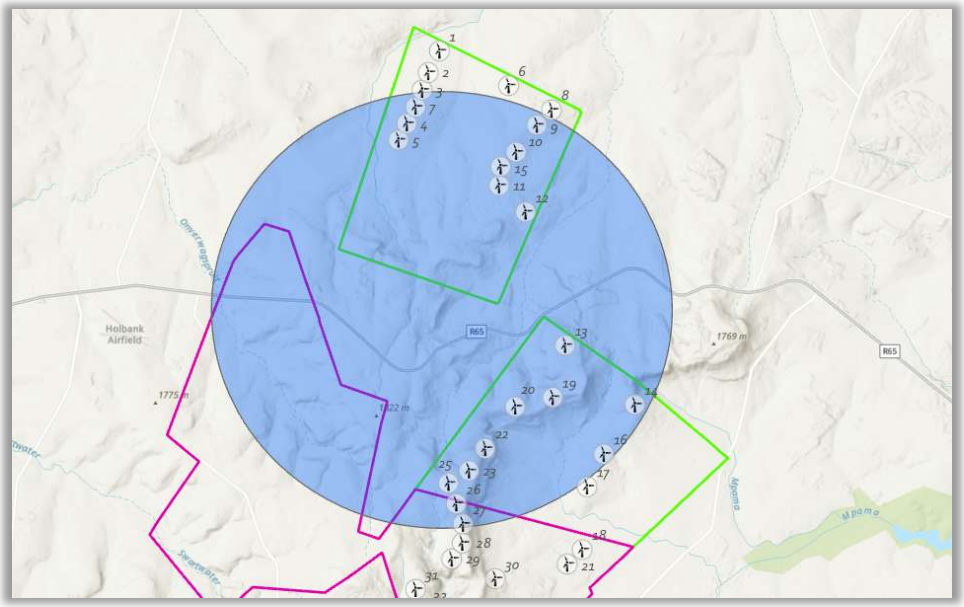


Figure 8: Application of a 5.5 km buffer around the Martial Eagle nest site and the impacted wind turbines.

Avifaunal Assessment: 2 -year of data gathering required and overreliance of models

Given the site's avifaunal sensitivity, two years of comprehensive avifaunal monitoring would be required. While we understand an additional year was added to monitor the Martial Eagle, this did not include visiting all vantage points as required by BirdLife guidelines. Figure 19 in the Avifaunal assessment shows the limited extent of this additional monitoring, which was confined to the Martial Eagle nest site. Such sensitive and vulnerable avifauna requires more comprehensive monitoring to properly understand and assess potential impacts.

Modelling is used throughout the project sites, from the identification of suitable habitat to avoid, through to predicting where Southern Bald Ibis is likely to fly once leaving a roost, to mitigating impacts. AfriAvian's flamingo model for Leghoya WEF was found to miss 50% of the important pans supporting flamingos (based on actual sightings). We highlight above the spatial bias that was introduced into the Martial Eagle Flight Risk Model, and the inability to replicate and confirm that 75% of the recorded flight activity is within 75% of the nest. George P. Box famously once said "*All models are wrong, but some are useful*".

There is an increasing tendency to over rely on models, perhaps because they sound to sophisticated, to mitigate and minimise all possible impacts to acceptable levels. This is wrong. Unless models can be validated with data that was withheld, or gathered afterwards, we need to approach models with caution. Models may be acceptable when they refine boundaries of established circular buffers, but they become problematic when they result in 50% reductions in buffer boundaries without validation or peer review. Our detailed analysis of the Martial Eagle model revealed several critical flaws, as discussed above.

As a result of these repeated issues with model accuracy and validation, the MTPA has become increasingly distrustful of models as primary decision-making tools for sensitive environmental assessments. Robust field monitoring and established precautionary guidelines must take precedence over unvalidated modelling outputs.

Cape Vulture flyways

Cape Vultures are globally vulnerable and regionally endangered. The specialist assessment did observe Cape Vultures over the project area for 48 minutes over 756 hours, and within the rotor swept zone. This amounts to 1 vulture visit every 2 weeks. According to the vantage point priority bird monitoring statistics, Cape Vultures were the 7th most observed priority species (out of 23) over the 1 year of observation.

In the recent Birdlife summary report from monitoring operational wind energy facilities (2025), it provides a case study of a wind farm that recorded a very low numbers of Cape Vultures during pre-construction monitoring (recorded in less than 1% of total vantage point surveys), yet later in the year, once operational, the wind farm had shutdowns involving 384 Cape Vultures. This highlights the need for impact assessments to incorporate all sources of information, and to be careful of initial low observations during pre-construction monitoring.

The MTPA queried the Cape Vulture flight paths on Movebank.org early in April 2025 – See Figure 9 (Kruger NP Raptors E-obs (n=18); Vulpro (Rehab & Captive bred) (n=123); & EWT SigFox Vultures (n=18)) to create the below map showing Cape Vulture flight paths based on density of observations in Movebank.org. This data in Figure 9 clearly shows a north-south flightpath that connects the northern Mpumalanga Escarpment with KwaZulu Natal in the south. And with the specialist reported observation that the vultures fly within the rotor swept zone, we are very concerned about the risk that the wind farm may pose to vultures as they fly through this corridor. This corridor impacts all the proposed wind turbines.

Vantage Point Monitoring

Based on the latest and current turbine layout, 3 of the 25 turbines are not covered by the 2km vantage point buffers, amounting to 12% of turbines not been covered.

2.3 Specialist Assessments

While extensive specialist work has been undertaken, MTPA notes areas where further information or methodological alignment could strengthen the overall environmental assessment.

General

Enhanced integration between the aquatic, faunal, bat, terrestrial and avifaunal assessments is recommended to better understand potential synergistic or cumulative biological impacts.

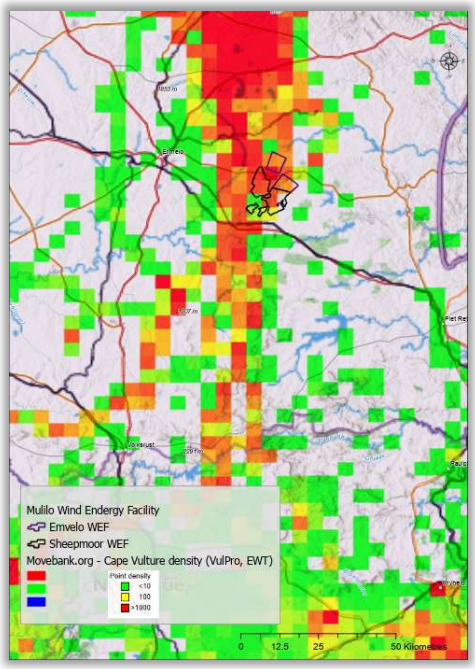


Figure 9: Tracking data from Cape Vultures flying over the Emvelo and Mulilo WEFs. Data sourced from Movebank.org in April 2025. Data source VulPro, EWT. Symbology represents density of recorded points. Red = high density.

Faunal Specialist Assessment

Placement of infrastructure in high/very high sensitivity areas warrants careful justification given specialist recommendations to avoid these areas. While we acknowledge the inclusion of a detailed oribi management plan, no detailed oribi survey of this area has occurred, nor is a map of oribi habitat or oribi observations included. Its inclusion at this late stage is only in response to issues raised in the Draft EIA report. Although it is possible that an oribi management plan could improve the local status of the oribi within the footprint area, it can also be said that the failure to adequate survey for oribi since this was raised in the scoping report stage (meeting), means that the proposed development may have a significant negative impact on the oribi. How do we know that turbines, roads, or infrastructure will not be placed in core habitat for oribi? The MTPA has reached out to EWT and they do not know what impact wind turbines will have on this highly sensitive mammal. The developer should not be surveying for oribi after the development is approved, it should have happened during the EIA phase.

Terrestrial Biodiversity Assessment:

The MTPA has significant reservations regarding the Terrestrial Assessment. Key concerns include:

- The terrestrial biodiversity theme is still not aligned with SANBI's Species Environmental Assessment Guideline (2022) that the consultant is required to comply with in terms of Notice 1150 of Government Gazette 43855 of 2020.

- The author only allowed for 4 days to survey both the Sheepmoor and Emvelo WEF sites during the summer months, when most summer rainfall plants would be flowering and identifiable. Four days is certainly not enough to cover an area this size (12,543 ha for both WEFs). This report is the same report as submitted with previous DEIA.
- No plant species of conservation concern, or endemics, were recorded on site. This is not surprising given the lack of time to survey this large area. ERM also opted to appoint a botanist not familiar with the flora of this area. There are several endemics restricted to this area that would be unfamiliar to someone not from the area. It just makes it harder to confirm identification, particularly with limited time and coverage in the field. **The MTPA is confident that several species of conservation concern would occur on site; they were just not detected**.
- The failure to apply the SANBI Guidelines resulted in inadequate time being allowed to properly assess the terrestrial biodiversity (botany) and the determining of site ecological importance (SEI). The consultant did not follow the SEI methodology, as required in terms of the SANBI guidelines and the MTPA does not believe that the approach followed to identify sensitive areas would be able to adequately assess the environmental sensitivity for this area. There were a number of additional variables that could have been applied (site-specific species, CBAs and ESAs, climate change corridors, intact grasslands, rocky ridges, etc.), patch size, together with criteria and approach of that are required in the SANBI Species Environmental Assessment Guidelines.
- The approach followed resulted in some CBA Irreplaceable areas, that overlapped with intact grasslands and provincial climate change corridors, being designated **medium** sensitivity (as a maximum value because it did not ultimately fall within the Eastern Highveld Grassland). This is fundamentally wrong as there was no consideration for any species of conservation concern (like roosting areas) or other spatial priorities like CBAs to meet biodiversity targets. Applying the SANBI criteria could allow the montane grassland to be categorised as *high*, or even *very high* if species and additional data were considered.
- In terms of the terrestrial biodiversity assessment, the result is that the montane grassland (not degraded) is of *medium* sensitivity, but the degraded Highveld grassland has *high* sensitivity, and non-degraded a *very-high* sensitivity. This does not make sense. We have significantly more threatened plant species recorded in the Wakkerstroom Montane Grassland than for the Eastern Highveld Grassland and consider far more sensitive.
- Ultimately, the MTPA does not agree with the vegetation sensitivity analysis that then fed into other planning processes, such as the offsets, as it did not apply SANBI's Species Environmental Assessment Guideline (2022).

2.4 Biodiversity Offset Report (BOR)

Firstly, the MTPA never requested a biodiversity offset report. When meeting with Mulilo many months ago, Mulilo mentioned they would offset their impacts, and even committed to developing an Oribi Biodiversity Management Plan. In reviewing the first DEIA, the MTPA merely commented that there were no BOR or Oribi management plans.

The MTPA appreciates the effort that has gone into compiling the draft Biodiversity Offset report, however the offset assessment and report only partly covers the residual biodiversity loss to sensitive areas, such as CBAs and Intact Grassland Areas, and not to the avifauna of conservation concern. The offset report should in fact explicitly assess whether any residual impacts affect irreplaceable biodiversity that cannot be offset, which will be a fatal flaw. In

addition, the MTPA feel that the anticipated negative impacts to long-lived threatened bird species cannot be adequately quantified nor offset.

The proposed BOR sets specific hectare targets for offsetting the direct loss of natural terrestrial habitats, particularly for areas supporting Species of Conservation Concern (SCC). These targets are based on biodiversity offset ratios, with a total of 507.15 hectares designated for offset, broken down by vegetation type and Mpumalanga Biodiversity Sector Plan (MBSP) category. The core of the terrestrial offset involves restoration efforts on disturbed and transformed areas within the study area. These areas include cultivated lands, disturbed Montane Grassland, disturbed Highveld Grassland, and alien invasive plantations. The aim of the BOR is to create additional habitat for Species of Conservation Concern (SCC), such as the Oribi, by restoring degraded grasslands.

The proposed offset strategy is partly aligned with the national offset strategy, however the formal legal security of the offset sites is incomplete. The BOR is certainly not clear how the site security will be guaranteed over the long term. Mulilo have lease agreements, and mention that servitudes or protected areas declaration may be pursued, but that does not meet the requirement of the offset guideline to do so and secure them. Mulilo proposes several internal onsite areas as offsets. These may not meet the requirements for a protected environment in a wind farm where avifaunal collisions occur. The MTPA will only consider offsets away from areas with turbines as possible protected environments. Hence there is no guarantee that the selected offset areas can ever be secured. Offsite offsets should have been identified and assessed in the report.

Furthermore, the candidate portfolio of offset sites is not provided in any detail. This shortfall is important as it is required for the competent authorities to assess any risks that cannot be offset. In addition, Mulilo commits to monitoring and adaptive management but alignment with the national offset guidelines do require specific biodiversity outcomes, monitoring indicators, success thresholds, and reporting plans.

The long-term financing mechanism and governance of the offsets are not discussed in any detail. It is important to secure long-term management funding (via a trust, endowment, etc.) and the governance arrangements, such as who will manage the sites, who will audit performance, etc.

The BOR also relies on rehabilitating disturbed areas; however, offsets should ideally be in relatively good condition (except for wetlands, which can be disturbed). Once grassland has been ploughed or planted up with trees, the biodiversity does not recover in our lifetime and restoration of these areas do not meet the biodiversity offset requirements.

The BOR includes offsite actions for priority bird species and avifauna buffer concepts, however, these must be converted into measurable outcomes (e.g., collision mortality reduction targets, powerline design/marking standards, and monitoring). Alignment with the national offset strategy requires species-sensitive responses be explicitly built into offset design when species with specific habitat needs are affected.

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2.5 Cumulative Impacts

The concentration of renewable energy projects in Mpumalanga (890 turbines approved, in process, or planned), particularly along this sensitive escarpment, necessitates careful consideration of cumulative impacts. Each additional project contributes incrementally to regional habitat fragmentation and potential impacts on species

populations, especially avifauna. The avifaunal assessment states that the proposed Mulilo WEF, alongside three other renewable energy projects within a 35 km radius, would contribute to a total of 131 (incl. Sheepmoor). Sheepmoor's turbines represent approximately 21% of the total planned turbines, indicating a moderate to high cumulative impact. For Sheepmoor, the cumulative impacts on birds are rated as High pre-mitigation and Medium post-mitigation. Bearing in mind the very optimistic mitigation proposals, dependant on a multitude of models and processes, places the implementation at risk.

The MTPA was able to query its database on renewable energy projects and actual turbine locations to provide the following important statistics (based on approved, under-consideration, and planned wind farms). Please note that these stats include the current proposed Sheepmoor project's turbines within the numbers presented.

- *10 km radius*: 70 turbines (3 approved)
- *20 km radius*: 216 turbines (65 approved)
- *35 km radius*: 359 turbines (127 approved)

The actual number of turbines approved or in process of being approved is double that what the avifaunal specialist used in their calculations. Yes, their addition makes up a smaller percentage but it adds to the threshold beyond which avifauna populations(and bats) may start crashing. With every turbine added, the risk of collisions increases. As these turbines have not been built, the renewable energy industry, and government, do not fully comprehend the massive impact that the wind farms will have on the avifauna and bats and the need to preserve sensitive areas to ensure their long terms persistence.

2.6 Acknowledgement of recent change in landcover and impact on results

The delineation of the CBAs and intact grassland patches was based off a landcover map from 2010 and 2019 (but just for CBAs). Any subsequent loss or transformation is not a fault in the MBSP or intact grassland patches, but as a result of a legal or illegal change in land use. In the MBSP Handbook, the guidelines recommend that a site assessment is required to confirm the current land use. Any loss may require additional areas to meet targets (to be addressed in MBSP v2), while acknowledging that **the CBA status may no longer apply to these areas if they have been ploughed or developed** (where recovery is not possible within our lifetimes). Therefore, in terms of the Sheepmoor WEF, any change in land use from natural to cultivation or plantation would result in this particular area no longer being identified as a CBA or intact grassland patch.

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3. Summary of Turbine Locations Requiring Reconsideration

Should DFFE proceed towards authorisation, we strongly recommend the exclusion of the turbines identified in below.

- WT 18: KBA, African Grass Owl buffer
- WT 21: KBA
- Wt 26: Intact Grassland Patch; NPAES, within 5.5km Martial Eagle buffer, IBA

- WT 27: Intact Grassland Patch, NPAES, within 5.5km Martial Eagle buffer, IBA
- WT 28: Intact Grassland Patch, NPAES, within Bald Ibis buffer, IBA
- WT 29: Intact Grassland Patch, Climate change corridor, NPAES, within Bald Ibis buffer, IBA
- WT 31: Intact Grassland Patch, Climate change corridor, NPAES
- WT 32: Intact Grassland Patch, Climate change corridor
- WT 33: Intact Grassland Patch, Climate change corridor, NPAES
- WT 34: Climate change corridor
- WT 36: Climate change corridor
- WT 40: Climate change corridor
- WT 41: Within Bald Ibis buffer
- WT 42: Climate change corridor
- WT 43: Intact Grassland Patch, Climate change corridor, NPAES,
- WT 44: Climate change corridor, NPAES
- WT 45: Climate change corridor, NPAES, CBA
- WT 46: Climate change corridor,
- WT 50: IBA
- WT 51: Climate change corridor, IBA,
- WT 52: Climate change corridor, NPAES, IBA
- WT 53: Climate change corridor, NPAES, IBA

4. Closing

In conclusion, **the MTPA maintains a strong objection to the proposed Sheepmoor WEF in its current form**. The site overlaps with highly sensitive and irreplaceable biodiversity features—including intact grassland patches, climate change corridors, Critical Biodiversity Areas, KBAs, IBAs, and NPAES priority expansion areas—supporting numerous threatened and endemic species. The avifaunal assemblage present, particularly threatened species such as the Martial Eagle, Black Harrier, Denham's Bustard, Cape Vulture, and African Grass Owl, places this site among the most sensitive in the province for wind energy development.

Our review identifies substantial flaws in the baseline data, methodological approaches, and statistical analyses used in the supporting specialist studies, particularly in the avifaunal assessment. Several models relied upon for impact prediction and mitigation zone delineation are unvalidated, contain spatial biases, or deviate from nationally recognised guidelines. Critical surveys, such as comprehensive Oribi assessments and adequate botanical surveys aligned with SANBI protocols, were not completed. As a result, sensitivity mapping, buffer zones, and mitigation recommendations cannot be considered robust or defensible.

The proposed mitigation measures—many novel, untested, and potentially unfeasible—are unlikely to adequately reduce the high to very high pre-mitigation risks to acceptable levels. Given the cumulative turbine density in the broader landscape, the unquantifiable long-term impacts on species with slow reproductive rates, and the loss of ecological connectivity, residual effects are expected to be severe and potentially irreversible.

In light of these factors, the MTPA concludes that the current turbine layout and offset strategy are fatally flawed from both a biodiversity conservation and environmental authorisation perspective. We recommend that authorisation be withheld and that any future proposal for this site be preceded by at least two full years of comprehensive, guideline-aligned monitoring; complete botanical and faunal surveys; and a layout that entirely avoids intact grasslands, key corridors, and critical habitats for species of conservation concern. Only a precautionary, science-based approach can ensure the long-term persistence of the biodiversity assets of this region.

Please do not hesitate to contact this office if there are any enquiries.



DR. M. LÖTTER

MANAGER BIODIVERSITY PLANNING

DATE: 15 August 2025

Cc: Ms B Ncube BNcube@dffe.gov.za
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Mr G Cowden gcowden@mpg.gov.za
Ms S Mbuyane mbuyanesb@mpg.gov.za

References

- BirdLife South Africa 2025. Summary Bird Monitoring Reports from Operational Wind Energy Facilities in South Africa. BirdLife South Africa Occasional Report Series No. 3. BirdLife South Africa, Johannesburg, South Africa
- Lloyd KJ, Ralston-Paton S, Day KD, Retief E, Smit-Robinson HA. 2025. Guidelines for surveying and mitigating impacts on White-winged Flufftail in avifaunal assessments for development applications, Version 1. Johannesburg: BirdLife South Africa.
- South African National Biodiversity Institute, 2020. Species Environmental Assessment Guideline. Guidelines for the implementation of the Terrestrial Fauna and Terrestrial Flora Species Protocols for environmental impact assessments in South Africa. South African National Biodiversity Institute, Pretoria
- Pretorius, M.D. 2019. The ecological preferences of the African Grass Owl *Tyto capensis* on the highveld of South Africa. Master of Science. Tshwane University of Technology.

From: Jamie Pote
Sent on: Monday, 18 August 2025 17:19:11
To: Lucien Barbeau; ERM Arcus Amsterdam
CC: Stephen Burton; Mpho Malema
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Hi Lucien I will take a look and get responses to you.

You had let us know about the responses so had kept a window this week.

I'll get them to you as soon as I can, I will just need to taka a look and may need to give some thought for a day or two or do some further analysis depending on what they are.

I note the timeline and will try get to you by end Wednesday or sooner if they are not too comlplex.

Regards
Jamie

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, August 18, 2025 4:54:08 PM
To: Jamie Pote <jamiepote@live.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Jamie,

Over and above we have also received comment from MTPA which does require Terrestrial biodiversity input. Kindly see attached these comments for your attention.

I do apologize for the short notice we have on this project, but we do intend to submit the final by the end of the week on the 22 Aug. Please do let me know if you can accommodate us with these comment responses?

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted]

erm.com

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, August 18, 2025 12:00 PM
To: Jamie Pote <jamiepote@live.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Jamie,

Thank you for your support and delivering these reports at short notice. If you feel that these report updates were out of your scope and you would like to submit a change order, the client is open to it so please do share

that with me.

I have attached the DARDLEA comments for your attention, I kindly require assistance with the with regards to comments directed to your specialism, notably 18.3 and 18.5.

If I could kindly request your assistance to argue your point on these grassland comments.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Jamie Pote <jamiepote@live.co.za>
Sent: Friday, August 15, 2025 7:38 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Hi Lucien, here are the reports with the revised layouts replaced where applicable (the last few maps in the reports).

There is an overlap with the Emvelo/Sheepmoor boundary that was provided where a central area fall within both sites. I have not had time to figure out what's going on there or to scrutinise the layout to check if there are any changes that affect the outcome of the assessment.

Terr Bio Assess Report - Mulilo Emvelo WEF (Jamie Pote) 20250815) Final.docx

Terr Bio Assess Report - Mulilo Sheepmoor WEF (Jamie Pote) 20250815_Final.docx

Terr Bio Assess Report - Mulilo Sheepmoor WEF (Jamie Pote) 20250815_Final.pdf

Terr Bio Assess Report - Mulilo Emvelo WEF (Jamie Pote) 20250815) Final.pdf

Regards
Jamie

Mr Jamie Pote
Biodiversity – Environmental – GIS

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[redacted]
jamiepote@live.co.za

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 06 August 2025 16:26
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Specialist,

I trust you are well.

Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by Monday, 12 August 2025.

If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Lucien Barbeau
Sent on: Monday, 18 August 2025 18:43:30
To: Jamie Pote; ERM Arcus Amsterdam
CC: Stephen Burton; Mpho Malema
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Jamie,

Thanks for your positive response, we really appreciate your efforts on this!

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Jamie Pote <jamiepote@live.co.za>
Sent: Monday, August 18, 2025 5:19 PM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Hi Lucien I will take a look and get responses to you.

You had let us know about the responses so had kept a window this week.

I'll get them to you as soon as I can, I will just need to taka a look and may need to give some thought for a day or two or do some further analysis depending on what they are.

I note the timeline and will try get to you by end Wednesday or sooner if they are not too comlplex.

Regards
Jamie

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, August 18, 2025 4:54:08 PM
To: Jamie Pote <jamiepote@live.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Jamie,

Over and above we have also received comment from MTPA which does require Terrestrial biodiversity input. Kindly see attached these comments for your attention.

I do apologize for the short notice we have on this project, but we do intend to submit the final by the end of the week on the 22 Aug. Please do let me know if you can accommodate us with these comment responses?

Regards,

Lucien Barbeau
Senior Consultant

Sustainability is our business

Cape Town [redacted] **erm.com**

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, August 18, 2025 12:00 PM
To: Jamie Pote <jamiepote@live.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Jamie,

Thank you for your support and delivering these reports at short notice. If you feel that these report updates were out of your scope and you would like to submit a change order, the client is open to it so please do share that with me.

I have attached the DARDLEA comments for your attention, I kindly require assistance with the with regards to comments directed to your specialism, notably 18.3 and 18.5.

If I could kindly request your assistance to argue your point on these grassland comments.

Kind Regards

Lucien Barbeau
Senior Consultant

Sustainability is our business

Cape Town [redacted] **erm.com**

From: Jamie Pote <jamiepote@live.co.za>
Sent: Friday, August 15, 2025 7:38 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Hi Lucien, here are the reports with the revised layouts replaced where applicable (the last few maps in the reports).

There is an overlap with the Emvelo/Sheepmoor boundary that was provided where a central area fall within both sites. I have not had time to figure out what's going on there or to scrutinise the layout to check if there are any changes that affect the outcome of the assessment.

[redacted] Terr Bio Assess Report - Mulilo Emvelo WEF (Jamie Pote) 20250815) Final.docx

Terr Bio Assess Report - Mulilo Sheepmoor WEF (Jamie Pote) 20250815_Final.docx

Terr Bio Assess Report - Mulilo Sheepmoor WEF (Jamie Pote) 20250815_Final.pdf

Terr Bio Assess Report - Mulilo Emvelo WEF (Jamie Pote) 20250815) Final.pdf

Regards
Jamie

Mr Jamie Pote
Biodiversity – Environmental – GIS

BSc (Hons) Pr. Sci. Nat (115233)
Postnet Suite 57, Private Bag X13130, Humewood - Port Elizabeth - South Africa
[redacted]
[redacted]

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 06 August 2025 16:26
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Specialist,

I trust you are well.

Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by Monday, 12 August 2025.

If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Lucien Barbeau
Sent on: Monday, 18 August 2025 18:51:45
To: Reabetswe MOKOMELE; ERM Arcus Amsterdam
CC: Victor DE ABREU; Stephen Burton
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Reabetswe,

Just following up with the below

Regards

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Thursday, August 14, 2025 10:13 AM
To: Reabetswe MOKOMELE <Reabetswe.Mokomele@smec.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Victor DE ABREU <Victor.deAbreu@smec.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Thank you for updating me Reabetswe,

Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Reabetswe MOKOMELE <Reabetswe.Mokomele@smec.com>
Sent: Thursday, August 14, 2025 9:43 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Victor DE ABREU <Victor.deAbreu@smec.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Hi Lucian,

Herewith confirmation that we'll be able to issue the updated reports by midday tomorrow, 15 August.

Kind regards

Reabetswe MOKOMELE
[redacted]
267 Kent Avenue, Ferndale, Johannesburg, 2194, South Africa

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 13 August 2025 19:41
To: Reabetswe MOKOMELE <Reabetswe.Mokomele@smec.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Victor DE ABREU <Victor.deAbreu@smec.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Reabetswe, I am just following up with the report submissions, are you able to share them tomorrow?

Regards

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, August 11, 2025 11:38 AM
To: Reabetswe MOKOMELE <Reabetswe.Mokomele@smec.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Victor DE ABREU <Victor.deAbreu@smec.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Reabetswe,

Understood, thanks for informing me. From my visual inspection, here has not been WTG or road changes, just minor infrastructure footprint changes. If I could please refer you to the boundary KMZs, these have been changed. I kindly bare in mind when updating any figures within reports.

Can I expect the changes to the report on Wednesday?

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Reabetswe MOKOMELE <Reabetswe.Mokomele@smec.com>
Sent: Thursday, August 7, 2025 10:26 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Victor DE ABREU <Victor.deAbreu@smec.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Dear Lucian,

Your request is received but kindly note the following:

Due Dates - Due to committed site visits taking place on 11 and 12 August 2025, unfortunately it is not possible to meet the due date of 12 August 2025. The revised issue date must consider both the updating and internal reviews which would be at least one (1) week.

Variation Order - Our team will review the final layouts and determine whether the changes will require and Addendum Letter or Full Revisions to be issued. The time and effort for updating the reports (full revisions) will require a variation order which will be confirmed and communicated to you for approval.

Trust you find the above in order.

Kind regards

Reabetswe MOKOMELE
[redacted]
267 Kent Avenue, Ferndale, Johannesburg, 2194, South Africa

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 06 August 2025 16:27
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Specialist,

I trust you are well.

Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by Monday, 12 August 2025.

If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.

Kind regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Sam Ralston
Sent on: Monday, 18 August 2025 18:59:59
To: ERM Arcus Amsterdam
Subject: Automatic reply: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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

EXTERNAL MESSAGE

Thank you for your email. I will be back at my desk on the 26 August and will respond to you as soon as I can.

From: ERM Arcus Amsterdam
Sent on: Monday, 18 August 2025 18:59:51
To: Sam Ralston; ERM Arcus Amsterdam
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Sam, I hope this email finds you well.

Thank you for your email and response.
We acknowledge receipt of your comment and concern; we hereby confirm that they will be addressed and incorporated into the Comments and Responses Report for the proposed development.

A formal response to your comments will be provided within that report, which will form part of the Final EIA submission to the DFFE.

Kind Regards

ERM
Sustainability is our business

Mpho Bridget Malema
Consulting Associate

Johannesburg [redacted] **erm.com**



From: Sam Ralston <energy@birdlife.org.za>
Sent: Thursday, August 14, 2025 3:19 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Dear Lucien

Thank you for the opportunity to review the additional information. While we have not have the capacity to review the revised application in-depth, it is apparent that that many of our previously raised concerns and recommendations have not been addressed. Our previous comments dated 10 April 2025, and our objection to the proposed developments, therefore remain applicable.

We would also like to draw your attention the recently published guidelines for Special Species 23, available at the following link. We are concerned that the application is not aligned with these guidelines, which have been endorsed by the DFFE. Please consider those guidelines as additional comment on the applications.

Yours sincerely

Sam

Samantha Ralston-Paton

Birds and Renewable Energy Project Manager

Isdell House, 17 Hume Road (cnr Hume Road/Jan Smuts Drive), Dunkeld West 2196, Gauteng
Private Bag X16, Pinegowrie 2123, Johannesburg, Gauteng, South Africa
[redacted]za
http://www.birdlife.org.za

Donations to BirdLife South Africa may contribute to your B-BBEE scorecard as we are a Level 1 B-BBEE contributor. We are also a registered Public Benefit Organisation (No. 930004518) and authorised to issue 18A tax certificates where applicable.

BirdLife South Africa's Birds and Renewable Energy Project is sponsored by the Lewis Foundation and Investec Corporate and Institutional Banking



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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Date: Wednesday, 16 July 2025 at 13:54
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Interested and Affected Party,

Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.

The revised comment period now ends on 15 August 2025.

All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.

Thank you for your continued participation.

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted]

erm.com

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Lucien Barbeau
Senior Consultant

Cape Town [redacted]

erm.com

Sustainability is our business



From: ERM Arcus Amsterdam
Sent on: Tuesday, 19 August 2025 13:34:20
To: Lloyd Barnes; ERM Arcus Amsterdam
CC: Stephanie Gopaul; Stephen Burton; Andrew Pearson
Subject: RE: Comments on the draft EIA report for Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province - NWJ Vorster Trust
Attachments: P Vorster responses 15.08.2025.docx (37.05 KB)

Hi Lloyd,

Kindly see prepared responses to P Vorster concerns for your review, they are attached.

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Lloyd Barnes <Lloyd@mulilo.com>
Sent: Friday, August 15, 2025 3:16 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Andrew Pearson <Andrew@mulilo.com>
Subject: RE: Comments on the draft EIA report for Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province - NWJ Vorster Trust

EXTERNAL MESSAGE

Thank you Lucien, please provide your proposed response.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
www.mulilo.com
[redacted]
mulilo

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, 15 August 2025 13:41
To: Lloyd Barnes <Lloyd@mulilo.com>
Cc: Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Andrew Pearson <Andrew@mulilo.com>
Subject: FW: Comments on the draft EIA report for Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province - NWJ Vorster Trust

Hi Lloyd,

Sharing comments that have come in from Mr Pikkie Vorster as well.

Kind Regards

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

Sustainability is our business

From: Retsrov Boerdery <vorsterboerdery@lantic.net>
Sent: Friday, August 15, 2025 1:28 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Comments on the draft EIA report for Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province - NWJ Vorster Trust

You don't often get email from vorsterboerdery@lantic.net. Learn why this is important
EXTERNAL MESSAGE

The NWJ Vorster Trust is thankfully not part of the proposed WEF anymore.
We will still be affected by the wind farm if it becomes a reality.
Therefore we want to raise our strongest concern against it.

1. All the turbines, on the edge of the escarpment, will permanently scar the scenery and is unacceptable.
2. We are very concerned about proposed turbines 40, 44, 45 and 46 because of the noise and most probably shadow flickering.
3. The same applies for turbines 51, 52 and 53.
4. Turbines 40, 41,42,43,44,45,46, 51 and 52 will cause visual pollution which is unacceptable.
5. Proposed turbines 40,043 and 44 are too close to the breeding site of the secretary bird. A safe no-go zone of at least 2,5km should be implemented around the nest. The two secretary birds stay in the area south east of this location and provision should be made to secure its foddering habit.
6. A Marial Eagle pair were spotted several times in the past at Farm Klipfontein. It is of great concern because the always fly off in a north east direction where most of the turbines will be located.
7. The southern bald ibis are also present in great numbers on the farm Klipfontein especially when cultivating land or harvesting. Provision should be made for a safe flying zone to their roosting site on neighbouring farm Windhoek where four turbines will be located.

Regards,

Pikkie Vorster – Director at Retsrov Boerdery
[redacted]



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The NWJ Vorster Trust is thankfully not part of the proposed WEF anymore.

We will still be affected by the wind farm if it becomes a reality.

Therefore we want to raise our strongest concern against it.

1. All the turbines, on the edge of the escarpment, will permanently scar the scenery and is unacceptable.

Visual impacts have been assessed by a qualified visual specialist. While the introduction of turbines will alter the landscape, the placement and design have been guided by specialist input to reduce visual intrusion where possible. The concern regarding the scenic value of the escarpment has been recorded and will form part of the decision-making record.

2. We are very concerned about proposed turbines 40, 44, 45 and 46 because of the noise and most probably shadow flickering.

Noise and shadow flicker impacts have been assessed through specialist studies. Turbine placement and mitigation measures will be implemented to ensure compliance with acceptable thresholds. Should post-construction monitoring identify exceedances, further mitigation will be required.

3. The same applies for turbines 51, 52 and 53.

Answered above

4. Turbines 40, 41,42,43,44,45,46, 51 and 52 will cause visual pollution which is unacceptable.

As noted, visual impacts have been assessed by the visual specialist, with turbine locations refined to reduce exposure from key viewpoints. Your objection to the visual impact of these turbines has been recorded.

5. Proposed turbines 40,043 and 44 are too close to the breeding site of the secretary bird. A safe no-go zone of at least 2,5km should be implemented around the nest. The two secretary birds stay in the area south east of this location and provision should be made to secure its foddering habit.

The avifaunal specialist has surveyed known Secretary bird nesting and foraging areas in the study area. Turbine placement has considered these areas, and appropriate buffer zones are being implemented. Your request for a 2.5 km no-go zone will be shared with the avifaunal specialist for consideration in the final mitigation recommendations.

6. A Marial Eagle pair were spotted several times in the past at Farm Klipfontein. It is of great concern because the always fly off in a north east direction where most of the turbines will be located.

Martial eagle observations have been incorporated into the avifaunal assessment. Turbine layout refinements have been made to reduce potential collision risk, and mitigation measures, including operational curtailment where necessary, are being considered.

7. The southern bald ibis are also present in great numbers on the farm Klipfontein especially when cultivating land or harvesting. Provision should be made for a safe flying zone to their roosting site on neighbouring farm Windhoek where four turbines will be located.

Southern Bald Ibis roosting and foraging behaviour has been a key focus of the avifaunal specialist study. Turbine placement has been adjusted where possible to avoid high-use flight paths. Mitigation measures, such as operational shutdowns during high-risk periods, are under consideration.

From: Andrew Pearson
Sent on: Tuesday, 19 August 2025 13:34:44
To: ERM Arcus Amsterdam
Subject: Automatic reply: Comments on the draft EIA report for Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province - NWJ Vorster Trust

EXTERNAL MESSAGE

Good day.
I'm travelling for work and may not check emails regularly. If urgent, please send me a text message on 0847224855 or contact luke@mulilo.com

Andrew

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Comments made by B Moodie

1. I am the owner of the farm Windhoek 291 Portion 3 & 5 and leaser of portion 4 & 10 which are adjacent to the proposed development of the Sheepmoor Windfarm'

Acknowledged. Your ownership and leasehold details have been noted and recorded for the project.

2. No communication or notification from Mulilo concerning the development the windfarm next to my property. Neighbours informed me of it and helped me to register as I&AP in March 2025. Mulilo acting on there own and ignore all protocols and spells danger for the future.

Notification of the project was undertaken in accordance with the requirements of the Environmental Impact Assessment (EIA) Regulations, including the placement of site notices, newspaper adverts, direct notification to identified landowners, and availability of project information for registration as an Interested and Affected Party (I&AP). We acknowledge that you became aware of the project through neighbours, and we will ensure that you continue to receive all project-related updates going forward.

3. May 2025 draft report suggested power lines will be constructed over my Windhoek property. There was no prior communication nor negotiations from any party concerning the permission for the power lines. Totally unacceptable.

The draft EIA report included an alternative grid connection layout and this is not the preferred route. Your opposition to any overhead lines crossing your land has been noted. The applicant is committed to engaging with yourself following a decision on the EA, in order to ensure that the layout aligns with your operations, as discussed with yourself during the in person meeting held on 04 August 2025.

4. No power lines will be allowed to run over my properties for various reasons.

4.1 Route as shown in report are crossing crop lands and will interfere with activities of farm machinery.

4.2 It will limit future expansions on the farm.

4.3 Increase movement of people for inspection line will increase criminal activities and risk of veld fires and therefore not acceptable.

4.4 Indications that power lines have negative influence on the reproduction of cattle. Unplanned and poorly communicated maintenance visits especially if involving helicopters and machinery can spook cattle, leading to stampedes,

Injuries, or even loss of livestock not to mention damage to infrastructure like fencing.

4.5 Aesthetic and Environmental Value will be lost.

4.6 Danger due to collusion of the bird population on the farm.

The potential impacts on farming operations, farm expansion, security, livestock health, aesthetic value, and avifauna have been recorded and assessed as part of the EIA report. We note your comments and will likely utilise other routes that do not pass over your property. We expect that the final layout of the powerline will not be approved in the EA process, and a layout update and future approval of the final route will still be needed.

5. There is secretary birds present on my farm which are foddering on the grassland where 4 turbines are planned on Windhoek Portion 8. These secretary birds will be in great danger to be killed by collusion with the turbines.

Avifaunal specialist studies have identified several sensitive bird species within the project area. Turbine placements have all been mitigated, and the avifaunal specialist is confident that the data and modelling undertaken to date to address avifaunal impacts is both accurate and credible. Secretarybirds are large conspicuous birds, that spend large periods of time on the ground. When they do fly, we are confident that the proposed mitigation of Shut Down on Demand will prevent significant mortalities of this species.

6. The same danger exists for the ibises which are in great numbers present on the farm. Some are roosting on the farm Waaihoek to the east and other on the farm Windhoek to the north - west. Both roosting routes will be polluted with turbines and the shredding of birds will be unavoidable, even with proposed mitigation gimmies.

Avifaunal assessments conducted for the project included focal studies specifically aimed at understanding the movement and habitat use of Southern Bald Ibis (SBI) within the landscape. These studies informed the delineation of formal no-go areas, which were established to avoid critical roosting and foraging zones.

The flight paths and spatial use patterns of SBI were modelled using extensive site-specific data, collected over multiple seasons. This modelling allowed for a more accurate representation of how the species interacts with the terrain and infrastructure.

As a result, turbine placements have been strategically adjusted to avoid overlap with identified SBI activity zones. In addition to spatial avoidance, mitigation

measures such as Shut Down on Demand (SDOD) will be implemented to further reduce collision risk during active flight periods.

7. I apposed the location of the 4 turbines close to the eastern border because.
7.1 Killing of the southern bald ibis which due that route to there roosting site.
7.2 Located in the secretary bird foddering area.
7.3 Combined effect will change the local microclimate of surrounding area. Report by specialist of influence on microclimate are requested.
7.4 It is visual not acceptable.
7.5 The noise pollution will increase during the dominate eastern winds.
7.6 The lights during the night as required by aviation are not acceptable.

Your concerns regarding turbine placement near the eastern border and on Portion 8 have been recorded, including potential impacts on avifauna, microclimate, noise, visual character, lighting, and shadow flicker. The microclimate aspect is outside the standard EIA scope, however, specialist studies have addressed noise, visual, and shadow flicker impacts, with recommendations and mitigations that the applicant will adhere to. The applicant will investigate all feasible solutions to reduce light pollution, in line with CAA minimum requirements, which may include an automated lights/radar system that only activates selected minimal turbine lights if aircraft are in the area.

8. Also opposed the turbines on the Farm Windhoek Portion 8
8.1 Killing the southern bald ibis on their route to their breeding nest in the winter.
8.2 Turbine 51 & 52 to close to my boundary in case of collapsing when the steep slope considered
8.3 Turbine 51,52 & 53 will be to close to the farmhouse on Windhoek Por 4 and will cause unaccepted noise pollution which are likely to be more due to the topography.
8.4 There are people staying in the same farmhouse which are on chronical medication for heart and epilepsy. The shadow flickering of turbines 51, 52 and 53 will trigger the epilepsy.

Please see above response regarding the impacts associated with turbine placements.

9. It will kill the bee population in the area which are essential for pollination of the fauna. Report of effect on the bee population by specialist are requested.

At present, this aspect is not covered within the EIA specialist studies, however, your request for further investigation has been noted and will be shared with the project team. It is important to highlight that a terrestrial ecological assessment was conducted as part of the EIA process. This assessment evaluated the broader ecological impacts of the proposed development, including habitat integrity and

species presence. According to the screening tool and field surveys, no species of conservation concern—including pollinators such as bees—were flagged within the project area.

While bees were not identified as a focal concern in the current assessment, the ecological study does speak to habitat quality, vegetation types, and ecosystem functioning, which indirectly supports pollinator health.

10. Further the proposed Sheepmoor windfarm are going to negatively damage the character and scenic views of the escarpment and will change the sense of place.

Visual impact assessments have been conducted by a qualified specialist. While any large infrastructure will have some visual impact, the design and placement of turbines aims to reduce the visual impact where possible.

11. Therefore, we apposed the proposed Sheepmoor windfarm in the strongest terms.

Your overall opposition to the proposed Sheepmoor Wind Farm is noted and will be included in the Final Comments and Responses Report submitted to the competent authority for decision-making.

From: ERM Arcus Amsterdam
Sent on: Tuesday, 19 August 2025 16:43:50
To: Josua Meyer
CC: ERM Arcus Amsterdam; Lloyd Barnes; Johans Van Wyk; Rebecca Thomas; Richard Summers; celine@summersinc.co.za; Stephanie Gopaul; Stephen Burton; Lucien Barbeau; Lloyd Barnes
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Attachments: Formal J Meyer Meeting Minutes 04 AUG.pdf (112.95 KB), Meeting Transcript with Lucien Barbeau_04 AUG.pdf (230.03 KB)

Dear Mr. Meyer,

Thank you once again for your participation in the recent stakeholder engagement meeting regarding the proposed Sheepmoor and Emvelo WEFs. We also appreciate your patience as we compiled and reviewed the meeting documentation.

Please find attached a copy of the meeting minutes and the full transcript of the session. These documents reflect the discussions held, including your contributions and concerns. Certain sections of the transcript were relistened to and translated from Afrikaans to English to ensure clarity and accuracy.

Should you have any feedback or wish to propose amendments, please feel free to reach out. These minutes will form part of the official record.

Kind Regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Tuesday, August 12, 2025 11:32 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

Time is running out.

Where are the minutes of the meeting as well as a copy of the recorded transcript?

Thanks

On Tue, Aug 12, 2025 at 9:15 AM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Good day Mr Meyer,
>
> I trust that you are well. Kindly note that we will provide our responses to your comments by close of business today.

Kind Regards



Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Wednesday, August 6, 2025 2:56 PM
To: Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Meyer,

Thank you for your email and for taking the time to share your reflections following our meeting on Monday.

We acknowledge receipt of your comments and the additional questions you have raised. We appreciate your continued engagement in the process and will respond to your queries as soon as possible.

Should you have any further inputs in the meantime, please feel free to share them with us.

Kind Regards,



Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Wednesday, August 6, 2025 1:47 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Johans Van Wyk <Piwy@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Richard Summers <richard@summersinc.co.za>; celine@summersinc.co.za
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Hi Lucien,

The purpose of the meeting was to address concerns of the I&AP's regarding the proposed Sheepmoor and Emvelo WEF's. The applicant gives the impression that they are not interested in taking any action regarding the I&AP's concerns and attend it only to avoid negative reflection. Therefore the meeting created unfortunately more questions than answers. Your EAP's input was also disappointing.

We urgently need clarification and answers on the following

1 - The EAP is expected to participate and actively engage with the impacted community. Why has my request for a meeting since February 2025 repeatedly declined and pushed in at the 11th hour?

2 - Do you as EAP feel that the process has been credible and transparent as well as accountable in circumstances where you reach out and respond to a request for a meeting at the 11th hour? How is that considered to be meaningful and in the spirit of the constitution?

3 - Why are biodiversity related issues only being property investigated at the 11th hour although the Provincial Department requested it in the scoping phase?

4 - Why are requested documentation regarding the additional 3 months extension granted by DFFE to the applicant still outstanding?

5 - Are you as EAP confident that the data and modelling that has been undertaken to address bird related impacts and specifically the martial eagle is accurate and credible? If so, please explain why.

6 - Are you as EAP confident and can you confirm in writing that the data that is being obtained in relation to the martial eagle was correctly obtained and in accordance with all minimal standards and legal criteria?

7 - Are you as EAP comfortable that if the tagging of the martial eagle were done without a valid permit, that the tagged data can still be used in the specialist report? If so, please explain why.

8 - Are you as EAP in acceptance that the permits to tag the martial eagles, also the one at Verkykerskop, were not presented at the meeting? If so, please explain why.

9 - Are you as EAP confident that all the recommendations in the specialist reports and specifically the Social report are satisfactorily addressed? If not, please explain why.

10 - It became clear in the meeting that none of the affected landowners are prepared to allow the proposed powerline over their properties. Are AEP comfortable to support an application without a secured powerline route?

11 - The avifaunal specialist signed a NDA (non disclosure agreement) with the applicant and it was also revealed in the meeting by the applicant that they collectively determined the shaped exclusion zones for the southern bald ibis. Are you as EAP comfortable that it is not in contradiction with the declaration the avifaunal specialist signed as independant specialist? If so, please explain why.

Due to the time constraint answers required before the 11/08/2025.

Regards

On Sun, Aug 3, 2025 at 12:36 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Mr Meyer,
>
> Thank you for confirming the meeting for 12h00 tomorrow, 4 August, at your farm. That time works perfectly, and we look forward to meeting with you.
>
> If you would kindly share the physical address or GPS coordinates for the entrance to your farm, it would be greatly appreciated to ensure we arrive without any difficulty.
>
> There will be five people attending the meeting, including myself.
>
> Should there be anything further you would like us to prepare or bring along for the meeting, please don’t hesitate to let us know, we’ll be happy to assist in any way we can.
>
> Kind regards,

Lucien Barbeau
Senior Consultant

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Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, August 1, 2025 1:29 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Good day
Monday is fine with me
I did inform Johans also
Will 12h00 be convenient for you?
How may people?
Regards

On Fri, 01 Aug 2025, 11:42 ERM Arcus Amsterdam, <ERM.ArcusAmsterdam@erm.com> wrote:

> Good Morning Mr Meyer,
>
> Thank you for your response. If you feel Monday is too short availability, please do not feel rushed. We would be happy to accommodate you later in the week. We will await your feedback and move accordingly from there.
>
> Kind Regards,
>
> **Lucien Barbeau**
> Senior Consultant
>
> Sustainability is our business
>
> Cape Town [redacted] **erm.com**
>
> **From:** Josua Meyer <meyerjosua55@gmail.com>
> **Sent:** Thursday, July 31, 2025 6:13 PM
> **To:** Lucien Barbeau <Lucien.Barbeau@erm.com>
> **Cc:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
> **Subject:** Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
>
> Some people who received this message don't often get email from meyerjosua55@gmail.com. Learn why this is important
> **EXTERNAL MESSAGE**
>
> Goodday
> Will confirm tomorrow before 12h00
> Thanks

On Thu, Jul 31, 2025 at 2:22 PM Lucien Barbeau <Lucien.Barbeau@erm.com> wrote:

> Dear Mr Meyer,
>
> I hope this message finds you well.
>
> I'm writing to kindly follow up on our proposed meeting scheduled for Monday, 4 August at 13:00 at your farm. We would appreciate it if you could please confirm whether you are still available to meet on that date.
>
> Should you require any additional information or documentation ahead of the meeting, beyond what you have already requested, please don't hesitate to let me know, I'd be happy to assist.
>
> Looking forward to your confirmation.
>
> Kind regards,

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Lucien Barbeau
Senior Consultant

Cape Town [redacted]

erm.com

From: ERM Arcus Amsterdam
Sent: Monday, July 28, 2025 11:49 AM
To: Josua Meyer <meyerjosua55@gmail.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Lloyd Barnes <lloyd@mulilo.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <andrew@mulilo.com>; Rebecca Thomas <reth@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>
Subject: RE: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Meyer,

Following discussions with the applicant, unfortunately it will not be possible to schedule a meeting prior to 1 August due to limited availability.

However, we would be pleased to meet with you on Monday the 4th of August 2025 at 13:00, as per your request, at your farm.

Kindly confirm whether this date and time are suitable, and please advise who will be attending the meeting from your side.

I will continue to provide you with the requested documentation ahead of the meeting.

Kind regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted]

erm.com

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 25, 2025 5:11 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday Lucien

Proposed date for the meeting seems to be too close to submission of comments which is already 9/08/25.

Can you arrange the meeting for us before 1/07/2025.

Can you in the meantime forward the detail previously requested

- All the documentation with Department concerning the 3 months extension granted even after time lapps to submit final report

- Mulilo's permits to fit telemetry device on the two martial eagles

- AfriAvian motivation for altering Figure 33 in both avifaunal reports

Above info are urgently required and no reason to wait for the meeting

Regards

Josua

On Tue, Jul 22, 2025 at 10:30 AM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Hi Lucien
>
> There might be a mistake in your day or date ..... 7 August 2025 is a Thursday.
>
> Nevertheless the 6 or 7 th August 2025 is fine with us.
>
> Will appreciate it if we can meet on my farm.
>
> We intend to be three (3) I&AP
>
> Regards
>
> Josua Meyer
>
> On Mon, Jul 21, 2025 at 11:36 AM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:
>
> > Dear Mr. Meyer,
> >
> > Good day, and thank you for your recent correspondence regarding the Draft EIA Reports.
> >
> > We acknowledge your request for a meeting to discuss the concerns raised. In consultation with the applicant, Mulilo, we are proposing a provisional date of Wednesday, 7 August 2025, with the meeting to be held at a venue in Ermelo. Kindly confirm whether this date is suitable for you and whether you will be attending alone or accompanied by others.
> >
> > As a registered I&AP, your comments form an important part of the formal public participation process and will be incorporated into the Final EIA Reports. We also acknowledge the concerns raised regarding the tagging of the Martial Eagles. Relevant documentation, including permits, will be made available where appropriate to support transparency and clarity during the engagement.

We look forward to your response.

Kind Regards,

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Friday, July 18, 2025 4:51 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Johans Van Wyk <Piwy@mulilo.com>; Lloyd@mulilo.com
Subject: Re: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Goodday mr Lucien Barbeau,

Referring to your email dated 7/04/2025 it will be appreciated if you can arrange such a meeting urgently before the 9/08/2025 with the applicant, Mulilo, on site.

Concerns as previously raised with Mulilo in an email dated 19/02/2025 will be on the agenda. That request for a meeting was refused by Mulilo.

Another urgent item which also must be discussed is the tagging of the two martial eagles. According to the MTPA report in my possession, the martial eagles were tagged by Mulilo without a permit. Copy of the report can be provided at the meeting.

That leaves the tagging of the martial eagles illegally, if not criminal.

Therefore the data being used in the specialist report is illegally obtained and all sections, models and references where data has been used must be removed from the report.

Looking forward to your urgent response.

Regards

Josua Meyer (I&AP)

On Wed, Jul 16, 2025 at 4:41 PM Josua Meyer <meyerjosua55@gmail.com> wrote:

> Goodday Sir
>
> The avifaunal specialist removed in both reports, Sheepmoor WEF and Emvelo WEF, the High Sensitivity - Turbine Exclusion Zone in Figures 33 for the aquatic buffer zones from an avifaunal perspective.
>
> It must be an unintentional mistake and request reinstatement of it.
>
> If it was deliberate we request the detailed reasoning and motivation for such a drastic decision.

Thanks

Josua Meyer

On Wed, Jul 16, 2025 at 1:54 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Interested and Affected Party,
>
> Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.
>
> The revised comment period now ends on 15 August 2025.
>
> All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.
>
> Thank you for your continued participation.

ERM

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Lucien Barbeau
Senior Consultant

Cape Town
+[redacted]

erm.com

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final EIA

Report. More information on how you are able to participate in this process is attached in the above documentation. Please indicate which application your comment in respect of.

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM

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Lucien Barbeau
Senior Consultant

Cape Town [redacted]

erm.com



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MINUTES

LOCATION	Jan Roberts Family Farm, Mpumalanga
DATE	4 August 2025
TIME	12:30- 14:45pm
GROUP/TOPIC	J Meyer Comments and Concerns

ATTENDANCE

Lucien Barbeau (ERM)

Rebecca Thomas (Mulilo)

Andrew Pearson (Mulilo)

Lloyd Barnes (Mulilo)

Anton Lohse (Mulilo)

Josua Meyer (Affected Surrounding Landowner)

Jan Roberts (Affected Surrounding Landowner)

Braam Moodie (Affected Surrounding Landowner)

Jan Vorster (Affected Surrounding Landowner)

Pikkie Vorster (Affected Surrounding Landowner)

OVERVIEW

Lucien Barbeau

- Facilitated the meeting and explained the EIA process and public participation timeline.

- Clarified the role of the Applicant and the legislative procedures for project approval.

- Confirmed that the final EIA report (FEIAR) is expected to be submitted to the Competent authority (DFFE) for decision making by August 25, 2025.

- Acknowledged stakeholder concerns and committed to formal responses, which will be included in the Comments and Responses Report (CRR) to be included with the FEIAr documentation.

Josua Meyer

- Raised concerns about lack of consultation and delayed responses to emails.
- Raised concern that following the end of PPP, and him submitting his comments/concerns in writing, he would not have another chance to respond to the appliucant/EAPs responses to his comments raised.
- Questioned the status of the permit for the bird tagging and data usage in the EIA.
- Emphasized the importance of preserving biodiversity and traditional farming practices.
- Requested formal documentation and clarification on project boundaries.
- Expressed frustration over communication gaps and lack of specialist engagement.
- Requested to be supplied with all documentation around the initial extension request refusal and subsequent extension approval
- Highlighted the emotional and ecological value of the landscape and bird species.
- He emphasized that these birds fly between farms, covering distances of 3–6 kilometres, and forage in grasslands for worms and insects. He expressed skepticism about the accuracy of the specialist reports, suggesting they may be computer-generated and not reflective of actual bird movement

Rebecca Thomas

- Explained the biodiversity offset plan and its inclusion in the updated EIA.
- Clarified the rationale behind the extension request and new specialist studies.
- Acknowledged communication lapses and committed to follow-up on permits and responses.

- Confirmed that no infrastructure will be placed without signed servitude agreements.
- Addressed concerns about visual impact and turbine placement.

Andrew Pearson

- Provided technical insights on biodiversity impacts and offset ratios.
- Discussed the need for multiple seasonal surveys and specialist assessments.
- Explained curtailment strategies for bird protection and turbine operation.
- Confirmed that monitoring will continue post-construction to assess bird collisions.
- Explained the need to include power line alternatives in the EIA process, and that proposed power line routes are not final and the layouts are unlikely to be approved, even if the EA is approved. Explained that further amendments likely, bust on changes in route due to technical reasons and landowner engagements, and that landowner servitude negotiations typically happen after EA approval, later in the project development lifecycle.
- Acknowledged that emails sent by stakeholders to Lucien are being incorporated into the formal comments report as part of the EIA process. He noted that responses to these comments will be provided, and confirmed that stakeholders had requested to review these responses prior to the final submission of the EIA documentation.

Lloyd Barnes

- Clarified mapping discrepancies and project boundary updates. Lloyd clarified that while specialist maps may depict broader areas assessed for biodiversity and environmental studies, the actual areas evaluated have remained consistent from the Scoping Phase through to the EIA Phase. The change involved reorganizing the properties from three projects into two, with no new areas or properties added.
- Discussed the sensitivity of intact grasslands and rationale for offset plans.
- Explained the role of specialists and the importance of landowner engagement.
- Addressed concerns about fire risk and insurance protocols.
- Provided details on turbine placement and visual impact mitigation.
- Addressed concerns around avifaunal mapping and rationale.
- Noted that weekly collision monitoring would be conducted post-construction. If excessive bird fatalities are recorded, mitigation measures would be escalated, including potentially shutting down turbines during peak bird activity times.

Anton Lohse

- Explained the legal implications of servitude agreements and option contracts.

- Confirmed that landowners have the right to refuse infrastructure placement.
- Clarified that no expropriation is possible without consent.
- Discussed the financial and legal hurdles required for project approval.

Braam Moodie

- Expressed frustration over lack of registration and consultation, stating he had not received or reviewed the extensive documentation (referenced as 5,000 pages) related to the project
- Expressed concern around the powerline placement through his farm due to ecological and farming concerns, requested that the farm border be followed instead.
- Raised concerns about specialist credibility and project transparency.
- Asserted that he only became aware of the project in April 2025, and declared his opposition to the development, stating he would take further action.

Jan Roberts

- Shared insights on rotational grazing and fire management practices.
- Highlighted the ecological integrity of his farm and concerns about turbine placement on his farm.
- Discussed legal and procedural issues related to previously signed option agreements.
- Requested exemption from project obligations and raised concerns about fire liability. He expressed deep concern about fire risks associated with the proposed wind energy development, particularly in relation to liability and insurance coverage.
- He highlighted that South African law places responsibility for the spread of fire on the landowner, regardless of the cause — including arson or electrical faults from infrastructure such as Eskom lines.
- He shared a personal example of a neighbouring farmer who was financially ruined due to a forestry claim, despite having insurance. This underscores the potential inadequacy of standard insurance policies in covering large-scale fire damage.
- Jan also pointed out that government-owned farms in the area lack firefighting equipment, and that local fire authorities are ineffective, leaving farmers to manage fire outbreaks on their own.
- He stressed the need for formal agreements and clear fire mitigation protocols between the project developers and landowners, especially once the project transitions to Eskom’s operational control.

Pikkie Vorster

- Raised concerns about bat monitoring and specialist engagement on his farm.

- Questioned the accuracy of specialist reports and their relevance to local conditions.

LUCIEN BARBEAU

It's iPhone. iPhone recording that the transcript. And then I'll share the meeting when it's and transcript with everybody. And my interest is still with the whole project because of our b of this landscape with the r, birds and plants that we have here. And yeah. Okay. So before we continue with actual concerns, let's just can I just do a round of names with deductions first. Okay. Can you go search?

Anton Lohse

Yeah, so my name's Anton Lohse. I'm one of the commercial legal advisers at

Andrew Pearson

M. Andrew Person environmental manager.

LLOYD BARNES

Afternoon, Lloyd Barnes on the project developer, on the Emvelo and sheepmoor projects.

REBECCA THOMAS

Afternoon, Rebecca Thomas, I'm the director of Project Development, so overseeing all projects in the med pipeline from greenfielding through to financial close. Also, welcome to speak afrikaans, I understand it. It's just when I speak it, you're probably gonna want to speak English back to me. So I just want to shout out to let you know. Are you?

JOSUA MEYER
Yeah.. Okay. Okay, Foster..

BRAAM MOODIE

Introduces himself

Jan Vorster

Introduces himself

PIKKIE VORSTER

Introduces himself

LUCIEN BARBEAU

Okay. Right, here we go. I've got it out of the way. Um, Mr. Mayor, would you like to begin raising your comments and concerns to us?

JOSUA MEYER

I think the first thing is, if you can just explain, because we're not so familiar with all this this, inquisition and definition and duty in this.

LUCIEN BARBEAU

Okay. So as these two parties. Yeah. It's a developer and it's a land. Yeah. Okay. We only present a couple of land another land of the certainly. Well, they want to eat. Okay. Okay. So, I represent the ip for this project. So this is for a proposed wing form in this area, right? And Belo has appointed UM to conduct the legislative process for getting this being form approved through the pa app. Right? So Mario cannot do it on their own the leader representative that will allow an unbiassed way of going through the legislative process. We will always go through the proper procedures to follow for this process to be hard liable for the authorisation of the project shouldn't get to authorisation, right? The currently the project is at its draft, EIA phase, where we are currently in the public participation period, where if the INAP has an opportunity to comment on those reports that were released to you. Was it via email. So at this point here, by myself, I will be hearing your concerns, and the response is made by Malo and noting them down, just f verifying whatever applicant is saying, whether you be saying, can be heard. So, yeah. Thank you. Okay, this is the, I think. And then afterwards, Afterwards, you your comments will be firmly processed into a public participation report where the applicant or the he will respond to that comment and make a necessary changes to the project or justify the response that you have made. Okay. And as public won't have again to comment on their comment. their response? Because we are reaching the final process, the final report will be released, but this will be for viewing. There won't be a chance to comment, it will be a chance to appeal only after this point. Now, so this is basically the last time time that the game. Yes. After this point, you would have this point, the final.. When you date after the final The final will be released on the 25th. 25th of August. Yes. 2025. Okay, it was supposed to be in March, April. Yes, April. Apparently, there was some change of time and there was lapse of time and there was some stuff during going on between, I don't know, between Leido or a younger you, are In the extension, no, not bite, but I was Milo.

Lloyd Barnes

Yeah, okay, the reason is,

JOSUA MEYER

we ask for the reasons why, and we don't get anything.. It really, is a formal process. The corresponding is flying around.

REBECCA THOMAS

Correct. Yeah. So in April, we also met on site with the provincial department, and the parks in tourism agency, as well as in DARDLEA, the agricultural land rural development, yeah, where we presented the project, the phase we're in now, we presented it to them with the findings, the specialist findings. At that stage, when we were on site with them, they raised a concern about who report this, and that's obviously come up to all the special studies. So around critical biodiversity habitats, CVAs anti grasslands, etc. And while they were reported on, there was a question whether or not we should be considering what's called biodiversity or set plan. So we hadn't proposed a m university order also plan, we had proposed what was called. On side restoration. biodiversity management Plan, which was on site restoration on areas of the farms not being utilised by the actual infrastructure. So when the request, then the department also submitted therefore, formal comments in that period, submitted to this period now, and they basically said, and there is also biodiversity or set guidelines. And they said in terms of the guidelines, we feel biodiversity or set plan should be considered. So that's when we requested to the department of environment for an extension so we could include a biodiversity of set report. Workap in b legally, if you're introducing new information, then you have to go back to the public again. So and we have two choices to either get asked for an extension or essentially also in the legislation, there's a mechanism where the project can can lapse and you start back where it was lost approved by the Department of Environment. Either which or you say she started the same point being putting out the draft report for going pro you again. And that's how we got to the second making a report again available. For a review edit it now includes this report, which talks specifically about setting aside site of land relevant to size of land that impacted, but then we have to set aside, compensate, and put biodiversity offsets on that equivalent, you know, area related to the intact area.

Andrew Pearson

An offset is usually required when there's impact on either CBA1 or CBA2 or CBA 2 and then also on Intact grasslands. So not all projects actually have a physical footprint on those. So we would prefer to avoid those as far as possible, and where

it's not practical, we must acertain whatever area of impact that we do have on those areas. Thenthere's a ratio, I think it's 50 50 to 1, land that there needs to be in form of a protected environment or a reserve or some form of stewardship protected area, for the offset.

JOSUA MEYER

But wasn't that (i.e. the need for an offset) raised before?

REBECCA THOMAS

So it was, yes, and so No happy, bad pressions. No, no, no, no. No. So the biodiversity are also guidelines are also relatively new. You can probably talk more about that. Everything you about. Yeah, I. So, L like, Andrew said, CEAs and ESAs, et cet, are very clearly defined in the biodiversity of Management Plan. Intact grasslands was a bit loosely defined in terms of the spatial biodiversity plan. And essentially, it wasn't it's not like a set out in the biodiversity of set guidelines. doesn't doesn't talk to intact. doesn't talk to intact.

Andrew Pearson

I think the need for an offset came after our engagements with the provincial departments who pushed us for it.

REBECCA THOMAS

And we had done the biodiversity management plan, which we consulted with the specialists, and the specialists were in their opinion opinion that this was a suitable mechanism for the impacts in the intact rascals

JOSUA MEYER
There's, there's a lot of. Yes, yes. So it's 5530 then you and then you've got great depth this up, there's another 10,000 and that's because degree in 30 days.

LLOYD BARNES

That's a challenge.

JOSUA MEYER

And then we still have to run our own business. Yeah. So we might open your feet. So I might ask questions. That's not that is in the report. Yeah. But I didn't feel free to or anything happen.

LLOYD BARNES

You know, I think another important aspect is.
Intact grasslands layer in Mpumalanga is a particular area that the government has mapped only within Mpumalanga in terms of their management plans that direct us where to go and where not to go. There isn't much information with regards to these intact grasslands as to how much you must avoid them.
And they often states the very similar approach amongst all of their mapping that this is, you know, high level, but you need to do your specialist assessments. That's a large province. You guys need to go there and show us new assessments that maybe this isn't of a high quality or maybe this is a high quality.
Up until the point with the meeting that we had with these two government departments, we weren't. We were of the opinion that our assessments were strong enough to show that these areas were proposing aren't of such a high sensitivity. Due to the grazing and due to the alien vegetation and the current land uses, we then had to make a decision as to whether we take that chance that our arguments is strong enough and submit for a decision or be more conservative and go through this formal offset process and rather submit that with our final and say.
OK, we've heard what you guys embraced first in this meeting. You're concerned about the sensitivity of these grasslands and we will go forward with a biodiversity offset report, the initial screening and sensitivities, which came out in the scope and some of the special sports or a lot of them haven't been completed. They've maybe done one season.
And you have to do multiple seasons to go to the grasslands to check for the bulbs, to check for things like wild orchids and stuff like that, which does exist on the site. And that's been our motivation for going forward with this offset at this point with our final submission.

REBECCA THOMAS

I need to conclude on that you just for. Yeah, Mr Mayor, who is the specialist? That's

a racial specialist. OK, James, code. So. And what? What? There's the implement on the layer and when.
When specialist went to site there was a lot of what shows intact grasslands. When you went to site to the actual detail mapping within intact grasslands showing areas for instance, where there's the black water or investigations and demarcated it.
And that's where we said we would rather do restoration and management of like the black wattle and that sort of things. And and when we said some lot of the land was also impacted by grazing. So it's it's no longer got the same integrity.
As a as a natural impact throughout grassland, but that in pomalanga on that meeting said while that may be the case on site, it still serves a purpose. And then they made that argument and that's where at the end of that.
And at the end of that comment period, we sat down and said, OK, what do we now be with the comments and that's when we decided look.
The the idea is we we're getting the sense that more needs to be done.

JOSUA MEYER

is that formally done you're writing.

LLOYD BARNES

Yeah. With DFFE. Yeah. Yes, of course.

JOSUA MEYER

Why didn't they want to see? Because that. Sorry.. Why didn't they share that? The can documentation of us.

I'll ask you. I'll ask you explicitly what happened. What was the reason for the thing? Because originally he was like for us for extension done that.
I saw I saw a data from.
From P with P with PHAP at the time lapse and but then afterwards I'm getting a letter again. Now. Yeah. OK, so we we just ask him, can you just forward? I said that's. That correspondence, but it should be all of us.

REBECCA THOMAS

No. Make a note that we please get back to them on this. That there was notification, if I'm not mistaken, Lloyd of the extension.
Being granted that went up to.
Equally, there was a notice and happy to to discuss it. Prior to that, the department had issued a notice of the.
Extension being rejected, which we said that's fine.

JOSUA MEYER

Oh, OK. Yeah. Because the time. Yeah. Just correct me. It was.
All that helps.

LLOYD BARNES

No, no. So I think in terms of the application to extend the legislated timeframe, we submitted our application within our legislative time frame and the initial request came back rejecting it. We then went back to the DFFE and requested further information.
And then they're subsequently approved it.

JOSUA MEYER

Jamie Poats also just issue on the grave.
The reason why is grazing is going down, of course. We're not allowed to defend the field at the right time. What just do you think those and look now we?
He's doing his fibre right. That's one of the best. You must. You must, when it will be at the right time or nothing down here.

Andrew Pearson

By who? By the authorities.

JOSUA MEYER

Now the farmers fire. What from? From association violence. Yeah, it is. Is there internal flow? I felt probably to free. Yeah. Yeah. The only process supreme of crossing.
Yeah. OK. Interesting. And so that's all. I just, just, just just just a comment is that all album?

LLOYD BARNES

No, no, no. And I think those sort of plans need to come into the wind farm as well. If we're going to have an operational wind farm and the farmers have plans around planned buyers and fire breaks and fire regimes, you know that's something that we would have to get involved with as well and ensure that we don't get in your way for any required domains.

JOSUA MEYER

Yeah, those fits case in the past it was, there was a problem that helped nothing to do, OK, because he always thought of the helpfire and right. Basically. Right. Yeah. I'm very good honours of actors and don't appreciate it. So he burned down, right. I guess if we're not saying anything about fountain,

Anton Lohse

yes, I need off, right? I I think no, as if he wants to fountain. I came back by the OR scene and I said it and said so there's near the 20s where?
Yeah, fine. But yeah, is. Is it a good practise just to come and speak to the the land, you mean the the the station?

JOSUA MEYER

We're not specialists, but we a little bit more philtre.

LLOYD BARNES

Yeah, I think definitely and you know, and I think you might have had quite a number of conversations with some of the phone in mind and some other specialists, some of the specialists will get more involved with the land owners like the socioeconomic specialists where they will come and do actual interviews with you guys and we understand that you know exactly what's happening on the farms, and these sort of public participation engagements is also to cover that fact that the farmers and whoever's occupying the land has experienced and knowledge of that land that no one else has.
And these public participation opportunities and phases are there to allow all the farmers and anyone who doesn't, even if they don't own the at the farm, but they live in the area, they can look at a document and say no, this is incorrect or this is correct. You've missed something here. You haven't found something there.
Because it is recognised that your knowledge of the land for surpasses and you know what is a specialist is limited to obviously their knowledge, their expertise and their time. But it's not short of an audience but.

JOSUA MEYER

To come back to strong, there are only specialists that inform us of visits. They that didn't come to talk to us. We go to them because that will be playing on the cell phones, feasible specialists. It's the only guy that I have.
Contact with the other two guys.
There was no meeting children for me. Young asked me to. Prominent and to witness and that's where I met Scott. Interesting. I think that's something we've you're working.
The station is really coming, right, right, by saying the report. There's no.
Evidence of potential I'm especially thinking about it back there. The best specialist. Yes. Alright, let's see the best specialist. I wonder. I think he's surrounding it from all holldand
Of course he's thinking. I've been showing both minds on Mr forces. Four, it's 55 minutes.
Well, it is best not all of the events, but you see, that's what I'm saying. Yeah. Yeah.
Andrew Pearson Then can you please share that that information

PIKKIE VORSTER
because on the report is that there's no case, no area. But why there's five.
Andrew Pearson
Yeah, I think that's sort of talk to the bats, the bat specialist, they do have a database of bat colonies in the country of known major colonies that they, they do look at that. And yeah, they also.
Put up a boss. That master call. Yeah. Yeah, yeah, yeah. But the location of the cage other than boss, he's there is no beyond. There is on there is.

LLOYD BARNES

So I think that the bat specialist report will go into this. How different habitats and different sorts of environments are they assessed? Yes, because I haven't updated. Yes on the new. So I think maybe the final year AIM was just emphasise those bad locations and how different habitats were assessed.
And I think internally and one thing Mulilo can take away from this is that we will encourage our specialists to engage with the land owners a bit more, sometimes specialists when it comes to site them and do their thing, they don't want to talk to people. Some specialists like to talk to the farmers, they have their own ways of doing things.
But I'm very much of the opinion that, you know, the farmers and occupiers know a lot and should definitely be consulted directly, at least at the beginning to understand this opinion. Tell me where's eagle nest? What can you know? Have you seen any of these antelope on your property? I mean, that makes sense. So agree with that.

JAN ROBERTS

Just to come back to the grazing problem and the fires and things like that, that's not the only way to engage in in, in management of of of, of grasslands.
Force controlled force feeding rotation.
Has a better impact on the because it does no heat damage to roots and other plants between the grass I have. I'm on this farm for 26 years now. I haven't burnt one pedal.
In 26 years, I was burned by arson and run away fires from from neighbours and stuff

like that. And you're welcome to come and check my, my, my felt at this stage the the, the quality and what it is there. There's no. There's no sign of over.
grazin

LLOYD BARNES

can you can you explain how that how you how you, how you manage that, the controlled forces raising rotations,

JAN ROBERTS

rotational yarn and also.
I have extra land to to allow the amount of of cattle on my farm. It's far above the the the the average specified 3 hectares per one large animal.
I'm double on that because of this rotation of of thing and keeping the fires away. The fires kill all the good grass and the rough stuff take over, so yeah.
Yeah. That I just want to mention, just don't look at the the overgrazing and and things like that. It's caused by arson. The most is caused by arson, fires and escom short circuits of their lines in the whole area.

LLOYD BARNES

Thank you. Minya,

JAN ROBERTS

the experts are not the yeah. Theoretically, the experts.

LLOYD BARNES

I think that's a good point. I mean, arson and runway fires is something that a lot of other farmers have -

JAN ROBERTS

So. So now that allows another guy to put a foot out because.
Arson and thing is because of bad governance through the government, bad policing and all that type of stuff.

Rebecca Thomas

Sorry, I want to. I just want to make sure I'm getting the point on the rotational.
In that my understanding, on another project a few years ago, one of our land owners, that sort of like the spiral with the.
Sheep from camp to camp. Then it allows the grass to recover and you move back to that back to that camp over the time, and we can get there. Then it's recovered and then the cycle starts again. The understanding correct, similar sort of understanding that you move them so that the grass recovers.

JAN ROBERTS

Yeah. OK. And you you by by visual inspection? I do it by when? When my the the the length of my drawers gets to a certain stage. I move the animals.. If I don't have to move, I reduce the animals.

REBECCA THOMAS

And why? I just wanted. So what was interesting with that landowner is that he said if we're going to do a wind farm, he needs to be able to maintain his caps and his rotational forced feeding.
And that was that was well understood and definitely catered for. So is, is that also just?
Saying like, is that something that needs to be considered? If you are, you know, proposing developments that we still want to be able to farm in our usual farm manners and practises etcetera.

JAN ROBERTS

Just repeat the last

REBECCA THOMAS

is is the intent that regardless of what development, just that that the land owners and farmers can still maintain their usual farming practises.

JAN ROBERTS

Possibly because the other.
Things that come to you a a winter button.
Increases the ground temperature by two degrees. The two degrees takes away the dough and the dough is a natural moisturiser of any plants that grows.
Yeah, I think and that report was was not a report. It was not a a impact study that one of the MULilo guys, I think it's a Johannes Johannes send me a pamphlet of These different things.
The other one is pollination. These were never done on the impact on the last.
Report before you finalised I from my side, I put in bees.
They will not think I got a pamphlet from a subject quoted by a Frenchman in France that they don't do harm to bees. That's not in impact study.
And France, BS or not, the Africa B. So a definite impact study is is required.

JOSUA MEYER

I did want to clarify. Yes, Sir. Yes, that seems to be you have got to cover the things. In pain.
Yeah, some.
Your market like that the others got this added. I don't know if you wanted to get this. You're right to the project boundary. Yeah, the project boundary is from other added, yes.
So this is the the one the one is overlapping with Chief. Yeah, that's I'm not saying correct. That's the.

Lucien Barbeau

That's the new boundary that we now received from Malilo for the for the which before we were going into the final this is the this is the layout and the boundary that will be presented.
Entering the final,

JAN ROBERTS

but there is a problem. You can see you're going to see between cheaper and where. OK, so they said they said please. That's overlap. OK.

JAN ROBERTS

Do you want to have come have a look?
So.
Do you have the? Do you have the other map? This one? Yeah. You can have. No, no. Do you have the other one? This. This only shows on dealer at the moment. Yeah, in villa.

JAN ROBERTS

But sheet more is. She becomes like something like down like that. No. No sheet more.

Lucien Barbeau

Yeah. Yeah, they now share the land motion.

LLOYD BARNES

They share an implication they share in the access Rd with Shard through that app.

JAN ROBERTS

OK, yeah. Is that the new implication?

Lucien Barbeau

That's. Yeah. That's apparently what's on the. This is the one that the latest one you viewed is as well the Sony.

JAN ROBERTS

But what's fishing is this.
Aware in one way aware. Yeah, I know. I know.

LLOYD BARNES

So. So I think a lot of the specialist maps and there has been changes throughout this process since we started even having frequent forms and then having to drop the second the one.
And a lot of the specialists mapping will show much broader areas that they've assessed because they have to not just the project area, but not just after that. So a lot of their mapping would have much larger areas that they would have assessed. But the turbine locations and infrastructure and the roads and everything proposed will be the same throughout all the reports.
Whereby maybe the project boundary that they assess would be different, much larger, and the actual project boundaries in the application is limited to only the properties that are going to help infrastructure on whereby the specialist sort of assessed areas for this biodiversity offset report potentially.
Some much large areas where we previously were proposing to develop and then drop those areas. So those maps might still follow through to what you may see now. But what is in our application and our infrastructure positions is the same throughout all.

JAN ROBERTS

But so basically there's no.
Material impact?

LLOYD BARNES

No, no, there's no material material and the layout that we submit for our final decision making and not to get too much from what we currently are posting.

JAN ROBERTS

So these are that's why I'm saying you're looking, but they have some new information.
Report and the yes. First draught report. Yeah, it's the total buckle, citizens. Yeah, we are sorry. Yes. Discovery before the connection for our voice.

LLOYD BARNES

It's interesting. It's interesting. It's actually an interesting conversation because because,

JAN ROBERTS

yeah, my comments on the scoping, yeah. So it wasn't so critical, but now you come and yeah, which is right on my doorstep.

LLOYD BARNES

So in the need of my EIA process, the scoping phase is very much designed for what it is to scope what's out there and to find out what.
Legislation is applicable in the past as an EAP. Sometimes we would even hesitate from putting specialist reports after scoping decisions and comment because they're not finished yet and they're giving very broad information. So there are a lot of changes throughout scoping to final ERA and it's almost like a cake that you cuts

away cuts away.
And you eventually you're left with an OK, maybe one or two little problems that you now have to put twin farms, so that process does change. And I think I said Melilla again, should acknowledge that that should have been explained a lot clearer earlier in the process to our farmers who are new to these sort of.
Processes and I think that's something that we can say bring forward

REBECCA THOMAS

I think yeah on on this and it's not wind farms are particularly unique with the sort of movement between scoping.
And final and bearing in mind we are subject to this legislation, national Environmental Management Act, which has restricted time frames, you know, and it's gone over changes over many years and they're getting, it's getting more and more robust success but.
The end of the day you start, you know, we look on a map. It's as simple as that. We look on a map and that looks like it could be good wind resource. Nice close to electricity. And then when you get there and then there's, then there's a process from a development in terms of you have to get permits. You have to apply for different. Good things at different times. So we start the process with this area and now we started the time frame start on the NEMA act and you do your scoping. I think there's the airstrip that impacted a lot of our original placement.
So literally within the first 3-4 months when we had a project this size, you know, we now have a project this size because we went to science. Yeah, and now it's that size. So the process, while frustrating it is, is the process itself is almost written to the fact that as and when an information comes to light, you then must account for it.
And take it and address it and then the project goes from this to this to this and I understand. I think my point on this particular project in Pumalanga just.
Yeah, it's also pretty new territory for for the renewable energy space and with this particular project and the likes of intact grasses different, we're not dealing with the northern Cape here, right. We're a lot of the legacy projects are.
That it it's been a lot more complicated. So you know I understand that's it's I can understand how it can be frustrating and complicating and you're seeing this to this to this.

BRAAM MOODIE
As am I sitting here I don't understand anything, im very frustrated, I am from the farm Windhoek part of 3,4 and 5 Rietvallei up to Sheepmore. You spoke about 5000 pages which I have not seen before. Our land was not registered as IAP for the whole process. I've sent an email in April to be registered for the whole process. It seems that you look at a map and draw the line and this runs right through my farm. We are cattle farmers and there are no trees Colesbay has more trees and there are more trees to be removed. That is the reason you want to put up the powerlines here. Last week was the first that I heard of this, and I am completely against this and will take this further.

JAN ROBERTS

I spoke the first time when I approached it with me is the draughtsman, but there was an important.
Now with the new I opposing the they just draw the line there.
And I OK, he has a woman here who use different words here to put that down on there. I will see there's

BRAAM MOODIE

no way for this power line to go together from this site.

JAN ROBERTS

But when they draw it, yeah, I was thinking yes.

BRAAM MOODIE

Through our land there are windmills, mielie lands and what you mentioned earlier is true…you sit in the offices and make decisions. The only person who came to consult with me about these turbines is a Mr Le Grange, Christoph, 4-5 years ago and I then said I am not interested. We farm here and want to do so this the right way. Here are lots of Sekretaris birds and it cost us almost R300 000 to get rid of black wattle and

now it is the new thing about the turbines. I just don’t know – who is the specialist? During great day come and be a specialist in the high field.
It's a joke. Another joke. It's a changes now. They claim it's an additional info for the farm.
That hasn't with that info on your farm
It it was the income work out. Therefore pick up the infrastructure, the movement of people, you you keep in unproductive farmers on the land.
Because if you can't make, you're getting up. It's a of of my fault. The mistake, performance and.
Now you're keeping unproductive people. That's not even sitting on the farm. You keep them there on the farm because now they can't believe them. Now there's nothing happening there.
Where is the food coming from? If not, we're going that way. It doesn't just happen here. That's 80% the same. The same situation. Somebody in there.
At the farm in the farm? Yeah, she got no income. Only a small hire . And now they're putting windfalls on. Now she's got money.
Is it? Yeah, I'm saying what I'm saying this and I see that guy is striking all over this to involve. It's from the Cape.
Who's your our specialist? Yes. And your online. Your hand line? Yeah. I'm not even commenting on it because you you cannot argue to be false anymore. It's done. Hopefully, except Mr Trump, he said. Do you something about it?

Andrew Pearson

Yeah, OK. This one, I just wanted to work with Mr Moody. Yeah. First to the the power line and I feel that communication could have been a lot better.
And I think it's a good opportunity to explain the the process in terms of power line. So is that all, is that the 132 KV that so yeah, I think 12K. Yeah, so that that will be the 132 KV route that will connect the the wind farm and especially.
Yes, only and it will be a single monopole and and how it works is it will be authorised if it gets authorised. That's still wouldn't it a big gift if it gets authorised it will have its own separate EA environmental authorization will get separate.
Approval, because that will eventually be handed over to to Eskom so that the wind farm will construct the the power line and then hand it over to Eskom before before, before any of that can happen.

We would have to do servitude negotiations with the with landowners, so the route an authorised route does not does not equal constructed routes What we do at this stage of the projects development is one of the first permits that we're trying to obtain is the environmental authorization because without that we can't bid the project into into tenders, into the REEIPP programme or into.
And, you know, begin to gain negotiations with the private offtaker. None of that can happen. And without the environmental authorization, once, once we have the environmental authorization, it's only once the project becomes what they call a preferred bidder.
Where it's actually been selected by either by the Department of Energy or Private offtaker . Then then you go through another process to reach financial close and that's when we do servitude negotiations.
If the routes seem to change, we will then have to do environment EA amendments and layout changes. We'd have to change the route and investigate, investigate new routes. So during the first EIA process, we choose among we choose an alternative we choose.
Technically, what looks like the best route technically and we we have to put in a few alternatives, but you'll find if if if they're given yeah for the project they usually say. As a condition that the the layout the final layout is not approved, you must resubmit it in the future for for final approval because they understand that there's a lot of detailed design that still needs to happen with engineers and detailed design works. And and that that only does come later in process. And so yeah, we even even with that we we still have to negotiate a servitude. So they would still be servitude You've made it there there there has to be a servitude agreement with the land owners.
And and this is not binded as yet

Anton Lohse

We are not there yet in that part of the process yet.

BRAAM MOODIE

In the end, the land owner – whoever it may be can determine the route. You wont necessarily take the shortest route? In that instance, I would've suggested should it come to that, I will oppose absolutely it. Go to the border, completely on the border,

I don’t even want to see it cause it affects your cattle bulls fertility. The powerlines, Im busy with an investigation where they studied it in Norway, and suggested it affects the bulls fertility. So those individuals must be separated and fenced of to one area.

Anton Lohse

So just in connection to what Andrew said; that is a negotiation and a negeotiative process – so you wont be able to fence off a servitude road if those agreement is not in please. So can you negotiate, what works and what doesn’t work? And again, a person looks and assess what can work.

BRAAM MOODIE

But they definitely didn’t come to look in that area.

Anton Lohse

No, I understand that but at the time the tar is being laid, is the first; remember its an alternative route so then the process only begins, and its a negotiation process. – may not be the shortest route either. In my case if I may suggest if it comes down to it – although I will oppose it – completely on the border – I don’t even want to see it, because it affects the fertility of the bulls the power lines – they are busy with research in Norway that this is what happens. So the lines must be drawn aside.
So it is going to be a negotiation process so you are not going to get an easement if it is not agreed upon.
What works and what does not work.
We do a lot of this stuff. We try to always get alternative, I don’t know of one of our projects where eskom did their own thing.

LLOYD BARNES

The substation location, because it's updated location about brothers. You clicking my brother. OK, the. So this is the on site based on men and wooden farms. Substations. Yeah, obviously at the top of their spotment. I think I can see here.
I think that's on. There's one year. Sorry, sorry, sorry, sorry, yeah.

But that's on Germany, Kevin. Yeah. Yes. And their property. And your concern is that's going to be too close to your property.

JAN ROBERTS

Correct. OK. I'm quite concerned. But I will already make it. OK on that one. OK, OK. I don't want to take this one.

REBECCA THOMAS

If you do not sign a servitude agreement, we're not going to be putting in power line or infrastructure there. It's different to.
Use the mining the the mineral resources where you know just come and not even negotiate consults and get it at some sort of permit over your land. Then we I'd like you'd see that and not there is no option once you did not see.
Yeah.

BRAAM MOODIE

Im happy you say that because they are going to record it, cause you said it now
So yeah, so we're not bound by. If we don't sign, we're not bind, no.

Anton Lohse

We have no law that enables a private developer to go into some form of expropriation to register a servitude on another party's land and I think what Rebecca now indicated; It's a bit different with mining companies that might gain prospective rights to your land. They have a bit more say in this, cause the law gives them say. We don't have that. So the fact stays, if the landowner or the farmer decide to stand his ground, he stands his ground. Then you have to make a different plan or you have to go begging again, or you don't have a project.

JAN ROBERTS

This is exactly in terms of what I signed previously and what you just said; At that stage the options were signed in an uneducated manner, and then we were stuck.
I am now out of this process. I must now wait and why must I now wait till 2027 to get total exemption from this? This can now influence my estate costs to actually find a solution. I already have a letter to say there in no agreement.

Anton Lohse

I have no background of this actually. I got a short notice but we can follow up and I cant answer you on this right now. What I can tell you and what you said regarding the mining industry, I also place a option of negation on.
What I just want to say and I don't want to actually give advice, but the fact is if you have signed an optional agreement for someone to come and have a look, with an option to develop a wind farm on your land. This does not have any effect on estate or estate planning or something like that. There no project yet, there no value, theres no lease contract, it a personal right.

JAN ROBERTS

What I don't understand from the previous round of discussion, the option was, we couldn't get there?

Anton Lohse

No theres a different between whether you can get out of a certain option and what is the consequences thereof. So your very broad option is option to lease. So I as the developer signs an agreement with the landowner and then we start the studies to see the project can be validated and developed.
Now the reason you take an option, the law is actually quite simple. If you can come to an agreement with someone that you have an option to buy your harvest machinery. If you don't come to terms beforehand on what is the cost, what is the value of the transaction etc. So if you don't determine these things beforehand or come to an agreement, and now you say; I have an option, then you now come to a problem. Then what you do now to have a corrective option; you come to terms on some of the commercial terms in case you decide to develop a wind farm there. And

the reason you don't want a landowner to come out of this, is a commercial reason and that stems from. Look to develop these projects just where we are at now, costs millions. So you don't want to go into the process, put in a few million rand into a project that looks like its kicking off and now the landowner decides to pull out or he lets the competitors in here. So this is the reason why you have an option.

JAN ROBERTS

Sir, sorry can I just inform you? My option that I signed, the agreement, the attached to the option, I didn't sign.

Anton Lohse

Yes but you don't need to sign it.

JAN ROBERTS

Why not?

Anton Lohse

Because, what I just explained to you, is that with that, you only agree to what the commercial terms are. You will..

JAN ROBERTS

But I didn't accept it. I signed the option for them to be able to do an impact assessment. And therefore I was informed.

Anton Lohse

Okay but..

JAN ROBERTS

Then it got enforced further. I have a letter in which they explained that there may be legal action taken against me.

Anton Lohse

Ja I now didn’t see that but I also need to add is that this option and the attachment with the lease agreement, is only enforceable the moment it is signed by the party. At this stage, I am saying that we only come to agreement on these terms. But the moment I start my option, then the landowner still needs to sign the agreement cause these things must still go to the deeds office.

JAN ROBERTS

This is where I got threaten that if I don’t sign, then the legal action will be taken against me.

Anton Lohse

Yes, I will go back to it, but what I want to bring across;

JAN ROBERTS

I now have a letter that its required from me, and I now want final exemption from this. Why must this be kept in place till 2027.

Anton Lohse

I don’t know, I don’t have any answer to this.

REBECCA THOMAS

Yeah, I'm going to make a note and get back to you on this one. I signed that letter. My understanding is that that we had, we were allowing the option to completely lapse. I don't didn't know there was a date to it.
Yeah.

So I will get back to you on that. Yeah, my understanding is we were releasing you from, yeah.

JAN ROBERTS

And releases were released now. Yeah, from the day. But the legislates that it's it will only be totally thing in 2027 if I remember.

REBECCA THOMAS

No, I yeah that's not.
The intent at all now from my side when I was finding it, I was up there understanding that we were releasing you. I think all we wanted to do was put what what was in there saying that your farm is still part of the draft report because it was assessed.
But that so don't be don't don't see that as you're still bound by the option, you will be released and I will follow up with you on that. And if there are different terms, we'll get back to you on that.
But that's not how I understood How we were issuing us.

JAN ROBERTS

So when I asked, you honestly said no. They they don't want to release it because it it'll give more other farmers also the scapegoat to get out of it. So I don't know, it didn't make sense to me because why why?
Was rejected was due to specific impact reasons. Yeah, so so.
Yeah, we may be. Yeah, that's fine. Just to conclude, yeah, I don't put Rebecca.

BRAAM MOODIE

Yes, I think what Rebecca and Anton said now, you know that it rests with the landowner to sign a servitude, but I will oppose the development.

JOSUA MEYER

We all concerned about the change of this, what they call it. It's a nice word. Seems some placement.

LLOYD BARNES

It's a place. It's a SENSE OF place. Yeah.

JOSUA MEYER

This is a unique on this front.
If you need sceneries.
UNIQUE bird.
The plants, what do you call it? I'm not so familiar. I know grass And also they saw mountain reebok last week we saw the other people we saw.
We thought that there was a couple here, the space OK everybody is also here.

JAN ROBERTS

This mountain range is the watershed of the Indian and at the Atlantic Ocean, it's also a known an extension of the Vakistrum World Heritage, which was never incorporated. Why? What reason? What not?
Yeah.
Four or five years ago, we and that's still lying at at at now straight. We we we wanted to register as a as a yeah.
He laid all knee tight and phones it the the, the, the. The sushi is a TV area for for, for answers mark means of those means of working.

JOSUA MEYER

I think what happened was and the lady that.
Help us the team that we're going to be for the race. It's out in fault. No, I I followed it up. It's still in the file, you know, waiting for process because the the other priorities to that, of course.
Beyond the scope, we rely a lot on the the best properties, especially in this

Midsummer Midsummer and also the character that is giving the most.
It's. That's why.
I detention. Yeah, OK, that's why I'm not going to THE CAPE. That's that's what my question.
You won't see the list. You won't get the the deal. And the nicest thing is to sit on the on your land and the MIST IS coming over and you don't see even your sheet in there.
And also the the birds I'm talking about because you see a bit.

LLOYD BARNES

Yeah. I mean, yeah, I think I mean we experienced that sense of place. You know, when we've come to Omolo and I don't cover that as my second home because I'm coming here so often and coming from a farming background itself. And I know exactly how that feels. We didn't have many ills.
Springs so this is flat and most of the smoke was pollution not MIST. So I hear what you're saying and something that's synonymous with wind farms around the world, this impacts on sense of place and in our assessments, that will be something that will have to be considered from a social impact on how does that affect you guys? How does that impact the workers? How does that impact tourism into the area and that must be considered in our final impact assessment and certain TURBINES would have been advised by the visual specialist who isn't who? That is a person's job to go and determine what impact does it have on your view?
Or the socio specialist. How does that impact the sense of place which this this natural aggro feels but and we would have had to move certain turbines or peaks or mountains. So it's not viewed as visible from certain angles.
But I think the high sense of place sensitivity of this area must be properly addressed in the final impact assessments and show how we're going to because we move all the airlines on the 8th water each, yes.

JAN ROBERTS

And I don't know who is that speck of the slopes. How does that work? Because the slopes they say unsuitable. That's the thing. Yes. Nobody came a check. Those boulders this.

They don't need to battle to gain the foundation, they they will destroy the and they can tell you now that some places they have to give you spot, they cannot do that stuff. Converts that point when when they need the detailed design, they'll have to.

Andrew Pearson
To do geotech and they'll have to potentially move move positions away further away from the Ridge so there is a good chance that the that the lab will that the lab

JOSUA MEYER

will shift move it away from the beach. It is in place.
Yes, yes, you will be. What about trying to send it? Yeah, yeah, yeah. And maybe just further on to sorry. Finish. I can show you where the reaches they they move with the 1st to report. Fine.
It's not cursing, and actually one of my comments, please stay away. 1.5 kilometres from my boundary.
Going down to great all my problems actually going down the drain.
And now it's on on the verge of the Ridge. It's 200 metres from the scene, replaced on my form. The waterfall I, the future generation, want to do better vehicles.
Lost me. I don't. I do not people.
He's not anything.

Andrew Pearson

Yeah. And I wish to run that. It's specifically a few few of them.

JOSUA MEYER

The one thing right from I can show you now.
You know this is.
PIKKIE VORSTER

Did you like some? Great. Yeah,

Lucien Barbeau

I'm fine. Thank you. Thank you.

JOSUA MEYER

All this reasonably.
All, all that. Thanks on on the reach.
We have some rooms.
You're going to be destroyed at home and it's boldness. It's not.
And also, Mr Pote, he say no, he's fine. Then staying up the regions.
This is good.
He said Paul, so he.

LLOYD BARNES
So, Jamie, what's that provided some. He did an assessment of that area and he provided areas that are no areas. Yeah, but it's not actually between.
Yes, that you will advise only from a vegetation point of view. You know it's up to us how our challenge will be to construct it and obviously from our point of view, it's cheaper to have a turbine away from the edge because of the amounts of infilling and and works that.
Yes, it's so, so. So for us it's it's I already I

JOSUA MEYER

I can actually where you can repeat it it's all of it's there yes and that is it's on the it's on the edge of it but it's next to the Ibis and then often say.
Yes. Yeah, yeah.

LLOYD BARNES

So the the areas that Jamie had as well as the areas that the important of the governments had identified along that Ridge and how they have maps it as something they call other natural areas.
And as well as the bird, no go areas along that Ridge. There's only really a very small sliver of of space that we are allowed and permitted to put our wind turbines, the

current layouts that we're proposing avoids all sudden hold out of snow, go areas and all any formal no go areas.
We've further tried to reduce that impact and put the turbines a little bit off the Ridge by reducing our blade length so that they're not overhanging and so they're actually reduced by another 20 metres, which will also reduce the visual attacks a little bit because now they're smaller.
And.
It's unfortunate because that is the windiest Ridge in the area, with the most amount of resource and a large part of our intention to develop once advanced on that Ridge is the reason why we are entering into a biodiversity offset plan.
So that the impacts that are leftover after us avoid in those learnings are addressed in the biodiversity offset, which is approximately 550 ha.

JOSUA MEYER

But can you tell me if 300 metres away from a southern Volt of Ibis Kodomi missing sites, will they stay there?

LLOYD BARNES
I believe the ways that we've mapped them many.

Andrew Pearson

I'm just curious to what can you show where the the Ibis. I'm sure we have larger buffers and 300.

JOSUA MEYER

Yeah.
Any other one? And interesting there's one day it's not even recorded.
But we can forward it to the front rate. Great thing.
I don't know. It seems to me that this special report is computerized Generated.
.

BRAAM MOODIE

These ibis’s fly between our farms, its about 3-6 kilometres into our plot. It catches worms and insects there, but why?

LLOYD BARNES

So in our formal assessments, the specialists spend over by a year and a half and they spend time periods and look at different environments. They initially identify the two colonies.
They gave us these very generic no-go areas on our report. Yes, they gave us these very generic circular buffers for which we thought didn't actually reflect where the birds move because in our opinion, as the applicant, the bird doesn't stick to a little 2 kilometre circle. It's not living in a cage.
In the way we understand some, obviously that they follow a lot of the lands that have been ploughed, that eats in a lot of the grasslands. So we went and commissioned another study with Albert to go and specifically sit and watch these birds and see where they move for a period of time. And that's where he gave us. These more oblong Polygon shaped buffers which more accurately represent the geography where the birds move and these areas that have been identified are only for the sun world, others and you can see there's actually more than two that what we're originally site at the bottom, yeah so.
We can't put any turbines within any of those areas and none of the blades. So even the location of the turbine needs to be back by 91 metres because of the blade might go into that on top of on top of this, there will be a curtailment strategy as a part of the wind farm. That's a bird that flies.
In these areas, if it's a sensitive bird like southern bald ibis or Marshall Eagle, the wind turbine will in one way or another, be programmed to switch off either automatically based on the environmental conditions or via camera system, which will pick up that the bird is flying. Luckily, a southern bald arvis is not the smallest bird.
The camera system can pick them up blind and more every single day. We set the technology, gets fits and better and they can identify these birds up to two kilometres away with the camera that will be required for this.

JOSUA MEYER

How long you take? (to shut a turbine down)

Andrew Pearson

45 seconds. That's we are thinking we the two. The things that make 2 mark with Within a a minute, but around 40 seconds.

JOSUA MEYER

But your business, what to say?
About the eyes. Eyesight of the yeah, but no,

LLOYD BARNES

it's not great. Yeah, it's not great. So we was in the same stuff. Yeah. So sometimes we've seen on other existing wind farms that a bird can plug straight into the pylon. And should you guys see them flying into the fence?

JOSUA MEYER

So this one just applying this into Intel, exactly that I'm trying to get rid of one.

LLOYD BARNES

One thing that this EIA process is quite interesting that once if the wind farms are operational and we are doing monitoring every single week to see what birds are falling from the sky and what we're colliding with.
If it's seen that we are killing too many southern bald ibis's, we'll have to change what we are doing and increase our mitigation strategy and that might even mean turning some winds up months off complete in the morning and in the evenings when the bird we know some of the others flies at that time.
But can turn that knife because it's unboltered. There's not flying, so the project still has the ability, and I hope that when the wind farm is built that you hold us

accountable and and help us react to these sort of things.
We try to go with as big as a conservative approach and precautionary as possible, but things happen during operations and we still have to change. Then we have an existing wind farm in the Ark. At the moment it was found that the collisions on a particular eagle were too high and now we've we are going and painting those blades on in that wind farm too.

JOSUA MEYER

Well, not hoping it's informed by the AB formal

LLOYD BARNES

specialists who have advised that this is the way I'm

JOSUA MEYER

I'm scared of specialists.

Andrew Pearson

Yeah, well anyway, so. But so that's a it's just to give more character that it's actually a partnership with the.
So Percy Fitzpatrick Institute of Institute of African Ornithology in

JOSUA MEYER

I've got a big, big problem with with with who? That's James. Yeah. Doctor Jenkins?

Andrew Pearson

It's Arjun, Dr Arjun, Amar and Megan Murgatroyd. So they're working with the with the wind farm. And they've designed a blade patterning experiments.
Experiment. So that's so that's that's still under underway. And there is another experiment that's happening in hopefield at the moment and that is showing very

good results and so.
It's quite promising. It's not, it's not proven 100% and but it is improvement in in in Norway to be quite effective and it's starting to be proven now in South Africa. Let's I think those as well. So you know at Hopefield they're having very good results in the western cape.

JOSUA MEYER

I got a big problem. I got a big problem with all this sitting down and designing. Obviously, flying in order to model this models index experiment.
One Marshall Eagle is signal it. It's not cutting down. It's the upper market. And what this? What was the starting it do you think birds? What was the population before it? Yeah, let's. They're getting this promise on the on the box because it's this honestly. And then yeah. And that's what I want to do, put in music, but on different

JAN ROBERTS

on certain species. You don't have a chance for even adjustment. You're going to kill them out.
Be before you've done any adjustment or even finished your assessment. If there's only 5 eagles you got.
With them out being the theoretical calculations of all those being areas where they they fly if the wind blows in a certain direction with a certain speed that is null and void.
Wind direction and speed is not taken into consideration. That's it. It it it's it's a waste. So that's an interesting aspect.

LLOYD BARNES

So that's an interesting point that you bring up about the the wind conditions because I mean that's.

JAN ROBERTS

We have winds here of 75 kilometres an hour.

In any direction? Yeah, at at at different intervals, unpredicted intervals. Not even the weather report is accurate. Yes. Yeah. So sorry. What was that guy say?

LLOYD BARNES

Yes. Right. No, no, that's that's agreed. And the wind speeds are higher. We've seen them on our MET MASTS.
Part of another curtailment mechanism is to switch off the wind turbines automatically when those particular environments and conditions are met that we know particular birds will be flying,

JAN ROBERTS
or your your prime winds, you're gonna switch off your.
Your turbines, and that's what we will do, because that's when we have the prime wind. So it's gonna make you inefficient. Have you done those calculations?

LLOYD BARNES

Yes, that's what. That's what we mean. Thank you but also.
Uh, no, sorry. That's what I know. What I was gonna say who come back soon.

REBECCA THOMAS

And to a bigger point, which I think Antron was sort of heading to when you asked the question, if you don't have that land signed, then how do you make the project happen? So I think.
And I had a similar discussion with the representatives from the Mpumalanga agencies that we're following a development process. We have projects in, the northern, western and Eastern Cape. We're doing one in KZN. We actually walked away from 2 projects in KZN. We've walked away from sites in Mpumalanga. So we we do processes and.
Follow our development process.
The EIA is is where we're at on this project. We haven't got power line servitude signed up. It would still have to happen before this project is realised. Another aspect we briefly mentioned is financial close.

None.
That's what you'll know better. But I mean, we we're talking amounts of probably what close to 2 billion or something for our projects. The bank also knows you're looking about 33 billion 342 which you need to get the bank.
To loan you and during that loan process due diligence, there's also you know strict lenders requirements they they put their lawyers, they do a legal DD.
We have our shareholders CIP who hold us accountable for IFC World Bank standards. So you know if you're even thinking of taking a project to financial close. You've got a million more hurdles and to go through, we mean, and somebody also attest to this during an FC process, something will still pop up even though you've got, you've got this environmental authorization that says X.
During the IFC process, I can always guarantee you will change something two to five times before it's even nearly accepted or correct. And if you cannot do all those things.
One, I mean, the Bank's not going to sign off and lending the money and you're not going to have a project.
The.
Why are we looking at a wind farm in the malanga? A couple of reasons is.
We're all familiar, I'm sure. And for those who maybe aren't, but I'm sure you've read it in the news. Obviously there's great constrained and Eskom and the power lines and physically can't actually put more renewable energy in the Northern Cape because they haven't upgraded their lines.
A lot of movement towards the eastern side of the country. That's probably a big the biggest reason. The other one is OK, the coal-fired power stations, we know they're going into like a decommissioning phase over the next 5 to 10 years.
That they then get shut down. And what that happened? What happens then is because all the coal-fired power sessions are close to the load, which is obviously counting with most of the power is being utilised by the big industries etcetera.
So as that goes, then there's load centres further away from your other energy producing and then as energy travels through the power lines, you get losses, I suppose, like just like heat would dissipate from like a pie.
Electricity losses. So it's also that there is going to need. There's going to be the need for more actual power generated near the load.
These are all just part of our day-to-day job and the work we do, and by no means you know that's that's what molilo does. We look to address where, where the

energy can be sourced from where, where it can connect to.
And.
This is where we've landed.
We can see by the various reports that we are going through a very complicated process. I think our counterparties are experiencing the same in bomalanga, we would like to think we're following the processes.
I think today's been useful and exactly, I mean we will get back to you on a number of things, but also checking the sun for Ibis and and all of that.
Yeah, but bottom line is, if we cannot make this project work.
Because we cannot sign servitudes or or, the turbines aren't producing enough energy to make it financially viable. It will not happen, so it's even a project that can happen.
If it's, if everything is done correctly and the and the work is put in and the lenders and the wind and we answer everyone's question, but at the end of the day, if the wind's not right, if there's something that the lenders aren't going to, they're going to say there's too much risk.
It's not going to happen and that's our process we're following and.
And part of that process is the EIA, which is your opportunity to.
To say why you think it should not should happen.

Anton Lohse

If I can maybe just add to what Rebecca is saying. So this is only one of the hurdles on has to overcome to be able to develop a project. If you've gone through this process, it still doesn't mean you have a project. There are too many other moving parts to this before you get to the project. And what Rebecca stated is correct. And its maybe just good to know these things. Because these project are so difficult to develop, it doesn't match with any person to actually get that amount of money available. The bank borrows them the money at risk. The bank, because it is borrowed to you at risk, wont give you a cent, if they are of the opinion that there is something with this project that wont work. This can mean, you may need to use a specific turbine which may not work over specific times of the day, because this is what brings the assurance to the bank. The income that you generate out of that turbine, must be paid by the bank. Otherwise they wont allow you to perform this project. They just wont give you money. Another thing of importance, is that we do

have an international investor CPI, whom invest in pension funds money into this project. They also have to approve this project and they have more stringent requirements than some of the banks. So the moment when it look like you are busy with a project where the impacts will be too major and it doesn't make sense to them, they will also not allow you to continue with the project. The fact that you have an EIA is not the final piece, come hell or high water, and this is now where the project starts. This is just one step in the process and one of the hurdles you must overcome to get a project. On the other hand, you must also be able to sell the power. So if you cant produce power sufficiently, or you don't have enough, you also don't have a project. Theres a lot of moving parts to this whole process.

JOSUA MEYER

OK, now I just want to.
OK, I'll.
I just want to know, mulilo, why? Why does it take? Why do we have a meeting today? We're really asked for a meeting in February.
It was the night. It's they not got the root. OK, now the root, the.
Emails I got from.
From my lack of conspiracy concerning birds, I'm not classified to people being on birds.
I just want to know why if we wait so long.
Please come and sit around with table.

REBECCA THOMAS

I'll jump. I mean, I'll jump in with again also my knowledge.
Short answer is we definitely should've make with you earlier. Sorry, only not me.
Also yes, but they make you a young man that. But I was bypassing moment.

JAN ROBERTS

Why? Why meetings were made with me is after Christophe came around and we were put out on on on.
Options we signed and things like it. I started digging into this.

On the added list of things which I didn't know agree, I said. First off, I want feedback on it. It didn't happen. Then GAIL and be honest and.
And came along and then it stored it and I gave them feedback. This like it.
But I've I've I've never received a formal answer on all of those.
Another one, which is a a great concern of mine still is the spread of fire.
The law says the landowner.
Stays responsible for the spread of fire.
Doesn't matter who.
Mozo is on the property. The property owner, even arson. You. You you responsible on on on the spread of that. And I asked in what ways is is that going to be.
Guaranteed. We have an insurance, but it's the Max is limited. Mine is to 11,000,000.
If I increase that, they reduce my cover to my neighbour for my mishaps by 50%. So then it's 5 million.
And I have to pay an excess. We are surrounded on the eastern excalment by forestry. Their claims are massive. Already we have the history of a farmer that it has was sold out.
Due to a forestry claim, they said no. We insured you're under, that means nothing.
I you get you can have an insurance for five rent.
But there's no impact study done on what the contingents can be on.

Anton Lohse

Maybe I can answer, fires are a big problem-

REBECCA THOMAS

So I think Andrew and I was saying it should have happened earlier I.
Was also an e-mail where recently that this e-mail came through and.
I do not have an answer, but it appears this e-mail slipped through the cracks with your request for a meeting, and I've looked at it and I and I'm I sat there going but how? How I can fully understand.
Why, Mr Mayor, is now extremely upset because we have not answered him.
And I can only apologise for that on on behalf of our team. So in that respect, it should not happen,

JOSUA MEYER

but they seem to be there's a general.
Because I approached the bird specialist.
It's ignore.

Anton Lohse

hang on hang on, I wont know if you sent an email to the specialist, the fact of the matter is that this is an independent specialist.

JOSUA MEYER

That's responsible. What he's saying. You're using this word.

Anton Lohse

just to confirm what Rebecca says I want to take it back. landowners, most important participants in the process, because it's a long time term project. The point I want to make is we are here and we try to answer your questions as best as we can. Not Not everyone will agree with each other, but the fact is, the email we did miss and we apologise for that

JOSUA MEYER

The report on the speechless voice listener.
With the report of Canadians of the.
You stay.
Third problem, not invention.

LLOYD BARNES

So his findings,

JOSUA MEYER

I don't know if you want that that's in your report. OK. OK. What what is writing said are, are you looking at reports? Are you paying attention on this and that's that's what's working me.
What will change connect?

Anton Lohse

Yes. We talking past each other. What I want to know is I'm not following nicely now

JOSUA MEYER

Yes. the things that shows towards me, all my consent, not I sent faxes, but I don't know what's the channels. I sent my email to Lucy. We set what as infrastructure
I don't know. That's why I don't know. What is the channel between?
I'll I must work through the future channel, so I see my e-mail using.
And nothing. I asked the reasons. Can you put the?
The communication about the extension of oh, OK. Yeah. And this same happen with recommendations from the social specialist.
So nothing, nothing.

LLOYD BARNES

So how it works with all social specialists is that person who conducted the interview would take your points and issues that you may have raised. Maybe some things are on fire security. That specialist will then make recommendations to the project that they must implement. So if you sat and said this, I'm worried about security and the specialist would make a recommendation and say that the security for the Farm needs to be approved because it had been raised as a social issue.
Actual transcripts and interviews and those sort of things probably don't make it into the public reports because it's a private conversation, but the results would have had mitigation advised for it. So I can tell you for one security was picked up as an issue as this is an isolated area. We're in the farming region historically. we know what happens.

Places where we will access the wind farm or anyone who represents Mulilo will access the wind farm will be access control, so any of the farms which we are going to have turbines on there will be a controlled gates. There will be cameras, there will be sensors. No one will be able to access those farms so much anymore.
There won't be little fences that will be moisturised things such as no, but, but no, I my concerns.

JOSUA MEYER

With all the terms is that not a problem? It's supposed to be this year, yeah.
And that sound? The species also called it down. Sound is not only terribly 400 metres, not it is gross. I've got the same problem now. Redcap this side.
I've done it. They're going to be monitored, they're going to play. Yes, the moment I'm hearing that stuff, they're going to play.

LLOYD BARNES

So I think your particular points of scope we need to go and look at that and get this which is not responsive. I thought we will, we will come back to you with that
Andrew Pearson
I think you are referring to the emails that you've been sending to Lucian, I think you're wanting a direct response to those emails.
Those emails do go into the comments report and during this process there will be responses. But and you also asked, you'd like to see those responses before we submit the final

JOSUA MEYER

You might do that, but some of that.
That emails are a sync integration. It's not that my comments OK that is info that I need that I might OK able to comment. OK that's that's that's that's that's the correspondence that I think

Andrew Pearson

and do you want to have Better responses to those emails?

LLOYD BARNES

If you say Lucian, please send me more detail on that, but please send me a claim. Said that it's known as a comment. It's something that you don't need a comment. Yes, yes.
The response? The yeah. Yeah. So I get to receive Pete ****** asking for the coordinates of this device. Yeah, but but like, the the other one, I don't mention. It's no, it's

LLOYD BARNES

Great. OK. So we will give that to you.
And then the sign that I'm saying what the special is saying.
Yeah, I think they want the last thing that from my side that I want to clear up is the Marshall Eagle, the tagging of the Marshall Eagle.
Was it done with a permit?

REBECCA THOMAS

I think the concern has been raised here. I would like to start on this so.
The.
Yeah. On the the bird was tagged before I actually joined. But I mean, I've been doing developing and prior to developing lives actually wasn't as well. So generally, if you're going to capture and tag a bird it can only read.
Be done by a handful of people who've either done it before. We obviously using endangered wildlife, trust they've been involved in a number of period capturing and research programmes and.
Other permits from different municipalities, so in short, where we access and and I think the point I want to make here is we will.
Finalise all the documentation that needs to to send you. I think also on the sharing of the data, my original being not the person who applied for the permit or not,

nurse or not the authority.
Charge of renegotiation for the permits.
My one and only hesitation initially was.
Making available information on a protected species that I'm which I'm not able to seem familiar what their act says I can and can't do and that's what we wanted to find out. And oddly enough, we're still trying to close out the findings on on that.
There was a permit that was issued prior to the tagging of the bird. We will put all of this together and make sure you have it. I just want to make sure we have everything before so that we're not, we're not going back and forth any more on this NASA.
We would essentially never want to capture a bird illegally we by means of appointing specialists. To do this, we trust we got the right people to do the job.
There was a permit that permits.
There was some issue at the province where either the legislation changed or a new application for a permit had to be done, so there was a second application submitted and it was a permit issued for that.
And there was obviously also endangered Wildlife Trust before, before the Ethics Committee even allows any of their staff that the Ethics Committee will only sign it off if there are permits in half.
As I said, and I think, Mr Mayor, you've done your homework on this matter as well. And we're also just making sure that, you know, we're looking into what we did. Did we do anything wrong if we did, was no means.
The intention at all, and we will come back to you with a formal response on this matter so that it is it is factually presented and then we can take it from there

JOSUA MEYER

is that the permit that you create the last?
Anton Lohse
No, no

REBECCA THOMAS

there is.
There is now another one, and again I'm. I'm I'm frustrated because I'm annoyed to find out the issue we sent you or we that the permits and then there was another one

and I'm like guys.
This is not does not look good. I know it does not look good, so we will close this out for me. And then based on what's on the table, we will have the next discussion.
Yeah.

JOSUA MEYER

Are you comfortable to allow data to be used in your final report if it was?
If he was no permit.
Are you comfortable to use the data? Use the data in the final report.
You presented.
In your final, if the legislation says you need a permanent if it was no, if it was no.
No, no further.
Earth.
If that, that's the only question.
Cortana, I've I've had a huge problem with this this bird special this weekend.
That's why I don't want to recall.

Lucien Barbeau

Mr Mayor, I will okay can I put it in the formal response to you that answer?

JOSUA MEYER

Yeah. No, you don't have to. You have to sort it out yourself. If it is not valid.
Can that data be used in? There will be a question that is asked to ERM, yeah, yes.
And would need to. And I would not see what I would not see that permanence.
Yes, I also got two permits. Yeah, we'll see the onion. I I think he works on any from.
Yeah, I think onion. No. Yeah. Doctor Tate is in the two permits. So if.
If there's another thing.
Then I then I know discussed what happened here.

REBECCA THOMAS

There's two permits from the Doctor, Tate. And then there's WT index committee. Signal. Well, I'm sorry. Yeah. So that might consist of LG.
See. Thank you too one time.
I know you get it, but not just why we mostly you didn't. Yeah. And have it's when it's the winter and it's about you have. I'm safe.
But it's not. Yeah, I think that I see Roy. I think Roger might see that there's no.
INAUDIBLE
If I say it then.
No, this one.
You're comfortable because I pick them up on this day.
Sorry, what do we do to?
Where you from? OK. So these are all the point they just said. This is no. What I mean is this.
No, but we just we basically.
We have to hear what what source of the information we need.
With other jobs and information. Yeah. Yeah, that's a data that maybe we're going to have to.

JOSUA MEYER

That's for the female.
Yes, I'm not going to need you to because I think there's another one they had perfected this group.
You don't. I'm not going to need to start. Like I said, I'm not yet screw somebody.
Not yet. It's true. We're like, OK, take out something.
But there's something wrong in.
It's a one sandwich.
Any more, the one that you play that that what takes this for you can write list of takes it's ready to dependency.

Rebecca Thomas

OK so.
These are the two. It's the one that's the pictures really interesting site. That's what we've been. This boss. That always or just none. OK.
When we was, yeah. To the east, yeah.
You're the non, yeah.

Lloyd Barnes

Yeah. Then I'll use it as a perch.

JOSUA MEYER

And so she's a lot of activity. I think there's another juvenile there. I think she's given birth to another. Yeah, the juvenile philosophy that. And I think there's now my.
I saw that he was mistaking, so I think they put a breathing in another one. What happened? They got shot.
Yeah, it's the as it is. Good. Yeah, but discovered it's not like it should be recorded and the same up. And you have the the monitor of the birds that we killed at the the third one. The existing balls are got evidence.
If I.
I I I guess the acting on. Yeah that's that's that's that's that's.
You.

REBECCA THOMAS

I have to sit across the table and tell you we're doing things as responsibly. You know, we believe we're following the law. We believe we're doing things responsibly. We're looking at programmes, we're we're tracking an eagle knot because we want to do.
Yeah, it's the same that. Yeah. And I got the response of the report of.
And.
Yeah. So I think we need to, if we raise this and internally and it will be and someone can say between you and me, there will be a formal assignment. Yeah, it can be seen

practical statement and I can track the.
But I I don't know I suppose to yeah.

JOSUA MEYER

Yeah, as I say, are you willing to use it now?
You're comfortable to use that data in the appointment report or the models that's been created by them now.

Lucien Barbeau

Mr Mayor, I'll I'll whom it responds to you. Something you must vote to. I've written down your E question.

JOSUA MEYER

Maybe you'll be a lawyer, but the emails. But I must speak, speak to my lawyer. That's why. Yeah, I don't want to speak to lawyers. That's why my lawyer is not. And I think I don't want to go too far
I I tried to go in. I've told this to frustrate this. Welcome please. If it seems that area. This holds scope.

REBECCA THOMAS

Our reports are are quite clear and and attest to that as well. I think

JOSUA MEYER

I say say nothing with other people. Any definition? Yeah. Well, just to see.

JAN ROBERTS

I stole me the on the fire side of it. It's a world problem. At this stage. I mean, it's in Europe, it's in Canada.
We suffer every season fighting fires, arson and actually above that is eskim lines,

throwing spots due to shortages.
And any extension in electricity supply is increasing that risk to us.
And nobody, nobody assists. It's the farmers on their own. Even the FBI. We got the Fire Chief we got here. He's sort of against us.
He doesn't do his work. We sit amongst a lot of government owned farms that were just people saying there's no firefighting equipment. They take the grass alike when they want green grass for the animals.
And they just leave when it's they said it right, they leave it because they know we're going to stop it and we stop it to try and protect our property.

Anton Lohse

Okay.. It's not a project. A fire is just as big risk for energy project as it's on the ground You're not gonna get finance from the bank if there's not like rules that means if a fire exists from a neighbouring firm, it can come from both ways. You're not going to get insurance from the bank if there's no rules to protect against fire. and that includes insurance. The moment you look at at land owners on r grounds, the fire is, then you must have extra rules. If he causes the fire, he has to have the insurance to pay. I don't know if that answered the question.

JAN ROBERTS

There's. It's not a return on paper and there's there's there's no confirmation. I have to have the insurance, but the day, when it happens, then they're gonna point fingers. It's that one and that one. I understand. We are all involved in the fire. the guys that's not gonna agree the guys that's gonna get benefit out of it.

Anton Lohse

Just as you are a neighbour neighbouring landowner don't want the fire to come to to your property, so you also don't want it to come to your property. Then the ground owners will come together to make sure that there's a combined It's your tower. It's your insurance. It first comes to the landowner where the fire is. For instance, if a development happens on your your property, they will come to you to

say the project guys will tell you how you have to to put rules how to prevent the fire. You as the the guy that rents.

JAN ROBERTS

There's two phases when you set it up and then there's the phase where you operate. When it's going to Escom and then Scom starts, there's There's no formal contract between the landowner and the project where no fire happens., there must be like a formal agreement I can't run a project for the project to work, there must be all theurances in place.

[RECORDING AND MEETING ENDS]

- **Lucien Barbeau** stopped transcription

From: Lloyd Barnes
Sent on: Tuesday, 19 August 2025 21:11:07
To: ERM Arcus Amsterdam
CC: Stephanie Gopaul; Stephen Burton; Andrew Pearson; Johans Van Wyk; Andrew Pearson
Subject: RE: Comments on the draft EIA report for Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province - NWJ Vorster Trust
Attachments: P Vorster responses 15.08.2025_Mulilo.docx (45.85 KB)

EXTERNAL MESSAGE

Good day ERM team,

Please see the attached reviewed comments from Mr Vorster.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
www.mulilo.com
[redacted]



From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Tuesday, 19 August 2025 13:34
To: Lloyd Barnes <Lloyd@mulilo.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Andrew Pearson <Andrew@mulilo.com>
Subject: RE: Comments on the draft EIA report for Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province - NWJ Vorster Trust

Hi Lloyd,

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Regards,



Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Lloyd Barnes <Lloyd@mulilo.com>
Sent: Friday, August 15, 2025 3:16 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Andrew Pearson <Andrew@mulilo.com>
Subject: RE: Comments on the draft EIA report for Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province - NWJ Vorster Trust

EXTERNAL MESSAGE

Thank you Lucien, please provide your proposed response.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
www.mulilo.com
[redacted]

mulilo

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, 15 August 2025 13:41
To: Lloyd Barnes <Lloyd@mulilo.com>
Cc: Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Andrew Pearson <Andrew@mulilo.com>
Subject: FW: Comments on the draft EIA report for Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province - NWJ Vorster Trust

Hi Lloyd,

Sharing comments that have come in from Mr Pikkie Vorster as well.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Retsrov Boerdery <vorsterboerdery@lantic.net>
Sent: Friday, August 15, 2025 1:28 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Comments on the draft EIA report for Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province - NWJ Vorster Trust

You don't often get email from vorsterboerdery@lantic.net. Learn why this is important
EXTERNAL MESSAGE

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We will still be affected by the wind farm if it becomes a reality.
Therefore we want to raise our strongest concern against it.

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2. We are very concerned about proposed turbines 40, 44, 45 and 46 because of the noise and most probably shadow flickering.
3. The same applies for turbines 51, 52 and 53.
4. Turbines 40, 41,42,43,44,45,46, 51 and 52 will cause visual pollution which is unacceptable.
5. Proposed turbines 40,043 and 44 are too close to the breeding site of the secretary bird. A safe no-go zone of at least 2,5km should be implemented around the nest. The two secretary birds stay in the area south east of this location and provision should be made to secure its foddering habit.
6. A Marial Eagle pair were spotted several times in the past at Farm Klipfontein. It is of great concern because the always fly off in a north east direction where most of the turbines will be located.
7. The southern bald ibis are also present in great numbers on the farm Klipfontein especially when cultivating land or harvesting. Provision should be made for a safe flying zone to their roosting site on neighbouring farm Windhoek where four turbines will be located.

Regards,

Pikkie Vorster – Director at Retsrov Boerdery
[redacted]

Email: vorsterboerdery@lantic.net



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From: ERM Arcus Amsterdam
Sent on: Wednesday, 20 August 2025 10:27:41
To: Lloyd Barnes; ERM Arcus Amsterdam
CC: Stephanie Gopaul; Stephen Burton; Andrew Pearson; Johans Van Wyk; Andrew Pearson
Subject: RE: Comments on the draft EIA report for Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province - NWJ Vorster Trust

Thank you Lloyd,

Sending out to Mr P Vorster shortly.
Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Lloyd Barnes <Lloyd@mulilo.com>
Sent: Tuesday, August 19, 2025 9:11 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Andrew Pearson <Andrew@mulilo.com>; Johans Van Wyk <piwy@mulilo.com>; Andrew Pearson <Andrew@mulilo.com>
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Lloyd Barnes
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[redacted]
www.mulilo.com
21st Floor, Portside, 5 Buitengracht Street, Cape Town, 8001

mulilo

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Regards,

Pikkie Vorster – Director at Retsrov Boerdery
[redacted]



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From: ERM Arcus Amsterdam
Sent on: Wednesday, 20 August 2025 10:46:45
To: Retsrov Boerdery; ERM Arcus Amsterdam
CC: Stephanie Gopaul; Stephen Burton; Lloyd Barnes
Subject: RE: Comments on the draft EIA report for Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province - NWJ Vorster Trust
Attachments: P Vorster responses 20.08.2025.pdf (76.43 KB)

Good day Mr Vorster,

Thank you for your comments regarding the proposed Sheepmoor and Emvelo WEFs, and for your patience while we prepared responses to your comments.

Please find attached a document containing our responses to each of your comments. We would like to assure you that your comments and the corresponding responses will be incorporated into the Final Comments and Responses Report, which forms part of the EIA Process.

Should you have any further questions or require clarification on any of the points, please feel free to reach out.

Kind Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Retsrov Boerdery <vorsterboerdery@lantic.net>
Sent: Friday, August 15, 2025 1:28 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Comments on the draft EIA report for Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province - NWJ Vorster Trust

You don't often get email from vorsterboerdery@lantic.net. Learn why this is important
EXTERNAL MESSAGE

The NWJ Vorster Trust is thankfully not part of the proposed WEF anymore.
We will still be affected by the wind farm if it becomes a reality.
Therefore we want to raise our strongest concern against it.

1. All the turbines, on the edge of the escarpment, will permanently scar the scenery and is unacceptable.
2. We are very concerned about proposed turbines 40, 44, 45 and 46 because of the noise and most probably shadow flickering.
3. The same applies for turbines 51, 52 and 53.
4. Turbines 40, 41,42,43,44,45,46, 51 and 52 will cause visual pollution which is unacceptable.
5. Proposed turbines 40,043 and 44 are too close to the breeding site of the secretary bird. A safe no-go zone of at least 2,5km should be implemented around the nest. The two secretary birds stay in the area south east of this location and provision should be made to secure its foddering habit.
6. A Marial Eagle pair were spotted several times in the past at Farm Klipfontein. It is of great concern because the always fly off in a north east direction where most of the turbines will be located.
7. The southern bald ibis are also present in great numbers on the farm Klipfontein especially when cultivating land or harvesting. Provision should be made for a safe flying zone to their roosting site on neighbouring farm Windhoek where four turbines will be located.

Regards,

Pikkie Vorster – Director at Retsrov Boerdery



The NWJ Vorster Trust is thankfully not part of the proposed WEF anymore.

We will still be affected by the wind farm if it becomes a reality.

Therefore we want to raise our strongest concern against it.

1. All the turbines, on the edge of the escarpment, will permanently scar the scenery and is unacceptable.

Visual impacts have been assessed by a qualified visual specialist. While the introduction of turbines will alter the landscape, the placement and design have been guided by specialist input to reduce visual intrusion where possible by avoiding the placement of WTGs in areas advised by the specialist. The concern regarding the scenic value of the escarpment has been recorded and will form part of the decision-making record. The proposed WEF has a life time of between 20 and 25 years. The facility will therefore not exist permanently.

2. We are very concerned about proposed turbines 40, 44, 45 and 46 because of the noise and most probably shadow flickering.

Noise and shadow flicker impacts have been assessed through specialist studies. Turbine placement and mitigation measures will be implemented to ensure compliance with acceptable thresholds. Should post-construction monitoring identify exceedances, further mitigation will be required.

3. The same applies for turbines 51, 52 and 53.

Answered above

4. Turbines 40, 41,42,43,44,45,46, 51 and 52 will cause visual pollution which is unacceptable.

As noted, visual impacts have been assessed by the visual specialist, with turbine locations refined to reduce exposure from key viewpoints. Your objection to the visual impact of these turbines has been recorded.

5. Proposed turbines 40,043 and 44 are too close to the breeding site of the secretary bird. A safe no-go zone of at least 2,5km should be implemented around the nest. The two secretary birds stay in the area south east of this location and provision should be made to secure its foddering habit.

The avifaunal specialist has surveyed known Secretary bird nesting and foraging areas in the study area. Turbine placement has considered these areas, and appropriate buffer zones are being implemented. Your request for a 2.5 km no-go zone will be shared with the avifaunal specialist for consideration in the final mitigation recommendations. In order to accommodate for avifaunal species who inhabit the area following the completion pre-construction avifaunal monitoring, all wind turbines will contain patterning and all wind turbines will be subjected to Shut-down on demand. Shut-down on demand for Species such as a Secretary bird are especially impactful given the species size and ability to identify the species easily when flying.

6. A Marial Eagle pair were spotted several times in the past at Farm Klipfontein. It is of great concern because the always fly off in a north east direction where most of the turbines will be located.

Martial eagle observations have been incorporated into the avifaunal assessment. Turbine layout refinements have been made to reduce potential collision risk, and mitigation measures, including operational curtailment where necessary, are being considered. Mitigation measures, specific to Martial Eagle have been incorporated into the Final EMPr. These management measures are informed by robust data and scientific research. Additionally, the applicant has welcomed the blanket implementation of blade patterning and Shut-down on Demand.

7. The southern bald ibis are also present in great numbers on the farm Klipfontein especially when cultivating land or harvesting. Provision should be made for a safe flying zone to their roosting site on neighbouring farm Windhoek where four turbines will be located.

Southern Bald Ibis roosting and foraging behavior has been a key focus of the avifaunal specialist study. The avoidance areas (for Southern Bald Ibis) was informed by the focal point monitoring of the bird species over a dedicated period of time, to understand where the species forages and how they interact with the receiving environment. Turbine placement has been adjusted to avoid high-use flight paths. Mitigation measures, such as Shut-down on demand and blade patterning, are under consideration.

From: Lucien Barbeau
Sent on: Wednesday, 20 August 2025 13:49:31
To: Jamie Pote; ERM Arcus Amsterdam
CC: Stephen Burton; Mpho Malema; Lloyd Barnes
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]
Attachments: Biodiversity comments_Amst..docx (24.74 KB), Combined DEIR Comment_15.08.25.pdf (1.65 MB)

Hi Jamie,

I hope this message finds you well.

As part of the current Comments and Responses process, a number of specific WTGs have been called out by both departments and I&APs. Lloyd has taken the liberty of compiling a list of all such turbines and providing descriptions of the actual ground-truthed environmental conditions at each location.

We kindly request that you review these descriptions and provide your agreement and sign-off on their accuracy. Your confirmation is essential, as this information will also need to be shared with the specialist responsible for the Biodiversity Offset Report.

Given the tight timelines, we would greatly appreciate a very quick turnaround on this request. For your reference, we have attached the relevant I&AP comments alongside Lloyd's list.

Please let me know if you require any additional information to complete this review.

Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, August 18, 2025 6:44 PM
To: Jamie Pote <jamiepote@live.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Jamie,

Thanks for your positive response, we really appreciate your efforts on this!

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Jamie Pote <jamiepote@live.co.za>
Sent: Monday, August 18, 2025 5:19 PM

To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Hi Lucien I will take a look and get responses to you.

You had let us know about the responses so had kept a window this week.

I'll get them to you as soon as I can, I will just need to taka a look and may need to give some thought for a day or two or do some further analysis depending on what they are.

I note the timeline and will try get to you by end Wednesday or sooner if they are not too comlplex.

Regards
Jamie

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, August 18, 2025 4:54:08 PM
To: Jamie Pote <jamiepote@live.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Jamie,

Over and above we have also received comment from MTPA which does require Terrestrial biodiversity input. Kindly see attached these comments for your attention.

I do apologize for the short notice we have on this project, but we do intend to submit the final by the end of the week on the 22 Aug. Please do let me know if you can accommodate us with these comment responses?

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town
[redacted]

erm.com

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, August 18, 2025 12:00 PM
To: Jamie Pote <jamiepote@live.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Jamie,

Thank you for your support and delivering these reports at short notice. If you feel that these report updates were out of your scope and you would like to submit a change order, the client is open to it so please do share that with me.

I have attached the DARDLEA comments for your attention, I kindly require assistance with the with regards to comments directed to your specialism, notably 18.3 and 18.5.

If I could kindly request your assistance to argue your point on these grassland comments.

Kind Regards

ERM

Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Jamie Pote <jamiepote@live.co.za>
Sent: Friday, August 15, 2025 7:38 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Hi Lucien, here are the reports with the revised layouts replaced where applicable (the last few maps in the reports).

There is an overlap with the Emvelo/Sheepmoor boundary that was provided where a central area fall within both sites. I have not had time to figure out what's going on there or to scrutinise the layout to check if there are any changes that affect the outcome of the assessment.

Terr Bio Assess Report - Mulilo Emvelo WEF (Jamie Pote) 20250815) Final.docx

Terr Bio Assess Report - Mulilo Sheepmoor WEF (Jamie Pote) 20250815_Final.docx

Terr Bio Assess Report - Mulilo Sheepmoor WEF (Jamie Pote) 20250815_Final.pdf

Terr Bio Assess Report - Mulilo Emvelo WEF (Jamie Pote) 20250815) Final.pdf

Regards
Jamie

Mr Jamie Pote
Biodiversity – Environmental – GIS

BSc (Hons) Pr. Sci. Nat (115233)
Postnet Suite 57, Private Bag X13130, Humewood - Port Elizabeth - South Africa

[redacted]

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 06 August 2025 16:26
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Specialist,

I trust you are well.

Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by Monday, 12 August 2025.

If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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To be inserted on letterhead

Emvelo	
WTG in question	Area ground truthed to be.
WTG 3	Cleared Invaded: Low sensitivity, moderately modified
WTG 5	Transformed: Low sensitivity
WTG 7	Transformed: Low sensitivity
WTG 11	Plantation/invaded: Low sensitivity
WTG 13	Other Natural Area: Montane Grassland, Moderate sensitivity.
WTG 14	CBA Optimal: Montane Grassland, Moderate sensitivity
WTG 15	Transformed: Low sensitivity
WTG 18	Plantation/invaded: Low sensitivity, heavily modified
WTG 19	Other Natural Area: Montane Grassland, Moderate sensitivity
WTG 20	Other Natural Area: Montane Grassland, Moderate sensitivity
WTG 21	Plantation/invaded: Low sensitivity, heavily modified
WTG 22	Other Natural Area: Montane Grassland, Moderate sensitivity
WTG 23	Other Natural Area: Montane Grassland, Moderate sensitivity
WTG 25	Other Natural Area: Montane Grassland, Moderate sensitivity
Sheepmoor	
WTG in question	Area ground truthed to be.
WTG 26	Other Natural Area, Moderate sensitivity: Montane Grassland
WTG 27	Other Natural Area, Moderate sensitivity: Montane Grassland
WTG 28	Other Natural Area, Moderate sensitivity: Montane Grassland
WTG 29	Other Natural Area, Moderate sensitivity: Montane Grassland
WTG 30	Heavily modified, low sensitivity: Cleared Invaded
WTG 31	Ecological Support Area, Moderate sensitivity: Montane Grassland
WTG 32	Other Natural Areas, low sensitivity: Plantation/Invaded
WTG 33	Ecological Support Area, Moderate sensitivity: Montane Grassland
WTG 36	Plantation/Invaded: Low sensitivity
WTG 37	Plantation/Invaded: Low sensitivity, heavily modified
WTG 38	Other Natural Area: Highveld Grassland
WTG 43	Ecological Support Area: Montane Grassland, Moderate sensitivity
WTG 44	Ecological Support Area: Montane Grassland, Moderate sensitivity, along a road.
WTG 45	Transformed: Low sensitivity
WTG 46	Heavily modified: Highveld Grassland
WTG 52	Ecological Support Area: Montane Grassland, Moderate sensitivity
WTG 53	Heavily modified: Highveld Grassland

To be signed off.

RICHARD SUMMERS INC.
ATTORNEYS

Morris
Environmental & Groundwater
Alliances

Our reference: JSM25-001
DFFE ref.: 14/12/16/3/3/2/2611 &
14/12/16/3/3/2/2613

ERM Southern Africa (Pty) Ltd
Attention: Stephanie Gopaul
Email: erm.arcusamsterdam@erm.com
stephanie.gopaul@erm.com

15 August 2025

Dear Stephanie,

RE: COMMENTS ON THE ENVIRONMENTAL IMPACT ASSESSMENT PROCESS FOR THE PROPOSED EMVELO WIND ENERGY FACILITY AND SHEEPMOOR WIND ENERGY FACILITY [DFFE REFERENCE NUMBERS: 14/12/16/3/3/2/2611 & 14/12/16/3/3/2/2613]

1. INTRODUCTION

1.1. This document contains comments on the Environmental Impact Reports ("DEIRs") and associated Annexures for the proposed Emvelo and Sheepmoor Wind Energy Facilities ("WEFs") which were made available to interested and affected parties ("I&APs") during July 2025.

1.2. These comments are submitted on behalf of Mr. Josua Meyer a registered I&AP and owner of Portions 3, 4, 12 and 14 of the Farm Waaihoek No. 286, as well as Portions 4, 5 and 6 of the Farm Onverwacht No. 287, and Portion 7 of the Farm Windhoek No. 291.

1.3. Comments on the first version of the Draft EIA Report (March 2025) were provided within the commenting period timeframe of 30 days (i.e. by 10 April 2025) and covered both the proposed Emvelo and the Sheepmoor WEFs in a single report. ERM have released a second draft of the EIA Report dated July 2025 and the commenting period closes on 15 August 2025. The comments herein are supplementary to those made on the initial Draft EIA Reports of March 2025 and are not to be taken as substituting those earlier comments.

Unit 126, Victoria Junction
57 Prestwich Street
De Waterkant 8001
Cape Town
[redacted]
E: richard@summersinc.co.za

Director: Richard W. Summers Reg No: 2017/536164/21

PO Box 1251, Sedgefield, 6573, South Africa
[redacted]
Email: mjm@megateam.co.za
Web: www.megateam.co.za

Reg No. 1999/069163/23
Vat No. 412 0186921

1.4. It must be noted that the comments, recorded herein, are based on a review of select items using examples primarily from the Sheepmoor Draft EIA Report and associated documents, but apply equally to the proposed Emvelo WEF. This is because the same approach has been adopted by ERM for both projects.

2. FLAWED PUBLIC PARTICIPATION PROCESS (PPP)

User unfriendly documentation places an undue burden placed on I&APs

2.1. As noted in our comments of April 2025, an undue burden is placed on I&APs in the context of being forced to comment simultaneously on the EIA documents related to these two proposed WEFs. This situation has not changed in relation to the current commenting period. Yet again, an undue an unreasonable burden is placed on I&APs to comment on two Draft EIA Reports for two separate applications for the projects located adjacent to each other and proposed by the same Applicant. The commenting periods run concurrently which effectively reduces the opportunity for meaningful public participation.

2.2. In fact, as is noted elsewhere in these comments, the sites of the proposed WEFs have changed, such that they overlap to some extent. This points to the fact that separating these applications is a ruse and that it is unjustified and unreasonable to treat these as two separate applications. It serves no logical impact management purpose and simply places an undue and undesirable burden on the EIA system – I&APs, the commenting authorities and the Competent Authority.

2.3. Also noted in our comments of April 2025, the PPP reports for the respective proposed WEFs are difficult to follow. This situation persists with the current reports– no discernible effort by the EAP has been made to make these documents more user-friendly in this 'second version' of the Draft EIA Report.

2.4. There is extensive duplication of the same correspondence, which makes it an arduous exercise to track the sequence of different activities undertaken and also the issues raised by I&APs (Appendix 6 of the PPP report). Some correspondence is repeated more than 10 times. It also makes it exceedingly difficult to find the original comments made by an I&AP. This adds to the unfair burden on I&APs and reduces the opportunity for meaningful public participation.

2.5. In certain instances, one cannot read the original comments in their entirety (i.e. read the full letter or email from submitted by an I&AP) as the original communication is not provided. Thus, in these cases comments are only available in a disjointed point-by-point fashion in a tabular format (i.e. Section 7 – Comments and Responses Report in Volume III - PPP Report), hereafter referred to as the CRR. This adds to the unfair burden on I&APs and reduces the opportunity for meaningful public participation.

2.6. The burden placed on I&APs is exacerbated by the fact that the EAP has not clearly indicated or described what has changed, such as which specialist reports have been revised or which sections of the Draft EIA Reports have been updated. In addition, the documents themselves

do not show where changes have been made through use of underlining or a different colour text. This means I&APs are faced with having to compare the two draft reports (version 1 with version 2) to ascertain what changes have been made. Clearly this is wholly unreasonable and constitutes unfair process.

DFFE requirements in respect of PPP not met

2.7. The requirement by the DFFE which were communicated to the EAP regarding inclusion of original comments have not been met (see Sheepmoor PPP Report, Section 7 - CRR, page 47).

2.8. DFFE stated that: "Copies of the original comments received from I&APs and organs of state, which have jurisdiction in respect of the proposed activity, must be submitted with the Final EIAr." If these comments are required for the Final EIR Report, then it follows that must also be available in the Draft EIA Reports. Examples of missing original comments are:

2.8.1. Most notably, the **original comments on the first version of the Draft EIA Report** (dated March 2025) from DARDLEA and MTPA **are not provided** in the CRR, which forms part of the suite of documents that make up the July 2025 Draft EIA Report. These comments were submitted on 10 April 2025 (as per the CRR), but the original submissions are not included in the PPP Reports. This is the case for both Emvelo and Sheepmoor. This has been fact-checked through searching for DARDLEA, 10 April 2025, April 2025 as well as scrolling through Appendix 6 of the CRR. The EAP is requested to explain this material omission.

2.8.2. The comments submitted by Richard Summers Inc. and MEGA on the March 2025 Draft EIA Reports are ignored and not included. Email communication dated 10 April 2025 from Richard Summers Inc to ERM confirming that comments had been submitted is included in Appendix 6 of the CRR (see pages 371 and 372 Emvelo CRR and pages 377-379 Sheepmoor CRR). Several searches of both CRRs have been conducted, using various search terms as well as scrolling slowly through the respective documents. **The comments are nowhere to be found**. The EAP is requested to explain this material omission.

2.9. The DFFE also required the following: "All issues raised and comments received during the circulation of the SR and draft EIAr from registered Interested and Affected Parties (I&APs) and organs of state, as listed in your I&APs Database, and others which have jurisdiction in respect of the proposed activity must be adequately addressed and included in the final EIAr" (see Sheepmoor PPP Report, Section 7 - CRR, page 46). This also has not been achieved:

2.9.1. The aforementioned comments from Richard Summers Inc are not recorded in the CRR tables in either of the CRR reports (See Section 7). This means they have been completely ignored.

2.9.2. The comments of 15 April 2025 from Mr Joshua Meyer are not included in the CRR tables in either of the CRR reports (See Section 7). Since this communication involved follow-up

on previous comments to which Mr Meyer had not received an adequate response, these comments ought to have been included. The relevant correspondence can be found on page 369 of Appendix 6 Emvelo CRR and page 375 of Appendix 6 Sheepmoor CRR.

2.9.3. Two landowners, of which at least one is a neighbour, requested inclusion as an I&AP. These requests were submitted on 9 April 2025 (Mr Braam Moodie) and 4 April 2025 (Restov Boerdery). Neither of these I&APs were afforded a fair opportunity to comment on the Draft EIA Report – they were simply provided with a link to the EIA documentation. There is no evidence of any effort by the EAP to afford them a meaningful opportunity to comment or to assist them in familiarising themselves with the proposed projects and associated EIA process.

2.10. Whilst one of the uses of the CRR by I&APs is the ability to cross-reference a response from the EAP to the relevant section in the Draft EIA Report to see whether the I&AP's input was actually addressed (i.e. a change is discernible in the report) – this is of no use if an I&AP's comments are not recorded in the CRR first place. This is relevant because not all comments are recorded in the CRR. It therefore follows that these comments have not been considered at all.

3. INFORMATION PROVISION AND PRESENTATION

Confusing, unclear and poor-quality information

3.1. The site boundaries shown in the second version of the Draft EIR Report (dated July 2025) differs for both sites relative to the Draft EIA Report issued in March 2025. This is confusing and casts doubt on the accuracy of the information in the reports:

3.1.1. Portions 1, 6 and 5 of Farm 274, Farm Schiedamre are shown in the list of affected farm properties for both Sheepmoor (See Table 0.2) and Emvelo (See Table 0-2).

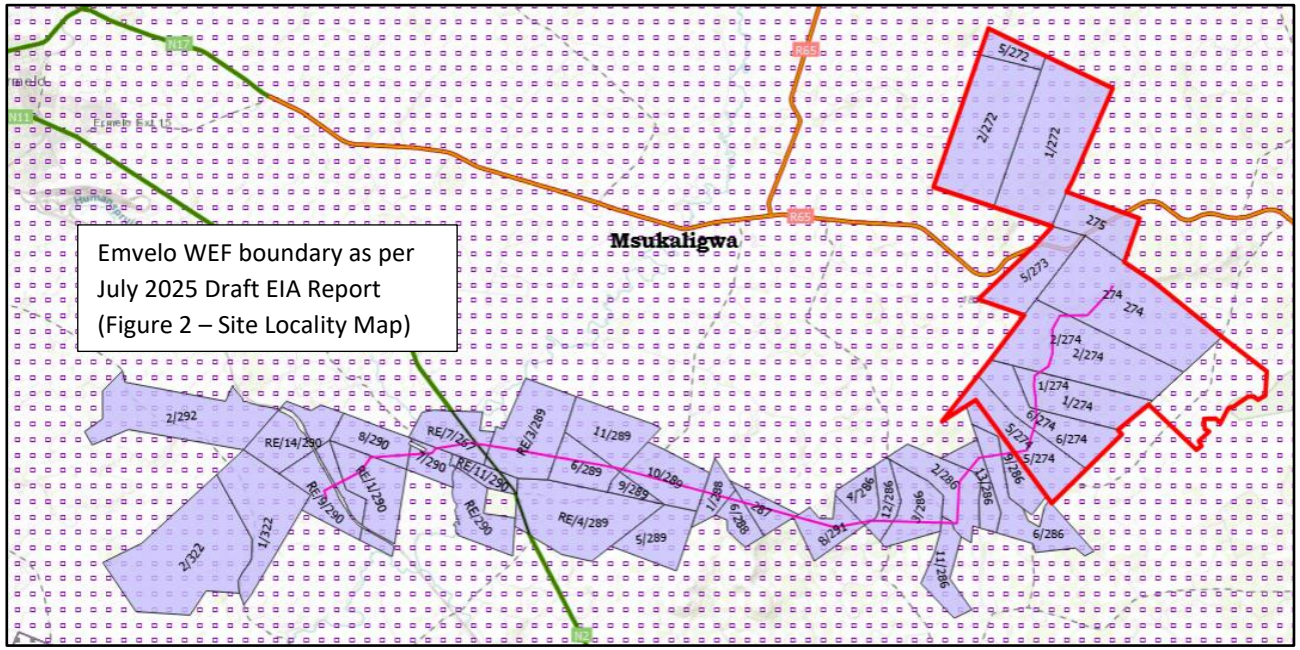
3.1.2. Further to the above, this is the case in both versions of the Draft EIA Reports, that is the March 2025 (Version 1) and July 2025 (Version 2), but the maps and diagrams in the March 2025 Draft EIA Report show a site boundary that does not include the aforementioned properties. This means that tabulated information (Table 0-2) in which affected farm properties are recorded for the proposed Emvelo WEF and the site boundary shown in diagrams and maps are different.

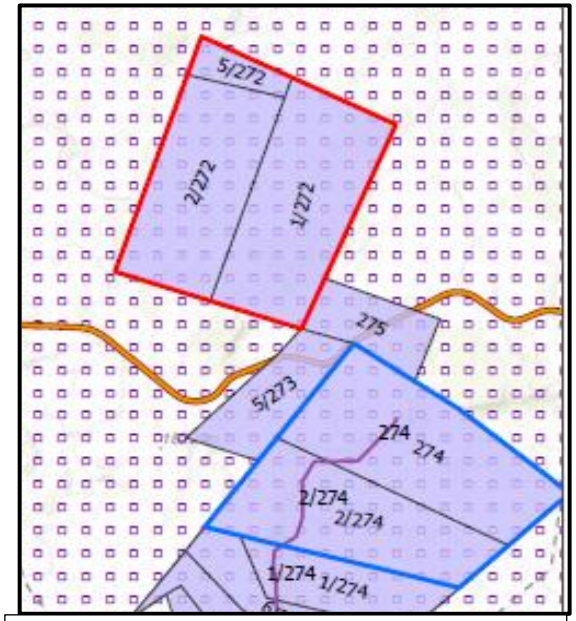
3.1.3. In addition, the site boundary for the proposed Sheepmoor WEF differs in the July 2025 Draft EIA Report, relative to that shown in the earlier version of March 2025. No explanation for the change is given. To add to the confusion, this change is not reflected in all of the maps / diagrams in the July 2025 Draft EIA Report. All of the figures in Section 6: Description of the Baseline Environment in the July 2025 Draft EIA Report show the old site boundary (i.e. as per the March 2025 Draft EIA Report).

3.1.4. The positions of WTGs on the overlapping farm portions (Portions 1, 6 and 5 of Farm 274,

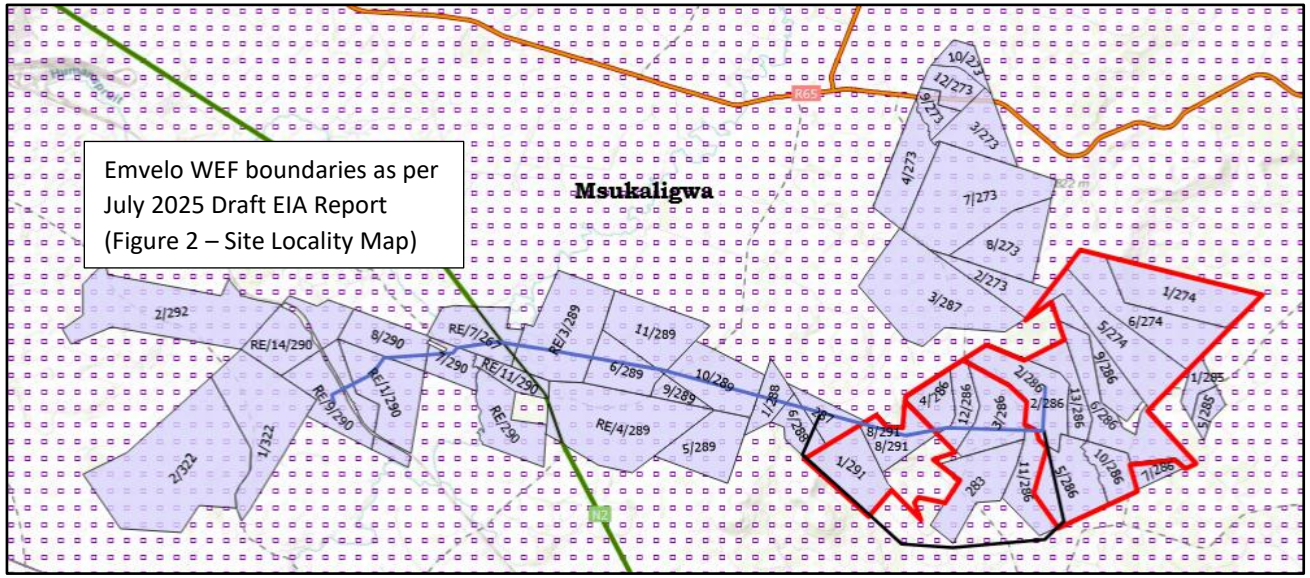
Farm Schiedamre) is unclear. Neither a written description nor a combined diagram showing WTG positions associated with the respective projects on these parcels of land is provided and the project information is materially deficient.

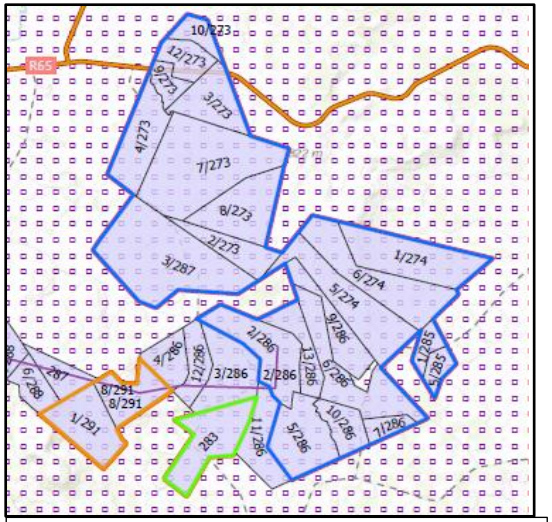
3.2. The evidence for the situation described above is shown in the following diagrams and tables. Boundary coordinates are listed in the tables, which show that no changes have been made to this list of boundary coordinates (the example is taken from the Sheepmoor Draft EIA Reports) provided in the March 2025 versus the July 2025 reports.





Emvelo WEF boundary as per March 2025 Draft EIA Report (Figure 2 – Site Locality Map)





Sheepmoor WEF boundary as per March 2025 Draft EIA Report (Figure 2 – Site Locality Map

Proposed Sheepmoor WEF coordinates

FEATURE	LATITUDE (S)			LONGITUDE (E)		
	DEG	MIN	SEC	DEG	MIN	SEC
Sheepmoor WEF 0.01	26°	33'	03"	30°	16'	20"
Sheepmoor WEF 0.02	26°	37'	21	30°	17	59 "
Sheepmoor WEF 0.03	26°	37'	27"	30°	21'	39"
Sheepmoor WEF 0.04	26°	41'	26"	30°	18'	09"
Sheepmoor WEF 0.05	26°	39'	39"	30°	17'	34 "
Sheepmoor WEF 0.06	26°	38'	32"	30°	16'	30"
Sheepmoor WEF 0.07	26°	38'	11"	30°	18'	16"
Sheepmoor WEF 0.08	26°	37'	32"	30°	18'	02"
Sheepmoor WEF 0.09	26°	38'	20"	30°	15'	48"
Sheepmoor WEF 0.10	26°	37'	18"	30°	14'	42"
Sheepmoor WEF 0.11	26°	36'	18"	30°	15'	24"
Sheepmoor WEF 0.12	26°	35'	56"	30°	14'	57"
Sheepmoor WEF 0.13	26°	40'	14"	30°	13'	46"
Sheepmoor WEF 0.14	26°	39'	29"	30°	15'	01"
Sheepmoor WEF 0.15	26°	39'	43"	30°	15'	28"

WEF boundary positions as given in Draft EIA Report dated March 2025 (Version 1)

Proposed Sheepmoor WEF coordinates

FEATURE	LATITUDE (S)			LONGITUDE (E)		
	DEG	MIN	SEC	DEG	MIN	SEC
Sheepmoor WEF 0.01	26°	33'	03"	30°	16'	20"
Sheepmoor WEF 0.02	26°	37'	21	30°	17	59 "
Sheepmoor WEF 0.03	26°	37'	27"	30°	21'	39"
Sheepmoor WEF 0.04	26°	41'	26"	30°	18'	09"
Sheepmoor WEF 0.05	26°	39'	39"	30°	17'	34 "
Sheepmoor WEF 0.06	26°	38'	32"	30°	16'	30"
Sheepmoor WEF 0.07	26°	38'	11"	30°	18'	16"
Sheepmoor WEF 0.08	26°	37'	32"	30°	18'	02"
Sheepmoor WEF 0.09	26°	38'	20"	30°	15'	48"
Sheepmoor WEF 0.10	26°	37'	18"	30°	14'	42"
Sheepmoor WEF 0.11	26°	36'	18"	30°	15'	24"
Sheepmoor WEF 0.12	26°	35'	56"	30°	14'	57"
Sheepmoor WEF 0.13	26°	40'	14"	30°	13'	46"
Sheepmoor WEF 0.14	26°	39'	29"	30°	15'	01"
Sheepmoor WEF 0.15	26°	39'	43"	30°	15'	28"

WEF boundary positions as given in Draft EIA Report dated July 2025 (Version 2)

Proposed Sheepmoor WEF coordinates						
Sheepmoor WEF 0.16	26°	39'	16"	30°	15'	30"
Sheepmoor WEF 0.17	26°	39'	50"	30°	16'	05"
Sheepmoor WEF 0.18	26°	40'	31"	30°	15'	06"
Sheepmoor WEF 0.19	26°	41'	14"	30°	14'	53"
Sheepmoor WEF 0.20	26°	41'	25"	30°	15'	56"
Sheepmoor WEF 0.21	26°	40'	36"	30°	16'	27"
Sheepmoor WEF 0.22	26°	40'	21"	30°	16'	07"
Sheepmoor WEF 0.23	26°	39'	57"	30°	17'	32"
Sheepmoor WEF 0.24	26°	40'	59"	30°	17'	09"
Sheepmoor WEF 0.25	26°	41'	01"	30°	16'	43"
Sheepmoor WEF 0.26	26°	41'	44"	30°	16'	20"

WEF boundary positions as given in Draft EIA Report dated March 2025 (Version 1)

Proposed Sheepmoor WEF coordinates						
Sheepmoor WEF 0.16	26°	39'	16"	30°	15'	30"
Sheepmoor WEF 0.17	26°	39'	50"	30°	16'	05"
Sheepmoor WEF 0.18	26°	40'	31"	30°	15'	06"
Sheepmoor WEF 0.19	26°	41'	14"	30°	14'	53"
Sheepmoor WEF 0.20	26°	41'	25"	30°	15'	56"
Sheepmoor WEF 0.21	26°	40'	36"	30°	16'	27"
Sheepmoor WEF 0.22	26°	40'	21"	30°	16'	07"
Sheepmoor WEF 0.23	26°	39'	57"	30°	17'	32"
Sheepmoor WEF 0.24	26°	40'	59"	30°	17'	09"
Sheepmoor WEF 0.25	26°	41'	01"	30°	16'	43"
Sheepmoor WEF 0.26	26°	41'	44"	30°	16'	20"

WEF boundary positions as given in Draft EIA Report dated July 2025 (Version 2)

3.3. The result of the situation as described in the foregoing points is that it is wholly unclear to I&APs as to what properties are affected by the proposed WEFs, what the extent of the respective proposed WEF sites actually is, how the two sites overlap in terms of infrastructure, WTGs and environmental constraints or sensitivities. Information which is materially deficient and reporting that is in such a state of disarray is not acceptable at the stage of a Draft EIA Report, which needs to be submitted as a Final EIA Report to the Competent Authority on 25 August 2025. It will not be possible to rectify these material omissions in that timeframe and any Final EIA Report submitted to the Competent Authority on this basis will be materially deficient.

3.4. Based on responses from the EAP in the CRR, it appears the some of the WTGs may have been relocated / moved. These site layout changes are not detailed and the rationale for any such changes is not given in the project description. In fact, the Draft EIA Report is silent on the manner in which the layout has changed and the rationale behind these changes and which were made in response to environmental constraints or sensitivities. Such details and related information are central to determining if a concerted and authentic effort has been made to avoid adverse impacts, in accordance with the precautionary principle and the mitigation hierarchy.

3.5. Coordinates of the WTGs are not provided, and therefore reliance has to be placed on the figures (diagrams), to ascertain where the turbines and other infrastructure is located relative to environmental sensitivities. This makes it confusing for I&APs to appreciate if the impact assessment is informed by credible data. This is exacerbated by the fact that the figures provided by ERM in the March 2025 Draft EIA Report did not have labels on the WTGs because the WTGs are not numbered. This makes it exceedingly difficult for I&APs and the Competent Authority to correlate these figures with those in the July 2025 Draft EIA Report. The lack of WTG coordinate information undermines the ability of I&APs and the Competent Authority to establish whether the position of WTGs has changed in response to concerns about environmental sensitivities.

3.6. Given the foregoing concerns regarding the adequacy and accuracy of information relied on by the EAP and provided in the reports, no reliance can be placed on any statements about WTGs having been relocated / moved in response to noise, biodiversity sensitivities, cultural / heritage resource sensitivities and the like because spatial data shown on maps is confusing, boundaries have changed, the two sites overlap and diagrams and maps in reports have not been updated accordingly.

Assurances given in the CRR have no substance

3.7. In the CRR the EAP has offered assurances to concerned parties that WTGs have been moved / relocated away from sensitive areas. Unfortunately, there are instances where this contention is not borne out by the facts and data contained in the reports. Therefore it must be concluded that these assertions by the EAP must be treated with extreme caution by the Competent Authority.

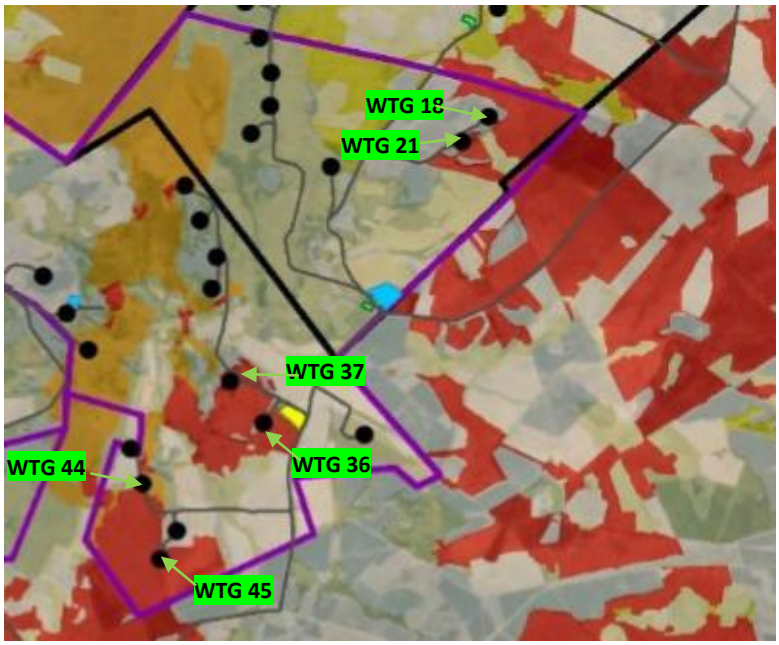
3.8. A specific example is the concern raised by DARDLEA about the location of WTGs in CBA: Irreplaceable areas, with specific mention of Turbine 45. In response the EAP has stated that

this turbine has been "relocated approximately 330 metres southward to ensure complete avoidance of the CBA: Irreplaceable area". Since the Figure 6 – Important Ecological Areas in the Draft EIA Report shows CBAs as a single entity (i.e. does not differentiate according to the CBA: Irreplaceable and CBA: Optimal categories as per the Mpumalanga Biodiversity Sector Plan (MBSP), it is difficult to verify this claim. The information is materially deficient and the Competent Authority, and I&APs are unable to determine – from the reports made available - if the claims made by the EAP are valid. There is too much uncertainty.

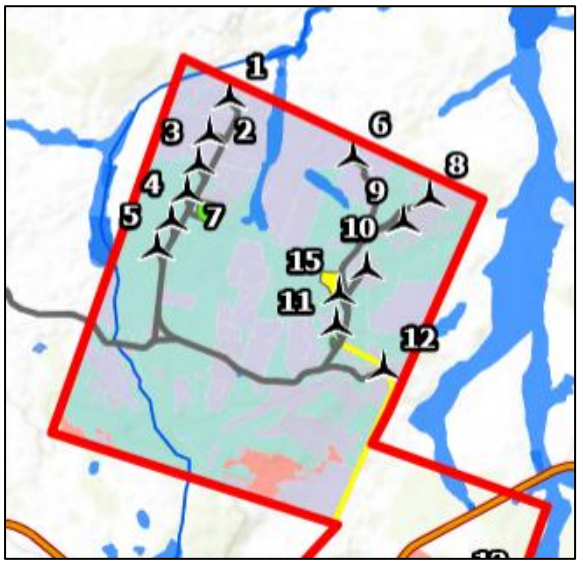
3.9. Accordingly, we considered the diagram on Biodiversity Offset Report prepared by WSP. This shows the CBA: Irreplaceable in accordance with the MBSP. It can be seen that in the case of the proposed Sheepmoor WEF, a number of WTGs fall within or right on the edge of CBA: Irreplaceable. WTG 45 remains located in CBA: Irreplaceable, despite the EAP's contention that it has been moved to completely avoid CBA: Irreplaceable.

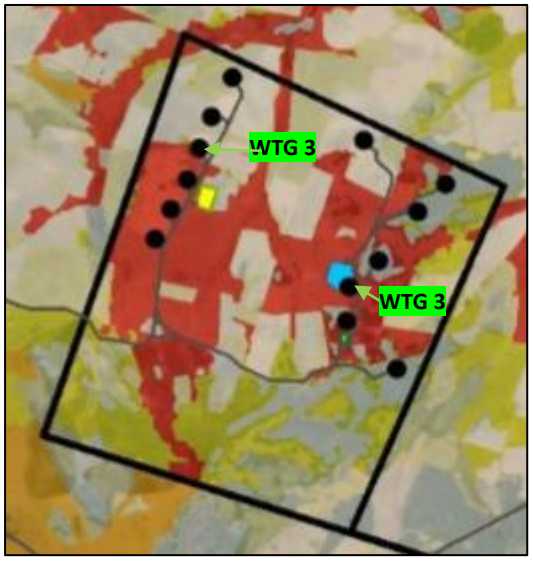
3.10. The contradiction in the documentation is deeply concerning because it misrepresents the correct factual position on the ground. Furthermore, even if it was moved southwards as stated by the EAP, this would not resolve the situation, since CBA: Irreplaceable is present to the south of this turbine.

3.11. What is notable in the case of Sheepmoor is that there are other WTGs sited within CBA: Irreplaceable or on the edge thereof, besides WTG 45: Irreplaceable, namely WTGs 44, 36, 37, 21 and 18. A similar situation exists for Emvelo as can be seen from the WSP Biodiversity Offset Report – Figure 3-1.



WTGs located in CBA: Irreplaceable – Sheepmoor (extract from Figure 3-1 of the WSP Biodiversity Offset Report). According to the key associated with this diagram, red shading shows CBA: Irreplaceable.





3.12. The EAP states "the turbine and infrastructure layout has been revised in accordance with specialist recommendations, with a strong emphasis on avoidance of ecologically sensitive areas. All no-go areas identified by biodiversity specialists have been fully excluded from the final layout." (e.g. Sheepmoor CRR, page 24).

3.13. Concern was raised about WTG 15 being located in a Key Biodiversity Area (KBA) that is untransformed (page 15 Emvelo CRR). In reply the EAP states that WTG 15 was removed from the final layout. This is not the case! Examination of the extract from Figure 6 – Important Ecological Areas (from the figures volume attached to the July 2025 Draft EIA Report) shows that both WTG 3 and WTG 15 remain located in a CBA (green shading), albeit in a different position relative to the March 2025 Draft EIA Report. A construction camp is located next to the WTG and is also shown situated in a CBA. What is the explanation for this? Therefore, the relocation of WTG 15 does not seem to have offered any advantage from an avoidance of an adverse impact on biodiversity perspective. The lower image is extracted from the Biodiversity Offsets Report and it can be seen that both WTG 3 and WTG 15 are situated within CBA: Irreplaceable. Again, it appears that this is mere tick-box exercise by the EAP with no real intent to report accurately.

3.14. The status of the layouts that have been assessed by the EAP is unclear. Terminology is used loosely as shown in the examples below, taken from the July 2025 Draft EIA Report for the proposed Emvelo WEF. The same text is evident in the Draft EIA Report for the proposed Sheepmoor WEF, albeit that the page numbers are different. Examples include:

3.14.1. Page 9 of the Emvelo July 2025 Draft EIA Report under the topic Terrestrial Biodiversity, it is stated that "It is recommended that a final site walkdown be undertaken in order to inform the final layout design and inform micro-siting of footprints."

3.14.2. Yet the project description also references final layout design as not being finalised (page 2): "The proposed turbine footprints and associated facility infrastructure will cover an area of up to 185 ha after rehabilitation, depending on final layout design."

3.14.3. Then on page 13 on the topic of fauna, the following statement is made: "Final layouts of turbine placement, access roads, OHPLs, and other associated developments were provided by ERM on 30 January 2025. The final layout plans indicate that several wind turbines and access roads fall within areas of high faunal sensitivity" .

3.14.4. Page 28: "Prior to the submission of the final layout plan to the DFFE for approval….."

3.15. It is unclear as to what the final layout constitutes because as already noted, in the CRR the EAP makes reference to WTGs being moved in the "final layout". The reports are plagued with inaccuracies and contradictory statements. The credibility of the assessment process is doubtful as so many uncertainties prevail. IN this regard, the following questions arise:

3.15.1. If as noted by the terrestrial biodiversity specialist (for example), final layout plans were provided by ERM in January 2025, then is this the layout that was assessed for the purposes of the March 2025 Draft EIA Report? This is not clear at all from the reports made available to I&APs.

3.15.2. If concerns were raised by I&APs, specifically commenting authorities, about the layout plan presented in the March 2025 Draft EIA Report, and the EAP's response is that this has been resolved in the final layout, then which final layout is this? This is not clear at all from the reports made available to I&APs.

3.15.3. More importantly, why is there a disparity between the EAP's claim that WTGs and infrastructure has been moved / relocated (and thus, according to the EAP, the concerns about environmental sensitivities have been addressed). This is NOT the case. The figures presented in the July 2025 Draft EIA Report, which show definitively that this is not the case, with one or two exceptions (WTG 7 was moved due to the sensitivity of bird species 23).

3.15.4. Why is there reference to the need to do a walkover to develop a final layout and inform micro-siting of turbines and infrastructure, whereas the CRR creates the impression that micrositing has already been done?

3.16. As evident from the foregoing discussion, as well as that in relation to avifaunal sensitivity, any assertion by the EAP that layouts have been changed, WTGs and infrastructure moved to avoid or reduce adverse impacts, are questionable. Such assertions must be interrogated by the Competent Authority and treated with caution. In fact, these claims cannot be relied upon and the manner in which information in this regard has been presented serves to compromise the entire EIA process. Moreover, it undermines the validity of significance ratings (over and above the weaknesses in the rating methodology highlighted in Section 4 of this document) pre-and post-mitigation.

4. INADEQUATE IDENTIFICATION AND ASSESSMENT OF IMPACTS

4.1. As noted in our previous comments (dated April 2025), the significance ratings of impacts reported by the EAP cannot be relied upon. It is inconceivable that in an environment that has so many highly sensitive environmental attributes, that not one single negative impact post-mitigation is rated more than being of 'moderate' significance. In general significance has been understated and this situation persists.

4.2. An example is the way the criterion "extent" is applied. To illustrate this point, avifauna is given as an example using the operational impact "Mortality due to Collisions with Turbines". The first problem is that all birds are considered as a single entity – there is no differentiation between Species of Conservation Concern versus other species. Where a species is listed globally as CE or E, then the extent of any impact that could cause mortality is a major concern at an international level and cannot be rated as medium in terms of extent. It is immediately apparent just from this single example of the criterion of "extent", that the result will be understatement of impact significance.

4.3. Impacts on policies and plans have not been assessed. For example, NPAES (National Protected Area Expansion Strategy) areas occur on the sites of both proposed WEFs. This is not shown on the sensitivity maps / diagrams. In addition, the impact on this strategy has not been assessed. Similarly, the potential impact of the proposed projects on conservation targets and objectives such as those expressed in the or on MBSP have not been assessed. There is also no indication that these types of policies, plans and programmes influenced impact significance rating.

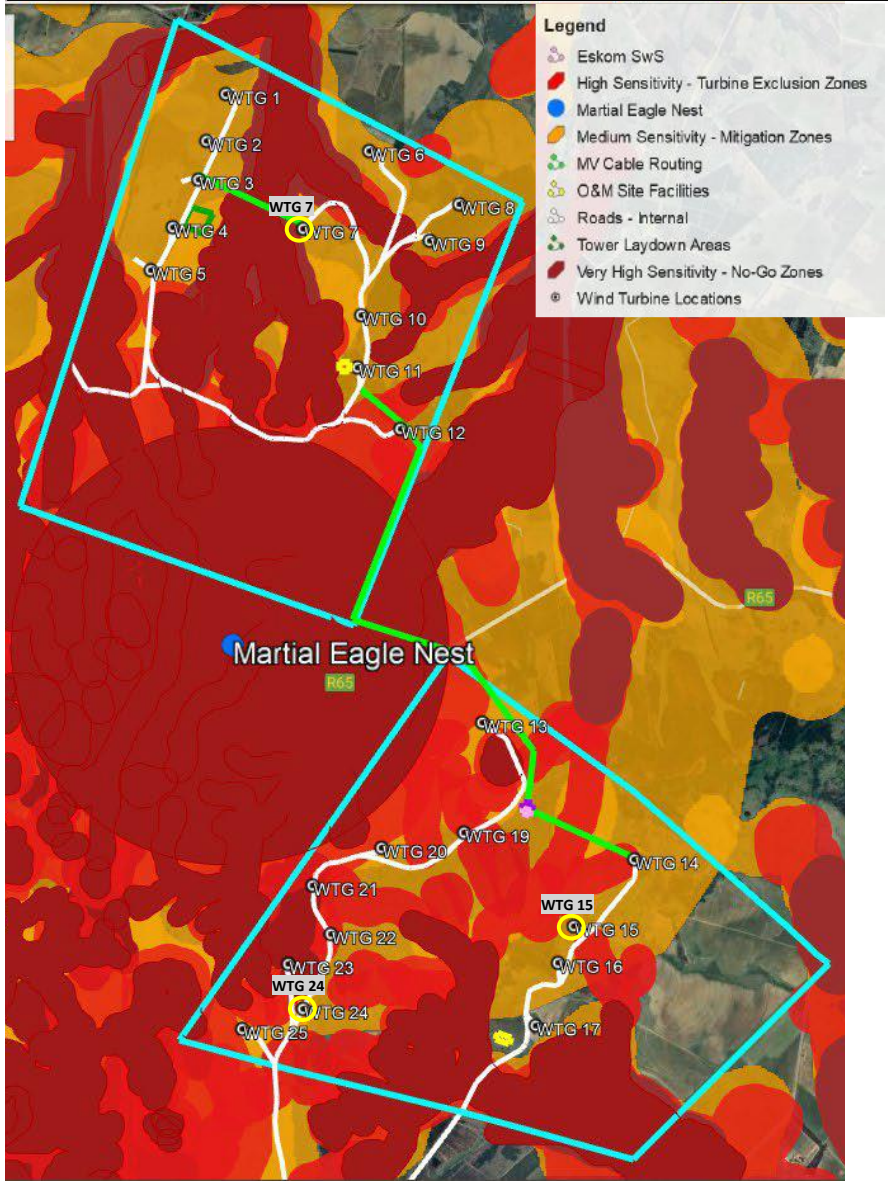
4.4. The figures overleaf (extracted from Figure 39 of the Avifaunal Specialist Study) do show that WTG 7 was moved (in response to the sensitivity of Species 23). Relocation of WTG 15 as described in point 19 would seem to be disadvantageous in the context of Martial Eagle sensitivity. It is located closer to the Martial Eagle buffer (May 2025 Avifaunal Specialist Study) and also closer to the "Very high risk – all infrastructure exclusion zone". It is not known to what extent the relocation of WTG 15 was considered in the May 2025 Avian Specialist Study as no reference could be found to a specific discussion in this regard. Note that changed turbine positions are shown in yellow circles in the diagrams overleaf.

4.5. There are several WTGs that are still located within the Martial Eagle Turbine Exclusion Zone. These are WTGs 12, 13, 14, 19 and 20 are located. This was raised in the comments on the Draft EIA Report dated March 2025 (page 20 Emvelo CRR). In response the EAP states the following: "Noted. WTGs 12, 20 and 21 have been moved outside of the Avifaunal Turbine Exclusion Zone (Martial Eagle nest buffer), and WTG 13 has been micro sited to be located further away with the rotor swept area also not intersecting with this zone. This is simply not the case, which means this response by the EAP is **factually incorrect**. In fact, the specialist notes in his revised report (May 2025 – page 106) that these turbines need to be moved. Accordingly, the EAP has misrepresented the situation with regard to an extremely sensitive species.

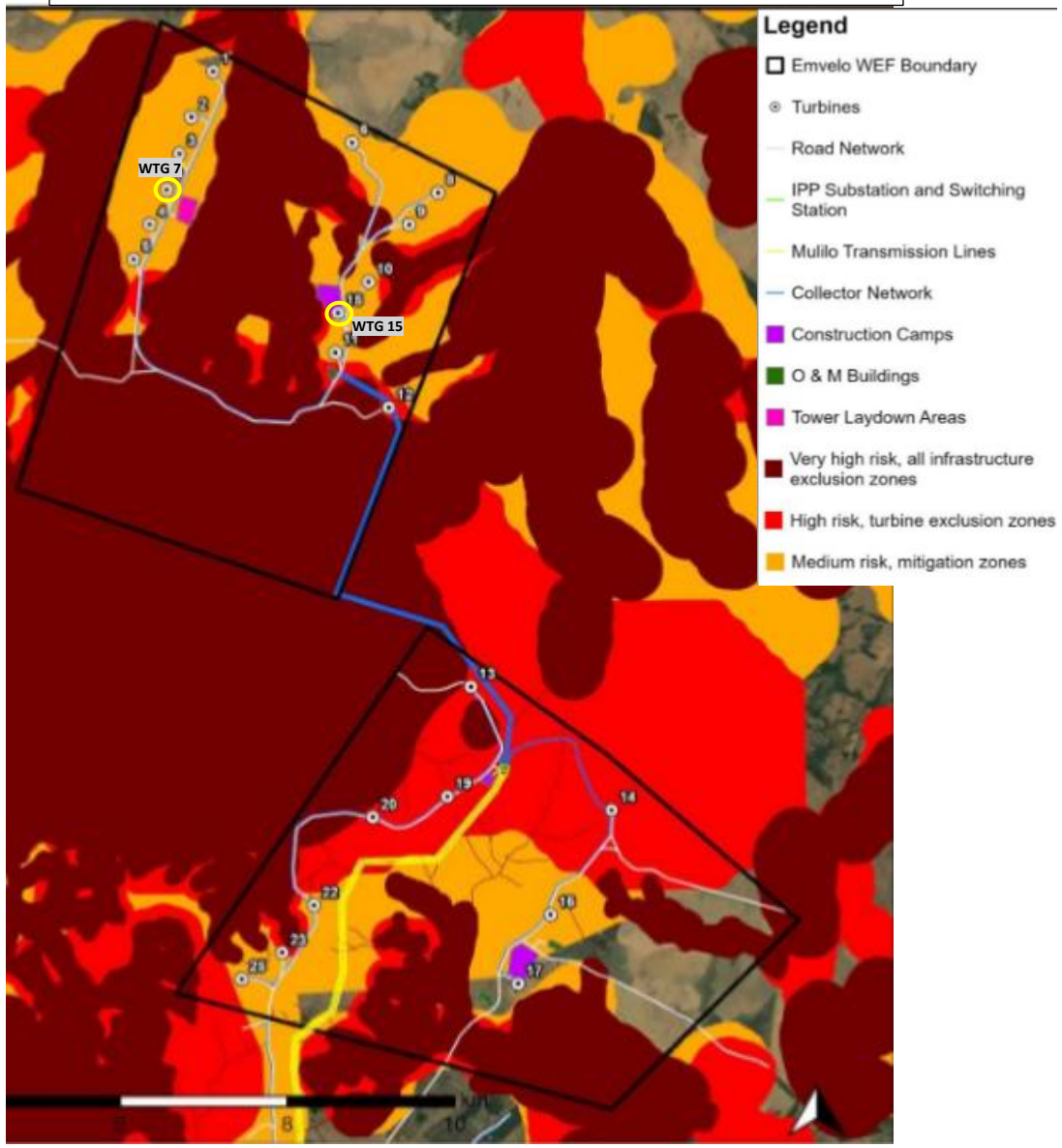
4.6. Further to the above, fatality rate decreases described in the Avifaunal Specialist Study (Section 5.8.8) are open to question. It is unclear how the fatality rate for the Martial Eagle,

for example, can be predicted to reduce as much as described in of the specialist study, especially as the reduction of >50% is attributed to project layout changes. In the absence of specific details of what was changed so as to result in this predicted fall in fatality rates, together with clear diagrams showing 'before' and 'after' layouts, this conclusion cannot carry a high degree of certainty. This is particularly as the recommended buffer zone for Martial Eagles has not been adhered to (5-6 km not 2.5 km radius). Moreover, the layout itself does not appear to have altered so significantly relative to Martial Eagle sensitive areas so as to point to a substantial reduction in the threat of fatality. The following diagrams from the Avifaunal Specialist Studies provided with the Draft EIA Reports of March and July 2025 show that it is exceedingly difficult to discern layout changes that may have been in response to avifaunal sensitivities.

Combined Avian Sensitivity – Proposed Emvelo WEF (extract from Fig. 3.9 of February 2025 specialist study included in March 2025 Draft EIA



Combined Avian Sensitivity – Proposed Emvelo WEF (extract from Fig. 3.9 of May 2025 specialist study included in July 2025 Draft EIA Report



5. INADEQUATE APPLICATION OF THE MITIGATION HIERARCHY

Avoiding avoidance – the pinnacle of the mitigation hierarchy

5.1. One just has to consider the impact tables where one of the questions is: "Can impact be avoided, managed, or mitigated?" realise that the impact assessment methodology is based on a misconception of the mitigation hierarchy. The specialist response to the question "Can impact be avoided, managed, or mitigated?" is either "yes" or "no". There is no requirement to specify which mitigation strategy is being applied. Avoidance is different to management / mitigation, but the EAP makes no account for this. It is important to know whether the impact can be avoided as opposed to whether it can be mitigated. This ought to be explicitly explained by the EAP, but the EAP has failed to provide a rational explanation.

5.2. Avoidance is preferred and should always be considered before any other options in terms of the sequence of tiered steps mandated by the impact mitigation hierarchy. Definitively proving that avoidance has been implemented in accordance with the mitigation hierarch is something the EAP has categorically failed to establish.

5.3. The EAP's trend and preferred methodology – as shown in the Draft EIA Report - is to avoid 'avoidance' as the primary means for preventing adverse impacts in terms of the hierarchy. The EAP's approach flies in the face of IEM and the mitigation hierarchy because avoidance is assumed but not reflected in the project documentation. When working in such a sensitive environment, such as the sites of the proposed projects, it goes without question that AVOIDANCE should be top priority and a critical threshold to adhere to BEFORE proceeding to the following stages of the mitigation hierarchy. The role of the EAP is to ensure development is undertaken in a manner that ensures the interests of the biophysical environment and affected communities. This is an enormous responsibility and cannot be fulfilled if concerns raised by I&APs and conservation authorities are downplayed and effectively ignored. The impact assessment and public participation processes are materially inadequate.

5.4. Instead of avoiding areas of high sensitivity the EAP recommends pre-commencement flora relocation and faunal relocation (see for example page 384 Draft EIA Report). This is unacceptable and illustrative of a fundamentally defective approach to impact assessment and management. Areas of high sensitivity ought to be avoided outright in terms of the mitigation hierarchy. This has NOT been done.

5.5. There is no clarity of which species will be affected or whether they are good candidates for relocation (i.e. is the success of this proposed mitigation measure proven). The proposal to relocate species has associated impacts and these have NOT been assessed. In a scenario where relocation is unavoidable (i.e. all other options in terms of the mitigation hierarchy have been applied and exhausted) – **this constitutes a project impact and is not solely a proposed mitigation measure.**

5.6. It is stated "Several burrowing faunal species are present and will allow for relocation of less mobile species, although most faunal species in proximity are likely to vacate the area once

earth moving equipment commences clearing and construction, however some species may require manual relocation." Firstly, the way this proposal is framed is muddled / does not make sense. It reads like some sort of circular argument. Secondly, the impacts of relocation have not been assessed. Thirdly, once earth-moving equipment moves in, the project has commenced – which does not tie up with the proposed pre-commencement relocation of the sensitive species.

5.7. Inadequate thought has been given to relocation of plant and animal species, which results in the following unsubstantiated, bland and rather meaningless statement by the EAP: "They are relocated into a suitable habitat and protected from further damage and all disturbances to aid their re-establishment."

5.8. There are too many unanswered questions to place any reliance on this relocation proposal:

5.8.1. Have suitable alternative habitat locations been identified for relocation purposes? How far away are these and is the location accessible for this purpose? These questions are unanswered.

5.8.2. What is the impact of the faunal species that might be relocated? What about their wellbeing? These questions are unanswered.

5.8.3. How will they be caught so as to avoid trauma? Are they territorial species and if so, how will they be introduced into a new territory? How will faunal species in the new territory react? These questions are unanswered.

5.8.4. Has a faunal relocation expert been consulted? Where is the specialist input on relocation? These questions are unanswered.

5.9. The key priority and statutory obligation for an EAP is to determine whether a proposed project can respond to the environmental constraints present at the proposed location. This is the most important assessment and guidance that an EAP can provide. Instead, in this case, focus is placed on mitigation such as relocation of sensitive flora and fauna. It appears that little or no thought is given to the recipients or receiving environment of this relocation, as if one is dealing with environmental impact management is akin to dealing with inanimate objects.

5.10. There is also a disproportionate reliance placed by the EAP on reconsideration of WTG positions following a post-authorisation walkthrough. The question that has not been answered by the EAP is this: Why can such a walkthrough not be conducted during the EIA process when the specialists have been on site? Emphasis is placed on how much field work has been done, so why did this not include detailed examination of proposed WTG locations? For example (page 87 of the Emvelo CRR) concern is raised about the location of turbines and roads within Yellow-breasted Pipit habitat, contrary to the avifaunal specialist's recommendations. The EAP's response is "All WTGs were removed from Yellow-breasted Pipit habitat with the exception of WTG 23 that still appears to be fringing on a high-risk area as identified for the Yellow-breasted Pipit. It is recommended that this turbine position be

reconsidered following the avifaunal walkthrough, post-EA (should such EA be granted) prior to construction." It seems that WTG 31 (Sheepmoor) is also located on the edge of this bird's habitat.

5.11. There is reference to turbines having been micro-sited out of certain areas. See for example the Emvelo CRR (page 20) in relation to Martial Eagle. This raises the obvious question as to why micro-siting was not completed for all bird species and other environmental sensitivities. The maps are such that it is extremely difficult to discern whether the positions of turbines have changed, and this is due to lack of information on coordinates as mentioned elsewhere in this report. An explanation as to how the siting of WTGs was done is required. Was this done in field? When and how was micro-siting done? Were the edges between sensitive habitats and WTG positions verified in the field?

5.12. It is strange that if there is such precision about blade sweep and how far it extends and that it does not impinge into sensitive areas (see page 19 and 20 of Emvelo CRR) that more detailed diagrams / maps are not provided at a scale that clearly shows the difference between the before and after changes that have been made to the layout. Another example (page 36 of the Sheepmoor CRR) of this type of feedback is: "The Sheepmoor WEF has undergone significant layout refinement to avoid high-sensitivity areas, particularly Critical Biodiversity Areas (CBAs) and known flight paths of key species." Again, is one looks at the figures, it is extremely difficult to see any material difference in the layout.

5.13. Given the foregoing points, no reliance can be placed of assurances that the layout has been substantially changed and that micro-siting has been conducted. If this were the case, then the information presentation would be clearer, especially spatial information. Precise coordinates would be given of WTG positions before and after relocation, for example.

Misunderstanding of legal obligations – alien invasive legislation

5.14. Clearing of alien invaded areas is offered as a trade-off, at a ratio of 1:3 for direct loss of natural grassland habitat (as a trade-off or offset), in conjunction with other mitigation proposed by the terrestrial biodiversity specialist. This proposal is repeated many times in the Draft EIA Report for both proposed WEFs (e.g. page 32 Emvelo Draft EIA Report of July 2025). This proposal cannot be accepted as a trade-off or an offset. The reason is that this proposal is attached to the site of the proposed development, and the influence / impacts are not confined solely to the development footprint.

5.15. Furthermore, alien vegetation control is a legal requirement under the Alien and Invasive Species Regulations (GNR 1020 of 25 September 2020). As such, the meeting of a legal obligation cannot be used as a trade-off. Even if the WEF owner is not the same party as the landowner, this applies, because the WEF is being operated on that land. Thus, under the duty of care obligations under NEMA, the WEF operator is required to fulfil alien vegetation control obligations.

5.16. It may be argued that the WEF operator has no obligation to control alien invasive vegetation, especially that present prior to development. This is a weak argument because one of the

impacts associated with disturbance caused by the proposed development is the possible spread of alien invasive vegetation.

Misuse of biodiversity offsets

5.17. The proposed offset does not meet the required outcomes of the National Biodiversity Offset Guideline of 2023, which are that the offset outcomes must be ***practically measurable on the ground***. Importantly an offset must ensure that:

5.17.1. biodiversity is secured in the long term through the protection and appropriate management of ecosystems and species;

5.17.2. efforts to protect biodiversity in the long term contribute to the expansion of South Africa's protected area network, and are focused in areas identified as biodiversity priorities, with particular emphasis on the consolidation of protected areas and biodiversity priority areas and securing effective ecological links between priority areas; and

5.17.3. it contributes to the long-term security of biodiversity priority areas and maintains or improves their ecological condition, thereby resulting in tangible and measurable positive outcomes for biodiversity conservation 'on the ground'.

5.18. Internationally, research, capacity building, training and other activities are not recognised as 'offsets' but can be used to support, expedite, improve or bolster the outcomes required of an offset.

5.19. The offset report proposes various measures to deal with residual impacts on birds. Area-based offsets are not feasible; several offsite actions have been proposed in an effort to achieve no net loss of these species. How no nett loss of bird species through these measures is to be achieved is wholly unclear. Furthermore, since WEFs pose a threat of bird deaths the loss of a single bird within the category of a species categorised as Critically Endangered or Endangered is one too many and pushes the species ever closer to a tipping point.

5.20. 13.7 ha of the 31 ha total residual impacts are in CBA 1 which is, by definition, **IRREPLACEABLE** and constitute a **FATAL FLAW** as noted in the national offset guideline. i.e. 44% of the proposed footprint. Also, it is in a NPAES focus area (Fig 3.1 of the WSP Biodiversity Offset Report).

5.21. **No assurance that land can be secured for conservation**, and **no assurance of long-term protection of a possible offset area is provided**. There is passing mention of 'may' look at conservation servitudes, but that is all." To suggest that Mulilo can motivate to the lessor that the offset plan is part of "maintenance and repairs" is wholly unacceptable and nonsensical.

5.22. **Furthermore, suggesting that target areas be identified in the context the existing site due to having lease agreements in place is counter to the intention of offsets. This land is within**

the proposed project's sphere of influence – so it is in fact not an offset as applied internationally and as understood in the aforementioned national guideline.

5.23. There is no clarity on responsibility for managing the offset area(s) (i.e. who would implement the offset and do the work) and covering costs of the offset, and duration of liability. Talking about clearing of alien species 'in a (questionable) ratio of 1:3' as a 'trade-off or offset' is nonsense. Any offset site would need to be cleared of alien species as an integral part of its management.

5.24. Of the **proposed offset measures for birds** (Section 10.2 in Biodiversity Offset report) – only the bird flight diverters may be acceptable BUT evidence that this would translate into on-the-ground outcomes is required (i.e. improvement in bird populations commensurate with expected residual impacts/ reduction in numbers due to electrocution/ collision with turbines/ powerlines). These outcomes must be directly linked to the affected species. Furthermore, no basis is given for specifying 5000 bird diverters every 10 years.

5.25. Support of research programmes are not recognised as an offset.

5.26. All of the items listed are in fact what a responsible corporate citizen ought to be doing and therefore do not constitute a praiseworthy offset (see point 53 below), particularly in circumstances where the mitigation hierarchy has not been applied. The first or top priority in the mitigation hierarchy is to avoid the adverse impact in the first place. This is precisely the mitigation approach that has been avoided in the EIA process for these proposed WEFs. Avoidance would mean removing any WEFs that is within away from bird sensitive areas on the basis of the precautionary principle – meaning do more than the minimum. For example, if there is a general guideline buffer applicable to nest areas, then application of the precautionary principle would mean adding to this buffer, because of the uncertainties about bird movements, for example.

5.27. The use of an offset demonstrates that there are residual adverse impacts, which means that the project has significant adverse impacts associated with it. It is not proactive compliance as espoused by the EAP. "This BOR is not a reactive add-on; it reflects a proactive compliance, demonstrating that the project has embraced its environmental responsibilities. Significant resources, technical input, and time were invested to ensure the offset plan would stand up to scrutiny and deliver real conservation value. It is a key part of what gives this project its integrity, and the applicant is proud to include it as a cornerstone of the DEIR submission. It should provide the competent authorities with a clear assurance that residual impacts have not only been recognised, but systematically addressed, avoided where possible, and responsibly offset where unavoidable." Besides the fact that the foregoing paragraph is verbiage, it is also factually incorrect. This type of language is wholly inappropriate – the language is not objective and compromises the independence of the EIA process.

5.28. Additional comments and concerns regarding the Offset Report prepared by WSP include:

Re: Section 3.1.2 PRIORITY AREAS FOR PROTECTED AREA EXPANSION

5.28.1. How has this section influenced the need for and design of any offset? This information would have and should have been evident during project planning and should have triggered upfront offset development at the earliest stages of the design process. What was this not investigated by the EAP before the 11th hour of the EIA process?

Re: 3.2.1 ECOLOGICAL IMPORTANCE OF VEGETATION COMMUNITIES IN THE LSA

5.28.2. The applicable Guideline suggest that impacts on CBAs should be AVOIDED AT ALL COSTS, unless the CBA can be shown to be inaccurately mapped or otherwise wrongly determined. The actual drivers of why the area is designated a CBA are important in terms of understanding the impact, requisite offset (if possible) and offset design to accommodate the feature driving CBA.

Re: Figure 3-7 - Sheepmoor Vegetation Sensitivity

5.28.3. It is curious (and inexplicable) to note that the areas in green are mapped as only moderate sensitive - although from an avifaunal perspective many areas are rated High or VERY HIGH. Offsets must synthesize the full array of features to derive a trigger but this has not been undertaken by the EAP.

Re: Section 5 AQUATIC BIODIVERSITY OVERVIEW

5.28.4. It is not clear whether there are any significant impacts on wetland systems (for instance from stream crossings by access roads or buried power lines) and whether these may trigger wetland offsets? This is unresolved and unanswered. The gaps in information and inadequacy of the assessment and it is not possible for the Competent Authority to render an informed decision on such impacts.

Re: Section 6.1.2 FLORA

5.28.5. EAP to confirm whether this is the first time a footprint figure has been made available during the EIA process. If so, why is this information made available at the 11th hour only?

5.28.6. There is no table of impact areas by feature, with a clear indication of what ratio should be applied. In order to determine a final offset quantum that can be audited for compliance monitoring the relevant information is not tabled. How much invaded area needs to be cleared? This is not clear from the reports. How is it to be rehabilitated to secondary grassland? This is not clear from the reports. Does this qualify as an acceptable offset for loss of intact grassland? If so, why? Again, this is not clear from the reports.

5.28.7. There is no map to determine whether it is feasible compensate for loss of secondary grassland in corridors between intact patches that are ESA designated – but the EAP states:

"this impact to negligible levels with only a very small proportion of the footprint occurring in or near higher sensitivity areas. Very High Sensitivity or No- Go habitat has largely been avoided and reduced to an acceptable level."

5.28.8. The above contradicts what the Avifauna report says or the fact that there are impacted CBAs and ecological corridors and processes. only valid for narrow vegetation lens. What is the total footprint of these areas impacted? Who is able to determine whether the impacts significance is acceptable without the material underlying data which has not been made available?

Re: Section 6.1.3 FAUNA

5.28.9. Agreed. This requires a clear and compensatory offset. i hope it still is to be clarified how much and where? could the OHPL be constructed without a service road? It seems unlikely

5.28.10. In this finely dissected landscape, with no-go areas immediately adjacent to low sensitivity, micro-siting would seem vital to have been completed before arriving at an impact statement and an estimation of footprint and offset liability. This is a key and material flaw in the entire EIA process. This weakness in impact assessment methodology flies in the face of IEM and the mitigation hierarchy.

5.28.11. The report relies on an indefinable and this un-auditable requirement and is fatally flawed.

Re: Plant Species page 410

5.28.12. Any loss of intact or degraded grassland habitat in corridors or wetland catchments cannot be rated as a positive impact!

Re: Table 9-2 – Terrestrial habitat offset targets

5.28.13. How does this relate to the 180 ha indicated in the report above? This is an unacceptable impact. fully 40% of the impact is in CBA1 ?

Re: Section 10 CANDIDATE OFFSET SITES

5.28.14. There is no candidate list, or any credible analysis of the contribution of each? do sufficient sites exist? are the landowners amenable to having their activities curtalied?

5.28.15. There is no evidence these lease conditions include restriction of farming activities and proactive biodiversity management. When were they signed, and has proof been submitted to the authorities?

5.28.16. Much of the assessment is entirely theoretical. Actual offset sites need to be identified and the specifics of their rehabilitation are determined to assess functional gains before

a decision can be made. More specifics would have helped the decision maker here regarding the biodiversity impacts

5.28.17. Rehab of grasslands is difficult and expensive, and often incomplete/inconclusive. restoration is likely impossible - especially to achieve prior diversity levels and structure, and keep invasive and alien species out.

Re: Section 10.1 SIGNED LEASE AGREEMENTS

5.28.18. The mooted lease agreements are likely to be contested by the landowners. A dedicated offset lease agreement and servitude - with accompanying management plan setting out the requisite outcomes - should have been concluded with the sites but this has not been done. . All of these proposed offset areas will be adjacent to the WEF/ WTG and this is questionable in terms of offset efficacy.

5.28.19. There is little indication of competing interests which might undermine potential offset efficacy e.g. Mining & Prospecting Rights, and the limits that these rights might impose on the applicants' ability to attain offset outcomes

Re: Section 11 10.2 OFFSITE ACTIONS FOR PRIORITY BIRD SPECIES

5.28.20. None of the actions listed qualify as offsets, or are so insufficiently described as to be so vague and meaningless that it is impossible to link the action directly to an impact (which methodology is expressly prohibited by the Offset Guideline). The reason being that the impact is not quantifiable and is unauditable based on the available information.

Re: Section 11 RECOMMENDED CONDITIONS FOR ENVIRONMENTAL AUTHORISATION

5.28.21. The quantum needs to be specified here, but it isn't quantified. The final status and/or protection and management regime need to be confirmed but this information has not been made available

5.28.22. There is insufficient information to demonstrate that the landowner has consented to the proposed arrangement. It is also not clear how certain this outcome is and whether this is covered in the lease conditions.

Re: Section: AFFECTED TERRESTRIAL HABITATS

5.28.23. This assessment is meaningless unless attached to a specific infrastructure element, which it is not. In the circumstances, the DFFE is unable to determine accurately what the offset liability is should they choose to only approve a portion of the project

The reliance on micro-siting

5.29. Whilst post-approval micrositing is applied internationally in the wind energy sector, this is

within very specific limitations. According to Scottish Natural Heritage[1], for example, the siting of wind turbines in small incremental distances and is used at two main stages of wind farm development:

5.29.1. Firstly, during the design stage to ensure that turbine layout is satisfactory from key viewpoints and achieves the design objectives.

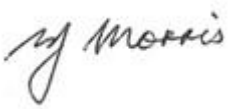
5.29.2. Secondly, during the construction phase of a project, where previously unexpected conditions are encountered on site.

5.30. Provision for micrositing is normally covered by a specification in the EIA Report which can then be included in the conditions in the approval. This serves to set a limit within which micrositing is permitted and normally limits this to 50-100m from the specified (approved) turbine location. This information ought to be known to ERM South Africa, since exactly this approach is applied by the company in the UK (for example Crosbie Wind Farm.[2]

5.31. From the foregoing information it can be seen that micrositing is not to be applied in a non-specific manner. It is recognised that some flexibility is required in final design stages and also to allow for unforeseen circumstances during construction. It is standard and accepted practice internationally to specify a distance limitation within which micrositing is permitted. This must of course be included in the project description and included in the impact assessment. This way, I&APs and the Competent Authority are provided with a full picture of the potential development footprint (including the micrositing zone) and the associated footprint. More importantly, it means the Competent Authority has full information and can include a specific zone for each WTG within which micrositing is permissible. Hence, this is clear and known to the Competent Authority upfront from the provision of this information in the EIA Report, instead of being faced with an unknown quantity in terms of

RICHARD SUMMERS INC. **Morris Environmental & Groundwater Alliances**





Per: R W Summers **Per MJ Morris**

[1] Scottish Natural Heritage (2017): Siting and Designing Wind Farms in the Landscape. https://www.nature.scot/sites/default/files/2017-11/Siting%20and%20designing%20windfarms%20in%20the%20landscape%20-%20version%203a.pdf

[2] https://crosbiewindfarm.co.uk/wp-content/uploads/2025/01/Volume-1-EIAR-Chapter-8-Ground-Conditions-Peat-and-Geology.pdf. Accessed 11 August 2025.

From: Lloyd Barnes
Sent on: Wednesday, 20 August 2025 16:53:22
To: ERM Arcus Amsterdam; Anton Lohse
CC: Stephen Burton; Stephanie Gopaul; Rebecca Thomas; Andrew Pearson
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Good day Lucien,

We are in the process of finalising a response to the attached, could you please provide responses to the following:

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- Please confirm whether the 22 April Letter, and our responses thereto will be included in the public participation report for the EA Application?

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted] Town, 8001
mulilo

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, 14 August 2025 13:30
To: Anton Lohse <Anton@mulilo.com>
Cc: Lloyd Barnes <Lloyd@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Anton,

Kindly see attached correspondence from the IAP Lawyer

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town **erm.com**
+[redacted]

From: Riaan Meintjes <riaan@themis.co.za>
Sent: Thursday, August 14, 2025 12:58 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Mpho Malema <mpho.malema@erm.com>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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EXTERNAL MESSAGE

Dear Lucien

Please see the attached.

We look forward to receiving the information requested in our email of 7 August 2025 without further delay.

Regards
Riaan Meintjes
Director

BusinessDay Best Lawyers for 2025: Arbitration and Mediation; Litigation; Real Estate Law

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Date: Thursday, 14 August 2025 at 10:20
To: Riaan Meintjes <riaan@themis.co.za>, ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Mpho Malema <mpho.malema@erm.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Riaan Meintjes,

Thank you for providing comment, we will return with responses shortly.

May I please request the name and CAA Registration number for the aerodrome in question.

Your prompt attention to this request would be greatly appreciated.

Regards

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted]

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From: Riaan Meintjes <riaan@themis.co.za>
Sent: Thursday, August 7, 2025 1:48 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Date: Wednesday, 16 July 2025 at 13:55
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Interested and Affected Party,

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All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.

Thank you for your continued participation.

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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Sent on: Thursday, 21 August 2025 09:45:52
To: ERM Arcus Amsterdam; Anton Lohse
CC: Stephen Burton; Stephanie Gopaul; Rebecca Thomas; Andrew Pearson
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Good morning Lucien,

The information below is fairly urgent, please could you provide a response at your earliest opportunity.

Thank you!

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
www.mulilo.com
[redacted]

From: Lloyd Barnes
Sent: Wednesday, 20 August 2025 16:53
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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Lucien Barbeau
Senior Consultant

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Cape Town [redacted] **erm.com**



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From: Lloyd Barnes
Sent on: Thursday, 21 August 2025 09:47:27
To: Lucien Barbeau; ERM Arcus Amsterdam
CC: Stephen Burton; Mpho Malema; Rebecca Thomas
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Good day Lucien,

Thank you for sending this to Jamie.

Did he respond directly perhaps? It's fairly urgent.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
mulilo

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 20 August 2025 13:50
To: Jamie Pote <jamiepote@live.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>; Lloyd Barnes <Lloyd@mulilo.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Jamie,

I hope this message finds you well.

As part of the current Comments and Responses process, a number of specific WTGs have been called out by both departments and I&APs. Lloyd has taken the liberty of compiling a list of all such turbines and providing descriptions of the actual ground-truthed environmental conditions at each location.

We kindly request that you review these descriptions and provide your agreement and sign-off on their accuracy. Your confirmation is essential, as this information will also need to be shared with the specialist responsible for the Biodiversity Offset Report.

Given the tight timelines, we would greatly appreciate a very quick turnaround on this request. For your reference, we have attached the relevant I&AP comments alongside Lloyd's list.

Please let me know if you require any additional information to complete this review.

Regards

ERM
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Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, August 18, 2025 6:44 PM
To: Jamie Pote <jamiepote@live.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Jamie,

Thanks for your positive response, we really appreciate your efforts on this!

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Jamie Pote <jamiepote@live.co.za>
Sent: Monday, August 18, 2025 5:19 PM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Hi Lucien I will take a look and get responses to you.

You had let us know about the responses so had kept a window this week.

I'll get them to you as soon as I can, I will just need to taka a look and may need to give some thought for a day or two or do some further analysis depending on what they are.

I note the timeline and will try get to you by end Wednesday or sooner if they are not too comlplex.

Regards
Jamie

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, August 18, 2025 4:54:08 PM
To: Jamie Pote <jamiepote@live.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Jamie,

Over and above we have also received comment from MTPA which does require Terrestrial biodiversity input. Kindly see attached these comments for your attention.

I do apologize for the short notice we have on this project, but we do intend to submit the final by the end of the week on the 22 Aug. Please do let me know if you can accommodate us with these comment responses?

Regards,

Lucien Barbeau
Senior Consultant

Sustainability is our business

Cape Town [redacted] **erm.com**

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, August 18, 2025 12:00 PM
To: Jamie Pote <jamiepote@live.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Jamie,

Thank you for your support and delivering these reports at short notice. If you feel that these report updates were out of your scope and you would like to submit a change order, the client is open to it so please do share that with me.

I have attached the DARDLEA comments for your attention, I kindly require assistance with the with regards to comments directed to your specialism, notably 18.3 and 18.5.

If I could kindly request your assistance to argue your point on these grassland comments.

Kind Regards

Lucien Barbeau
Senior Consultant

Sustainability is our business

Cape Town [redacted] **erm.com**

From: Jamie Pote <jamiepote@live.co.za>
Sent: Friday, August 15, 2025 7:38 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Hi Lucien, here are the reports with the revised layouts replaced where applicable (the last few maps in the reports).

There is an overlap with the Emvelo/Sheepmoor boundary that was provided where a central area fall within both sites. I have not had time to figure out what's going on there or to scrutinise the layout to check if there are any changes that affect the outcome of the assessment.

Terr Bio Assess Report - Mulilo Emvelo WEF (Jamie Pote) 20250815) Final.docx

Terr Bio Assess Report - Mulilo Sheepmoor WEF (Jamie Pote) 20250815_Final.docx

Terr Bio Assess Report - Mulilo Sheepmoor WEF (Jamie Pote) 20250815_Final.pdf

Terr Bio Assess Report - Mulilo Emvelo WEF (Jamie Pote) 20250815) Final.pdf

Regards
Jamie

Mr Jamie Pote
Biodiversity – Environmental – GIS

BSc (Hons) Pr. Sci. Nat (115233)
Postnet Suite 57, Private Bag [redacted]
[redacted]
[redacted]

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 06 August 2025 16:26
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Specialist,

I trust you are well.

Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by Monday, 12 August 2025.

If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: ERM Arcus Amsterdam
Sent on: Thursday, 21 August 2025 10:37:53
To: Lloyd Barnes; ERM Arcus Amsterdam; Anton Lohse
CC: Stephen Burton; Stephanie Gopaul; Rebecca Thomas; Andrew Pearson
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Hi Lloyd,

Apologies for the delay, responses provided below.

Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Lloyd Barnes <Lloyd@mulilo.com>
Sent: Thursday, August 21, 2025 9:46 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Anton Lohse <Anton@mulilo.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Rebecca Thomas <reth@mulilo.com>; Andrew Pearson <Andrew@mulilo.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

EXTERNAL MESSAGE

Good morning Lucien,

The information below is fairly urgent, please could you provide a response at your earliest opportunity.

Thank you!

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
www.mulilo.com
[redacted]

mulilo

From: Lloyd Barnes
Sent: Wednesday, 20 August 2025 16:53
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Anton Lohse <Anton@mulilo.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Rebecca Thomas <reth@mulilo.com>; Andrew Pearson <Andrew@mulilo.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Good day Lucien,

We are in the process of finalising a response to the attached, could you please provide responses to the following:

- EAP to provide clarification and factual circumstances regarding whether impacts on the nature conservancy have been or will be considered in the EA Application documents, as this is a factual query.

The landscape-level impacts associated with the proposed wind farm have been assessed by the relevant specialists, including the visual, faunal, and avifaunal specialists. Appropriate mitigation measures will be implemented to manage potential impacts. In particular, specific mitigation measures relating to large terrestrial bird species, such as the Secretarybird, have been outlined in detail within the avifaunal specialist reports

- Please confirm whether the 22 April Letter, and our responses thereto will be included in the public participation report for the EA Application?

Please note that the original letter dated 22 April was submitted outside of the Public Participation Process (PPP) period and was therefore not included in the original publication report. However, as the letter has since been resubmitted during the current PPP period, within the prescribed timeframes, both the letter and our responses will be incorporated into the Final Comments and Responses Report (CRR).

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]
mulilo

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, 14 August 2025 13:30
To: Anton Lohse <Anton@mulilo.com>
Cc: Lloyd Barnes <Lloyd@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Anton,

Kindly see attached correspondence from the IAP Lawyer

Regards,

ERM
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Lucien Barbeau
Senior Consultant

Cape Town
[redacted]

erm.com

From: Riaan Meintjes <riaan@themis.co.za>
Sent: Thursday, August 14, 2025 12:58 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Mpho Malema <mpho.malema@erm.com>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

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EXTERNAL MESSAGE

Dear Lucien

Please see the attached.

We look forward to receiving the information requested in our email of 7 August 2025 without further delay.

Regards
Riaan Meintjes
Director

BusinessDay Best Lawyers for 2025: Arbitration and Mediation; Litigation; Real Estate Law

HAYES EST H 2005 INCORPORATED

[redacted]
W: www.themislawchambers.co.za

Unit 1, Roeland Square
Corner of Roeland Street and Drury Lane
Cape Town, 8001

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Date: Thursday, 14 August 2025 at 10:20
To: Riaan Meintjes <riaan@themis.co.za>, ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Mpho Malema <mpho.malema@erm.com>
Subject: RE: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Mr Riaan Meintjes,

Thank you for providing comment, we will return with responses shortly.

May I please request the name and CAA Registration number for the aerodrome in question.

Your prompt attention to this request would be greatly appreciated.

Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Riaan Meintjes <riaan@themis.co.za>
Sent: Thursday, August 7, 2025 1:48 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province
Importance: High

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EXTERNAL MESSAGE

Dear Sir/Madam

We have briefly perused the draft EIA report and have been unable to find any reference to the comment submitted by us on the instructions of our client, a copy of which is attached to this email.

Kindly refer us to the relevant pages of the draft report which deal with our client's comments?

We further note from the draft report that a formal application has been lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted. Kindly furnish us with a copy of this application and all communications to and from ATNS relating thereto.

We look forward to hearing from you as a matter of urgency.

Regards
Riaan Meintjes
Director

BusinessDay Best Lawyers for 2025: Arbitration and Mediation; Litigation; Real Estate Law

HAYES EST 2005 INCORPORATED

[redacted]
W: www.themislawchambers.co.za

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Corner of Roeland Street and Drury Lane
Cape Town, 8001

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---

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Date: Wednesday, 16 July 2025 at 13:55
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: FW: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Dear Interested and Affected Party,

Please note that the public comment period for the Draft Environmental Impact Assessment (EIA) Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities has been extended by one day, due to the public holiday on 9 August 2025.

The revised comment period now ends on 15 August 2025.

All other details remain unchanged. We encourage you to submit your comments by the new deadline should you wish to have your input considered in the Final EIA Report.

Thank you for your continued participation.

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam
Sent: Tuesday, July 15, 2025 4:43 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft EIA Report Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft EIA Reports for the proposed Sheepmoor and Emvelo Wind Energy Facilities, Mpumalanga Province

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30-day comment period from 15 July 2025 to 14 August 2025.

Following the public review period of the Draft EIA Report, comments from MDARDLEA and MTPA, particularly related to biodiversity mitigation measures, necessitated additional inputs from the specialists. The DFFE granted an extension to the timeframes of the EIA process, in line with Regulation 3(7) of the EIA Regulations, 2014, as amended and the Final EIA Report was stated to be due on or before 25 August 2025. As a result, a second public commenting period of 30 days is therefore opened on the Draft EIA Report to ensure transparency and to allow stakeholders the opportunity to review the revised report, studies and Comments and Responses prior to submission of the Final EIA Report.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Lucien Barbeau
Sent on: Thursday, 21 August 2025 10:38:35
To: Lloyd Barnes; ERM Arcus Amsterdam
CC: Stephen Burton; Mpho Malema; Rebecca Thomas
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Lloyd,

I have communicated with Jamie, he is currently working on those responses, to be provided to us later today.

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Lloyd Barnes <Lloyd@mulilo.com>
Sent: Thursday, August 21, 2025 9:47 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>; Rebecca Thomas <reth@mulilo.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Good day Lucien,

Thank you for sending this to Jamie.

Did he respond directly perhaps? It's fairly urgent.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted] Town, 8001

mulilo

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 20 August 2025 13:50
To: Jamie Pote <jamiepote@live.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>; Lloyd Barnes <Lloyd@mulilo.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Jamie,

I hope this message finds you well.

As part of the current Comments and Responses process, a number of specific WTGs have been called out by both departments and I&APs. Lloyd has taken the liberty of compiling a list of all such turbines and providing descriptions of the actual ground-truthed environmental conditions at each location.

We kindly request that you review these descriptions and provide your agreement and sign-off on their accuracy. Your confirmation is essential, as this information will also need to be shared with the specialist responsible for the Biodiversity Offset Report.

Given the tight timelines, we would greatly appreciate a very quick turnaround on this request. For your reference, we have attached the relevant I&AP comments alongside Lloyd's list.

Please let me know if you require any additional information to complete this review.

Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, August 18, 2025 6:44 PM
To: Jamie Pote <jamiepote@live.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Jamie,

Thanks for your positive response, we really appreciate your efforts on this!

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Jamie Pote <jamiepote@live.co.za>
Sent: Monday, August 18, 2025 5:19 PM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Hi Lucien I will take a look and get responses to you.

You had let us know about the responses so had kept a window this week.

I'll get them to you as soon as I can, I will just need to taka a look and may need to give some thought for a day or two or do some further analysis depending on what they are.

I note the timeline and will try get to you by end Wednesday or sooner if they are not too comlplex.

Regards
Jamie

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, August 18, 2025 4:54:08 PM
To: Jamie Pote <jamiepote@live.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Jamie,

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I do apologize for the short notice we have on this project, but we do intend to submit the final by the end of the week on the 22 Aug. Please do let me know if you can accommodate us with these comment responses?

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted]

erm.com

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, August 18, 2025 12:00 PM
To: Jamie Pote <jamiepote@live.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Jamie,

Thank you for your support and delivering these reports at short notice. If you feel that these report updates were out of your scope and you would like to submit a change order, the client is open to it so please do share that with me.

I have attached the DARDLEA comments for your attention, I kindly require assistance with the with regards to comments directed to your specialism, notably 18.3 and 18.5.

If I could kindly request your assistance to argue your point on these grassland comments.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted]

erm.com

From: Jamie Pote <jamiepote@live.co.za>
Sent: Friday, August 15, 2025 7:38 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Hi Lucien, here are the reports with the revised layouts replaced where applicable (the last few maps in the reports).

There is an overlap with the Emvelo/Sheepmoor boundary that was provided where a central area fall within both sites. I have not had time to figure out what's going on there or to scrutinise the layout to check if there are any changes that affect the outcome of the assessment.

Terr Bio Assess Report - Mulilo Emvelo WEF (Jamie Pote) 20250815) Final.docx

Terr Bio Assess Report - Mulilo Sheepmoor WEF (Jamie Pote) 20250815_Final.docx

Terr Bio Assess Report - Mulilo Sheepmoor WEF (Jamie Pote) 20250815_Final.pdf

Terr Bio Assess Report - Mulilo Emvelo WEF (Jamie Pote) 20250815) Final.pdf

Regards
Jamie

Mr Jamie Pote
Biodiversity – Environmental – GIS

BSc (Hons) Pr. Sci. Nat (115233)
Postnet Suite 57, Private Bag [redacted]
[redacted]
[redacted]

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 06 August 2025 16:26
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Specialist,

I trust you are well.

Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by

Monday, 12 August 2025.

If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Reabetswe MOKOMELE
Sent on: Thursday, 21 August 2025 10:49:50
To: Lucien Barbeau; ERM Arcus Amsterdam
CC: Victor DE ABREU; Stephen Burton
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Hi Lucian,

Herewith a OneDrive to access the updated Traffic Impact Assessment Reports.

Traffic Impact Assessment - Mulilo Amsterdam Emvelo and Sheepmoor Wind Energy Facilities

- Mulilo Amsterdam Emvelo Wind Energy Facility (Pty) LTD - Traffic Impact Assessment Rev1
- Mulilo Amsterdam Sheepmoor Wind Energy Facility (Pty) LTD - Traffic Impact Assessment Rev1

Please see a summary of our associated time and effort for your consideration.

Table 1--1: Incurred Costs

Task – Updating of Traffic Impact Assessment Reports	Cost
Emvelo DEIAr: Mulilo Amsterdam Emvelo Wind Energy Facility (Pty) LTD)	R5 724.74
Sheepmoor Final EIA Layout: Mulilo Amsterdam Sheepmoor Wind Energy Facility (Pty) LTD	R5 724.74
Total (Excluding VAT)	**R11 449.49**

I trust you find the above in order.

Kind regards

Reabetswe MOKOMELE
Engineer, Planning and Traffic Engineering, Infrastructure + Energy
[redacted]

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, 18 August 2025 18:52
To: Reabetswe MOKOMELE <Reabetswe.Mokomele@smec.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Victor DE ABREU <Victor.deAbreu@smec.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Reabetswe,

Just following up with the below

Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Thursday, August 14, 2025 10:13 AM
To: Reabetswe MOKOMELE <Reabetswe.Mokomele@smec.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Victor DE ABREU <Victor.deAbreu@smec.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Thank you for updating me Reabetswe,

Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Reabetswe MOKOMELE <Reabetswe.Mokomele@smec.com>
Sent: Thursday, August 14, 2025 9:43 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Victor DE ABREU <Victor.deAbreu@smec.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Hi Lucian,

Herewith confirmation that we'll be able to issue the updated reports by midday tomorrow, 15 August.

Kind regards

Reabetswe MOKOMELE
Engineer, Planning and Traffic Engineering, Infrastructure + Energy
[redacted]

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 13 August 2025 19:41
To: Reabetswe MOKOMELE <Reabetswe.Mokomele@smec.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Victor DE ABREU <Victor.deAbreu@smec.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Reabetswe, I am just following up with the report submissions, are you able to share them tomorrow?

Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, August 11, 2025 11:38 AM
To: Reabetswe MOKOMELE <Reabetswe.Mokomele@smec.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>

Cc: Victor DE ABREU <Victor.deAbreu@smec.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Reabetswe,

Understood, thanks for informing me. From my visual inspection, here has not been WTG or road changes, just minor infrastructure footprint changes. If I could please refer you to the boundary KMZs, these have been changed. I kindly bare in mind when updating any figures within reports.

Can I expect the changes to the report on Wednesday?

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Reabetswe MOKOMELE <Reabetswe.Mokomele@smec.com>
Sent: Thursday, August 7, 2025 10:26 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Victor DE ABREU <Victor.deAbreu@smec.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Dear Lucian,

Your request is received but kindly note the following:

Due Dates - Due to committed site visits taking place on 11 and 12 August 2025, unfortunately it is not possible to meet the due date of 12 August 2025. The revised issue date must consider both the updating and internal reviews which would be at least one (1) week.

Variation Order - Our team will review the final layouts and determine whether the changes will require and Addendum Letter or Full Revisions to be issued. The time and effort for updating the reports (full revisions) will require a variation order which will be confirmed and communicated to you for approval.

Trust you find the above in order.

Kind regards

Reabetswe MOKOMELE
Engineer, Planning and Traffic Engineering, Infrastructure + Energy
[redacted], South Africa

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 06 August 2025 16:27
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Specialist,

I trust you are well.

Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by Monday, 12 August 2025.

If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Lloyd Barnes
Sent on: Thursday, 21 August 2025 10:54:59
To: Lucien Barbeau; ERM Arcus Amsterdam
CC: Stephen Burton; Mpho Malema; Rebecca Thomas
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Thank you Lucien.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted] Town, 8001

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Thursday, 21 August 2025 10:39
To: Lloyd Barnes <Lloyd@mulilo.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>; Rebecca Thomas <reth@mulilo.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Lloyd,

I have communicated with Jamie, he is currently working on those responses, to be provided to us later today.

Regards,

Lucien Barbeau
Senior Consultant
Cape Town **erm.com**
[redacted]
Sustainability is our business

From: Lloyd Barnes <Lloyd@mulilo.com>
Sent: Thursday, August 21, 2025 9:47 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>; Rebecca Thomas <reth@mulilo.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Good day Lucien,

Thank you for sending this to Jamie.

Did he respond directly perhaps? It's fairly urgent.

Kind Regards,

Lloyd Barnes

Senior Associate: Developer.
[redacted]

mulilo

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 20 August 2025 13:50
To: Jamie Pote <jamiepote@live.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>; Lloyd Barnes <Lloyd@mulilo.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Jamie,

I hope this message finds you well.

As part of the current Comments and Responses process, a number of specific WTGs have been called out by both departments and I&APs. Lloyd has taken the liberty of compiling a list of all such turbines and providing descriptions of the actual ground-truthed environmental conditions at each location.

We kindly request that you review these descriptions and provide your agreement and sign-off on their accuracy. Your confirmation is essential, as this information will also need to be shared with the specialist responsible for the Biodiversity Offset Report.

Given the tight timelines, we would greatly appreciate a very quick turnaround on this request. For your reference, we have attached the relevant I&AP comments alongside Lloyd's list.

Please let me know if you require any additional information to complete this review.

Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, August 18, 2025 6:44 PM
To: Jamie Pote <jamiepote@live.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Jamie,

Thanks for your positive response, we really appreciate your efforts on this!

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Jamie Pote <jamiepote@live.co.za>
Sent: Monday, August 18, 2025 5:19 PM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Hi Lucien I will take a look and get responses to you.

You had let us know about the responses so had kept a window this week.

I'll get them to you as soon as I can, I will just need to taka a look and may need to give some thought for a day or two or do some further analysis depending on what they are.

I note the timeline and will try get to you by end Wednesday or sooner if they are not too comlplex.

Regards
Jamie

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, August 18, 2025 4:54:08 PM
To: Jamie Pote <jamiepote@live.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Jamie,

Over and above we have also received comment from MTPA which does require Terrestrial biodiversity input. Kindly see attached these comments for your attention.

I do apologize for the short notice we have on this project, but we do intend to submit the final by the end of the week on the 22 Aug. Please do let me know if you can accommodate us with these comment responses?

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town **erm.com**
+[redacted]

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, August 18, 2025 12:00 PM
To: Jamie Pote <jamiepote@live.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

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Sustainability is our business

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Senior Consultant

Cape Town [redacted] **erm.com**

From: Jamie Pote <jamiepote@live.co.za>
Sent: Friday, August 15, 2025 7:38 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]

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Regards
Jamie

Mr Jamie Pote

Biodiversity – Environmental – GIS

BSc (Hons) Pr. Sci. Nat (115233)
Postnet Suite 57, Private Bag X13130, [redacted]
[redacted]
[redacted]

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 06 August 2025 16:26
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
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Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town **erm.com**
[redacted]



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CONFIDENTIALITY AND DATA PROTECTION. This email is intended only for the use of the intended recipient(s) and may contain information which is privileged and confidential, or personal data which is subject to data protection legislation. If you are not the intended recipient, any disclosure, copying and/or distribution of the content of this email, or reliance upon or other use of the contents of this email is strictly prohibited. If you have received this email in error, please erase all copies of it, including all attachments, do not forward it to anybody, and please also notify the sender immediately.
CONFIDENTIALITY AND DATA PROTECTION. This email is intended only for the use of the intended recipient(s) and may contain information which is privileged and confidential, or personal data which is subject to data protection legislation. If you are not the intended recipient, any disclosure, copying and/or distribution of the content of this email, or reliance upon or other use of the contents of this email is strictly prohibited. If you have received this email in error, please erase all copies of it, including all attachments, do not forward it to anybody, and please also notify the sender immediately.

From: Lucien Barbeau
Sent on: Thursday, 21 August 2025 11:03:18
To: Reabetswe MOKOMELE; ERM Arcus Amsterdam
CC: Victor DE ABREU; Stephen Burton
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Thanks Reabetswe,

Noted on below additional costing

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Reabetswe MOKOMELE <Reabetswe.Mokomele@smec.com>
Sent: Thursday, August 21, 2025 10:50 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Victor DE ABREU <Victor.deAbreu@smec.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Hi Lucian,

Herewith a OneDrive to access the updated Traffic Impact Assessment Reports.

Traffic Impact Assessment - Mulilo Amsterdam Emvelo and Sheepmoor Wind Energy Facilities

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- Mulilo Amsterdam Sheepmoor Wind Energy Facility (Pty) LTD - Traffic Impact Assessment Rev1

Please see a summary of our associated time and effort for your consideration.

Table 1--1: Incurred Costs

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Emvelo DEIAr: Mulilo Amsterdam Emvelo Wind Energy Facility (Pty) LTD)	R5 724.74
Sheepmoor Final EIA Layout: Mulilo Amsterdam Sheepmoor Wind Energy Facility (Pty) LTD	R5 724.74
Total (Excluding VAT)	**R11 449.49**

I trust you find the above in order.

Kind regards

Reabetswe MOKOMELE
Engineer, Planning and Traffic Engineering, Infrastructure + Energy
[redacted]

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, 18 August 2025 18:52
To: Reabetswe MOKOMELE <Reabetswe.Mokomele@smec.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Victor DE ABREU <Victor.deAbreu@smec.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Reabetswe,

Just following up with the below

Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
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To: Reabetswe MOKOMELE <Reabetswe.Mokomele@smec.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Victor DE ABREU <Victor.deAbreu@smec.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Thank you for updating me Reabetswe,

Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Reabetswe MOKOMELE <Reabetswe.Mokomele@smec.com>
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To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Victor DE ABREU <Victor.deAbreu@smec.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Hi Lucian,

Herewith confirmation that we'll be able to issue the updated reports by midday tomorrow, 15 August.

Kind regards

Reabetswe MOKOMELE
Engineer, Planning and Traffic Engineering, Infrastructure + Energy
[redacted]

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 13 August 2025 19:41
To: Reabetswe MOKOMELE <Reabetswe.Mokomele@smec.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>

Cc: Victor DE ABREU <Victor.deAbreu@smec.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Reabetswe, I am just following up with the report submissions, are you able to share them tomorrow?

Regards



Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, August 11, 2025 11:38 AM
To: Reabetswe MOKOMELE <Reabetswe.Mokomele@smec.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Victor DE ABREU <Victor.deAbreu@smec.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Reabetswe,

Understood, thanks for informing me. From my visual inspection, here has not been WTG or road changes, just minor infrastructure footprint changes. If I could please refer you to the boundary KMZs, these have been changed. I kindly bare in mind when updating any figures within reports.

Can I expect the changes to the report on Wednesday?

Regards,



Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Reabetswe MOKOMELE <Reabetswe.Mokomele@smec.com>
Sent: Thursday, August 7, 2025 10:26 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Victor DE ABREU <Victor.deAbreu@smec.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Dear Lucian,

Your request is received but kindly note the following:

Due Dates - Due to committed site visits taking place on 11 and 12 August 2025, unfortunately it is not possible to meet the due date of 12 August 2025. The revised issue date must consider both the updating and internal reviews which would be at least one (1) week.

Variation Order - Our team will review the final layouts and determine whether the changes will require and Addendum Letter or Full Revisions to be issued. The time and effort for updating the reports (full revisions) will require a variation order which will be confirmed and communicated to you for approval.

Trust you find the above in order.

Kind regards

Reabetswe MOKOMELE
Engineer, Planning and Traffic Engineering, Infrastructure + Energy
[redacted]

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 06 August 2025 16:27
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Specialist,

I trust you are well.

Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by Monday, 12 August 2025.

If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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From: Jamie Pote
Sent on: Thursday, 21 August 2025 16:02:22
To: Lucien Barbeau; ERM Arcus Amsterdam
CC: Stephen Burton; Mpho Malema; Lloyd Barnes
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]
Attachments: Terr Bio Final EIR Responses_20250720.docx (47.04 KB), Terr Bio Final EIR Responses_20250720.pdf (265.9 KB)

EXTERNAL MESSAGE

Hi Lucien, please see attached.

I've done what I can, but the time available is extremely limited to be able to respond adequately to these comments. If there were a few weeks available I'd have liked to have been able to rock the boat a bit on some of those comments, but have tried to keep it as unconfrontational as possible.

I notice that both authorities are still stuck on the same issues, and are still not giving attention to the ground truthing of the MBSP and just ignoring the findings and still comparing with the official MBSP. Its a case of not seeing the forest for the trees I guess, or purely that it doesn't serve their interests, so they only pay attention to what serves their interests. I'm also noticing that perhaps Mr Lotter (I see he's on both letters) is not having a more personal attack on anything that steps on 'his MBSP', which would bring into question its validity. Hopefully the DFFE will apply a more balanced outlook, I haven't seen much from them comment wise.

I also added a comment to each of the WTGs as per the table from Lloyd.

Regards
Jamie

Mr Jamie Pote
Biodiversity – Environmental – GIS

BSc (Hons) Pr. Sci. Nat (115233)
[redacted]

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 20 August 2025 13:49
To: Jamie Pote <jamiepote@live.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>; Lloyd Barnes <lloyd@mulilo.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Jamie,

I hope this message finds you well.

As part of the current Comments and Responses process, a number of specific WTGs have been called out by both departments and I&APs. Lloyd has taken the liberty of compiling a list of all such turbines and providing descriptions of the actual ground-truthed environmental conditions at each location.

We kindly request that you review these descriptions and provide your agreement and sign-off on their accuracy. Your confirmation is essential, as this information will also need to be shared with the specialist responsible for the Biodiversity Offset Report.

Given the tight timelines, we would greatly appreciate a very quick turnaround on this request. For your reference, we have attached the relevant I&AP comments alongside Lloyd's list.

Please let me know if you require any additional information to complete this review.

Regards

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

Sustainability is our business

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, August 18, 2025 6:44 PM
To: Jamie Pote <jamiepote@live.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Jamie,

Thanks for your positive response, we really appreciate your efforts on this!

Regards,

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

Sustainability is our business

From: Jamie Pote <jamiepote@live.co.za>
Sent: Monday, August 18, 2025 5:19 PM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Hi Lucien I will take a look and get responses to you.

You had let us know about the responses so had kept a window this week.

I'll get them to you as soon as I can, I will just need to taka a look and may need to give some thought for a day or two or do some further analysis depending on what they are.

I note the timeline and will try get to you by end Wednesday or sooner if they are not too comlplex.

Regards
Jamie

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, August 18, 2025 4:54:08 PM
To: Jamie Pote <jamiepote@live.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Mpho Malema <mpho.malema@erm.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Jamie,

Over and above we have also received comment from MTPA which does require Terrestrial biodiversity input. Kindly see attached these comments for your attention.

I do apologize for the short notice we have on this project, but we do intend to submit the final by the end of the week on the 22 Aug. Please do let me know if you can accommodate us with these comment responses?

Regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Monday, August 18, 2025 12:00 PM
To: Jamie Pote <jamiepote@live.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>
Subject: RE: Mulilo Amsterdam Final Layout - [12 AUG 225]

Hi Jamie,

Thank you for your support and delivering these reports at short notice. If you feel that these report updates were out of your scope and you would like to submit a change order, the client is open to it so please do share that with me.

I have attached the DARDLEA comments for your attention, I kindly require assistance with the with regards to comments directed to your specialism, notably 18.3 and 18.5.

If I could kindly request your assistance to argue your point on these grassland comments.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Jamie Pote <jamiepote@live.co.za>
Sent: Friday, August 15, 2025 7:38 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Mulilo Amsterdam Final Layout - [12 AUG 225]

EXTERNAL MESSAGE

Hi Lucien, here are the reports with the revised layouts replaced where applicable (the last few maps in the reports).

There is an overlap with the Emvelo/Sheepmoor boundary that was provided where a central area fall within both sites. I have not had time to figure out what's going on there or to scrutinise the layout to check if there are any changes that affect the outcome of the assessment.

Terr Bio Assess Report - Mulilo Emvelo WEF (Jamie Pote) 20250815) Final.docx

Terr Bio Assess Report - Mulilo Sheepmoor WEF (Jamie Pote) 20250815_Final.docx

Terr Bio Assess Report - Mulilo Sheepmoor WEF (Jamie Pote) 20250815_Final.pdf

Terr Bio Assess Report - Mulilo Emvelo WEF (Jamie Pote) 20250815) Final.pdf

Regards
Jamie

Mr Jamie Pote
Biodiversity – Environmental – GIS

BSc (Hons) Pr. Sci. Nat (115233)
[redacted]

[redacted] Lucien Barbeau <Lucien.Barbeau@erm.com>
Sent: Wednesday, 06 August 2025 16:26
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Mulilo Amsterdam Final Layout - [12 AUG 225]

Dear Specialist,

I trust you are well.

Please find attached the final layout for the proposed Amsterdam WEF as received from the applicant. Kindly update your respective specialist reports to reflect this final layout, and to submit your revised reports by Monday, 12 August 2025.

If, for any reason, you anticipate that you will not be able to meet this deadline, please inform me as soon as possible so that we can explore alternative arrangements.

Thank you for your continued support and contributions to the project. Should you have any questions or require any additional information, please don't hesitate to reach out.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**



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TERRESTRIAL BIODIVERSITY: COMMENTS & RESPONSES: FINAL EIR (2025/08/20)

COMMENT	RESPONSE
EMVELO DARDLEA	
2. The proposed Emvelo Wind Energy Facility and associated grid infrastructure is located on a site comprising: CSA Irreplaceable and Optimal; Intact Grassland Patches; Key Biodiversity Areas; the Grasslands Important Bird Area (IBA); Ecological Support Areas; National Protected Area Expansion Strategy Areas (NPAES); Threatened Ecosystems - including Wakkerstroom Montane Grassland and Eastern Highveld Grassland; CSA: Aquatic Rivers; ESA: Strategic Water Source Area; ESA: Wetlands and ESA: Important Sub-catchments.	The terrestrial biodiversity assessment served to refine the mapping, which is the norm, where bioregional plans are often not up to date and/or reflect inconsistencies that require ground-truthing. This was presented in the terrestrial biodiversity assessment reporting accordingly, which is being ignored by the respective authorities. This was noted in the draft EIA comments but is still being overlooked.
5. DARDLEA is not supportive of development of WEFs (or any non-compatible land use) within Critical Biodiversity Areas and Key Biodiversity Areas, or within intact grassland patches. In respect of Intact Grassland Patches, it is important to note that the Mpumalanga Biodiversity Sector Plan (MBSP) specifically incorporated climate change into spatial priorities through the prioritisation of the connectivity of remaining intact grassland patches in the province, as they provide habitat for species to thrive, and allow for their dispersal. Intact grasslands are crucial for supporting threatened fauna and avifauna. This is verified in the fauna! assessment which states that "any remaining Oribi sub-populations and any contiguous areas of intact grassland are considered as high conservation importance" and that "cumulative impacts may become more significant if added to existing or future impacts from other activities, such as other renewable energy projects in the area". Intact Grassland Patches are important source areas in terms of metapopulation dynamics. The MBSP - adopted in 2023 (Provincial Notice 279 of 2023) - is a planning tool that has been developed to manage biodiversity resources of the province by setting strategic objectives to ensure that spatial biodiversity and climate change priorities are effectively incorporated into land-use and development planning, environmental assessments and authorisations, and natural resource management within Mpumalanga Province. The links to the various reports and shape files, including the MBSP Technical Report which details the scientific methods used to identify Intact Grassland Patches, can be accessed at https://mtpa. maps. ArcGIS. com/sharing/rest/content/items/fc6d8f9e 7 ef84d2f87f86b91 e8e9f87 *a/d*ata).	The terrestrial biodiversity assessment served to refine the mapping, which is the norm, where bioregional plans are often not up to date and/or reflect inconsistencies that require ground-truthing. This was presented in the terrestrial biodiversity assessment reporting accordingly, which is being ignored by the respective authorities. This was noted in the draft EIA comments but is still being overlooked as it does not align with the agenda that serves to promote the Mpumalanga Bioregional Plan rather than acknowledge that there are shortcomings. The proposed project is not seeking to develop the entire intact grassland patch, only a very small footprint. The resultant loss is thus not deemed to be excessive as the area that will remain undeveloped (i.e. intact grassland) far exceeds the actual hard stand footprint of the project. Were it a mining or agricultural project that would result in the clearance of thousands of hectares of grassland the impact would be more significant. The terrestrial biodiversity impact or risks to ecological processes associated with an access road and turbine footprint would not be deemed excessive within an already modified surrounding landscape (i.e. significant agricultural and mining related land transformation).
11. The number of turbines that are located in areas recommended for avoidance (at least 16 out of 22), and the location of the roads, construction camps and OHLs in sensitive areas demonstrates that the site is not compatible with the proposed land use. The areas of concern as they relate to the abovementioned comments, are outlined below:	Refer to separate table. The comments are not giving consideration to the ground truthed findings (for example where it is designated CBA as per MBSP, but in fact it's in the middle of a mielie field).

14. The Terrestrial Assessment (inclusive of Plant Species) did not apply the Site Ecological Importance (SEI) methodology, which is a requirement of the Species Environmental Assessment Guideline. The Species Protocols specifically stipulate that assessments "must be undertaken in accordance with the *Species Environmental Assessment Guideline"* (South African National Biodiversity Institute, 2020. Species Environmental Assessment Guideline. Guidelines for the implementation of the Terrestrial Fauna and Terrestrial Flora Species Protocols for environmental impact assessments in South Africa. South African National Biodiversity Institute, Pretoria). Non-compliance with the *Species Environmental Assessment Guideline* has resulted in the following deficiencies: 14.1. Insufficient time was allocated to surveying in the appropriate season (only 4 days for both Sheepmoor and Emvelo WEF sites, as well as the Grid sites). 14.2. The classification of the Montane Grassland on site as "moderate sensitivity" in the absence of applying all relevant criteria, including *inter alia,* conservation importance, functional integrity, receptor resilience, as well as species of conservation concern, spatial priorities, intact grassland patches, and CBAs. 14.1. The montane ridge (where WTGs 13, 19, 20, 22, 23 and 25, along with grid infrastructure are proposed), which also coincides with intact grassland and the highest sensitivity for Fauna (according to the Faunal Assessment), being classified as "moderate sensitivity". (Noting further that according to the Fauna Assessment, "the high sensitive escarpment area is likely of general importance for a range of faunal groups, representative of a large contiguous and ecologically intact area of mostly good-quality montane grassland". If the correct and required criteria are applied, the classification of this area is more likely to be classified as "High" or "Very High Sensitivity".	Incorrect deduction regarding number of days on site – refer to clear outline of dates provided under site visit in Terrestrial Biodiversity Assessment Report, which was more than 4 days across two seasonal visits. This was clarified in the draft comments and responses but is still being incorrectly stated in the MPTA comments as being 4 days only. The MPTA correctly states that 4 days is inadequate, <u>which is why 10 days were spent on site</u>. A preliminary overview site visit was conducted on 18 April 2023 (late autumn/early winter) for the purposes of a high-level reconnaissance of the site, followed by a further site visit between 19 & 22 June 2023 (winter) in order to undertake the preliminary screening, site sensitivity mapping and survey. A final comprehensive site visit and survey was undertaken between 09 & 13 December 2024, which constituted the summer seasonal site visit and assessment and also served to inform final layout design. This constitutes a sampling period of 10 days, which was deemed to be adequate for such an assessment. The blanket designation of an entire vegetation unit based on species that might be represented locally within that vegetation unit, would be incorrect. If the species represented were to inhabit the entire vegetation unit, then it is likely that they would not be considered to have an elevated conservation status, as they would be common.
15. As a result of the deficiencies in the Terrestrial Assessment outlined above, we have low confidence in the associated impact analysis, and dispute the Specialist's "low" significance ratings.	This project is a Wind Energy Facility, which includes access roads and small localised footprint. It is not an agricultural or mining project that would result in vast areas being transformed (i.e. thousands of hectares). The overall impact is thus low.
18. Biodiversity Offset Strategy: 18.1. According to the Biodiversity Offset Guideline, *"The desired outcome of biodiversity offsets is to ensure that - the cumulative impact of an authorised activity, or activities, and land and resource use change does not: result in the loss of irreplaceable biodiversity or jeopardise the ability to meet biodiversity targets; lead to any ecosystem with a threat status of Vulnerable or Least Concern becoming Endangered; or any Endangered ecosystem becoming Critically Endangered; or cause an irreversible decline in the conservation status of species and the presence of special habitats: or cause a significant loss in ecosystem services".* A biodiversity offset cannot therefore cater for the loss of Irreplaceable CBAs or intact	The layout has sought to avoid the most sensitive areas and prioritise lower sensitivity areas. In order for the project to be feasible some footprints may extend into higher sensitivity areas, but these can be specifically managed. The layout provided includes only road and turbine positions, not final design. The final design will include the actual footprint and it can be undertaken in such a manner that loss can be minimised (for example, where a turbine position (i.e. the point on the map) falls on the edge of or slightly within an elevated

grasslands. As detailed in the comments above, intact grasslands are crucial for supporting threatened fauna and avifauna. 18.2. The Biodiversity Offset Guideline specifically states that "biodiversity offsets are not appropriate when an activity, or activities, will have residual impacts on biodiversity of very high significance, including when residual negative impacts will result in loss of irreplaceable biodiversity". 18.3. In addition to Irreplaceable CBAs, the Biodiversity Offset Guideline also categorises the following as "irreplaceable biodiversity": Biodiversity of major potential concern, where residual impacts in this category could lead to - loss of vulnerable or potentially irreplaceable biodiversity in areas of recognised importance, such as - areas evaluated as having High Ecological Site Importance. We maintain that the correct and required implementation of the Species Environmental Assessment Guideline would have resulted in the Montane Grassland being classified as having High Ecological Site Importance. 18.4. The Intact Grassland Patches on the site must therefore be avoided, and cannot be offset. The requirement to consider biodiversity offsets is applicable only once it has been demonstrated that all measures of avoidance have been exhausted. The loss of irreplaceable biodiversity cannot be offset, and, as outlined above, "irreplaceable biodiversity" includes, key ecological corridors recognized as important for evolutionary processes and climate change adaptation where no options to safeguard these processes exist. 18.5. Furthermore, the Biodiversity Offset Report does not meet the following minimum requirements: i. A portfolio of candidate biodiversity offset sites, including the likelihood of each site's availability and feasibility. ii. The required biodiversity outcomes on each of the candidate biodiversity offset sites.	sensitivity area, the actual hard stand area can be aligned so that as much as possibly falls outside of the 'sensitive' area. Again, this project is a Wind Energy Facility, which includes access roads and small localised footprint. It is not an agricultural or mining project that would result in vast areas being transformed (i.e. thousands of hectares). The assumptions being made in the comments are assuming that there is going to be transformation of vast areas of grassland (such as would occur in a mining or agricultural context).
19. Cumulative Impact Assessment: 19.1. In our comments dated 10 April 2025 on your original draft EIA, despite bringing another 5 approved and in-process WEFs (within a 35 km radius) to your attention (i.e. Zephyr, Ujekamanzi Ntabande and Daggafoort and Emvelo), your revised cumulative impact assessment once again fails to mention or assess these. Subsequently, there are now an additional 3 WEFs within 35 km that are now in-process, i.e. Leghoya WEF 1, 2 & 3, and another one (1) within a 55 km radius (i.e. Anemoi WEF). 19.2. Furthermore, although section 4.3.3 states that "the scope of this assessment will include all operational, approved or current and planned renewable energy applications", in addition to the approved or in-process WEFs identified in 17 .1. above (not included in this assessment), there are actually an additional two (2) WEFs within 35 km and a further	Again, this project is a Wind Energy Facility, which includes access roads and small localised footprint. It is not an agricultural or mining project that would result in vast areas being transformed (i.e. thousands of hectares). The assumptions being made in the comments are assuming that there is going to be transformation of vast areas of grassland (such as would occur in a mining or agricultural context). The comment is again quoting the total project area rather than the actual WEF footprint of the projects included in the calculation. Only a small proportion of the grassland will be transformed (i.e. the

two (2) proposed WEFs (i.e. Pre-Application) within a 55 km radius, that have not been identified. The total number of turbines within 35 km is more than double that indicated in both the Draft EIA and Revised Draft EIA reports, i.e. 435 (and not 192) and within a 55 km radius there are more than 663 turbines (approved, in-process and proposed). As a minimum, the cumulative impact of approved and in-process applications must be assessed. 19.3. Avifauna 19.4. Fauna 19.5. DFFE also requires that "the cumulative impact assessment for all identified and assessed impacts must indicate the following: (a) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land". The Revised EIA Report does again not accurately quantify the size of the identified impacts, i.e. hectares of cumulatively transformed land. The overall footprint size of this, and all other similar proposed and approved renewable energy facilities within a 35 km radius is now 178 017.24 ha (Approved: 31 440.17 ha, In Progress: 89 247.96 ha, Pre-Application: 57 329.11 ha). Again, as a minimum, the cumulative impact of approved and in-process applications must be assessed. 19.6. Avifauna	actual road, WEF and other infrastructure footprint. The grassland that is retained will still function.
SHEEPMOOR DARDLEA	
3. The proposed Sheepmoor Wind Energy Facility and associated grid infrastructure is located on a site comprising: CBA Irreplaceable and Optimal; Intact Grassland Patches; Key Biodiversity Areas; the Grasslands Important Bird Area (IBA); Ecological Support Areas; National Protected Area Expansion Strategy Areas (NPAES); Local-scale and Landscape-scale Climate Change Corridors; Threatened Ecosystems - including Wakkerstroom Montane Grassland and Eastern Highveld Grassland; CBA: Wetlands; CBA: Aquatic Rivers; ESA: Strategic Water Source Area and ESA: Important Sub-catchments.	The terrestrial biodiversity assessment served to refine the mapping, which is the norm, where bioregional plans are often not up to date and/or reflect inconsistencies that require ground-truthing. This was presented in the terrestrial biodiversity assessment reporting accordingly, which is being ignored by the respective authorities. This was noted in the draft EIA comments but is still being overlooked.
6. DARDLEA is not supportive of development of WEFs (or any non-compatible land use) within Critical Biodiversity Areas and Key Biodiversity Areas, or within intact grassland patches. In respect of Intact Grassland Patches, it is important to note that the Mpumalanga Biodiversity Sector Plan (MBSP) specifically incorporated climate change into spatial priorities through the prioritisation of the connectivity of remaining intact grassland patches in the province, as they provide habitat for species to thrive, and allow for their dispersal. Intact grasslands are crucial for supporting threatened fauna and avifauna. This is verified in the fauna! assessment which states that "any remaining Oribi sub-populations and any contiguous areas of intact grassland are considered as high	The terrestrial biodiversity assessment served to refine the mapping, which is the norm, where bioregional plans are often not up to date and/or reflect inconsistencies that require ground-truthing. This was presented in the terrestrial biodiversity assessment reporting accordingly, which is being ignored by the respective authorities. This was noted in the draft EIA comments but is still being overlooked as it does not align with the agenda that serves to promote the Mpumalanga Bioregional Plan rather than acknowledge that there are shortcomings.

conservation importance" and that "cumulative impacts may become more significant if added to existing or future impacts from other activities, such as other renewable energy projects in the area". Intact Grassland Patches are important source areas in terms of metapopulation dynamics. The MBSP - adopted in 2023 (Provincial Notice 279 of 2023) - is a planning tool that has been developed to manage biodiversity resources of the province by setting strategic objectives to ensure that spatial biodiversity and climate change priorities are effectively incorporated into land-use and development planning, environmental assessments and authorisations, and natural resource management within Mpumalanga Province. The links to the various reports and shape files, including the MBSP Technical Report which details the scientific methods used to identify Intact Grassland Patches, can be accessed at https://mtpa. maps. ArcGIS. com/sharing/rest/content/items/fc6d8f9e 7 ef84d2f87f86b91 e8e9f87 *a/d*ata).	The proposed project is not seeking to develop the entire intact grassland patch, only a very small footprint. The resultant loss is thus not deemed to be excessive as the area that will remain undeveloped (i.e. intact grassland) far exceeds the actual hard stand footprint of the project. Were it a mining or agricultural project that would result in the clearance of thousands of hectares of grassland the impact would be more significant. The terrestrial biodiversity impact or risks to ecological processes associated with an access road and turbine footprint would not be deemed excessive within an already modified surrounding landscape (i.e. significant agricultural and mining related land transformation).
12. The number of turbines that are located in areas recommended for avoidance (at least 17 out of 25), and the location of the O&M building, roads and OH Ls in sensitive areas demonstrates that the site is not compatible with the proposed land use. The areas of concern as they relate to the abovementioned comments, are outlined below:	Refer to separate table. The comments are not giving consideration to the ground truthed findings (for example where it is designated CBA as per MBSP, but in fact it's in the middle of a mielie field).
14. The Terrestrial Assessment (inclusive of Plant Species), did not apply the Site Ecological Importance (SEI) methodology, which is a requirement of the Species Environmental Assessment Guideline. The Species Protocols specifically stipulate that assessments "must be undertaken in accordance with the *Species Environmental Assessment Guideline"* (South African National Biodiversity Institute, 2020. Species Environmental Assessment Guideline. Guidelines for the implementation of the Terrestrial Fauna and Terrestrial Flora Species Protocols for environmental impact assessments in South Africa. South African National Biodiversity Institute, Pretoria). Non-compliance with the *Species Environmental Assessment Guideline* has resulted in the following deficiencies: 14.1. Insufficient time was allocated to surveying in the appropriate season (only 4 days for both Sheepmoor and Emvelo WEF sites, as well as the Grid sites). 14.2. The classification of the Montane Grassland on site as "moderate sensitivity" in the absence of applying all relevant criteria, including *inter alia,* conservation importance, functional integrity, receptor resilience, as well as species of conservation concern, spatial priorities, intact grassland patches, and CBAs. 14.1. The montane ridge (where WTGs 26, 27, 28, 29, 30 and 33, along with grid infrastructure are proposed), which also coincides with intact grassland and the highest sensitivity for Fauna (according to the Fauna! Assessment), being classified as "moderate sensitivity". (Noting further that according to the Fauna Assessment, "the high sensitive escarpment area is likely of general importance for a range of fauna! groups,	Incorrect deduction regarding number of days on site – refer to clear outline of dates provided under site visit in Terrestrial Biodiversity Assessment Report, which was more than 4 days across two seasonal visits. This was clarified in the draft comments and responses but is still being incorrectly stated in the MPTA comments as being 4 days only. The MPTA correctly states that 4 days is inadequate, which is why 10 days were spent on site. A preliminary overview site visit was conducted on 18 April 2023 (late autumn/early winter) for the purposes of a high-level reconnaissance of the site, followed by a further site visit between 19 & 22 June 2023 (winter) in order to undertake the preliminary screening, site sensitivity mapping and survey. A final comprehensive site visit and survey was undertaken between 09 & 13 December 2024, which constituted the summer seasonal site visit and assessment and also served to inform final layout design. This constitutes a sampling period of 10 days, which was deemed to be adequate for such an assessment. The blanket designation of an entire vegetation unit based on species that might be represented locally within that vegetation unit, would be incorrect. If the species represented were to inhabit the entire

representative of a large contiguous and ecologically intact area of mostly good-quality montane grassland".	vegetation unit, then it is likely that they would not be considered to have an elevated conservation status, as they would be common.
15. As a result of the deficiencies in the Terrestrial Assessment outlined above, we have low confidence in the associated impact analysis, and dispute the Specialist's "low" significance ratings.	This project is a Wind Energy Facility, which includes access roads and small localised footprint. It is not an agricultural or mining project that would result in vast areas being transformed (i.e. thousands of hectares). The overall impact is thus low.
17. Cumulative Impact Assessment: 17.1. In our comments dated 10 April 2025 on your original draft EIA, despite bringing another 5 approved and in-process WEFs (within a 35 km radius) to your attention (i.e. Zephyr, Ujekamanzi Ntabande and Daggafoort and Emvelo), your revised cumulative impact assessment once again fails to mention or assess these. Subsequently, there are now an additional 3 WEFs within 35 km that are now in-process, i.e. Leghoya WEF 1, 2 & 3, and another one (1) within a 55 km radius (i.e. Anemoi WEF). 17.2. Furthermore, although section 4.3.3 states that "the scope of this assessment will include all operational, approved or current and planned renewable energy applications", in addition to the approved or in-process WEFs identified in 17 .1. above (not included in this assessment), there are actually an additional two (2) WEFs within 35 km and a further two (2) proposed WEFs (i.e. Pre-Application) within a 55 km radius, that have not been identified. The total number of turbines within 35 km is more than double that indicated in both the Draft EIA and Revised Draft EIA reports, i.e. 435 (and not 192) and within a 55 km radius there are more than 663 turbines (approved, in-process and proposed). As a minimum, the cumulative impact of approved and in-process applications must be assessed. 17.3. Avifauna 17.4. Fauna 17.5. DFFE also requires that "the cumulative impact assessment for all identified and assessed impacts must indicate the following: (a) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land". The Revised EIA Report does again not accurately quantify the size of the identified impacts, i.e. hectares of cumulatively transformed land. The overall footprint size of this, and all other similar proposed and approved renewable energy facilities within a 35 km radius is now 178 017.24 ha (Approved: 31 440.17 ha, In Progress: 89 247.96 ha, Pre-Application: 57 329.11 ha). Again, as a minimum, the cumulative impact of approved and in-process applications must be assessed. 17.6. Avifauna	Again, this project is a Wind Energy Facility, which includes access roads and small localised footprint. It is not an agricultural or mining project that would result in vast areas being transformed (i.e. thousands of hectares). The assumptions being made in the comments are assuming that there is going to be transformation of vast areas of grassland (such as would occur in a mining or agricultural context). The comment is again quoting the total project area rather than the actual WEF footprint of the projects included in the calculation. Only a small proportion of the grassland will be transformed (i.e. the actual road, WEF and other infrastructure footprint. The grassland that is retained will still function. The layout has sought to avoid the most sensitive areas and prioritise lower sensitivity areas. In order for the project to be feasible some footprints may extend into higher sensitivity areas, but these can be specifically managed. The layout provided includes only road and turbine positions, not final design. The final design will include the actual footprint and it can be undertaken in such a manner that loss can be minimised (for example, where a turbine position (i.e. the point on the map) falls on the edge of or slightly within an elevated sensitivity area, the actual hard stand area can be aligned so that as much as possibly falls outside of the 'sensitive' area. Again, this project is a Wind Energy Facility, which includes access roads and small localised footprint. It is not an agricultural or mining project that would result in vast areas being transformed (i.e. thousands of hectares). The assumptions being made in the comments are assuming that there is going to be transformation of vast areas of grassland (such as would occur in a mining or agricultural context).

19. Biodiversity Offset Strategy: According to the Biodiversity Offset Guideline, *"The desired outcome of biodiversity offsets is to ensure that - the cumulative impact of an authorised activity, or activities, and land and resource use change does not: result in the loss of irreplaceable biodiversity or jeopardise the ability to meet biodiversity targets; lead to any ecosystem with* a *threat status of Vulnerable or Least Concern becoming Endangered; or any Endangered ecosystem becoming Critically Endangered; or cause an irreversible decline in the conservation status of species and the presence of special habitats; or cause a significant loss in ecosystem services".* A biodiversity offset cannot therefore cater for the loss of Irreplaceable CBAs or intact grasslands. As detailed in the comments above, intact grasslands are crucial for supporting threatened fauna and avifauna. 19.2. The Biodiversity Offset Guideline specifically states that "biodiversity offsets are not appropriate when an activity, or activities, will have residual impacts on biodiversity of very high significance, including when residual negative impacts will result in loss of irreplaceable biodiversity". 19.3. In addition to Irreplaceable CBAs, the Biodiversity Offset Guideline also categorises the following as "irreplaceable biodiversity": Biodiversity of major potential concern, where residual impacts in this category could lead to - loss of vulnerable or potentially irreplaceable biodiversity in areas of recognised importance, such as - areas evaluated as having High Ecological Site Importance. We maintain that the correct and required implementation of the Species Environmental Assessment Guideline would have resulted in the Montane Grassland being classified as having High Ecological Site Importance. 19.4. The Intact Grassland Patches on the site must therefore be avoided, and cannot be offset. The requirement to consider biodiversity offsets is applicable only once it has been demonstrated that all measures of avoidance have been exhausted. The loss of irreplaceable biodiversity cannot be offset, and, as outlined above, "irreplaceable biodiversity" includes, key ecological corridors recognized as important for evolutionary processes and climate change adaptation where no options to safeguard these processes exist. 19.5. Furthermore, the Biodiversity Offset Report does not meet the following minimum requirements: i. A portfolio of candidate biodiversity offset sites, including the likelihood of each site's availability and feasibility. ii. The required biodiversity outcomes on each of the candidate biodiversity offset sites.	The layout has sought to avoid the most sensitive areas and prioritise lower sensitivity areas. In order for the project to be feasible some footprints may extend into higher sensitivity areas, but these can be specifically managed. The layout provided includes only road and turbine positions, not final design. The final design will include the actual footprint and it can be undertaken in such a manner that loss can be minimised (for example, where a turbine position (i.e. the point on the map) falls on the edge of or slightly within an elevated sensitivity area, the actual hard stand area can be aligned so that as much as possibly falls outside of the 'sensitive' area. Again, this project is a Wind Energy Facility, which includes access roads and small localised footprint. It is not an agricultural or mining project that would result in vast areas being transformed (i.e. thousands of hectares). The assumptions being made in the comments are assuming that there is going to be transformation of vast areas of grassland (such as would occur in a mining or agricultural context).
EMVELO MTPA	

2.1. Sensitive Habitats *Intact Grassland Patches* Intact grassland patches allow species to thrive and to support species that may need to move in response to climate change, enabling the normal functioning of natural ecological processes such as fire regimes or pollination. These patches are typically larger than 100 ha, with little or no gaps and minimal edge effects, and occur in close proximity to other intact grassland patches. They function as "source areas" in metapopulation dynamics where birth rates exceed death rates. No significant impacts should be allowed that would change a source area into a sink area (where death rates exceed birth rates). Mpumalanga has only 1,039 intact grassland patches, covering 15% of the province. These areas have been prioritised for their connectivity importance and must be avoided by wind energy facilities. The intact patches on Emvelo are critical for maintaining connectivity with other grasslands. Despite MTPA raising concerns, specialist reports were largely silent on their importance. Using over 80,000 bird observations, the MTPA confirmed that intact grasslands have a 22% higher likelihood of hosting birds of conservation concern, 49% more birds of conservation concern, and 98% more individual bird observations than non-intact grasslands. These patches make up 23% of the Emvelo WEF footprint, and six turbines (13, 19, 20, 22, 23, and 25) are located within them. These turbines should be removed. The MTPA feels strongly that the establishment of wind farms in intact grassland patches should not be allowed as it may turn a "source" area into a "sink" area. Even Pages 3 and 4 of the Faunal assessment within the DEIA recognises that "*Faunal integrity relies on inter-connected grassland habitats across landscapes*." and "…*any contiguous areas of intact grassland are considered as high conservation importance*." *Climate Change Corridors* The MBSP's climate change corridor network was designed to enable species and ecosystems to adapt to a changing environment. The corridor network considered a single-best (least-cost) corridor connecting up the climate change refugia with the climate change corridors from adjacent provinces. Additional fine-scale corridors were then identified using Circuitscape, finding alternative pathways and identifying pinch points in the corridors and thereby building resilience into the corridor network. As can be seen from Figure 2, climate change corridor runs predominantly north-south through the project area, linking the climate change focal areas (as well as coincidentally the Grassland IBA with the Chrissies Pans IBA). Given that large birds do not fly in narrow, predictable lines, a flight corridor would need to be functionally broader than the MTPA provided fine-scale corridor. A broader macro-scaled corridor would be required for	The terrestrial biodiversity assessment served to refine the mapping, which is the norm, where bioregional plans are often not up to date and/or reflect inconsistencies that require ground-truthing. This was presented in the terrestrial biodiversity assessment reporting accordingly, which is being ignored by the respective authorities. This was noted in the draft EIA comments but is still being overlooked as it does not align with the agenda that serves to promote the Mpumalanga Bioregional Plan rather than acknowledge that there are shortcomings. The proposed project is not seeking to develop the entire intact grassland patch, only a very small footprint. The resultant loss is thus not deemed to be excessive as the area that will remain undeveloped (i.e. intact grassland) far exceeds the actual hard stand footprint of the project. Were it a mining or agricultural project that would result in the clearance of thousands of hectares of grassland the impact would be more significant. The terrestrial biodiversity impact or risks to ecological processes associated with an access road and turbine footprint would not be deemed excessive within an already modified surrounding landscape (i.e. significant agricultural and mining related land transformation).

avifauna to ensure safe passage along the corridors. Maintaining this linkage is essential for long-term ecological resilience under climate change. The following turbines are within 500m of the climate change corridors and should be removed: 1, 4, 5, 7, and 25, as they would compromise this corridor. The risk from the proposed wind farm on the corridor network is that the wind farm is unfortunately located along an important north-south macro regional flyway/corridor (also supported by vulture tracking data, Figure 9) which will result in increased collisions and electrocution, and habitat displacement. It stands to disrupt movement along the corridor and result in increased mortalities. *National Protected Area Expansion Strategy (NPAES 2018)* Over 70% of the proposed WEF falls within NPAES spatial priority areas, with 25% of turbines directly on focal areas. These sites are nationally significant for conservation expansion. Currently, seven turbines (13, 14, 19, 20, 22, 23, and 25) are located in NPAES zones and should be removed.	
2.3 Specialist Assessments – other The MTPA has significant reservations regarding the Terrestrial Assessment. Key concerns include: • The terrestrial biodiversity theme is still not aligned with SANBI's Species Environmental Assessment Guideline (2022) that the consultant is required to comply with in terms of Notice 1150 of Government Gazette 43855 of 2020. • The author only allowed for 4 days to survey both the Sheepmoor and Emvelo WEF sites during the summer months, when most summer rainfall plants would be flowering and identifiable. Four days is certainly not enough to cover an area this size (12,543 ha for both WEFs). This report is the same report as submitted with previous DEIA. • No plant species of conservation concern, or endemics, were recorded on site. This is not surprising given the lack of time to survey this large area. ERM also opted to appoint a botanist not familiar with the flora of this area. There are several endemics restricted to this area that would be unfamiliar to someone not from the area. It just makes it harder to confirm identification, particularly with limited time and coverage in the field. The MTPA is confident that several species of conservation concern would occur on site; they were just not detected. • The failure to apply the SANBI Guidelines resulted in inadequate time being allowed to properly assess the terrestrial biodiversity (botany) and the determining of site ecological importance (SEI). The consultant did not follow the SEI methodology, as required in terms of the SANBI guidelines and the MTPA does not believe that the	The terrestrial biodiversity assessment served to refine the mapping, which is the norm, where bioregional plans are often not up to date and/or reflect inconsistencies that require ground-truthing. This was presented in the terrestrial biodiversity assessment reporting accordingly, which is being ignored by the respective authorities. This was noted in the draft EIA comments but is still being overlooked as it does not align with the agenda that serves to promote the Mpumalanga Bioregional Plan rather than acknowledge that there are shortcomings. The proposed project is not seeking to develop the entire intact grassland patch, only a very small footprint. The resultant loss is thus not deemed to be excessive as the area that will remain undeveloped (i.e. intact grassland) far exceeds the actual hard stand footprint of the project. Were it a mining or agricultural project that would result in the clearance of thousands of hectares of grassland the impact would be more significant. The terrestrial biodiversity impact or risks to ecological processes associated with an access road and turbine footprint would not be deemed excessive within an already modified surrounding landscape (i.e. significant agricultural and mining related land transformation).

approach followed to identify sensitive areas would be able to adequately assess the environmental sensitivity for this area. There were a number of additional variables that could have been applied (site-specific species, CBAs and ESAs, climate change corridors, intact grasslands, rocky ridges, etc.), patch size, together with criteria and approach of that are required in the SANBI Species Environmental Assessment Guidelines. • The approach followed resulted in some CBA Irreplaceable areas, that overlapped with intact grasslands and provincial climate change corridors, being designated medium sensitivity (as a maximum value because it did not ultimately fall within the Eastern Highveld Grassland). This is fundamentally wrong as there was no consideration for any species of conservation concern (like roosting areas) or other spatial priorities like CBAs to meet biodiversity targets. Applying the SANBI criteria could allow the montane grassland to be categorised as *high*, or even *very high* if species and additional data were considered. • In terms of the terrestrial biodiversity assessment, the result is that the montane grassland (not degraded) is of *medium* sensitivity, but the degraded Highveld grassland has *high* sensitivity, and non-degraded a *very-high* sensitivity. This does not make sense. We have significantly more threatened plant species recorded in the Wakkerstroom Montane Grassland than for the Eastern Highveld Grassland and consider far more sensitive. • Ultimately, the MTPA does not agree with the vegetation sensitivity analysis that then fed into other planning processes, such as the offsets, as it did not apply SANBI's Species Environmental Assessment Guideline (2022).	
3. Summary of Turbine Locations requiring reconsideration Should DFFE proceed towards authorisation, we strongly recommend the exclusion of the turbines identified in below.	Refer to separate table. The comments are not giving consideration to the ground truthed findings (for example where it is designated CBA as per MBSP, but in fact it's in the middle of a mielie field).
SHEEPMOOR MTPA	
2.1. Sensitive Habitats *Intact Grassland Patches* Intact grassland patches allow species to thrive and to support species that may need to move in response to climate change, enabling the normal functioning of natural ecological processes such as fire regimes or pollination. These patches are typically larger than 100 ha, with little or no gaps and minimal edge effects, and occur in close proximity to other intact grassland patches. They function as "source areas" in metapopulation dynamics where birth rates exceed death rates. No significant impacts should be allowed that would change a source area into a sink area (where death rates exceed birth rates). Mpumalanga	The terrestrial biodiversity assessment served to refine the mapping, which is the norm, where bioregional plans are often not up to date and/or reflect inconsistencies that require ground-truthing. This was presented in the terrestrial biodiversity assessment reporting accordingly, which is being ignored by the respective authorities. This was noted in the draft EIA comments but is still being overlooked as it does not align with the agenda that serves to promote the Mpumalanga Bioregional Plan rather than acknowledge that there are shortcomings.

has only 1,039 intact grassland patches, covering 15% of the province. These areas have been prioritised for their connectivity importance and must be avoided by wind energy facilities. The intact patches on Sheepmoor are critical for maintaining connectivity with other grasslands. Despite MTPA raising concerns, specialist reports were largely silent on their importance. Using over 80,000 bird observations, the MTPA confirmed that intact grasslands have a 22% higher likelihood of hosting birds of conservation concern, 49% more birds of conservation concern, and 98% more individual bird observations than non-intact grasslands. These patches make up 23% of the Sheepmoor WEF footprint, and eight turbines (26, 27, 28, 29, 31, 32, 33, and 43) are located within them. These turbines should be removed. See Figure 1. Therefore, the MTPA feels stronger than ever that the establishment of wind farms in intact grassland patches should not be allowed as it may turn a "source" area into a "sink" area. Even Page 3 and 4 of the Faunal assessment within the DEIA recognises that "Faunal integrity relies on inter-connected grassland habitats across landscapes." and "…any contiguous areas of intact grassland are considered as high conservation importance.". *Climate Change Corridors* The MBSP's climate change corridor network was designed to enable species and ecosystems to adapt to a changing environment. The corridor network considered a single-best (least-cost) corridor connecting up the climate change refugia with the climate change corridors from adjacent provinces. Additional fine-scale corridors were then identified using Circuitscape, finding alternative pathways and identifying pinch points in the corridors and thereby building resilience into the corridor network. As can be seen from Figure 2, climate change corridor runs predominantly north-south through the project area, linking the climate change focal areas (as well as coincidentally the Grassland IBA with the Chrissies Pans IBA). Given that large birds do not fly in narrow, predictable lines, a flight corridor would need to be functionally broader than the MTPA provided fine-scale corridor. A broader macro-scaled corridor would be required for avifauna to ensure safe passage along the corridors. Maintaining this linkage is essential for long-term ecological resilience under climate change. The following turbines are within 500m of the climate change corridors and should be removed: 29, 31, 32, 33, 34, 36, 40, 42, 43, 44, 45, 46, 51, 52, and 53, as they would compromise this corridor. The risk from the proposed wind farm on the corridor network is that the wind farm is unfortunately located along an important north-south macro regional flyway/corridor (also supported by vulture tracking data, Figure 9) which will result in increased collisions and electrocution, and habitat displacement. It stands to disrupt movement along the corridor	The proposed project is not seeking to develop the entire intact grassland patch, only a very small footprint. The resultant loss is thus not deemed to be excessive as the area that will remain undeveloped (i.e. intact grassland) far exceeds the actual hard stand footprint of the project. Were it a mining or agricultural project that would result in the clearance of thousands of hectares of grassland the impact would be more significant. The terrestrial biodiversity impact or risks to ecological processes associated with an access road and turbine footprint would not be deemed excessive within an already modified surrounding landscape (i.e. significant agricultural and mining related land transformation).

and result in increased mortalities. *National Protected Area Expansion Strategy (NPAES 2018)* Over 60% of the proposed WEF falls within NPAES spatial priority areas, with 25% of turbines directly on focal areas. These sites are nationally significant for conservation expansion. Currently, 11 turbines (26, 27, 28, 29, 31, 33, 43, 44, 45, 52 and 53) are located in NPAES zones and should be removed.	
2.4 Specialist Assessments – other The MTPA has significant reservations regarding the Terrestrial Assessment. Key concerns include: • The terrestrial biodiversity theme is still not aligned with SANBI's Species Environmental Assessment Guideline (2022) that the consultant is required to comply with in terms of Notice 1150 of Government Gazette 43855 of 2020. • The author only allowed for 4 days to survey both the Sheepmoor and Emvelo WEF sites during the summer months, when most summer rainfall plants would be flowering and identifiable. Four days is certainly not enough to cover an area this size (12,543 ha for both WEFs). This report is the same report as submitted with previous DEIA. • No plant species of conservation concern, or endemics, were recorded on site. This is not surprising given the lack of time to survey this large area. ERM also opted to appoint a botanist not familiar with the flora of this area. There are several endemics restricted to this area that would be unfamiliar to someone not from the area. It just makes it harder to confirm identification, particularly with limited time and coverage in the field. The MTPA is confident that several species of conservation concern would occur on site; they were just not detected. • The failure to apply the SANBI Guidelines resulted in inadequate time being allowed to properly assess the terrestrial biodiversity (botany) and the determining of site ecological importance (SEI). The consultant did not follow the SEI methodology, as required in terms of the SANBI guidelines and the MTPA does not believe that the approach followed to identify sensitive areas would be able to adequately assess the environmental sensitivity for this area. There were a number of additional variables that could have been applied (site-specific species, CBAs and ESAs, climate change corridors, intact grasslands, rocky ridges, etc.), patch size, together with criteria and approach of that are required in the SANBI Species Environmental Assessment Guidelines. • The approach followed resulted in some CBA Irreplaceable areas, that overlapped with intact grasslands and provincial climate change corridors, being designated medium	The terrestrial biodiversity assessment served to refine the mapping, which is the norm, where bioregional plans are often not up to date and/or reflect inconsistencies that require ground-truthing. This was presented in the terrestrial biodiversity assessment reporting accordingly, which is being ignored by the respective authorities. This was noted in the draft EIA comments but is still being overlooked as it does not align with the agenda that serves to promote the Mpumalanga Bioregional Plan rather than acknowledge that there are shortcomings. The proposed project is not seeking to develop the entire intact grassland patch, only a very small footprint. The resultant loss is thus not deemed to be excessive as the area that will remain undeveloped (i.e. intact grassland) far exceeds the actual hard stand footprint of the project. Were it a mining or agricultural project that would result in the clearance of thousands of hectares of grassland the impact would be more significant. The terrestrial biodiversity impact or risks to ecological processes associated with an access road and turbine footprint would not be deemed excessive within an already modified surrounding landscape (i.e. significant agricultural and mining related land transformation).

sensitivity (as a maximum value because it did not ultimately fall within the Eastern Highveld Grassland). This is fundamentally wrong as there was no consideration for any species of conservation concern (like roosting areas) or other spatial priorities like CBAs to meet biodiversity targets. Applying the SANBI criteria could allow the montane grassland to be categorised as *high*, or even *very high* if species and additional data were considered. • In terms of the terrestrial biodiversity assessment, the result is that the montane grassland (not degraded) is of *medium* sensitivity, but the degraded Highveld grassland has *high* sensitivity, and non-degraded a *very-high* sensitivity. This does not make sense. We have significantly more threatened plant species recorded in the Wakkerstroom Montane Grassland than for the Eastern Highveld Grassland and consider far more sensitive. • Ultimately, the MTPA does not agree with the vegetation sensitivity analysis that then fed into other planning processes, such as the offsets, as it did not apply SANBI's Species Environmental Assessment Guideline (2022).	
3. Summary of Turbine Locations requiring reconsideration Should DFFE proceed towards authorisation, we strongly recommend the exclusion of the turbines identified in below.	Refer to separate table. The comments are not giving consideration to the ground truthed findings (for example where it is designated CBA as per MBSP, but in fact it's in the middle of a mielie field).

WTG POSITION COMMENTS

Emvelo	
WTG in question	Area ground truthed to be.
WTG 3	Cleared Invaded: Low sensitivity, moderately modified. WTG within mielie field, ion edge of remnant grassland pocket. Final design can avoid the more sensitive area.
WTG 5	Transformed: Low sensitivity. WTG within mielie field, on edge of remnant grassland pocket. Final design can avoid the more sensitive area.
WTG 7	Transformed: Low sensitivity. WTG within mielie field, on edge of remnant grassland pocket. Final design can avoid the more sensitive area.
WTG 11	Plantation/invaded: Low sensitivity. This is a densely invaded area, transformed or significantly degraded (i.e. natural ecological processes are significantly altered, including the soil (due to impact of dense invasion plus historical hot fires). Final design can avoid the more sensitive areas.
WTG 13	Other Natural Area: Montane Grassland, Moderate sensitivity.
WTG 14	CBA Optimal: Montane Grassland, Moderate sensitivity. WTG on edge of densely invaded area, transformed or significantly degraded (i.e. natural ecological processes are significantly altered, including the soil (due to impact of dense invasion plus historical hot fires). Final design can avoid the more sensitive areas.

WTG 15	Transformed: Low sensitivity. WTG on edge of cultivated area, on edge of remnant grassland pocket. Final design can avoid the more sensitive area.
WTG 18	Plantation/invaded: Low sensitivity, heavily modified. WTG on edge of densely invaded area, transformed or significantly degraded (i.e. natural ecological processes are significantly altered, including the soil (due to impact of dense invasion plus historical hot fires). . Final design can avoid the more sensitive areas.
WTG 19	Other Natural Area: Montane Grassland, Moderate sensitivity. The site is designated OTHER NATURAL AREA AS PER MBSP.
WTG 20	Other Natural Area: Montane Grassland, Moderate sensitivity. The site is designated OTHER NATURAL AREA AS PER MBSP.
WTG 21	Plantation/invaded: Low sensitivity, heavily modified. WTG on edge of densely invaded area, transformed or significantly degraded (i.e. natural ecological processes are significantly altered, including the soil (due to impact of dense invasion plus historical hot fires). . Final design can avoid the more sensitive areas.
WTG 22	Other Natural Area: Montane Grassland, Moderate sensitivity. The site is designated OTHER NATURAL AREA AS PER MBSP. Loss associated with a small footprint will not significantly affect ecological processes or connectivity within the broader landscape.
WTG 23	Other Natural Area: Montane Grassland, Moderate sensitivity. The site is designated OTHER NATURAL AREA AS PER MBSP. Loss associated with a small footprint will not significantly affect ecological processes or connectivity within the broader landscape.
WTG 25	Other Natural Area: Montane Grassland, Moderate sensitivity. The site is designated OTHER NATURAL AREA AS PER MBSP. Loss associated with a small footprint will not significantly affect ecological processes or connectivity within the broader landscape.
Sheepmoor	
WTG in question	Area ground truthed to be.
WTG 26	Other Natural Area, Moderate sensitivity: Montane Grassland. The site is designated OTHER NATURAL AREA AS PER MBSP. Loss associated with a small footprint will not significantly affect ecological processes or connectivity within the broader landscape.
WTG 27	Other Natural Area, Moderate sensitivity: Montane Grassland. The site is designated OTHER NATURAL AREA AS PER MBSP. Loss associated with a small footprint will not significantly affect ecological processes or connectivity within the broader landscape.
WTG 28	Other Natural Area, Moderate sensitivity: Montane Grassland. The site is designated OTHER NATURAL AREA AS PER MBSP. Loss associated with a small footprint will not significantly affect ecological processes or connectivity within the broader landscape.
WTG 29	Other Natural Area, Moderate sensitivity: Montane Grassland. The site is designated OTHER NATURAL AREA AS PER MBSP. Loss associated with a small footprint will not significantly affect ecological processes or connectivity within the broader landscape.
WTG 30	Heavily modified, low sensitivity: Cleared Invaded. WTG within transformed area. Final design can avoid any more sensitive areas in surrounds.
WTG 31	Ecological Support Area, Moderate sensitivity: Montane Grassland. Loss associated with a small footprint will not significantly affect ecological processes or connectivity within the broader landscape.
WTG 32	Other Natural Areas, low sensitivity: Plantation/Invaded. WTG within transformed area. Final design can avoid any more sensitive areas in surrounds.
WTG 33	Ecological Support Area, Moderate sensitivity: Montane Grassland. The site is designated ECOLOGICAL SUPPORT AREA AS PER MBSP. Loss associated with a small footprint will not significantly affect ecological processes or connectivity within the broader landscape.
WTG 36	Plantation/Invaded: Low sensitivity. WTG within transformed area. Final design can avoid any more sensitive areas in surrounds.

WTG 37	Plantation/Invaded: Low sensitivity, heavily modified. WTG within transformed area. Final design can avoid any more sensitive areas in surrounds.
WTG 38	Other Natural Area: Highveld Grassland. The site is designated OTHER NATURAL AREA AS PER MBSP. Loss associated with a small footprint will not significantly affect ecological processes or connectivity within the broader landscape.
WTG 43	Ecological Support Area: Montane Grassland, Moderate sensitivity. The site is designated ECOLOGICAL SUPPORT AREA AS PER MBSP. Loss associated with a small footprint will not significantly affect ecological processes or connectivity within the broader landscape.
WTG 44	Ecological Support Area: Montane Grassland, Moderate sensitivity, along a road. The site is designated ECOLOGICAL SUPPORT AREA AS PER MBSP. Loss associated with a small footprint will not significantly affect ecological processes or connectivity within the broader landscape.
WTG 45	Transformed: Low sensitivity. WTG within transformed area. Final design can avoid any more sensitive areas in surrounds.
WTG 46	Heavily modified: Highveld Grassland. WTG position is on the edge of intact vegetation and transformed area. WEF laydown footprint can thus be aligned to minimise this substantially.
WTG 52	Ecological Support Area: Montane Grassland, Moderate sensitivity. The site is designated ECOLOGICAL SUPPORT AREA AS PER MBSP. Loss associated with a small footprint will not significantly affect ecological processes or connectivity within the broader landscape.
WTG 53	Heavily modified: Highveld Grassland. WTG position is on the edge of intact vegetation and transformed area. WEF laydown footprint can thus be aligned to minimise this substantially.

TERRESTRIAL BIODIVERSITY: COMMENTS & RESPONSES: FINAL EIR (2025/08/20)

COMMENT	RESPONSE
EMVELO DARDLEA	
2. The proposed Emvelo Wind Energy Facility and associated grid infrastructure is located on a site comprising: CSA Irreplaceable and Optimal; Intact Grassland Patches; Key Biodiversity Areas; the Grasslands Important Bird Area (IBA); Ecological Support Areas; National Protected Area Expansion Strategy Areas (NPAES); Threatened Ecosystems - including Wakkerstroom Montane Grassland and Eastern Highveld Grassland; CSA: Aquatic Rivers; ESA: Strategic Water Source Area; ESA: Wetlands and ESA: Important Sub-catchments.	The terrestrial biodiversity assessment served to refine the mapping, which is the norm, where bioregional plans are often not up to date and/or reflect inconsistencies that require ground-truthing. This was presented in the terrestrial biodiversity assessment reporting accordingly, which is being ignored by the respective authorities. This was noted in the draft EIA comments but is still being overlooked.
5. DARDLEA is not supportive of development of WEFs (or any non-compatible land use) within Critical Biodiversity Areas and Key Biodiversity Areas, or within intact grassland patches. In respect of Intact Grassland Patches, it is important to note that the Mpumalanga Biodiversity Sector Plan (MBSP) specifically incorporated climate change into spatial priorities through the prioritisation of the connectivity of remaining intact grassland patches in the province, as they provide habitat for species to thrive, and allow for their dispersal. Intact grasslands are crucial for supporting threatened fauna and avifauna. This is verified in the fauna! assessment which states that "any remaining Oribi sub-populations and any contiguous areas of intact grassland are considered as high conservation importance" and that "cumulative impacts may become more significant if added to existing or future impacts from other activities, such as other renewable energy projects in the area". Intact Grassland Patches are important source areas in terms of metapopulation dynamics. The MBSP - adopted in 2023 (Provincial Notice 279 of 2023) - is a planning tool that has been developed to manage biodiversity resources of the province by setting strategic objectives to ensure that spatial biodiversity and climate change priorities are effectively incorporated into land-use and development planning, environmental assessments and authorisations, and natural resource management within Mpumalanga Province. The links to the various reports and shape files, including the MBSP Technical Report which details the scientific methods used to identify Intact Grassland Patches, can be accessed at https://mtpa. maps. ArcGIS. com/sharing/rest/content/items/fc6d8f9e 7 ef84d2f87f86b91 e8e9f87 *a*/data).	The terrestrial biodiversity assessment served to refine the mapping, which is the norm, where bioregional plans are often not up to date and/or reflect inconsistencies that require ground-truthing. This was presented in the terrestrial biodiversity assessment reporting accordingly, which is being ignored by the respective authorities. This was noted in the draft EIA comments but is still being overlooked as it does not align with the agenda that serves to promote the Mpumalanga Bioregional Plan rather than acknowledge that there are shortcomings. The proposed project is not seeking to develop the entire intact grassland patch, only a very small footprint. The resultant loss is thus not deemed to be excessive as the area that will remain undeveloped (i.e. intact grassland) far exceeds the actual hard stand footprint of the project. Were it a mining or agricultural project that would result in the clearance of thousands of hectares of grassland the impact would be more significant. The terrestrial biodiversity impact or risks to ecological processes associated with an access road and turbine footprint would not be deemed excessive within an already modified surrounding landscape (i.e. significant agricultural and mining related land transformation).
11. The number of turbines that are located in areas recommended for avoidance (at least 16 out of 22), and the location of the roads, construction camps and OHLs in sensitive areas demonstrates that the site is not compatible with the proposed land use. The areas of concern as they relate to the abovementioned comments, are outlined below:	Refer to separate table. The comments are not giving consideration to the ground truthed findings (for example where it is designated CBA as per MBSP, but in fact it's in the middle of a mielie field).

14. The Terrestrial Assessment (inclusive of Plant Species) did not apply the Site Ecological Importance (SEI) methodology, which is a requirement of the Species Environmental Assessment Guideline. The Species Protocols specifically stipulate that assessments "must be undertaken in accordance with the *Species Environmental Assessment Guideline*" (South African National Biodiversity Institute, 2020. Species Environmental Assessment Guideline. Guidelines for the implementation of the Terrestrial Fauna and Terrestrial Flora Species Protocols for environmental impact assessments in South Africa. South African National Biodiversity Institute, Pretoria). Non-compliance with the *Species Environmental Assessment Guideline* has resulted in the following deficiencies: 14.1. Insufficient time was allocated to surveying in the appropriate season (only 4 days for both Sheepmoor and Emvelo WEF sites, as well as the Grid sites). 14.2. The classification of the Montane Grassland on site as "moderate sensitivity" in the absence of applying all relevant criteria, including *inter alia,* conservation importance, functional integrity, receptor resilience, as well as species of conservation concern, spatial priorities, intact grassland patches, and CBAs. 14.1. The montane ridge (where WTGs 13, 19, 20, 22, 23 and 25, along with grid infrastructure are proposed), which also coincides with intact grassland and the highest sensitivity for Fauna (according to the Faunal Assessment), being classified as "moderate sensitivity". (Noting further that according to the Fauna Assessment, "the high sensitive escarpment area is likely of general importance for a range of faunal groups, representative of a large contiguous and ecologically intact area of mostly good-quality montane grassland". If the correct and required criteria are applied, the classification of this area is more likely to be classified as "High" or "Very High Sensitivity".	Incorrect deduction regarding number of days on site – refer to clear outline of dates provided under site visit in Terrestrial Biodiversity Assessment Report, which was more than 4 days across two seasonal visits. This was clarified in the draft comments and responses but is still being incorrectly stated in the MPTA comments as being 4 days only. The MPTA correctly states that 4 days is inadequate, <u>which is why 10 days were spent on site</u>. A preliminary overview site visit was conducted on 18 April 2023 (late autumn/early winter) for the purposes of a high-level reconnaissance of the site, followed by a further site visit between 19 & 22 June 2023 (winter) in order to undertake the preliminary screening, site sensitivity mapping and survey. A final comprehensive site visit and survey was undertaken between 09 & 13 December 2024, which constituted the summer seasonal site visit and assessment and also served to inform final layout design. This constitutes a sampling period of 10 days, which was deemed to be adequate for such an assessment. The blanket designation of an entire vegetation unit based on species that might be represented locally within that vegetation unit, would be incorrect. If the species represented were to inhabit the entire vegetation unit, then it is likely that they would not be considered to have an elevated conservation status, as they would be common.
15. As a result of the deficiencies in the Terrestrial Assessment outlined above, we have low confidence in the associated impact analysis, and dispute the Specialist's "low" significance ratings.	This project is a Wind Energy Facility, which includes access roads and small localised footprint. It is not an agricultural or mining project that would result in vast areas being transformed (i.e. thousands of hectares). The overall impact is thus low.
18. Biodiversity Offset Strategy: 18.1. According to the Biodiversity Offset Guideline, *"The desired outcome of biodiversity offsets is to ensure that - the cumulative impact of an authorised activity, or activities, and land and resource use change does not: result in the loss of irreplaceable biodiversity or jeopardise the ability to meet biodiversity targets; lead to any ecosystem with a threat status of Vulnerable or Least Concern becoming Endangered; or any Endangered ecosystem becoming Critically Endangered; or cause an irreversible decline in the conservation status of species and the presence of special habitats: or cause a significant loss in ecosystem services".* A biodiversity offset cannot therefore cater for the loss of Irreplaceable CBAs or intact	The layout has sought to avoid the most sensitive areas and prioritise lower sensitivity areas. In order for the project to be feasible some footprints may extend into higher sensitivity areas, but these can be specifically managed. The layout provided includes only road and turbine positions, not final design. The final design will include the actual footprint and it can be undertekn in such a manner that loss can be minimised (for example, where a turbine position (i.e. the point on the map) falls on the edge of or slightly within an elevated

grasslands. As detailed in the comments above, intact grasslands are crucial for supporting threatened fauna and avifauna. 18.2. The Biodiversity Offset Guideline specifically states that "biodiversity offsets are not appropriate when an activity, or activities, will have residual impacts on biodiversity of very high significance, including when residual negative impacts will result in loss of irreplaceable biodiversity". 18.3. In addition to Irreplaceable CBAs, the Biodiversity Offset Guideline also categorises the following as "irreplaceable biodiversity": Biodiversity of major potential concern, where residual impacts in this category could lead to - loss of vulnerable or potentially irreplaceable biodiversity in areas of recognised importance, such as - areas evaluated as having High Ecological Site Importance. We maintain that the correct and required implementation of the Species Environmental Assessment Guideline would have resulted in the Montane Grassland being classified as having High Ecological Site Importance. 18.4. The Intact Grassland Patches on the site must therefore be avoided, and cannot be offset. The requirement to consider biodiversity offsets is applicable only once it has been demonstrated that all measures of avoidance have been exhausted. The loss of irreplaceable biodiversity cannot be offset, and, as outlined above, "irreplaceable biodiversity" includes, key ecological corridors recognized as important for evolutionary processes and climate change adaptation where no options to safeguard these processes exist. 18.5. Furthermore, the Biodiversity Offset Report does not meet the following minimum requirements: i. A portfolio of candidate biodiversity offset sites, including the likelihood of each site's availability and feasibility. ii. The required biodiversity outcomes on each of the candidate biodiversity offset sites.	sensitivity area, the actual hard stand area can be aligned so that as much as possibly falls outside of the 'sensitive' area. Again, this project is a Wind Energy Facility, which includes access roads and small localised footprint. It is not an agricultural or mining project that would result in vast areas being transformed (i.e. thousands of hectares). The assumptions being made in the comments are assuming that there is going to be transformation of vast areas of grassland (such as would occur in a mining or agricultural context).
19. Cumulative Impact Assessment: 19.1. In our comments dated 10 April 2025 on your original draft EIA, despite bringing another 5 approved and in-process WEFs (within a 35 km radius) to your attention (i.e. Zephyr, Ujekamanzi Ntabande and Daggafoort and Emvelo), your revised cumulative impact assessment once again fails to mention or assess these. Subsequently, there are now an additional 3 WEFs within 35 km that are now in-process, i.e. Leghoya WEF 1, 2 & 3, and another one (1) within a 55 km radius (i.e. Anemoi WEF). 19.2. Furthermore, although section 4.3.3 states that "the scope of this assessment will include all operational, approved or current and planned renewable energy applications", in addition to the approved or in-process WEFs identified in 17 .1. above (not included in this assessment), there are actually an additional two (2) WEFs within 35 km and a further	Again, this project is a Wind Energy Facility, which includes access roads and small localised footprint. It is not an agricultural or mining project that would result in vast areas being transformed (i.e. thousands of hectares). The assumptions being made in the comments are assuming that there is going to be transformation of vast areas of grassland (such as would occur in a mining or agricultural context). The comment is again quoting the total project area rather than the actual WEF footprint of the projects included in the calculation. Only a small proportion of the grassland will be transformed (i.e. the

two (2) proposed WEFs (i.e. Pre-Application) within a 55 km radius, that have not been identified. The total number of turbines within 35 km is more than double that indicated in both the Draft EIA and Revised Draft EIA reports, i.e. 435 (and not 192) and within a 55 km radius there are more than 663 turbines (approved, in-process and proposed). As a minimum, the cumulative impact of approved and in-process applications must be assessed. 19.3. Avifauna 19.4. Fauna 19.5. DFFE also requires that "the cumulative impact assessment for all identified and assessed impacts must indicate the following: (a) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land". The Revised EIA Report does again not accurately quantify the size of the identified impacts, i.e. hectares of cumulatively transformed land. The overall footprint size of this, and all other similar proposed and approved renewable energy facilities within a 35 km radius is now 178 017.24 ha (Approved: 31 440.17 ha, In Progress: 89 247.96 ha, Pre-Application: 57 329.11 ha). Again, as a minimum, the cumulative impact of approved and in-process applications must be assessed. 19.6. Avifauna	actual road, WEF and other infrastructure footprint. The grassland that is retained will still function.
SHEEPMOOR DARDLEA	
3. The proposed Sheepmoor Wind Energy Facility and associated grid infrastructure is located on a site comprising: CBA Irreplaceable and Optimal; Intact Grassland Patches; Key Biodiversity Areas; the Grasslands Important Bird Area (IBA); Ecological Support Areas; National Protected Area Expansion Strategy Areas (NPAES); Local-scale and Landscape-scale Climate Change Corridors; Threatened Ecosystems - including Wakkerstroom Montane Grassland and Eastern Highveld Grassland; CBA: Wetlands; CBA: Aquatic Rivers; ESA: Strategic Water Source Area and ESA: Important Sub-catchments.	The terrestrial biodiversity assessment served to refine the mapping, which is the norm, where bioregional plans are often not up to date and/or reflect inconsistencies that require ground-truthing. This was presented in the terrestrial biodiversity assessment reporting accordingly, which is being ignored by the respective authorities. This was noted in the draft EIA comments but is still being overlooked.
6. DARDLEA is not supportive of development of WEFs (or any non-compatible land use) within Critical Biodiversity Areas and Key Biodiversity Areas, or within intact grassland patches. In respect of Intact Grassland Patches, it is important to note that the Mpumalanga Biodiversity Sector Plan (MBSP) specifically incorporated climate change into spatial priorities through the prioritisation of the connectivity of remaining intact grassland patches in the province, as they provide habitat for species to thrive, and allow for their dispersal. Intact grasslands are crucial for supporting threatened fauna and avifauna. This is verified in the fauna! assessment which states that "any remaining Oribi sub-populations and any contiguous areas of intact grassland are considered as high	The terrestrial biodiversity assessment served to refine the mapping, which is the norm, where bioregional plans are often not up to date and/or reflect inconsistencies that require ground-truthing. This was presented in the terrestrial biodiversity assessment reporting accordingly, which is being ignored by the respective authorities. This was noted in the draft EIA comments but is still being overlooked as it does not align with the agenda that serves to promote the Mpumalanga Bioregional Plan rather than acknowledge that there are shortcomings.

conservation importance" and that "cumulative impacts may become more significant if added to existing or future impacts from other activities, such as other renewable energy projects in the area". Intact Grassland Patches are important source areas in terms of metapopulation dynamics. The MBSP - adopted in 2023 (Provincial Notice 279 of 2023) - is a planning tool that has been developed to manage biodiversity resources of the province by setting strategic objectives to ensure that spatial biodiversity and climate change priorities are effectively incorporated into land-use and development planning, environmental assessments and authorisations, and natural resource management within Mpumalanga Province. The links to the various reports and shape files, including the MBSP Technical Report which details the scientific methods used to identify Intact Grassland Patches, can be accessed at https://mtpa. maps. arcgis. com/sharing/rest/content/items/fc6d8f9e 7 ef84d2f87f86b91 e8e9f87 *a*/data).	The proposed project is not seeking to develop the entire intact grassland patch, only a very small footprint. The resultant loss is thus not deemed to be excessive as the area that will remain undeveloped (i.e. intact grassland) far exceeds the actual hard stand footprint of the project. Were it a mining or agricultural project that would result in the clearance of thousands of hectares of grassland the impact would be more significant. The terrestrial biodiversity impact or risks to ecological processes associated with an access road and turbine footprint would not be deemed excessive within an already modified surrounding landscape (i.e. significant agricultural and mining related land transformation).
12. The number of turbines that are located in areas recommended for avoidance (at least 17 out of 25), and the location of the O&M building, roads and OH Ls in sensitive areas demonstrates that the site is not compatible with the proposed land use. The areas of concern as they relate to the abovementioned comments, are outlined below:	Refer to separate table. The comments are not giving consideration to the ground truthed findings (for example where it is designated CBA as per MBSP, but in fact it's in the middle of a mielie field).
14. The Terrestrial Assessment (inclusive of Plant Species), did not apply the Site Ecological Importance (SEI) methodology, which is a requirement of the Species Environmental Assessment Guideline. The Species Protocols specifically stipulate that assessments "must be undertaken in accordance with the *Species Environmental Assessment Guideline"* (South African National Biodiversity Institute, 2020. Species Environmental Assessment Guideline. Guidelines for the implementation of the Terrestrial Fauna and Terrestrial Flora Species Protocols for environmental impact assessments in South Africa. South African National Biodiversity Institute, Pretoria). Non-compliance with the *Species Environmental Assessment Guideline* has resulted in the following deficiencies: 14.1. Insufficient time was allocated to surveying in the appropriate season (only 4 days for both Sheepmoor and Emvelo WEF sites, as well as the Grid sites). 14.2. The classification of the Montane Grassland on site as "moderate sensitivity" in the absence of applying all relevant criteria, including *inter alia,* conservation importance, functional integrity, receptor resilience, as well as species of conservation concern, spatial priorities, intact grassland patches, and CBAs. 14.1. The montane ridge (where WTGs 26, 27, 28, 29, 30 and 33, along with grid infrastructure are proposed), which also coincides with intact grassland and the highest sensitivity for Fauna (according to the Fauna! Assessment), being classified as "moderate sensitivity". (Noting further that according to the Fauna Assessment, "the high sensitive escarpment area is likely of general importance for a range of fauna! groups,	Incorrect deduction regarding number of days on site – refer to clear outline of dates provided under site visit in Terrestrial Biodiversity Assessment Report, which was more than 4 days across two seasonal visits. This was clarified in the draft comments and responses but is still being incorrectly stated in the MPTA comments as being 4 days only. The MPTA correctly states that 4 days is inadequate, <u>which is why 10 days were spent on site</u>. A preliminary overview site visit was conducted on 18 April 2023 (late autumn/early winter) for the purposes of a high-level reconnaissance of the site, followed by a further site visit between 19 & 22 June 2023 (winter) in order to undertake the preliminary screening, site sensitivity mapping and survey. A final comprehensive site visit and survey was undertaken between 09 & 13 December 2024, which constituted the summer seasonal site visit and assessment and also served to inform final layout design. This constitutes a sampling period of 10 days, which was deemed to be adequate for such an assessment. The blanket designation of an entire vegetation unit based on species that might be represented locally within that vegetation unit, would be incorrect. If the species represented were to inhabit the entire

representative of a large contiguous and ecologically intact area of mostly good-quality montane grassland".	vegetation unit, then it is likely that they would not be considered to have an elevated conservation status, as they would be common.
15. As a result of the deficiencies in the Terrestrial Assessment outlined above, we have low confidence in the associated impact analysis, and dispute the Specialist's "low" significance ratings.	This project is a Wind Energy Facility, which includes access roads and small localised footprint. It is not an agricultural or mining project that would result in vast areas being transformed (i.e. thousands of hectares). The overall impact is thus low.
17. Cumulative Impact Assessment: 17.1. In our comments dated 10 April 2025 on your original draft EIA, despite bringing another 5 approved and in-process WEFs (within a 35 km radius) to your attention (i.e. Zephyr, Ujekamanzi Ntabande and Daggafoort and Emvelo), your revised cumulative impact assessment once again fails to mention or assess these. Subsequently, there are now an additional 3 WEFs within 35 km that are now in-process, i.e. Leghoya WEF 1, 2 & 3, and another one (1) within a 55 km radius (i.e. Anemoi WEF). 17.2. Furthermore, although section 4.3.3 states that "the scope of this assessment will include all operational, approved or current and planned renewable energy applications", in addition to the approved or in-process WEFs identified in 17 .1. above (not included in this assessment), there are actually an additional two (2) WEFs within 35 km and a further two (2) proposed WEFs (i.e. Pre-Application) within a 55 km radius, that have not been identified. The total number of turbines within 35 km is more than double that indicated in both the Draft EIA and Revised Draft EIA reports, i.e. 435 (and not 192) and within a 55 km radius there are more than 663 turbines (approved, in-process and proposed). As a minimum, the cumulative impact of approved and in-process applications must be assessed. 17.3. Avifauna 17.4. Fauna 17.5. DFFE also requires that "the cumulative impact assessment for all identified and assessed impacts must indicate the following: (a) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land". The Revised EIA Report does again not accurately quantify the size of the identified impacts, i.e. hectares of cumulatively transformed land. The overall footprint size of this, and all other similar proposed and approved renewable energy facilities within a 35 km radius is now 178 017.24 ha (Approved: 31 440.17 ha, In Progress: 89 247.96 ha, Pre-Application: 57 329.11 ha). Again, as a minimum, the cumulative impact of approved and in-process applications must be assessed. 17.6. Avifauna	Again, this project is a Wind Energy Facility, which includes access roads and small localised footprint. It is not an agricultural or mining project that would result in vast areas being transformed (i.e. thousands of hectares). The assumptions being made in the comments are assuming that there is going to be transformation of vast areas of grassland (such as would occur in a mining or agricultural context). The comment is again quoting the total project area rather than the actual WEF footprint of the projects included in the calculation. Only a small proportion of the grassland will be transformed (i.e. the actual road, WEF and other infrastructure footprint. The grassland that is retained will still function. The layout has sought to avoid the most sensitive areas and prioritise lower sensitivity areas. In order for the project to be feasible some footprints may extend into higher sensitivity areas, but these can be specifically managed. The layout provided includes only road and turbine positions, not final design. The final design will include the actual footprint and it can be undertekn in such a manner that loss can be minimised (for example, where a turbine position (i.e. the point on the map) falls on the edge of or slightly within an elevated sensitivity area, the actual hard stand area can be aligned so that as much as possibly falls outside of the 'sensitive' area. Again, this project is a Wind Energy Facility, which includes access roads and small localised footprint. It is not an agricultural or mining project that would result in vast areas being transformed (i.e. thousands of hectares). The assumptions being made in the comments are assuming that there is going to be transformation of vast areas of grassland (such as would occur in a mining or agricultural context).

19. Biodiversity Offset Strategy: According to the Biodiversity Offset Guideline, *"The desired outcome of biodiversity offsets is to ensure that - the cumulative impact of an authorised activity, or activities, and land and resource use change does not: result in the loss of irreplaceable biodiversity or jeopardise the ability to meet biodiversity targets; lead to any ecosystem with a threat status of Vulnerable or Least Concern becoming Endangered; or any Endangered ecosystem becoming Critically Endangered; or cause an irreversible decline in the conservation status of species and the presence of special habitats; or cause a significant loss in ecosystem services".* A biodiversity offset cannot therefore cater for the loss of Irreplaceable CBAs or intact grasslands. As detailed in the comments above, intact grasslands are crucial for supporting threatened fauna and avifauna. 19.2. The Biodiversity Offset Guideline specifically states that "biodiversity offsets are not appropriate when an activity, or activities, will have residual impacts on biodiversity of very high significance, including when residual negative impacts will result in loss of irreplaceable biodiversity". 19.3. In addition to Irreplaceable CBAs, the Biodiversity Offset Guideline also categorises the following as "irreplaceable biodiversity": Biodiversity of major potential concern, where residual impacts in this category could lead to - loss of vulnerable or potentially irreplaceable biodiversity in areas of recognised importance, such as - areas evaluated as having High Ecological Site Importance. We maintain that the correct and required implementation of the Species Environmental Assessment Guideline would have resulted in the Montane Grassland being classified as having High Ecological Site Importance. 19.4. The Intact Grassland Patches on the site must therefore be avoided, and cannot be offset. The requirement to consider biodiversity offsets is applicable only once it has been demonstrated that all measures of avoidance have been exhausted. The loss of irreplaceable biodiversity cannot be offset, and, as outlined above, "irreplaceable biodiversity" includes, key ecological corridors recognized as important for evolutionary processes and climate change adaptation where no options to safeguard these processes exist. 19.5. Furthermore, the Biodiversity Offset Report does not meet the following minimum requirements: i. A portfolio of candidate biodiversity offset sites, including the likelihood of each site's availability and feasibility. ii. The required biodiversity outcomes on each of the candidate biodiversity offset sites.	The layout has sought to avoid the most sensitive areas and prioritise lower sensitivity areas. In order for the project to be feasible some footprints may extend into higher sensitivity areas, but these can be specifically managed. The layout provided includes only road and turbine positions, not final design. The final design will include the actual footprint and it can be undertekn in such a manner that loss can be minimised (for example, where a turbine position (i.e. the point on the map) falls on the edge of or slightly within an elevated sensitivity area, the actual hard stand area can be aligned so that as much as possibly falls outside of the 'sensitive' area. Again, this project is a Wind Energy Facility, which includes access roads and small localised footprint. It is not an agricultural or mining project that would result in vast areas being transformed (i.e. thousands of hectares). The assumptions being made in the comments are assuming that there is going to be transformation of vast areas of grassland (such as would occur in a mining or agricultural context).
EMVELO MTPA	

2.1. Sensitive Habitats ***Intact Grassland Patches*** Intact grassland patches allow species to thrive and to support species that may need to move in response to climate change, enabling the normal functioning of natural ecological processes such as fire regimes or pollination. These patches are typically larger than 100 ha, with little or no gaps and minimal edge effects, and occur in close proximity to other intact grassland patches. They function as "source areas" in metapopulation dynamics where birth rates exceed death rates. No significant impacts should be allowed that would change a source area into a sink area (where death rates exceed birth rates). Mpumalanga has only 1,039 intact grassland patches, covering 15% of the province. These areas have been prioritised for their connectivity importance and must be avoided by wind energy facilities. The intact patches on Emvelo are critical for maintaining connectivity with other grasslands. Despite MTPA raising concerns, specialist reports were largely silent on their importance. Using over 80,000 bird observations, the MTPA confirmed that intact grasslands have a 22% higher likelihood of hosting birds of conservation concern, 49% more birds of conservation concern, and 98% more individual bird observations than non-intact grasslands. These patches make up 23% of the Emvelo WEF footprint, and six turbines (13, 19, 20, 22, 23, and 25) are located within them. These turbines should be removed. The MTPA feels strongly that the establishment of wind farms in intact grassland patches should not be allowed as it may turn a "source" area into a "sink" area. Even Pages 3 and 4 of the Faunal assessment within the DEIA recognises that "*Faunal integrity relies on inter-connected grassland habitats across landscapes*." and "*… any contiguous areas of intact grassland are considered as high conservation importance*." ***Climate Change Corridors*** The MBSP's climate change corridor network was designed to enable species and ecosystems to adapt to a changing environment. The corridor network considered a single-best (least-cost) corridor connecting up the climate change refugia with the climate change corridors from adjacent provinces. Additional fine-scale corridors were then identified using Circuitscape, finding alternative pathways and identifying pinch points in the corridors and thereby building resilience into the corridor network. As can be seen from Figure 2, climate change corridor runs predominantly north-south through the project area, linking the climate change focal areas (as well as coincidentally the Grassland IBA with the Chrissies Pans IBA). Given that large birds do not fly in narrow, predictable lines, a flight corridor would need to be functionally broader than the MTPA provided fine-scale corridor. A broader macro-scaled corridor would be required for	The terrestrial biodiversity assessment served to refine the mapping, which is the norm, where bioregional plans are often not up to date and/or reflect inconsistencies that require ground-truthing. This was presented in the terrestrial biodiversity assessment reporting accordingly, which is being ignored by the respective authorities. This was noted in the draft EIA comments but is still being overlooked as it does not align with the agenda that serves to promote the Mpumalanga Bioregional Plan rather than acknowledge that there are shortcomings. The proposed project is not seeking to develop the entire intact grassland patch, only a very small footprint. The resultant loss is thus not deemed to be excessive as the area that will remain undeveloped (i.e. intact grassland) far exceeds the actual hard stand footprint of the project. Were it a mining or agricultural project that would result in the clearance of thousands of hectares of grassland the impact would be more significant. The terrestrial biodiversity impact or risks to ecological processes associated with an access road and turbine footprint would not be deemed excessive within an already modified surrounding landscape (i.e. significant agricultural and mining related land transformation).

avifauna to ensure safe passage along the corridors. Maintaining this linkage is essential for long-term ecological resilience under climate change. The following turbines are within 500m of the climate change corridors and should be removed: 1, 4, 5, 7, and 25, as they would compromise this corridor. The risk from the proposed wind farm on the corridor network is that the wind farm is unfortunately located along an important north-south macro regional flyway/corridor (also supported by vulture tracking data, Figure 9) which will result in increased collisions and electrocution, and habitat displacement. It stands to disrupt movement along the corridor and result in increased mortalities. *National Protected Area Expansion Strategy (NPAES 2018)* Over 70% of the proposed WEF falls within NPAES spatial priority areas, with 25% of turbines directly on focal areas. These sites are nationally significant for conservation expansion. Currently, seven turbines (13, 14, 19, 20, 22, 23, and 25) are located in NPAES zones and should be removed.	
2.3 Specialist Assessments – other The MTPA has significant reservations regarding the Terrestrial Assessment. Key concerns include: • The terrestrial biodiversity theme is still not aligned with SANBI's Species Environmental Assessment Guideline (2022) that the consultant is required to comply with in terms of Notice 1150 of Government Gazette 43855 of 2020. • The author only allowed for 4 days to survey both the Sheepmoor and Emvelo WEF sites during the summer months, when most summer rainfall plants would be flowering and identifiable. Four days is certainly not enough to cover an area this size (12,543 ha for both WEFs). This report is the same report as submitted with previous DEIA. • No plant species of conservation concern, or endemics, were recorded on site. This is not surprising given the lack of time to survey this large area. ERM also opted to appoint a botanist not familiar with the flora of this area. There are several endemics restricted to this area that would be unfamiliar to someone not from the area. It just makes it harder to confirm identification, particularly with limited time and coverage in the field. **The MTPA is confident that several species of conservation concern would occur on site; they were just not detected**. • The failure to apply the SANBI Guidelines resulted in inadequate time being allowed to properly assess the terrestrial biodiversity (botany) and the determining of site ecological importance (SEI). The consultant did not follow the SEI methodology, as required in terms of the SANBI guidelines and the MTPA does not believe that the	The terrestrial biodiversity assessment served to refine the mapping, which is the norm, where bioregional plans are often not up to date and/or reflect inconsistencies that require ground-truthing. This was presented in the terrestrial biodiversity assessment reporting accordingly, which is being ignored by the respective authorities. This was noted in the draft EIA comments but is still being overlooked as it does not align with the agenda that serves to promote the Mpumalanga Bioregional Plan rather than acknowledge that there are shortcomings. The proposed project is not seeking to develop the entire intact grassland patch, only a very small footprint. The resultant loss is thus not deemed to be excessive as the area that will remain undeveloped (i.e. intact grassland) far exceeds the actual hard stand footprint of the project. Were it a mining or agricultural project that would result in the clearance of thousands of hectares of grassland the impact would be more significant. The terrestrial biodiversity impact or risks to ecological processes associated with an access road and turbine footprint would not be deemed excessive within an already modified surrounding landscape (i.e. significant agricultural and mining related land transformation).

approach followed to identify sensitive areas would be able to adequately assess the environmental sensitivity for this area. There were a number of additional variables that could have been applied (site-specific species, CBAs and ESAs, climate change corridors, intact grasslands, rocky ridges, etc.), patch size, together with criteria and approach of that are required in the SANBI Species Environmental Assessment Guidelines. • The approach followed resulted in some CBA Irreplaceable areas, that overlapped with intact grasslands and provincial climate change corridors, being designated **medium** sensitivity (as a maximum value because it did not ultimately fall within the Eastern Highveld Grassland). This is fundamentally wrong as there was no consideration for any species of conservation concern (like roosting areas) or other spatial priorities like CBAs to meet biodiversity targets. Applying the SANBI criteria could allow the montane grassland to be categorised as *high*, or even *very high* if species and additional data were considered. • In terms of the terrestrial biodiversity assessment, the result is that the montane grassland (not degraded) is of *medium* sensitivity, but the degraded Highveld grassland has *high* sensitivity, and non-degraded a *very-high* sensitivity. This does not make sense. We have significantly more threatened plant species recorded in the Wakkerstroom Montane Grassland than for the Eastern Highveld Grassland and consider far more sensitive. • Ultimately, the MTPA does not agree with the vegetation sensitivity analysis that then fed into other planning processes, such as the offsets, as it did not apply SANBI's Species Environmental Assessment Guideline (2022).	
3. Summary of Turbine Locations requiring reconsideration Should DFFE proceed towards authorisation, we strongly recommend the exclusion of the turbines identified in below.	Refer to separate table. The comments are not giving consideration to the ground truthed findings (for example where it is designated CBA as per MBSP, but in fact it's in the middle of a mielie field).
SHEEPMOOR MTPA	
2.1. Sensitive Habitats ***Intact Grassland Patches*** Intact grassland patches allow species to thrive and to support species that may need to move in response to climate change, enabling the normal functioning of natural ecological processes such as fire regimes or pollination. These patches are typically larger than 100 ha, with little or no gaps and minimal edge effects, and occur in close proximity to other intact grassland patches. They function as "source areas" in metapopulation dynamics where birth rates exceed death rates. No significant impacts should be allowed that would change a source area into a sink area (where death rates exceed birth rates). Mpumalanga	The terrestrial biodiversity assessment served to refine the mapping, which is the norm, where bioregional plans are often not up to date and/or reflect inconsistencies that require ground-truthing. This was presented in the terrestrial biodiversity assessment reporting accordingly, which is being ignored by the respective authorities. This was noted in the draft EIA comments but is still being overlooked as it does not align with the agenda that serves to promote the Mpumalanga Bioregional Plan rather than acknowledge that there are shortcomings.

has only 1,039 intact grassland patches, covering 15% of the province. These areas have been prioritised for their connectivity importance and must be avoided by wind energy facilities. The intact patches on Sheepmoor are critical for maintaining connectivity with other grasslands. Despite MTPA raising concerns, specialist reports were largely silent on their importance. Using over 80,000 bird observations, the MTPA confirmed that intact grasslands have a 22% higher likelihood of hosting birds of conservation concern, 49% more birds of conservation concern, and 98% more individual bird observations than non-intact grasslands. These patches make up 23% of the Sheepmoor WEF footprint, and eight turbines (26, 27, 28, 29, 31, 32, 33, and 43) are located within them. These turbines should be removed. See Figure 1. Therefore, the MTPA feels stronger than ever that the establishment of wind farms in intact grassland patches should not be allowed as it may turn a "source" area into a "sink" area. Even Page 3 and 4 of the Faunal assessment within the DEIA recognises that "Faunal integrity relies on inter-connected grassland habitats across landscapes." and "… any contiguous areas of intact grassland are considered as high conservation importance.". ***Climate Change Corridors*** The MBSP's climate change corridor network was designed to enable species and ecosystems to adapt to a changing environment. The corridor network considered a single-best (least-cost) corridor connecting up the climate change refugia with the climate change corridors from adjacent provinces. Additional fine-scale corridors were then identified using Circuitscape, finding alternative pathways and identifying pinch points in the corridors and thereby building resilience into the corridor network. As can be seen from Figure 2, climate change corridor runs predominantly north-south through the project area, linking the climate change focal areas (as well as coincidentally the Grassland IBA with the Chrissies Pans IBA). Given that large birds do not fly in narrow, predictable lines, a flight corridor would need to be functionally broader than the MTPA provided fine-scale corridor. A broader macro-scaled corridor would be required for avifauna to ensure safe passage along the corridors. Maintaining this linkage is essential for long-term ecological resilience under climate change. The following turbines are within 500m of the climate change corridors and should be removed: 29, 31, 32, 33, 34, 36, 40, 42, 43, 44, 45, 46, 51, 52, and 53, as they would compromise this corridor. The risk from the proposed wind farm on the corridor network is that the wind farm is unfortunately located along an important north-south macro regional flyway/corridor (also supported by vulture tracking data, Figure 9) which will result in increased collisions and electrocution, and habitat displacement. It stands to disrupt movement along the corridor	The proposed project is not seeking to develop the entire intact grassland patch, only a very small footprint. The resultant loss is thus not deemed to be excessive as the area that will remain undeveloped (i.e. intact grassland) far exceeds the actual hard stand footprint of the project. Were it a mining or agricultural project that would result in the clearance of thousands of hectares of grassland the impact would be more significant. The terrestrial biodiversity impact or risks to ecological processes associated with an access road and turbine footprint would not be deemed excessive within an already modified surrounding landscape (i.e. significant agricultural and mining related land transformation).

and result in increased mortalities. ***National Protected Area Expansion Strategy (NPAES 2018)*** Over 60% of the proposed WEF falls within NPAES spatial priority areas, with 25% of turbines directly on focal areas. These sites are nationally significant for conservation expansion. Currently, 11 turbines (26, 27, 28, 29, 31, 33, 43, 44, 45, 52 and 53) are located in NPAES zones and should be removed.	
2.4 Specialist Assessments – other The MTPA has significant reservations regarding the Terrestrial Assessment. Key concerns include: • The terrestrial biodiversity theme is still not aligned with SANBI's Species Environmental Assessment Guideline (2022) that the consultant is required to comply with in terms of Notice 1150 of Government Gazette 43855 of 2020. • The author only allowed for 4 days to survey both the Sheepmoor and Emvelo WEF sites during the summer months, when most summer rainfall plants would be flowering and identifiable. Four days is certainly not enough to cover an area this size (12,543 ha for both WEFs). This report is the same report as submitted with previous DEIA. • No plant species of conservation concern, or endemics, were recorded on site. This is not surprising given the lack of time to survey this large area. ERM also opted to appoint a botanist not familiar with the flora of this area. There are several endemics restricted to this area that would be unfamiliar to someone not from the area. It just makes it harder to confirm identification, particularly with limited time and coverage in the field. **The MTPA is confident that several species of conservation concern would occur on site; they were just not detected**. • The failure to apply the SANBI Guidelines resulted in inadequate time being allowed to properly assess the terrestrial biodiversity (botany) and the determining of site ecological importance (SEI). The consultant did not follow the SEI methodology, as required in terms of the SANBI guidelines and the MTPA does not believe that the approach followed to identify sensitive areas would be able to adequately assess the environmental sensitivity for this area. There were a number of additional variables that could have been applied (site-specific species, CBAs and ESAs, climate change corridors, intact grasslands, rocky ridges, etc.), patch size, together with criteria and approach of that are required in the SANBI Species Environmental Assessment Guidelines. • The approach followed resulted in some CBA Irreplaceable areas, that overlapped with intact grasslands and provincial climate change corridors, being designated **medium**	The terrestrial biodiversity assessment served to refine the mapping, which is the norm, where bioregional plans are often not up to date and/or reflect inconsistencies that require ground-truthing. This was presented in the terrestrial biodiversity assessment reporting accordingly, which is being ignored by the respective authorities. This was noted in the draft EIA comments but is still being overlooked as it does not align with the agenda that serves to promote the Mpumalanga Bioregional Plan rather than acknowledge that there are shortcomings. The proposed project is not seeking to develop the entire intact grassland patch, only a very small footprint. The resultant loss is thus not deemed to be excessive as the area that will remain undeveloped (i.e. intact grassland) far exceeds the actual hard stand footprint of the project. Were it a mining or agricultural project that would result in the clearance of thousands of hectares of grassland the impact would be more significant. The terrestrial biodiversity impact or risks to ecological processes associated with an access road and turbine footprint would not be deemed excessive within an already modified surrounding landscape (i.e. significant agricultural and mining related land transformation).

sensitivity (as a maximum value because it did not ultimately fall within the Eastern Highveld Grassland). This is fundamentally wrong as there was no consideration for any species of conservation concern (like roosting areas) or other spatial priorities like CBAs to meet biodiversity targets. Applying the SANBI criteria could allow the montane grassland to be categorised as *high*, or even *very high* if species and additional data were considered. • In terms of the terrestrial biodiversity assessment, the result is that the montane grassland (not degraded) is of *medium* sensitivity, but the degraded Highveld grassland has *high* sensitivity, and non-degraded a *very-high* sensitivity. This does not make sense. We have significantly more threatened plant species recorded in the Wakkerstroom Montane Grassland than for the Eastern Highveld Grassland and consider far more sensitive. • Ultimately, the MTPA does not agree with the vegetation sensitivity analysis that then fed into other planning processes, such as the offsets, as it did not apply SANBI's Species Environmental Assessment Guideline (2022).	
3. Summary of Turbine Locations requiring reconsideration Should DFFE proceed towards authorisation, we strongly recommend the exclusion of the turbines identified in below.	Refer to separate table. The comments are not giving consideration to the ground truthed findings (for example where it is designated CBA as per MBSP, but in fact it's in the middle of a mielie field).

WTG POSITION COMMENTS

Emvelo	
WTG in question	**Area ground truthed to be.**
WTG 3	Cleared Invaded: Low sensitivity, moderately modified. WTG within mielie field, ion edge of remnant grassland pocket. Final design can avoid the more sensitive area.
WTG 5	Transformed: Low sensitivity. WTG within mielie field, on edge of remnant grassland pocket. Final design can avoid the more sensitive area.
WTG 7	Transformed: Low sensitivity. WTG within mielie field, on edge of remnant grassland pocket. Final design can avoid the more sensitive area.
WTG 11	Plantation/invaded: Low sensitivity. This is a densely invaded area, transformed or significantly degraded (i.e. natural ecological processes are significantly altered, including the soil (due to impact of dense invasion plus historical hot fires). Final design can avoid the more sensitive areas.
WTG 13	Other Natural Area: Montane Grassland, Moderate sensitivity.
WTG 14	CBA Optimal: Montane Grassland, Moderate sensitivity. WTG on edge of densely invaded area, transformed or significantly degraded (i.e. natural ecological processes are significantly altered, including the soil (due to impact of dense invasion plus historical hot fires). . Final design can avoid the more sensitive areas.

WTG 15	Transformed: Low sensitivity. WTG on edge of cultivated area, on edge of remnant grassland pocket. Final design can avoid the more sensitive area.
WTG 18	Plantation/invaded: Low sensitivity, heavily modified. WTG on edge of densely invaded area, transformed or significantly degraded (i.e. natural ecological processes are significantly altered, including the soil (due to impact of dense invasion plus historical hot fires). . Final design can avoid the more sensitive areas.
WTG 19	Other Natural Area: Montane Grassland, Moderate sensitivity. The site is designated OTHER NATURAL AREA AS PER MBSP.
WTG 20	Other Natural Area: Montane Grassland, Moderate sensitivity. The site is designated OTHER NATURAL AREA AS PER MBSP.
WTG 21	Plantation/invaded: Low sensitivity, heavily modified. WTG on edge of densely invaded area, transformed or significantly degraded (i.e. natural ecological processes are significantly altered, including the soil (due to impact of dense invasion plus historical hot fires). . Final design can avoid the more sensitive areas.
WTG 22	Other Natural Area: Montane Grassland, Moderate sensitivity. The site is designated OTHER NATURAL AREA AS PER MBSP. Loss associated with a small footprint will not significantly affect ecological processes or connectivity within the broader landscape.
WTG 23	Other Natural Area: Montane Grassland, Moderate sensitivity. The site is designated OTHER NATURAL AREA AS PER MBSP. Loss associated with a small footprint will not significantly affect ecological processes or connectivity within the broader landscape.
WTG 25	Other Natural Area: Montane Grassland, Moderate sensitivity. The site is designated OTHER NATURAL AREA AS PER MBSP. Loss associated with a small footprint will not significantly affect ecological processes or connectivity within the broader landscape.
Sheepmoor	
WTG in question	**Area ground truthed to be.**
WTG 26	Other Natural Area, Moderate sensitivity: Montane Grassland. The site is designated OTHER NATURAL AREA AS PER MBSP. Loss associated with a small footprint will not significantly affect ecological processes or connectivity within the broader landscape.
WTG 27	Other Natural Area, Moderate sensitivity: Montane Grassland. The site is designated OTHER NATURAL AREA AS PER MBSP. Loss associated with a small footprint will not significantly affect ecological processes or connectivity within the broader landscape.
WTG 28	Other Natural Area, Moderate sensitivity: Montane Grassland. The site is designated OTHER NATURAL AREA AS PER MBSP. Loss associated with a small footprint will not significantly affect ecological processes or connectivity within the broader landscape.
WTG 29	Other Natural Area, Moderate sensitivity: Montane Grassland. The site is designated OTHER NATURAL AREA AS PER MBSP. Loss associated with a small footprint will not significantly affect ecological processes or connectivity within the broader landscape.
WTG 30	Heavily modified, low sensitivity: Cleared Invaded. WTG within transformed area. Final design can avoid any more sensitive areas in surrounds.
WTG 31	Ecological Support Area, Moderate sensitivity: Montane Grassland. Loss associated with a small footprint will not significantly affect ecological processes or connectivity within the broader landscape.
WTG 32	Other Natural Areas, low sensitivity: Plantation/Invaded. WTG within transformed area. Final design can avoid any more sensitive areas in surrounds.
WTG 33	Ecological Support Area, Moderate sensitivity: Montane Grassland. The site is designated ECOLOGICAL SUPPORT AREA AS PER MBSP. Loss associated with a small footprint will not significantly affect ecological processes or connectivity within the broader landscape.
WTG 36	Plantation/Invaded: Low sensitivity. WTG within transformed area. Final design can avoid any more sensitive areas in surrounds.

WTG 37	Plantation/Invaded: Low sensitivity, heavily modified. WTG within transformed area. Final design can avoid any more sensitive areas in surrounds.
WTG 38	Other Natural Area: Highveld Grassland. The site is designated OTHER NATURAL AREA AS PER MBSP. Loss associated with a small footprint will not significantly affect ecological processes or connectivity within the broader landscape.
WTG 43	Ecological Support Area: Montane Grassland, Moderate sensitivity. The site is designated ECOLOGICAL SUPPORT AREA AS PER MBSP. Loss associated with a small footprint will not significantly affect ecological processes or connectivity within the broader landscape.
WTG 44	Ecological Support Area: Montane Grassland, Moderate sensitivity, along a road. The site is designated ECOLOGICAL SUPPORT AREA AS PER MBSP. Loss associated with a small footprint will not significantly affect ecological processes or connectivity within the broader landscape.
WTG 45	Transformed: Low sensitivity. WTG within transformed area. Final design can avoid any more sensitive areas in surrounds.
WTG 46	Heavily modified: Highveld Grassland. WTG position is on the edge of intact vegetation and transformed area. WEF laydown footprint can thus be aligned to minimise this substantially.
WTG 52	Ecological Support Area: Montane Grassland, Moderate sensitivity. The site is designated ECOLOGICAL SUPPORT AREA AS PER MBSP. Loss associated with a small footprint will not significantly affect ecological processes or connectivity within the broader landscape.
WTG 53	Heavily modified: Highveld Grassland. WTG position is on the edge of intact vegetation and transformed area. WEF laydown footprint can thus be aligned to minimise this substantially.

Lucien Barbeau

From: Lloyd Barnes <Lloyd@mulilo.com>
Sent: Tuesday, 22 July 2025 11:57
To: ERM Arcus Amsterdam
Cc: Lucien Barbeau; Rebecca Thomas
Subject: FW: SHEEPMOOR WINDPLAAS en 132 Kraglyn

EXTERNAL MESSAGE

Good day ERM team,

Please be sure to include the email chain below in the CRR.

Kind Regards,

Lloyd Barnes
Senior Associate: Developer.
[redacted]

From: Johans Van Wyk <piwy@mulilo.com>
Sent: Wednesday, 19 February 2025 15:56
To: Josua Meyer <meyerjosua55@gmail.com>
Cc: Lloyd Barnes <Lloyd@mulilo.com>; Annitta Attieh <Annitta@mulilo.com>
Subject: RE: SHEEPMOOR WINDPLAAS en 132 Kraglyn

Geagte Mnr. Meyer,

Dit is my voorstel dat u wag vir die Konsepomgwingsimpakstudie rapport (DEIArr) wat teen Vrydag 28 Feb beskikbaar gestel gaan word aan almal, via epos. Dit laat ook toe u die nuutste informasie byderhand het om op kommentaar te lewer.

WSP sal ‘n epos uitstuur met die besonderhede vir wie die kommentaar aan gerig moet word. WSP moet dan formeel op alle kommentaar reageer.

Sodoende volg ons die korrekte formele prosses.

Die epos besonderhede virkommentaar sal in die Konsepomgwingsimpakstudie rapport wees.

Laat gerus indien u verderre vrae het.

Sincerely,

Johans van Wyk
Senior Associate: Landowner Liaison
[redacted]

From: Johans Van Wyk
Sent: Wednesday, February 19, 2025 1:45 PM
To: Josua Meyer <meyerjosua55@gmail.com>
Cc: Lloyd Barnes <Lloyd@mulilo.com>
Subject: RE: SHEEPMOOR WINDPLAAS en 132 Kraglyn

Geagte Mr Meyer,

Dankie vir u epos. Ons neem kennis en sal spoedig reageer met ’n formele antwoord.

Groete

Sincerely,

Johans van Wyk
Senior Associate: Landowner Liaison
[redacted]

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Wednesday, February 19, 2025 12:36 PM
To: Johans Van Wyk <piwy@mulilo.com>
Cc: Lloyd Barnes <Lloyd@mulilo.com>
Subject: SHEEPMOOR WINDPLAAS en 132 Kraglyn

Vir AANDAG : Johans van Wyk

Dagse

Op 6/2/2025 het mnr. Schalk van der Merwe, wat blykbaar die Sosiale Impakstudie vir Mulilo doen, kaarte ge-epos wat die Finale uitleg van die IWT vir EIA beoordeling van bogemelde windplaas toon.

Die uitleg verskil aansienlik van die konsep aansoek wat noodwendig ook die kommentaar daarop wesenlik beinvloed.

As opsommend die volgende kommentaar

- paaie en kraglyne word oor my eiendom getoon sonder enige konsultasie

- van die turbines is onaanvaarbaar naby wooneenhede. Die meerderheid internationale aanvaarbare minimum afstand is 1,5 km.

- kommersiële jag word op eiendom beoefen waar buitelandse jagters jaarliks deur Lloyd Safaris gereel word. Dit is finansieel baie voordelig. Sigbare turbines is egter onaanvaarbaar vir die jagters.

- ongedierte jag word deur die jaar beoefen op eiendom en vir veiligheid word buffersone van minstens 2 km vanaf my eiendom grense aanbeveel.

- lodge met gras vliegveld word beplan by die waterval vir die buitelandse jagters wat ook toeriste sal insluit. Dit sal nie kan realiseer met sigbare turbines in omgewing wat derhalwe eiendom waarde nadelig sal beinvloed.

- verskeie turbines is te na aan lande geplaas wat lugbespuiting van gewasse onmoontlik sal maak en gevolglik negatief met boerdery praktyke inmeng.

- ondersoek word vereis om impak van turbines op bye kolonies te ondersoek. Bye het essensieule funksie vir bestuiwing van omgewing flora en alternatiewe landbou gewasse o.a. nierbone.

- van die turbine is onaanvaarbaar naby bestaande broei area van bedreigde voël spesies. Die voorgestelde vlieg roetes verteenwoordig nie die werklikheid nie en is onaanvaarbaar.

- groot aantal turbines is op die borand van kruine geplaas wat baie opsigtelik en visueel onaanvaarbaar is.

- die brand versekering laat toe dat van vliegtuie (bommers) gebruik gemaak kan word ingeval van veldbrande. Dit sal nie moontlik wees met die windplaas nie wat eise van die aangrende bosbou kan meebring waarvoor Mulilo aanspreeklik gehou sal word.

- die groot aantal turbines reg oos van my eiendom gaan die mikroklimaat nadelig beinvloed wat negatiewe gevolge op my boerdery en omgewing inhou. Daar word saam met DARDLEA aan gedring op 'n volledige Mikroklimaat Impak Studie deur geakrediteerde onafhanklike instansie deur alle partye goedgekeur.

Deskundige advies word ingewin of die konsolidasie met gepaardgaande veranderings t.o.v. u oorspronklike aansoek nie 'n totaal nuwe aansoek regverdig nie.

Aangesien rooi ligte reeds begin flikker uit u reaksie op kommentaar deur partye in die konsep verslag, versoek ek 'n dringende vergadering met Mulilo en betrokke spesialiste om aangeleentheid te bespreek.

Dit is 'n poging om vertragings en duur uitgerekte regsgedinge te vermei.

Vertrou op 'n spoedige positiewe reaksie vanaf u.

J.Meyer
081 019 2213
CONFIDENTIALITY AND DATA PROTECTION. This email is intended only for the use of the intended recipient(s) and may contain information which is privileged and confidential, or personal data which is subject to data protection legislation. If you are not the intended recipient, any disclosure, copying and/or distribution of the content of this email, or reliance upon or other use of the contents of this email is strictly prohibited. If you have received this email in error, please erase all copies of it, including all attachments, do not forward it to anybody, and please also notify the sender immediately.
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including all attachments, do not forward it to anybody, and please also notify the sender immediately.
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TO BE PLACED ON ERM'S LETTERHEAD

23 August 2025

PER EMAIL

THE TRUSTEES FOR TIME BEING OF THE PETER CELLIERS TRUST C/O HAYES INCORPORATED

Attention: Riaan Meintjes
Email: riaan@themis.co.za

Dear Mr Meintjes

RE: SUBMISSION OF THE DRAFT EIA REPORT FOR THE MULILO AMSTERDAM WIND ENERGY FACILITY CLUSTER

1 We refer to:

1.1 the Draft Environmental Impact Assessment Reports circulated for public participation on 16 July 2025 in respect of the Sheepmoor and Emvelo Wind Energy Facilities, situated in the Mpumalanga Province ("**Proposed Project**") in respect of the environmental authorisation application ("**EA Application**") submitted by Environmental Resources Management Southern Africa (Pty) Ltd ("**ERM**" or "**us**") on behalf of the Applicants;

1.2 your letter to us, dated 22 April 2025 ("**22 April Letter**"); and

1.3 your emails to us, dated 7 August 2025 and 14 August 2025.

2 Thank you for your comments submitted in respect of the Proposed Project on behalf of the Trustees for the time being of the Peter Celliers Trust ("**Peter Celliers Trust**"), we note the content thereof.

3 The Applicant will apply for approval of aeronautical assessment of aviation obstacles to the Air Traffic and Navigation Services ("**ATNS**") ("**ATNS Approval Application**") under the Civil Aviation Regulations, 2011 (GN 425 of 1 June 2012) ("**Civil Aviation Regulations**") and the Aeronautical Information Circular dated 18 April 2024 (AIC 001-2024) in due course.

4 Please note that the Civil Aviation Regulations indicate that the ATNS Approval Application may be submitted at any time prior to the construction of the Proposed Project.

5 We note from the 22 April Letter that you reference part 1.14 of the SA-CATS 139.01.30 technical standard which prohibited the development of a wind farm within 35 km of an aerodrome. Please be advised that this prohibition has since been removed from SA-CATS 139.01.30 in the Amendment SA-CATS 2 of 2023 document and is no longer in effect.[1]

6 Regarding the concerns raised in paragraph 7 of the 22 April Letter we confirm that landscape-level impacts associated with the proposed wind farm have been assessed by the relevant specialists, including the visual, faunal, and avifaunal specialists. Appropriate mitigation measures will be implemented to manage potential impacts. In particular, specific mitigation measures relating to large terrestrial bird species, such as the Secretary bird, have been outlined in detail within the avifaunal specialist.

7 Finally, we wish to confirm that your comments, including the 22 April Letter, and our responses thereto will be included in the public participation report for the EA Application. The Applicant also confirms that it will keep the Peter Celliers Trust updated regarding the outcome of the ATNS Approval Application. It should be noted that the 22 April Letter was originally submitted outside of the prescribed Public Participation Process (PPP) period and was therefore not included in the original publication report. However, as this letter has since been resubmitted during the current PPP period, within the prescribed timeframes, both the letter and our responses will be incorporated into the Final Comments and Responses Report (CRR).

8 Please do not hesitate to contact the writer of this letter should you have any queries in this regard.

Yours faithfully

[INSERT NAME AND SIGNATURE]

---

[1] https://www.caa.co.za/legal-notices-2/.

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Westway Office Park
Westville, 3635
Durban, South Africa

Telephone: +27 31 265 0033
Fax: +27 31 265 0150

www.erm.com

19 July 2024

ERM Reference: 0684401

Dear Interested and Affected Party, Stakeholder, Organ of State

NOTIFICATION OF AVAILABILITY OF THE DRAFT SCOPING REPORTS FOR PUBLIC REVIEW AND COMMENT OF THE PROPOSED MULILO AMSTERDAM WIND ENERGY FACILITY (EMVELO, ROCHDALE AND SHEEPMOOR) CLUSTER, NEAR ERMELO, MPUMALANGA

Notice is hereby given of a Public Participation Process (PPP) to be undertaken in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA, 1998), as amended.

DFFE Reference(s): To Be Confirmed

Nature of Activity: Emvelo (Pty) Ltd, Rochdale (Pty) Ltd and Sheepmoor (Pty) Ltd ('the Project Applicants') are proposing the construction and operation of three (3) Wind Energy Facilities (WEF). The potential generation capacity of Emvelo WEF is up to 200 MW, Rochdale WEF is up to 220 MW and Sheepmoor up to 360 MW. Each WEF will comprise various buildings, access roads, a battery energy storage system (BESS), and a substation hub with associated electrical grid infrastructure such as but not limited to a 132kV overhead transmission powerline connecting the WEF to the national electrical grid network.

Development Location: The proposed Mulilo WEF's Cluster are located 30 km east of Ermelo within the Msukaligwa Local Municipality, and Gert Sibande District Municipality.

Application Process: In terms of Chapter 5 of the National Environmental Management Act, 1998 (Act 107 of 1998 – NEMA), Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), the Project Applicants appointed Environmental Resources Management (Pty) Ltd (ERM), to act as the project manager and to undertake the Scoping and Environmental Impact Assessment (S&EIA) processes as the independent environmental impact assessment practitioner (EAP).

ERM has submitted three separate Environmental Applications, including separate Draft Scoping Reports to the Department of Forestry, Fisheries and the Environment (DFFE).

Invitation to Comment: Members of the public, local communities, and stakeholders are invited to comment on the Draft Scoping Reports, which is available for public review and comment, from **Friday, 19 July 2024 to the 20 August 2024 (both days inclusive),** as per Table 1 below.

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Southern Africa (Pty) Ltd
1st Floor, Building 32
The Woodlands Office Park
Woodlands Drive, Woodmead
2148, Johannesburg, South Africa

Registered number: 2003/001404/07
VAT registration: 4780205482

Offices worldwide

Directors
Claudio Bertora
Urmilla Bob (Non-Executive)
Tania Swanepoel
Marinda Rasmussen

Ermelo Public Library	Ermelo, 2350
CD Copies will be made upon request to the EAP.	

Should you wish to be registered as an I&AP and / or would like comment please submit your name, interest in the project or comment, email and postal address and telephone number in writing to the below address:	
Environmental Resources Management Southern Africa (Pty) Ltd	
Project Reference: 0684401 Mulilo WEF Cluster	**Contact Person:** Lucien Barbeau
Email: ERM.ArcusAmsterdam@erm.com	**Telephone:** +27117985400
Post: Postnet Suite 90, Private Bag X12, Tokai, 7966	**Online:** https://amsterdamclusterwef.aidaform.com/stakeholder-engagement

Following the 30-day public participation, the comments will be addressed and incorporated into the Final Scoping Reports, which will be submitted to the DFFE for approval to progress to the EIA Phase.

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Correspondence throughout the Application Process will only be distributed to Registered I&APs. Registration is possible throughout the Application Process.

Thank you for the interest in the project.



Sadiya Salie
Environmental Consultant
Environmental Resources Management (Pty) Ltd

ERM

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19 Julie 2024

ERM Verwysing: 0684401

Geagte Belanghebbende en Geaffekteerde Party, Belanghebbende, Staats orgaan

KENNISGEWING VAN BESKIKBAARHEID VAN DIE KONSEP-OMVANGS VERSLAE VIR OPENBARE HERSIENING EN KOMMENTAAR VAN DIE VOORGESTELDE MULILO AMSTERDAM WIND ENERGIE FASILITEIT (EMVELO, ROCHDALE EN SHEEPMOOR) CLUSTER, NABY ERMELO, MPUMALANGA

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DFFE-verwysing(s): Om bevestig te word

Aard van aktiwiteit: Emvelo (Edms) Bpk, Rochdale (Edms) Bpk en Sheepmoor (Edms) Bpk ('die Projek aansoekers') stel voor dat drie (3) Wind energie fasiliteite (WEF) opgerig en bedryf word. Die potensiële opwekkingsvermoë van Emvelo WEF is tot 200 MW, Rochdale WEF is tot 220 MW en Sheepmoor tot 360 MW. Elke WEF sal bestaan uit verskeie geboue, toegangspaaie, 'n battery-energieberging stelsel (BESS) en 'n substasie naaf met gepaardgaande elektriese netwerk infrastruktuur soos, maar nie beperk tot 'n 132kV oorhoofse transmissie kraglyn wat die WEF met die nasionale elektriese netwerk verbind.

Ontwikkelings ligging: Die voorgestelde Mulilo WEF se cluster is 30 km oos van Ermelo binne die Msukaligwa Plaaslike Munisipaliteit en Gert Sibande Distriksmunisipaliteit geleë.

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Uitnodiging om kommentaar te lewer: Lede van die publiek, plaaslike gemeenskappe en belanghebbendes word uitgenooi om kommentaar te lewer op die konsep-omvang verslae, wat beskikbaar is vir openbare hersiening en kommentaar, vanaf **Vrydag, 19 Julie 2024 tot die 20 Augustus 2024 (albei dae ingesluit),** soos per Tabel 1 hieronder.

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Kantore wêreldwyd

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Marinda Rasmussen

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Projek verwysing: 0684401 Mulilo WEF-cluster	**Kontak persoon:** Lucien Barbeau
E-pos: ERM.ArcusAmsterdam@erm.com	**Telefoon:** +27117985400
Pos: Postnet Suite 90, Privaatsak X12, Tokai, 7966	**Aanlyn:** https://amsterdamclusterwef.aidaform.com/stakeholder-engagement

Na afloop van die openbare deelname van 30 dae, sal die kommentaar aangespreek en opgeneem word in die Finale Omvang verslae, wat aan die DFFE voorgelê sal word vir goedkeuring om na die EIA-fase te vorder.

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Korrespondensie gedurende die aansoek proses sal slegs aan geregistreerde I &AP's versprei word. Registrasie is moontlik gedurende die aansoek proses.

Dankie vir die belangstelling in die projek.

Sadiya Salie
Omgewings konsultant

Environmental Resources Management Southern Africa (Edms) Bpk

From:	ERM Arcus Amsterdam
To:	ERM Arcus Amsterdam
Subject:	Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga
Date:	Friday, 19 July 2024 16:38:35
Attachments:	image001.png IAP Notification Letter Afrikaans.pdf IAP Notification Letter English.pdf

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

Dear Interested and Affected Party,

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

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

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final Scoping Report.
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Please indicate which application your comment in respect of.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Consultant
Lucien Barbeau

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a19 Julie 2024

ERM Verwysing: 0684401

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Aard van aktiwiteit: Emvelo Windenergie fasiliteit Bpk, Rochdale Windenergie fasiliteit Bpk en Sheepmoor Windenergie fasiliteit Bpk ('die Projek aansoekers') stel voor dat drie (3) Wind energie fasiliteite (WEF) opgerig en bedryf word. Die potensiële opwekkingsvermoë van Emvelo WEF is tot 200 MW, Rochdale WEF is tot 220 MW en Sheepmoor tot 360 MW. Elke WEF sal bestaan uit verskeie geboue, toegangspaaie, 'n battery-energieberging stelsel (BESS) en 'n substasie naaf met gepaardgaande elektriese netwerk infrastruktuur soos, maar nie beperk tot 'n 132kV oorhoofse transmissie kraglyn wat die WEF met die nasionale elektriese netwerk verbind.

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19 July 2024

ERM Reference: 0684401

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Sadiya Salie
Environmental Consultant
Environmental Resources Management (Pty) Ltd

From: [redacted]

Subject: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga
Date: Friday, 19 July 2024 16:36:00
Attachments: image001.png
IAP Notification Letter Afrikaans.pdf
IAP Notification Letter English.pdf

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a19 Julie 2024

ERM Verwysing: 0684401

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Ontwikkelings ligging: Die voorgestelde Amsterdam WEF se cluster is 30 km oos van Ermelo binne die Msukaligwa Plaaslike Munisipaliteit en Gert Sibande Distriksmunisipaliteit geleë.

Aansoek proses: Ingevolge Hoofstuk 5 van die Wet op Nasionale Omgewingsbestuur, 1998 (Wet 107 van 1998 – NEMA), Omgewings Impak studie (EIA) Regulasies, 2014 (soos gewysig), het die Projek aansoekers, Environmental Resources Management (Edms) Bpk (ERM) aangestel om as projek bestuurder op te tree en die Omvang- en Omgewings Impak bepalings prosesse (S&EIA) as die onafhanklike omgewings impak bepalings praktisyn (EAP) te onderneem.

ERM het drie afsonderlike omgewings aansoeke ingedien, waaronder afsonderlike konsep-omvang verslae aan die departement van bosbou, visserye en die omgewing (DFFE).

Uitnodiging om kommentaar te lewer: Lede van die publiek, plaaslike gemeenskappe en belanghebbendes word uitgenooi om kommentaar te lewer op die konsep-omvang verslae, wat beskikbaar is vir openbare hersiening en kommentaar, vanaf **Vrydag, 19 Julie 2024 tot die 20 Augustus 2024 (albei dae ingesluit),** soos per Tabel 1 hieronder.

Tabel 1: Liggings vir openbare oorsig en kommentaar

Ligging	Fisiese adres
Elektroniese kopie lokasies (beskikbaar vir aflaai hieronder)	
Via One Drive	I &AP's kan versoek dat kopieë via een gedeelde gids van One Drive gestuur word.

Geregistreerde kantoor
Omgewingshulpbronbestuur
Suider-Afrika (Edms) Bpk
1ste verdieping, gebou 32
Die Woodlands-kantoorpark
Woodlandsrylaan, Woodmead
2148, Johannesburg, Suid-Afrika

Geregistreerde nommer: 2003/001404/07
BTW-registrasie: 4780205482

Kantore wêreldwyd

Direkteure
Claudio Bertora
Urmila Bob (nie-uitvoerende)
Tania Swanepoel
Marinda Rasmussen

Harde kopie ligging	
Ermelo Openbare Biblioteek	Ermelo, 2350
CD-kopieë sal op versoek aan die EAP gemaak word.	

Indien u as 'n I&AP geregistreer wil wees en / of kommentaar wil lewer, dien asseblief u naam, belangstelling in die projek of kommentaar, e-pos adres en pos adres en telefoon nommer skriftelik by die onderstaande adres in:	
Environmental Resources Management Southern Africa (Edms) Bpk	
Projek verwysing: 0684401 Mulilo WEF-cluster	**Kontak persoon:** Lucien Barbeau
E-pos: ERM.ArcusAmsterdam@erm.com	**Telefoon:** +27117985400
Pos: Postnet Suite 90, Privaatsak X12, Tokai, 7966	**Aanlyn:**https://mulilowef.aidaform.com/public-participation-form

Na afloop van die openbare deelname van 30 dae, sal die kommentaar aangespreek en opgeneem word in die Finale Omvang verslae, wat aan die DFFE voorgelê sal word vir goedkeuring om na die EIA-fase te vorder.

Let wel, met betrekking tot die Wet op die Beskerming van Persoonlike Inligting (PoPI Wet 4 van 2013, soos gewysig): Indien u versoek om as 'n I&AP te registreer, sal u persoonlike inligting aan 'n appel kandidaat beskikbaar gestel word in die geval van 'n appèl, en 'n aansoeker/EAP/onafhanklike persoon vir doeleindes daarvan om ingelig te word en toegang tot 'n ouditverslag te kry.

Korrespondensie gedurende die aansoek proses sal slegs aan geregistreerde I &AP's versprei word. Registrasie is moontlik gedurende die aansoek proses.

Dankie vir die belangstelling in die projek.

Sadiya Salie
Omgewings konsultant

Environmental Resources Management Southern Africa (Edms) Bpk

ERM

Suite S005
17 The Boulevard
Westway Office Park
Westville, 3635
Durban, South Africa

Telephone: +27 31 265 0033
Fax: +27 31 265 0150

www.erm.com

19 July 2024

ERM Reference: 0684401

Dear Interested and Affected Party, Stakeholder, Organ of State

NOTIFICATION OF AVAILABILITY OF THE DRAFT SCOPING REPORTS FOR PUBLIC REVIEW AND COMMENT OF THE PROPOSED AMSTERDAM WIND ENERGY FACILITY (EMVELO, ROCHDALE AND SHEEPMOOR) CLUSTER, NEAR ERMELO, MPUMALANGA

Notice is hereby given of a Public Participation Process (PPP) to be undertaken in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA, 1998), as amended.

DFFE Reference(s): To Be Confirmed

Nature of Activity: Emvelo Wind Energy Facility (Pty) Ltd, Rochdale Wind Energy Facility (Pty) Ltd and Sheepmoor Wind Energy Facility (Pty) Ltd ('the Project Applicants') are proposing the construction and operation of three (3) Wind Energy Facilities (WEF). The potential generation capacity of Emvelo WEF is up to 200 MW, Rochdale WEF is up to 220 MW and Sheepmoor up to 360 MW. Each WEF will comprise various buildings, access roads, a battery energy storage system (BESS), and a substation hub with associated electrical grid infrastructure such as but not limited to a 132kV overhead transmission powerline connecting the WEF to the national electrical grid network.

Development Location: The proposed Amsterdam WEF's Cluster are located 30 km east of Ermelo within the Msukaligwa Local Municipality, and Gert Sibande District Municipality.

Application Process: In terms of Chapter 5 of the National Environmental Management Act, 1998 (Act 107 of 1998 – NEMA), Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), the Project Applicants appointed Environmental Resources Management (Pty) Ltd (ERM), to act as the project manager and to undertake the Scoping and Environmental Impact Assessment (S&EIA) processes as the independent environmental impact assessment practitioner (EAP).

ERM has submitted three separate Environmental Applications, including separate Draft Scoping Reports to the Department of Forestry, Fisheries and the Environment (DFFE).

Invitation to Comment: Members of the public, local communities, and stakeholders are invited to comment on the Draft Scoping Reports, which is available for public review and comment, from **Friday, 19 July 2024 to the 20 August 2024 (both days inclusive)**, as per Table 1 below.

Table 1: Public Review and Comment Locations

Location	Physical Address
Electronic Copy Locations (Available for download below)	
Via One Drive	I&APs can request for copies to be sent via one drive shared folder.
Hard Copy Location	

Registered office
Environmental Resources Management
Southern Africa (Pty) Ltd
1st Floor, Building 32
The Woodlands Office Park
Woodlands Drive, Woodmead
2148, Johannesburg, South Africa

Registered number: 2003/001404/07
VAT registration: 4780205482

Offices worldwide

Directors
Claudio Bertora
Urmilla Bob (Non-Executive)
Tania Swanepoel
Marinda Rasmussen

Ermelo Public Library	Ermelo, 2350
CD Copies will be made upon request to the EAP.	

Should you wish to be registered as an I&AP and / or would like comment please submit your name, interest in the project or comment, email and postal address and telephone number in writing to the below address:	
Environmental Resources Management Southern Africa (Pty) Ltd	
Project Reference: 0684401 Mulilo WEF Cluster	**Contact Person:** Lucien Barbeau
Email: ERM.ArcusAmsterdam@erm.com	**Telephone:** +27117985400
Post: Postnet Suite 90, Private Bag X12, Tokai, 7966	**Online:** https://mulilowef.aidaform.com/public-participation-form

Following the 30-day public participation, the comments will be addressed and incorporated into the Final Scoping Reports, which will be submitted to the DFFE for approval to progress to the EIA Phase.

Please note, regarding the Protection of Personal Information Act (PoPI Act 4 of 2013, as amended): If you request to register as an I&AP, your personal information will be made available to an appellant in the case of an appeal, and an applicant/EAP/independent person for purposes of being informed and given access to an audit report.

Correspondence throughout the Application Process will only be distributed to Registered I&APs. Registration is possible throughout the Application Process.

Thank you for the interest in the project.



Sadiya Salie
Environmental Consultant
Environmental Resources Management (Pty) Ltd

From: Khululwa Matshoba
To: ERM Arcus Amsterdam
Subject: Automatic reply: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga
Date: Friday, 19 July 2024 16:38:35

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EXTERNAL MESSAGE

Good day

Please note that I am on leave from 15 to 26 July 2024. For work related matters please contact Martina Phiri.

Thank you.

Warm regards
Khululwa

Disclaimer

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From: EWT EIA Applications
To: ERM Arcus Amsterdam
Subject: Automatic reply: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga
Date: Friday, 19 July 2024 16:38:42

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EXTERNAL MESSAGE

Please note that this email address is an internal repository for development application documents only. Submissions to this email will not be considered as notifications to the interested and affected party. Only submissions to actual staff of the EWT will be considered as formal notifications of development applications. Please cc the relevant EWT staff member (if you know who is responsible for the region in question) and Kish Chetty (KishC@ewt.org.za) to ensure that the development application is considered and addressed.

Thank you.

From: Leonard Shaw (LS)
To: ERM Arcus Amsterdam
Subject: Automatic reply: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga
Date: Friday, 19 July 2024 16:40:29

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EXTERNAL MESSAGE

Out of office on 19 July 2024. Contact Trevor Watts (wattstj@telkom.co.za).
===== This e-mail and its contents are subject to the Telkom SA SOC Ltd. E-mail legal notice http://www.telkom.co.za/about_us/download/TelkomEMailLegalNotice.pdf =====

From: ERM Arcus Amsterdam
To: ERM Arcus Amsterdam
Bcc: [redacted]

Subject: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga
Date: Friday, 19 July 2024 16:36:00
Attachments: image001.png
IAP Notification Letter Afrikaans.pdf
IAP Notification Letter English.pdf

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

Dear Interested and Affected Party,

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

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

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final

Scoping Report.
More information on how you are able to participate in this process is attached in the above documentation.
Please indicate which application your comment in respect of.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Consultant
Lucien Barbeau

ERM
240 Main Road, Rondebosch, Cape Town
T [redacted]
E lucien.barbeau@erm.com | **W** www.erm.com



From: [redacted]
Subject: RE: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga
Date: Tuesday, 23 July 2024 09:25:26
Attachments: image002.png
image005.png
image006.png
image012.png
image001.png

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EXTERNAL MESSAGE

Good day,

I hope this email finds you well. Kindly note that the SACAA has transferred all obstacle assessments and applications responsibilities to Air Traffic and Navigation Services (ATNS) as published on the SACAA website: www.caa.co.za/industryinformation/obstacles/ . A formal application must be lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted. The list and contact details of the approved obstacles assessment services providers can be obtained from the CAA website: www.caa.co.za.

Kind regards,
Nrateng Mashiloane
Aviation Environmental Compliance Department
Aviation Safety Infrastructure (ASI)- Aviation Environmental Compliance
[redacted]
www.caa.co.za
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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, July 19, 2024 4:37 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

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SUBMISSION OF DRAFT SCOPING REPORT FOR THE WIND ENERGY FACILITY (SHEEPMOOR,

ROCHDALE AND EMVELO) CLUSTER

Dear Interested and Affected Party,

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

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

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

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Consultant
Lucien Barbeau

ERM
240 Main Road, Rondebosch, Cape Town
T [redacted]
E lucien.barbeau@erm.com | **W** www.erm.com



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From:	John Geeringh
To:	ERM Arcus Amsterdam
Subject:	RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga
Date:	Tuesday, 23 July 2024 11:53:35
Attachments:	image001.png Eskom requirements for work in or near Eskom servitudes.doc Renewable Energy Generation Plant Setbacks to Eskom Infrastructure Rev2 - signed.pdf

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EXTERNAL MESSAGE

Please send me KMZ files of the proposed developments and grid connection. Please find attached Eskom requirements for work at or near Eskom infrastructure and servitudes, as well as a setbacks guideline for RE Developments.

Kind regards

John Geeringh (Pr Sci Nat) Reg. EAP (EAPASA)
Senior Consultant Environmental Management
Grid Planning: Land and Rights
National Transmission Company South Africa SOC Ltd (NTCSA)
Megawatt Park, B2Y25, Maxwell Drive, Sunninghill, Sandton.
P O Box 1091, Johannesburg, 2000.
[redacted]

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, 19 July 2024 16:40
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

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

Dear Interested and Affected Party,

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

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

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

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Consultant
Lucien Barbeau

ERM
240 Main Road, Rondebosch, Cape Town
[redacted]
E lucien.barbeau@erm.com | **W** www.erm.com

ERM

TO WHOM IT MAY CONCERN

Eskom requirements for work in or near Eskom servitudes.

1. Eskom's rights and services must be acknowledged and respected at all times.

2. Eskom shall at all times retain unobstructed access to and egress from its servitudes.

3. Eskom's consent does not relieve the developer from obtaining the necessary statutory, land owner or municipal approvals.

4. Any cost incurred by Eskom as a result of non-compliance to any relevant environmental legislation will be charged to the developer.

5. If Eskom has to incur any expenditure in order to comply with statutory clearances or other regulations as a result of the developer's activities or because of the presence of his equipment or installation within the servitude restriction area, the developer shall pay such costs to Eskom on demand.

6. The use of explosives of any type within 500 metres of Eskom's services shall only occur with Eskom's previous written permission. If such permission is granted the developer must give at least fourteen working days prior notice of the commencement of blasting. This allows time for arrangements to be made for supervision and/or precautionary instructions to be issued in terms of the blasting process. It is advisable to make application separately in this regard.

7. Changes in ground level may not infringe statutory ground to conductor clearances or statutory visibility clearances. After any changes in ground level, the surface shall be rehabilitated and stabilised so as to prevent erosion. The measures taken shall be to Eskom's satisfaction.

8. Eskom shall not be liable for the death of or injury to any person or for the loss of or damage to any property whether as a result of the encroachment or of the use of the servitude area by the developer, his/her agent, contractors, employees, successors in title, and assignees. The developer indemnifies Eskom against loss, claims or damages including claims pertaining to consequential damages by third parties and whether as a result of damage to or interruption of or interference with Eskom's services or apparatus or otherwise. Eskom will not be held responsible for damage to the developer's equipment.

9. No mechanical equipment, including mechanical excavators or high lifting machinery, shall be used in the vicinity of Eskom's apparatus and/or services, without prior written permission having been granted by Eskom. If such permission is granted the developer must give at least seven working days' notice prior to the commencement of work. This allows time for arrangements to be made for supervision and/or precautionary instructions to be issued by the relevant Eskom Manager

Note: Where and electrical outage is required, at least fourteen work days are required to arrange it.

10. Eskom's rights and duties in the servitude shall be accepted as having prior right at all times and shall not be obstructed or interfered with.

11. Under no circumstances shall rubble, earth or other material be dumped within the servitude restriction area. The developer shall maintain the area concerned to Eskom's satisfaction. The developer shall be liable to Eskom for the cost of any remedial action which has to be carried out by Eskom.

12. The clearances between Eskom's live electrical equipment and the proposed construction work shall be observed as stipulated by *Regulation 15* of the *Electrical Machinery Regulations of the Occupational Health and Safety Act, 1993 (Act 85 of 1993).*

13. Equipment shall be regarded electrically live and therefore dangerous at all times.

14. In spite of the restrictions stipulated by Regulation 15 of the Electrical Machinery Regulations of the Occupational Health and Safety Act, 1993 (Act 85 of 1993), as an additional safety precaution, Eskom will not approve the erection of houses, or structures occupied or frequented by human beings, under the power lines or within the servitude restriction area.

15. Eskom may stipulate any additional requirements to highlight any possible exposure to Customers or Public to coming into contact or be exposed to any dangers of Eskom plant.

16. It is required of the developer to familiarise himself with all safety hazards related to Electrical plant.

17. Any third party servitudes encroaching on Eskom servitudes shall be registered against Eskom's title deed at the developer's own cost. If such a servitude is brought into being, its existence should be endorsed on the Eskom servitude deed concerned, while the third party's servitude deed must also include the rights of the affected Eskom servitude.

John Geeringh (Pr Sci Nat)(EAPASA)
Senior Consultant Environmental Management
Eskom Transmission Division: Land & Rights
Megawatt Park, D1Y42, Maxwell Drive, Sunninghill, Sandton.
P O Box 1091, Johannesburg, 2000.
[redacted]

Eskom	SCOT	Technology

Title:	**Renewable Energy Generation Plant Setbacks to Eskom Infrastructure**	Unique Identifier:	**240-65559775**
		Alternative Reference Number:	**N/A**
		Area of Applicability:	**Power Line Engineering**
		Documentation Type:	**Guideline**
		Revision:	**2**
		Total Pages:	**9**
		Next Review Date:	**N/A**
		Disclosure Classification:	**CONTROLLED DISCLOSURE**

Compiled by	Approved by	Authorised by
J W Chetty	**B Ntshuntsha**	**R A Vajeth**
Mechanical Engineer	**Chief Engineer (Lines)**	**Snr Manager (Lines) and SCOT/SC/ Chairperson**
Date: 15 / 09 / 2020	Date: 30/10/2020	Date: 30/10/2020

PCM Reference: 240-65132732 **LINE ENGINEERING SERVICES**
SCOT Study Committee Number/Name : **OVERHEAD LINES**

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FIGURES

Figure 1: Horizontal Axis Wind Turbine 8

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EXECUTIVE SUMMARY

In recent decades, the use of wind turbines, concentrated solar plants and photovoltaic plants have been on the increase as it serves as an abundant source of energy. This document specifies proposed setbacks for wind turbines and the reasons for these setbacks from infrastructure as well as setbacks for concentrated solar plants and photovoltaic plants. Setbacks for wind turbines employed in other countries were compared and a general setback to be used by Eskom was suggested for use with wind turbines and other renewable energy generation plants.

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1. INTRODUCTION

During the last few decades, a large amount of wind turbines have been installed in wind farms to accommodate for the large demand of energy and depleting fossil fuels. Wind is one of the most abundant sources of renewable energy. Wind turbines harness the energy of this renewable resource for integration in electricity networks. The extraction of wind energy is its primary function and thus the aerodynamics of the wind turbine is important. There are many different types of wind turbines which will all exhibit different wind flow characteristics. The most common wind turbine used commercially is the Horizontal Axis Wind Turbine. Wind flow characteristics of this turbine are important to analyse as it may have an effect on surrounding infrastructure.

Wind turbines also cause large turbulence downwind that may affect existing infrastructure. Debris or parts of the turbine blade, in the case of a failure, may be tossed behind the turbine and may lead to damage of infrastructure in the wake path.

This document outlines the minimum distances that need to be introduced between a wind turbine and Eskom infrastructure to ensure that debris and / or turbulence would not negatively impact on the infrastructure and future expansion of infrastructure (lines and substation) as per the long term planning scenario.

Safety distances of wind turbines from other structures as implemented by other countries were also considered and the reasons for their selection were noted. All renewable energy developments are approved by The Department of Environmental Affairs, Forestry and Fisheries (DEFF) in terms of NEMA. The DEFF is aware of the setbacks guideline, however they cannot use it in terms of decision making since the setbacks document has no legal standing in SA and it would be outside of their mandate who have been advised to follow the guidelines herein.

Concentrated solar plants and photovoltaic plants setbacks away from substations were also to be considered to prevent restricting possible power line access routes to the substation and possible expansion of substations.

2. SUPPORTING CLAUSES

2.1 SCOPE

This document provides guidance on the safe distance that a wind turbine should be located from any Eskom power line or substation. Although it is not based on any legislative requirement, it is deemed important that Eskom’s infrastructure and future network expansion planning is not impeded. The document specifies proposed setback distances for transmission lines (220 kV to 765 kV), distribution lines

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(66 kV to 132 kV) and all Eskom substations. Proposed setbacks for concentrated solar plants and photovoltaic plants are also specified away from substations.

2.1.1 Purpose

Setbacks for wind turbines and power lines / substations are required for various reasons. These include possible catastrophic failure of the turbine blade that may release fragments and which may be thrown onto nearby power lines that may result in damage with associated unplanned outages. Turbulence behind the turbine may affect helicopter flight during routine Eskom live line maintenance and inspections that may lead to safety risk of the aircraft / personnel. Concentrated solar plants and photovoltaic plants setback away from substations were required to prevent substations from being boxed in by these renewable generation plants limiting line route access to the substations and possible future substation expansion.

2.1.2 Applicability

This document is applicable to the siting of all new and existing wind turbines, concentrated solar plants and photovoltaic plants near power lines and substations and in line of site between Eskom telecommunication infrastructure, including future Eskom renewable energy development.

2.2 NORMATIVE/INFORMATIVE REFERENCES

2.2.1 Normative

1. http://www.envir.ee/orb.aw/class=file/action=preview/id=1170403/Hiiumaa+turbulence+impact+EMD.pdf.
2. http://www.energy.ca.gov/2005publications/CEC-500-2005-184/CEC-500-2005-184.PDF
3. http://www.adamscountywind.com/Revised%20Site/Windmills/Adams%20County%20Ordinance/Adams%20County%20Wind%20Ord.htm
4. http://www.dsireusa.org/incentives/incentive.cfm?Incentive_Code=PA11R&RE=1&EE=1
5. http://www.wind-watch.org/documents/european-setbacks-minimum-distance-between-wind-turbines-and-habitations/
6. http://www.publications.parliament.uk/pa/ld201011/ldbills/017/11017.1-i.html
7. http://www.caw.ca/assets/pdf/Turbine_Safety_Report.pdf
8. Rogers J, Slegers N, Costello M. (2011) A method for defining wind turbine setback standards. Wind energy 10.1002/we.468

2.2.2 Informative

None

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2.3 DEFINITIONS

Definition	Description
Setback	The minimum distance between a wind turbine and boundary line/dwelling/road/infrastructure/servitude etc.
Flicker	Effect caused when rotating wind turbine blades periodically cast shadows
Tip Height	The total height of the wind turbine ie. Hub height plus half rotor diameter (see Figure1)

2.3.1 Disclosure Classification

Controlled disclosure: controlled disclosure to external parties (either enforced by law, or discretionary).

2.4 ABBREVIATIONS

Abbreviation	Description
None	

2.5 ROLES AND RESPONSIBILITIES

All parties involved in the positioning wind turbines, concentrated solar plants and photovoltaic plants near power lines/substations should endeavour to follow the setbacks outlined in this guideline.

2.6 PROCESS FOR MONITORING

Agreement by Eskom in writing on any encroachment of the setbacks distance should be requested via the Grid Access Unit. Eskom should ensure that every application for renewable energy (RE) developments are informed about the existence of the setbacks document early in the RE planning process to ensure maximum effect. This includes Eskom RE development.

2.7 RELATED/SUPPORTING DOCUMENTS

None

3. DOCUMENT CONTENT

3.1 INTERNATIONAL SETBACK COMPARISON

Wind Turbine setbacks employed by various countries were considered. It was found that setbacks were determined for various reasons that include noise, flicker, turbine blade failure and wind effects as well as

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future network expansion planning. The distances (setbacks) varied based on these factors and were influenced by the type of infrastructure

Wind turbine setbacks varied for roads, power lines, dwellings, buildings and property and it was noted that the largest setbacks were employed for reasons of noise and flicker related issues [1-7]. Very few countries specified setbacks for power lines.

The literature survey [1-7], yielded information about studies and experiments were conducted to determine the distance that a broken fragment from a wind turbine might be thrown. Even though of low probability of hitting a power line [$5.0x10^{-5}$ [8]], the distances recorded were significant [750m [8]]

Wind turbines may also cause changes in wind patterns with turbulent effects behind the hub. These factors influence the wind turbine setbacks specified in this document.

Setbacks were thus introduced to prevent any damage to Eskom infrastructure and impedance to operation and future network expansion planning.

Renewable energy plant can also limit access into substations for power lines of all voltages. A setback distance should therefore be employed to prevent substations from being boxed in by these generation plants and preventing future network expansion. These setback distances are specified in this document.

3.2 ESKOM RECOMMENDED SETBACKS

Any renewable energy applicant should engage with Eskom to determine if their plant layout or positioning of turbines, CSP or PV infrastructure would encroach on the proposed setbacks provided for in this guideline and to ensure that their planning and Eskom's future expansion planning is taken into account. Eskom must inform all renewable energy developers, including Eskom RE, of the existence of the setbacks guideline early in the development process. Should there be an encroachment, a formal request should be sent to and accepted by Eskom in writing if any of the below mentioned setback distances are infringed upon:

- Eskom requests a setback distance of 3 times the tip height of the wind turbine from the edge of the closest Eskom servitude (including vacant servitudes) for transmission lines (220kV to 765kV) and Substations.
- Eskom requests a setback distance of 1 times the tip height of the wind turbine from the edge of the closest Eskom servitude (including vacant servitudes) for distribution lines (66 kV to 132 kV) and Substations.

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- A written request should be sent to Eskom via the Grid Access Unit regarding any proposed wind turbine, concentrated solar plants and photovoltaic activity within a 5 km radius of a substation for Eskom to comment on.
- Where concentrated solar plants, photovoltaic structures, battery storage systems (BESS) and other renewable generation plants fall within a 2 km radius of the closest point of a transmission or distribution substation (66kV to 765kV), a written agreement with Eskom is recommended during the planning phase of such plant or structures to ensure Eskom's future planning is not impeded.
- Applicants should not position any wind turbine in the line of site between and two Eskom Radio Telecommunication masts. It should be proven that Eskom radio telecommunication systems (mainly microwave systems) will not be affected in any way by wind turbines due to the criticality of this infrastructure in terms of network operation. Eskom Telecommunications should be engaged on this matter.
- If the position or size of any turbine changes and subsequently infringes on any of the above stated setbacks, a request for relaxation must be sent through to Eskom as per the point mentioned above.

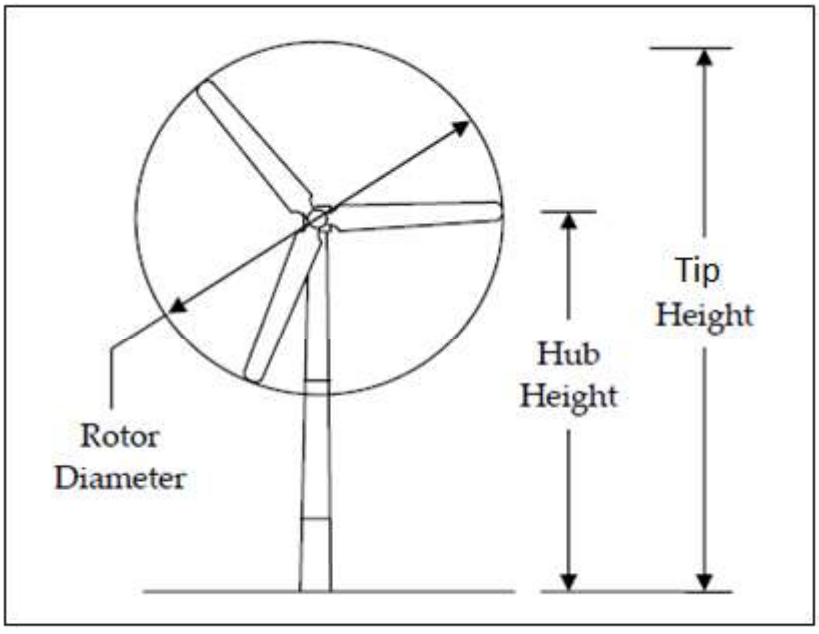


Figure 1: Horizontal Axis Wind Turbine [2]

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4. AUTHORISATION

This document has been seen and accepted by:

Name & Surname	Designation
V Naidoo	Chief Engineer
Dr P Pretorius	Electrical Specialist
J Geeringh	Snr Consultant Environ Mngt
B Haridass	Snr Consultant Engineer
B Ntshuntsha	Chief Engineer
R Vajeth	Snr Manager (Lines)
D A Tunnicliff	Snr Manager L&R (Acting)
B Branfield	Snr Consultant Engineer

5. REVISIONS

Date	Rev.	Compiler	Remarks
November 2013	0	J W Chetty	First Publication - No renewable energy generation plant setback specification in existence.
October 2018	1	JW Chetty	Modification to sub-section 3.2 to provide more clarity for application procedure.
June 2020	2	JW Chetty	Content within the guideline was re-worded to explain the benefits of mutual agreements between the applicants and ESKOM rather than the application being a legal obligation.

6. DEVELOPMENT TEAM

The following people were involved in the development of this document:

Jonathan Chetty (Mechanical Engineer)

Vivendhra Naidoo (Chief Engineer)

Dr Pieter Pretorius (Electrical Specialist)

John Geeringh (Snr Consultant Environ Mngt)

Bharat Haridass (Snr Consultant Engineer)

Riaz Vajeth (Snr Manager (Lines))

Bruce Ntshuntsha (Chief Engineer)

David Tunnicliff (Snr Manager L&R Acting)

CONTROLLED DISCLOSURE

When downloaded from the EDMS, this document is uncontrolled and the responsibility rests with the user to ensure it is in line with the authorised version on the system.

From:	Lydia Kutu
To:	ERM Arcus Amsterdam
Cc:	Bathandwa Ncube; EIAadmin; Salome Mambane; Stephen Burton; Sadiya Salie; Anathi Manyakanyaka; Stephanie Gopaul
Subject:	14/12/16/3/3/2/2591
Date:	Wednesday, 24 July 2024 07:34:11

You don't often get email from lkutu@dffe.gov.za. Learn why this is important

EXTERNAL MESSAGE

Dear Sir/Madam

ACKNOWLEDGEMENT OF RECEIPT OF THE NEW APPLICATION FORM AND DRAFT SCOPING REPORT FOR THE PROPOSED CARLETONVILLE SOLAR PHOTOVOLTAIC PLANT AND ASSOCIATED INFRASTRUCTURE ON REMAINDER OF FARM TWYFELVLAKTE NO. 105, MERAFONG CITY LOCAL MUNICIPALITY, WEST RAND DISTRICT MUNICIPALITY, GAUTENG PROVINCE.

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

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

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

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

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

Kind Regards,
Lydia Kutu
Integrated Environmental Authorisations:
Coordination, Strategic Planning and Support
[redacted]

To God be the Glory!!!

From:	Lydia Kutu
To:	ERM Arcus Amsterdam
Cc:	Bathandwa Ncube; EIAadmin; Salome Mambane; Stephen Burton; Sadiya Salie; Anathi Manyakanyaka; Stephanie Gopaul
Subject:	Recall: 14/12/16/3/3/2/2591
Date:	Wednesday, 24 July 2024 07:36:10

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EXTERNAL MESSAGE

Lydia Kutu would like to recall the message, "14/12/16/3/3/2/2591".

From:	Lydia Kutu
To:	ERM Arcus Amsterdam
Cc:	Bathandwa Ncube; EIAadmin; Salome Mambane; Stephen Burton; Sadiya Salie; Anathi Manyakanyaka; Stephanie Gopaul
Subject:	14/12/16/3/3/2/2592
Date:	Wednesday, 24 July 2024 07:37:17

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EXTERNAL MESSAGE

Dear Sir/Madam

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

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

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

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

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

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

Kind Regards,
Lydia Kutu
Integrated Environmental Authorisations:
Coordination, Strategic Planning and Support
[redacted]

To God be the Glory!!!

From:	Lydia Kutu
To:	ERM Arcus Amsterdam
Cc:	Bathandwa Ncube; EIAadmin; Salome Mambane; Stephen Burton; Sadiya Salie; Anathi Manyakanyaka; Stephanie Gopaul
Subject:	14/12/16/3/3/2/2591
Date:	Wednesday, 24 July 2024 07:38:14

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EXTERNAL MESSAGE

Dear Sir/Madam

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

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

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

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

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

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

Kind Regards,
Lydia Kutu
Integrated Environmental Authorisations:
Coordination, Strategic Planning and Support
[redacted]

To God be the Glory!!!

From:	Lydia Kutu
To:	ERM Arcus Amsterdam
Cc:	Bathandwa Ncube; EIAadmin; Salome Mambane; Stephen Burton; Sadiya Salie; Anathi Manyakanyaka; Stephanie Gopaul
Subject:	14/12/16/3/3/2/2593
Date:	Wednesday, 24 July 2024 07:40:13

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EXTERNAL MESSAGE

Dear Sir/Madam

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

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

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

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

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

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

Kind Regards,
Lydia Kutu
Integrated Environmental Authorisations:
Coordination, Strategic Planning and Support
[redacted]

To God be the Glory!!!

From: BC Admin
To: ERM Arcus Amsterdam
Cc: Portia Makitla; Tebego Kgaphola; Lindiwe Victoria Dlamini
Subject: RE: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga
Date: Monday, 29 July 2024 09:21:58
Attachments: image002.png
image001.png
image005.png

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EXTERNAL MESSAGE

Dear Sir/Madam

DFFE Directorate: Biodiversity Conservation hereby acknowledge receipt of the invitation to review and comment on the project mentioned on the subject line. Kindly note that the project has been allocated to Mrs P Makitla and Ms Tebego Kgaphola (Copied on this email). In addition, kindly share the shapefiles of the development footprints/application site with the Case Officers.

Please note: All Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries must be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@dffe.gov.za for attention of Mr Seoka Lekota



Tebego Kgaphola

Directorate: Biodiversity Mainstreaming and EIA
Branch: Biodiversity and Conservation
473 Steve Biko Road | Private Bag X477 | Pretoria | 001
[redacted]
Website:www.environment.gov.za



From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, 19 July 2024 16:37
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

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

Dear Interested and Affected Party,

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

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

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

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Consultant
Lucien Barbeau

ERM
240 Main Road, Rondebosch, Cape Town
[redacted]
E lucien.barbeau@erm.com | **W** www.erm.com



From:	ERM Arcus Amsterdam
To:	John Geeringh; ERM Arcus Amsterdam
Subject:	RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga
Date:	Monday, 29 July 2024 17:55:00
Attachments:	image002.png image003.png Amsterdam (2023-07-12).kmz

Dear John,

Thank you for your e-mail. Please find attached a KMZ file of each WEF.

Thank You
Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town
+27105963488

erm.com

From: John Geeringh <GeerinJH@ntcsa.co.za>
Sent: Tuesday, July 23, 2024 11:50 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

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EXTERNAL MESSAGE

Please send me KMZ files of the proposed developments and grid connection. Please find attached Eskom requirements for work at or near Eskom infrastructure and servitudes, as well as a setbacks guideline for RE Developments.

Kind regards

John Geeringh (Pr Sci Nat) Reg. EAP (EAPASA)
Senior Consultant Environmental Management
Grid Planning: Land and Rights
National Transmission Company South Africa SOC Ltd (NTCSA)
Megawatt Park, B2Y25, Maxwell Drive, Sunninghill, Sandton.
P O Box 1091, Johannesburg, 2000.
[redacted]

Disclaimer

NB: This Email and its contents are subject to the NTCSA EMAIL LEGAL NOTICE which can be viewed here.

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, 19 July 2024 16:40
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

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

Dear Interested and Affected Party,

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

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

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

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Consultant
Lucien Barbeau

ERM
240 Main Road, Rondebosch, Cape Town
T [redacted]
E lucien.barbeau@erm.com | **W** www.erm.com



From: aidaform@aidaform.com
To: [redacted]
Subject: New Response for "Stakeholder Engagement Form"
Date: Tuesday, 30 July 2024 09:01:06
Attachments: image001.png (63.2 kB)

[You don't often get email from aidaform@aidaform.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

EXTERNAL MESSAGE

Dear AidaForm user,

Your form "Stakeholder Engagement Form" has a new response.

---

1. What's your name?
tg rf

2. Who do you represent?
rf t

3. Your Email
t@gmail.com

4. Your Phone Number
+12

5. Alternative Phone Number
+12

6. Your Address
12, df, sd, NA, 12, na

7. What is your interest in the projects?
NA

8. Please visit the EIRM website (link below) for more info and access to the reports. Are you able to access the website?
Yes

9. What are your comments regarding the Rochdale, Entwele and Sheepmoor WEF Charter?
NA

10. Protection of Personal Information (POPI) Act, Act 4 of 2013
Yes (0)

You can turn off or manage notifications for this form at:
https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwp.aidaform.com%2Fform%2Fmrng56gvmh8%2Fsettings%2Femail&data=05%7C02%7Cirm.arcsaunterdam%40rm.com%7Cc42a0d8551e9476ac5848f8dcb065f3b%27c7f2fdc0bd39c4e485bac68e1f82ba88130%7C0%7C0%7C638579197055285680%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=EYXskpmaYnQYyaVs6v9vAsvIHf%2BTWVkEkXV%2BlZBC8TVc%3D&reserved=0

Stay productive and take care!
Your AidaForm Team

Stakeholder Engagement Form

https://mulilowef.aidaform.com/public-participation-form

Tuesday, July 30, 2024 06:59 UTC

What's your name?

First Name
tg

Last Name
rf

Who do you represent?

Organisation
rf

Designation
i

Your Email

i@gmail.com

Your Phone Number

+12

Alternative Phone Number

+12

Your Address

Street Address
12

Street Address Line 2
df

City
sd

State/Province
NA

Zip Code
12

Country
na

What is your interest in the projects?

NA

Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website?

Yes

What are your comments regarding the Rochdale, Emvelo and Sheepmoor WEF Cluster?

NA

Protection of Personal Information (POPI) Act, Act 4 of 2013

Yes (0)

From: Josua Meyer
To: ERM Arcus Amsterdam
Subject: Fwd: SHEEPMOOR, EMVELO WIND ENERGIE PROJEKTE
Date: Tuesday, 30 July 2024 11:00:29

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EXTERNAL MESSAGE

---------- Forwarded message ---------
From: **Josua Meyer** <meyerjosua55@gmail.com>
Date: Tue, Jul 30, 2024 at 10:59 AM
Subject: SHEEPMOOR, EMVELO WIND ENERGIE PROJEKTE
To: <lucien.barbeau@erm.com>

VERSOEK VORM OM TE REGISTREER AS BELANGHEBBENDE PARTY OP BOGEMELDE PROJEKTE sodat kommentaar gelewer kan word.

Het nie rekening op aida om aanlyn te registreer nie en die foon nommer 011-798 5400 is foutief.

Waardeer

Josua Meyer
[redacted]

From:	ERM Arcus Amsterdam
To:	Lloyd Barnes; ERM Arcus Amsterdam; Lucien Barbeau
Cc:	Gail Wheeler; Stephen Burton
Subject:	RE: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga
Date:	Wednesday, 31 July 2024 08:33:20
Attachments:	image002.png image006.png image007.png image008.png image009.png 1412163322592.msg 1412163322591.msg 1412163322593.msg

Hi Lloyd,

The DFFE has acknowledge submission, please see attached correspondence.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: Lloyd Barnes <Lloyd@mulilo.com>
Sent: Tuesday, July 30, 2024 9:21 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: Gail Wheeler <Gail@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: RE: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

EXTERNAL MESSAGE

Good day Lucien,

Thank you for the response.

Yes, the documents are accessible now. And updated, thank you.

Has the DFFE acknowledged submission?

Kind Regards,

Lloyd Barnes
Project Manager: Environmental
[redacted]
[redacted]com
[redacted]

mulilo

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Monday, July 29, 2024 5:01 PM
To: Lloyd Barnes <Lloyd@mulilo.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: Gail Wheeler <Gail@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: RE: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

Hi Lloyd,

Are you able to try and access the link once again? We have slightly modified the form now that allows the IAP to view the ERM website for the WEF Cluster. Additionally, the landing page has been updated accordingly. Noted all documents will be reviewed to not mention Mulilo prior to Final scoping submission.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: Lloyd Barnes <Lloyd@mulilo.com>
Sent: Monday, July 29, 2024 3:46 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: Gail Wheeler <Gail@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: RE: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

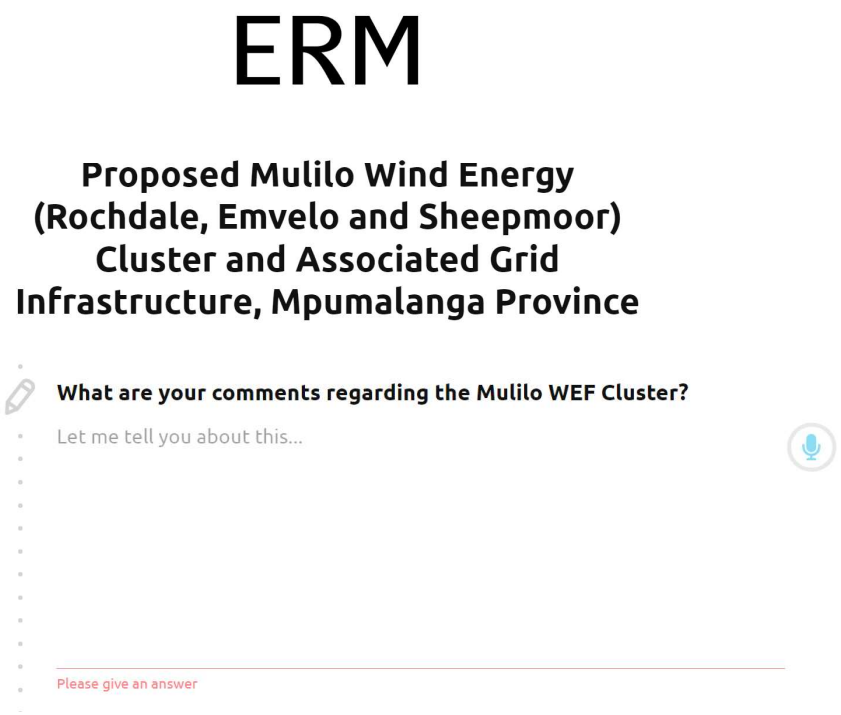
EXTERNAL MESSAGE

Good day Lucien,

I followed the link provided below and it took me to a landing page. After completing the required information, I didn't receive a link to the reports, nor did the documents automatically download.
Please may you kindly explain how an I&AP would access docs? Worryingly, we can only find Emvelo and Sheepmoor when doing a simple Google Search.
Once updated, could you please let me know, as we like to furnish the LO's with the links

personally. Ideally today.

Also, I noted that within the Draft Scoping Reports, and now on the I&AP landing page, that **Mulilo** is constantly referred to. i.e below.



Earlier on in the process, it was explicitly mentioned that there should be **NO** reference to Mulilo. We did not name it the Mulilo WEF cluster, nor is Mulilo the applicant. Please could this landing page be updated to remove reference to Mulilo. Post PP, could **all** documents please be reviewed to remove this reference, unless extremely necessary.

Kind Regards,

Lloyd Barnes
Project Manager: Environmental
[redacted]
www.mulilo.com
[redacted]
mulilo

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, July 19, 2024 4:37 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

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

Dear Interested and Affected Party,

This email serves to inform you about the submission of the Draft Scoping Reports for the

proposed Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga.

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

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

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Consultant
Lucien Barbeau

ERM
240 Main Road, Rondebosch, Cape Town
T +[redacted]
E lucien.barbeau@erm.com | **W** www.erm.com



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From:	Lydia Kutu
To:	ERM Arcus Amsterdam
Cc:	Bathandwa Ncube; EIAadmin; Salome Mambane; Stephen Burton; Sadiya Salie; Anathi Manyakanyaka; Stephanie Gopaul
Subject:	14/12/16/3/3/2/2591
Date:	Wednesday, 24 July 2024 07:38:14

You don't often get email from lkutu@dffe.gov.za. Learn why this is important

EXTERNAL MESSAGE

Dear Sir/Madam

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

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

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

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

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

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

Kind Regards,
Lydia Kutu
Integrated Environmental Authorisations:
Coordination, Strategic Planning and Support
[redacted]

To God be the Glory!!!

From:	Lydia Kutu
To:	ERM Arcus Amsterdam
Cc:	Bathandwa Ncube; EIAadmin; Salome Mambane; Stephen Burton; Sadiya Salie; Anathi Manyakanyaka; Stephanie Gopaul
Subject:	14/12/16/3/3/2/2592
Date:	Wednesday, 24 July 2024 07:37:17

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EXTERNAL MESSAGE

Dear Sir/Madam

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

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

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Kind Regards,
Lydia Kutu
Integrated Environmental Authorisations:
Coordination, Strategic Planning and Support
[redacted]

To God be the Glory!!!

From:	Lydia Kutu
To:	ERM Arcus Amsterdam
Cc:	Bathandwa Ncube; EIAadmin; Salome Mambane; Stephen Burton; Sadiya Salie; Anathi Manyakanyaka; Stephanie Gopaul
Subject:	14/12/16/3/3/2/2593
Date:	Wednesday, 24 July 2024 07:40:13

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EXTERNAL MESSAGE

Dear Sir/Madam

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

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Kind Regards,
Lydia Kutu
Integrated Environmental Authorisations:
Coordination, Strategic Planning and Support
[redacted]

To God be the Glory!!!

From:	Lydia Kutu
To:	ERM Arcus Amsterdam
Cc:	Bathandwa Ncube; EIAadmin; Salome Mambane; Stephen Burton; Sadiya Salie; Anathi Manyakanyaka; Stephanie Gopaul
Subject:	14/12/16/3/3/2/2591
Date:	Wednesday, 24 July 2024 07:38:14

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Kind Regards,
Lydia Kutu
Integrated Environmental Authorisations:
Coordination, Strategic Planning and Support
[redacted]

To God be the Glory!!!

From:	Lydia Kutu
To:	ERM Arcus Amsterdam
Cc:	Bathandwa Ncube; EIAadmin; Salome Mambane; Stephen Burton; Sadiya Salie; Anathi Manyakanyaka; Stephanie Gopaul
Subject:	14/12/16/3/3/2/2592
Date:	Wednesday, 24 July 2024 07:37:17

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Kind Regards,
Lydia Kutu
Integrated Environmental Authorisations:
Coordination, Strategic Planning and Support
[redacted]

To God be the Glory!!!

From:	Lydia Kutu
To:	ERM Arcus Amsterdam
Cc:	Bathandwa Ncube; EIAadmin; Salome Mambane; Stephen Burton; Sadiya Salie; Anathi Manyakanyaka; Stephanie Gopaul
Subject:	14/12/16/3/3/2/2593
Date:	Wednesday, 24 July 2024 07:40:13

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EXTERNAL MESSAGE

Dear Sir/Madam

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

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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.

Kind Regards,
Lydia Kutu
Integrated Environmental Authorisations:
Coordination, Strategic Planning and Support
[redacted]

To God be the Glory!!!

From: Lloyd Barnes
To: ERM Arcus Amsterdam; Lucien Barbeau
Cc: Gail Wheeler; Stephen Burton
Subject: RE: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga
Date: Wednesday, 31 July 2024 09:17:32
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png

EXTERNAL MESSAGE

Thank you, Lucien.

As discussed, we intend on submitting the Final Scoping report one day after PP has ended (baring no issues).
Other than the layout and one outstanding LO consent form (Pieter Langenhoven), please may you indicate if there are any other outstanding items required for you to update the Draft Scoping Reports to Final?

Kind Regards,

Lloyd Barnes
Project Manager: Environmental
[redacted]
mulilo

[redacted] ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Wednesday, July 31, 2024 8:33 AM
To: Lloyd Barnes <Lloyd@mulilo.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: Gail Wheeler <Gail@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: RE: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

Hi Lloyd,

The DFFE has acknowledge submission, please see attached correspondence.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: John Geeringh
To: ERM Arcus Amsterdam
Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga
Date: Wednesday, 31 July 2024 15:48:01
Attachments: image001.png
image002.png

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EXTERNAL MESSAGE

Thanks, they will have to relook at their turbine layouts with regards to the setbacks requirements of 3 x tip height from TX lines and 1 x tip height from Dx lines. Lines connecting to power stations are extremely sensitive and chance are we may no grant setbacks relaxation.

Regards

John Geeringh (Pr Sci Nat) Reg. EAP (EAPASA)
Senior Consultant Environmental Management
Grid Planning: Land and Rights
National Transmission Company South Africa SOC Ltd (NTCSA)
Megawatt Park, B2Y25, Maxwell Drive, Sunninghill, Sandton.
P O Box 1091, Johannesburg, 2000.
[redacted]

Disclaimer

NB: This Email and its contents are subject to the NTCSA EMAIL LEGAL NOTICE which can be viewed here.

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Monday, 29 July 2024 17:57
To: John Geeringh <GeerinJH@ntcsa.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

Dear John,

Thank you for your e-mail. Please find attached a KMZ file of each WEF.

Thank You
Kind Regards

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: John Geeringh <GeerinJH@ntcsa.co.za>
Sent: Tuesday, July 23, 2024 11:50 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

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EXTERNAL MESSAGE

Please send me KMZ files of the proposed developments and grid connection. Please find attached Eskom requirements for work at or near Eskom infrastructure and servitudes, as well as a setbacks guideline for RE Developments.

Kind regards

John Geeringh (Pr Sci Nat) Reg. EAP (EAPASA)
Senior Consultant Environmental Management
Grid Planning: Land and Rights
National Transmission Company South Africa SOC Ltd (NTCSA)
Megawatt Park, B2Y25, Maxwell Drive, Sunninghill, Sandton.
P O Box 1091, Johannesburg, 2000.
[redacted]

Disclaimer

NB: This Email and its contents are subject to the NTCSA EMAIL LEGAL NOTICE which can be viewed here.

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, 19 July 2024 16:40
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

SUBMISSION OF DRAFT SCOPING REPORT FOR THE WIND ENERGY FACILITY

(SHEEPMOOR, ROCHDALE AND EMVELO) CLUSTER

Dear Interested and Affected Party,

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

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

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

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Consultant
Lucien Barbeau

ERM
240 Main Road, Rondebosch, Cape Town
T [redacted]
E lucien.barbeau@erm.com | **W** www.erm.com



From: Josua Meyer
To: ERM Arcus Amsterdam
Subject: VOORGESTELDE ERMELO WINDPLASE
Date: Thursday, 01 August 2024 21:06:21

You don't often get email from meyerjosua55@gmail.com. Learn why this is important

EXTERNAL MESSAGE

Plasing, groottes van turbines onduidelik
Versoek duidelike kaart waar turbines geplaas gaan word. Eiendom grense en distrikspaaie moet duidelik getoon word.

From: Robyn Luyt
To: ERM Arcus Amsterdam
Cc: cagenbach@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za; whector@dffe.gov.za; Gavin Cowden; Sindy Mbuyane; Celia.dewaal@mtpa.co.za; frans.krige@mtpa.co.za; mervyn@mtpa.co.za
Subject: Consultation | Mlulio Wind Farms Mpumalanga
Date: Saturday, 03 August 2024 15:09:43
Importance: High

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EXTERNAL MESSAGE

Good day Ms Gopaul,

It has come to our attention, and not via any official notification from ERM, that draft Scoping Reports for the following wind farms proposed in the Gert Sibande District in Mpumalanga Province are out for public comment from 19 July 2024 to 20 August 2024 (as per ERM website), where ERM is the EAP:
1. Shepmoore WEF
2. Emvelo WEF
3. Rochdale WEF

Neither DARDLEA nor MTPA have been consulted to date, nor have we received copies of any of the draft Scoping Reports. Aside from the requirements of the EIA Regulations, DARDLEA and MTPA have through internal arrangements with DFFE requested to be included in all pre-application consultations for Renewable Energy projects in Mpumalanga, particularly wind energy facilities. DARDLEA and MTPA must be included during all pre-application meetings and in all in-process consultations.

For the purpose of commenting on draft reports during the regulatory periods, we request that hard copies of all reports are submitted to Ms Sindi Mbuyane in our Ermelo office (where projects are located in the Gert Sibande District), and sent electronically to me via WeTransfer. Please also ensure that MTPA receives the reports in the manner requested by them. For your records I include the contact details of all relevant officials to be consulted in DARDLEA (when an application is in the Gert Sibande District) and MTPA:

DARDLEA	DESIGNATION	EMAIL	PHONE
Robyn Luyt	Director: Environmental Impact Management (EIM)	rluyt@mpg.gov.za	[redacted]
Sindisiwe Mbuyane	Deputy Director: EIM Gert Sibande District	mbuyanesb@mpg.gov.za	[redacted]
Gavin Cowden	Deputy Director: Environmental Policy, Planning and Coordination	gcowden@mpg.gov.za	
MTPA	**DESIGNATION**	**EMAIL**	**PHONE**
Mervyn Lotter	Manager: Biodiversity Planning	Mervyn@mtpa.co.za	[redacted]
Frans Krige	Land Use Advisor	Frans.Krige@mtpa.co.za	
Khumbelo Malele	Land Use Advisor	Khumbelo.Malele@mtpa.co.za khumbelomalele@gmail.com	[redacted]
Celia de	EIA Data Capturer	celia.dewaal@mtpa.co.za	[redacted]

Waal	LUA		[redacted]

Please note that time frames for commenting on draft reports can only commence on the date that hard copies of the reports are received, and we request that our 30 day time frame aligns with DFFE's.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
Nelspruit, 1200
[redacted]

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From: Celia de Waal
To: ERM Arcus Amsterdam
Cc: Mervyn Lotter; Johan Eksteen; Frans Krige; Khumbelo Malele
Subject: FW: Register for the Zephyr WEF Meeting and site visit
Date: Tuesday, 06 August 2024 09:39:58

You don't often get email from celia@mtpa.co.za. Learn why this is important

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

EXTERNAL MESSAGE

Good morning

Kindly send us, the MTPA, hard copies of the 3 Wind Farm reports, for our Scientists to comment on, to the following physical address:

To: Cecilia de Waal (EIA Data Capturer)
MTPA Office Building (Lydenburg)
End of Morgan street
Lydenburg 1120

My contact details are: [redacted]

Kind regards

Celia de Waal

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
[redacted]

From: Mervyn Lotter <mervyn@mtpa.co.za>
Sent: Saturday, August 3, 2024 9:00 AM
To: Frans Krige <frans@mtpa.co.za>; Celia de Waal <celia@mtpa.co.za>; Robyn Luyt (rluyt@mpg.gov.za) <rluyt@mpg.gov.za>; Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>
Subject: FW: Register for the Zephyr WEF Meeting and site visit

Hi there

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

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

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

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

Best wishes
Mervyn

From: Christophe Pajonk <Christophe.Pajonk@edf-re.co.za>
Sent: Friday, August 2, 2024 12:19 PM
To: Mervyn Lotter <mervyn@mtpa.co.za>
Subject: RE: Register for the Zephyr WEF Meeting and site visit

Hi Mervyn,

Many thanks for reaching out.

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

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

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

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

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

I hope this helps.

Kind regards,

Christophe

From: Mervyn Lotter <mervyn@mtpa.co.za>
Sent: Thursday, August 1, 2024 8:25 PM
To: Christophe Pajonk <Christophe.Pajonk@edf-re.co.za>
Subject: RE: Register for the Zephyr WEF Meeting and site visit

EXTERNAL MAIL
Hi Christophe

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

Best wishes
Mervyn

From: Christophe Pajonk <Christophe.Pajonk@edf-re.co.za>
Sent: Thursday, August 1, 2024 4:50 PM
To: Sindy Mbuyane <mbuyanesb@mpg.gov.za>; Gavin Cowden <GCowden@mpg.gov.za>; Robyn Luyt <RLuyt@mpg.gov.za>; Frans Krige <frans@mtpa.co.za>; hlatshwayo.mixo@mtpa.co.za; Mervyn Lotter <mervyn@mtpa.co.za>; Rockey Nkosi <rockey.nkosi@mtpa.co.za>
Cc: Ryan David-Andersen <ryan@amdadevelopments.co.za>
Subject: RE: Register for the Zephyr WEF Meeting and site visit

Good afternoon everyone,

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

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

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

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

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

Kind regards,

Christophe

From: Sindy Mbuyane <mbuyanesb@mpg.gov.za>
Sent: Wednesday, July 31, 2024 11:23 AM
To: Ryan David-Andersen <ryan@amdadevelopments.co.za>; Christophe Pajonk <Christophe.Pajonk@edf-re.co.za>; Gavin Cowden <GCowden@mpg.gov.za>; Robyn Luyt <RLuyt@mpg.gov.za>; Frans Krige <frans@mtpa.co.za>; hlatshwayo.mixo@mtpa.co.za; mervyn@mtpa.co.za; rockey.nkosi@mtpa.co.za
Subject: Register for the Zephyr WEF Meeting and site visit

EXTERNAL MAIL
Good day All,

Find attached for your attention.

Kind Regards,

Sindisiwe Mbuyane
EAPASA Reg: 2021/3509, IAIAsa 2040304
Environmental Officer Control Grade B
Gert Sibande District (13 De Jager Street, Ermelo 2350)
[redacted]
[redacted]

This message and any attachments relating to official business of the Mpumalanga Provincial Government (MPG) is proprietary to the MPG and intended for the original addressee only. The message may contain information that is confidential and subject to legal privilege. Any views expressed in this message are those of the individual sender. If you receive this message in error, please notify the original sender immediately and destroy the original message. If you are not the intended recipient of this message, you are hereby notified that you must not disseminate, copy, use, distribute, or take any action in connection therewith. The MPG cannot insure that the integrity of this communication has been maintained, nor that it is free of errors, viruses, interception and / or interference. The MPG is not liable whatsoever for loss or damage resulting from the opening of this message and / or attachments and / or the use of the information contained in this message and / or attachments.

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The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more Click Here.

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From: ERM Arcus Amsterdam
To: Josua Meyer; ERM Arcus Amsterdam
Subject: RE: VOORGESTELDE ERMELO WINDPLASE
Date: Tuesday, 06 August 2024 09:46:44
Attachments: 0684401-GIS-010 Fig 3 Emvelo WEF Preferred Site Development Plan Map.pdf
0684401-GIS-003 Fig 3 Rochdale Preferred Site Development Plan Map.pdf
0684401-GIS-017 Fig 3 Sheepmoor Preferred Site Development Plan Map.pdf
image001.png

Good day,

Kindly see attached Layout of Proposed WEF's. Additional information on the project can be found in the link below:

https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/

Kind Regards,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

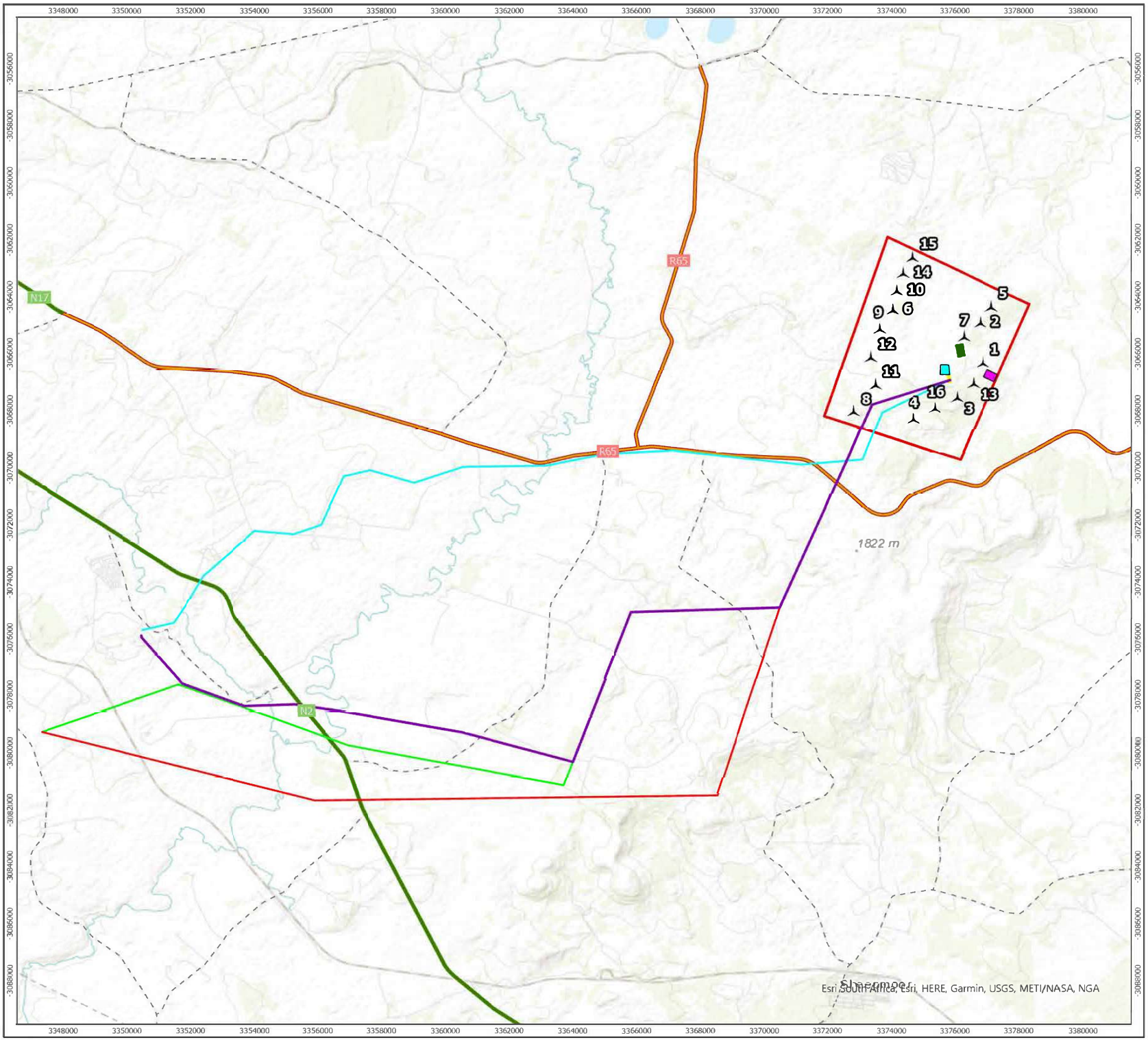
Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Thursday, August 1, 2024 9:06 PM
To: ERM Arcus Amsterdam <erm.arcusamsterdam@erm.com>
Subject: VOORGESTELDE ERMELO WINDPLASE

You don't often get email from meyerjosua55@gmail.com. Learn why this is important

EXTERNAL MESSAGE

Plasing, groottes van turbines onduidelik
Versoek duidelike kaart waar turbines geplaas gaan word. Eiendom grense en distrikspaaie moet duidelik getoon word.



ERM

Rochdale WEF Infrastructure

- Turbine Locations
- Rochdale WEF Boundary

Associated Infrastructure Locations

- Substation
- O&M Buildings
- Laydown Area Alternative
- Laydown Area

Grid Connection Options

- Preferred Grid Connection
- Alternative 1 Grid Connection
- Alternative 2 Grid Connection
- Alternative 3 Grid Connection

Public Roads

- National Road
- Arterial Road
- Secondary Road

1:115,000 Scale @ A3

0 2.25 4.5 km

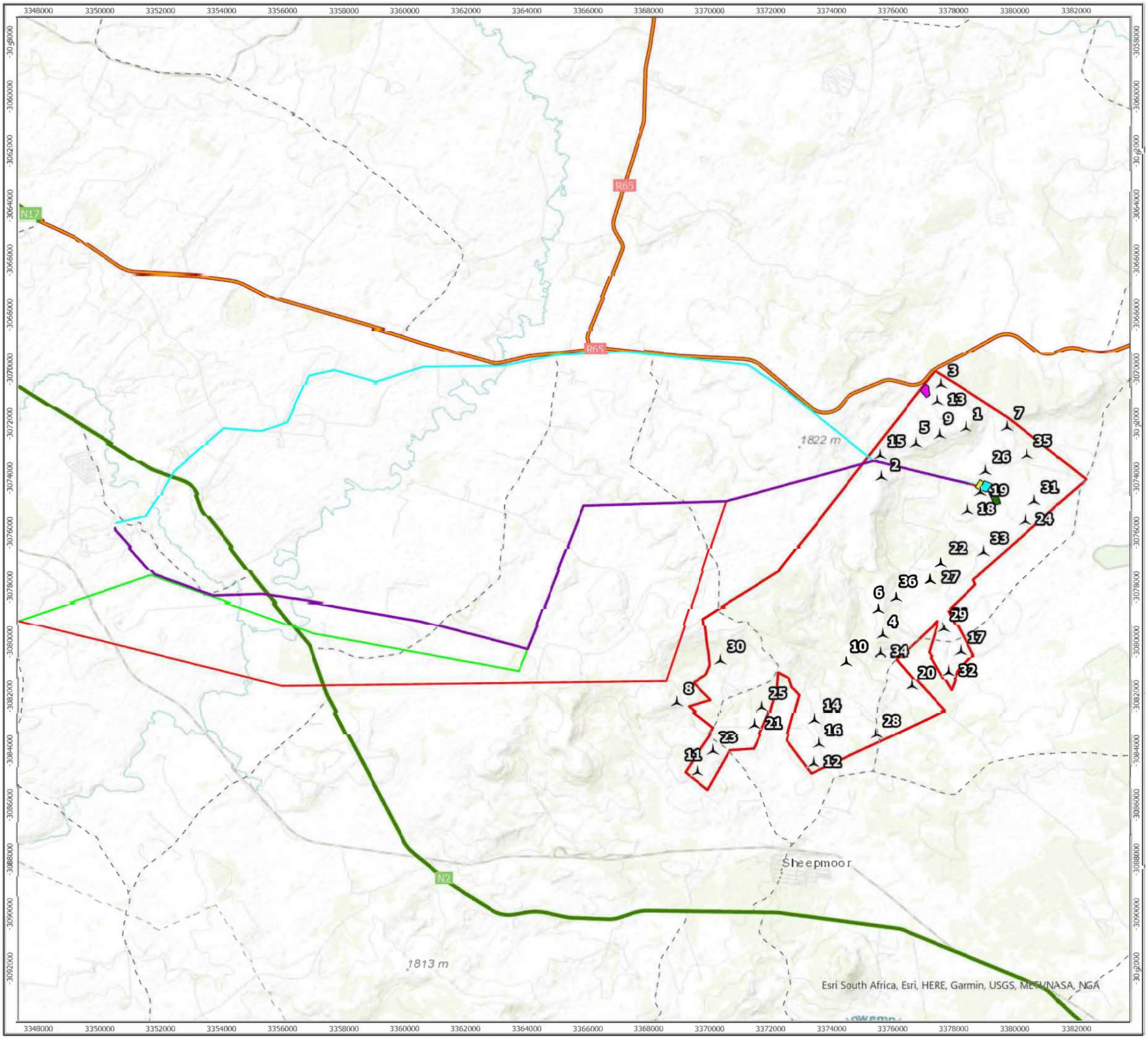
NORTH

Produced By: KM	Ref: 0684401-GIS-003
Checked By:LB	Date: 6/9/2024

Preferred Site Development Plan
Figure 1-2

Rochdale WEF Scoping Report

G:\SA-GIS\Environment\0684401 Mulilo WEFs\0684401 Mulilo WEFs.aprx\0684401-GIS-003 Fig 3 Rochdale Preferred Site Development Plan Map



ERM

Emvelo WEF Infrastucture

- Turbine Locations
- Emvelo WEF Boundary

Asscociated Infrastructure Locations

- Substation
- O&M Buildings
- Laydown Area (Preferred)
- Laydown Area (Alternative)

Grid Connection Options

- Preferred Grid Connection
- Alternative 1 Grid Connection
- Alternative 2 Grid Connection
- Alternative 3 Grid Connection

Public Roads

- National Road
- Arterial Road
- Secondary Road

1:120,000 Scale @ A3

0 2.35 4.7 km

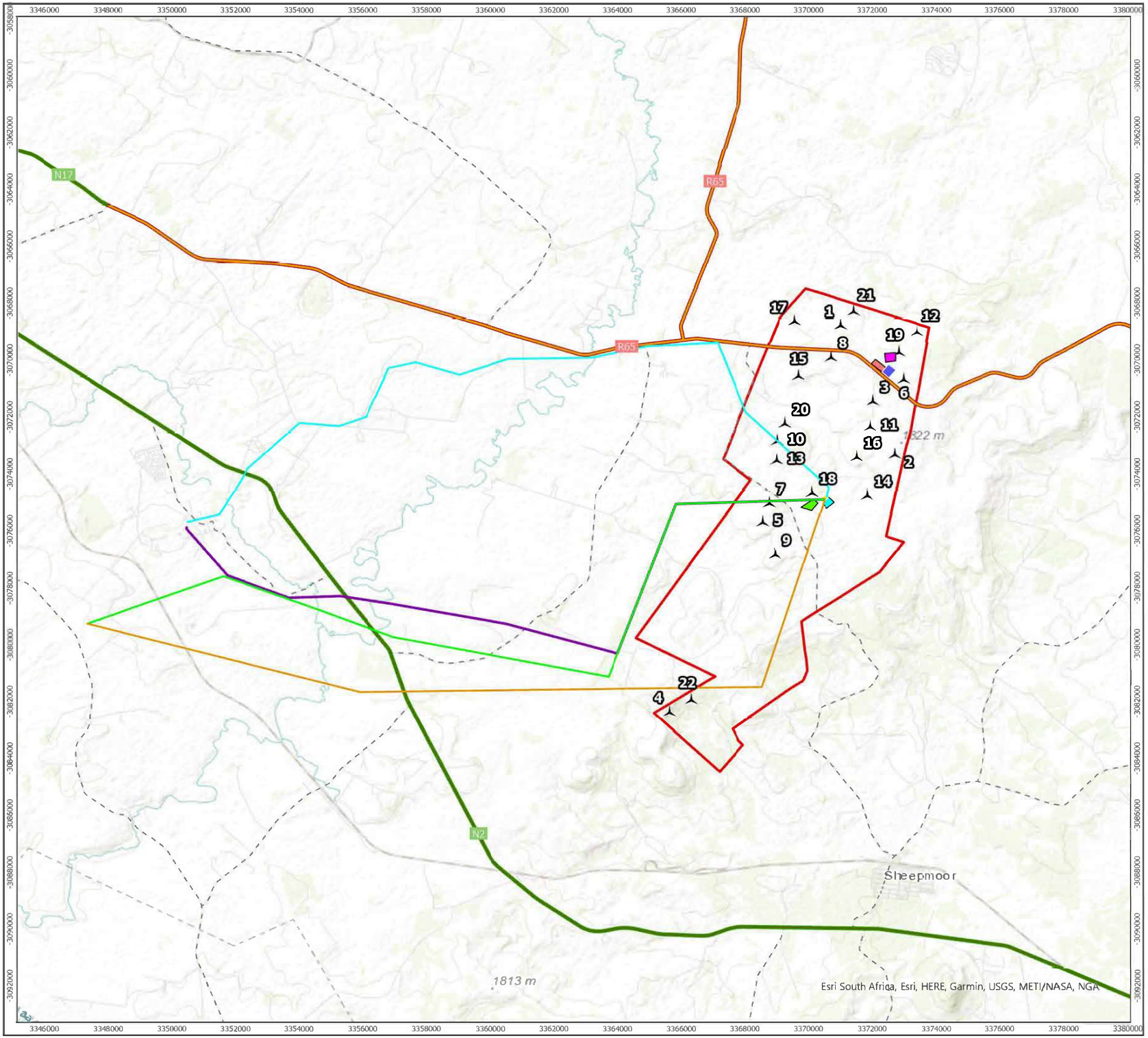
NORTH

Produced By: KM	Ref: 0684401-GIS-010
Checked By: AA	Date: 6/9/2024

Preferred Site Development Plan
Figure 1-2

Emvelo WEF Scoping Report

G:\SA-GIS\Environment\0684401 Mulilo WEFs\0684401 Mulilo WEFs.aprx\0684401-GIS-010 Fig 3 Emvelo WEF Preferred Site Development Plan Map



ERM

Sheepmoor WEF Infrastructure

- Turbine Locations
- Sheepmoor WEF Boundary

Associated Infrastructure

- Substation (Preferred)
- Substation (Alternative)
- Laydown Area (Preferred)
- Laydown Area (Alternative)
- O&M Buildings (Alternative)
- O&M Buildings (Preferred)

Grid Connection Options

- Preferred Grid Connection
- Alternative 1 Grid Connection
- Alternative 2 Grid Connection
- Alternative 3 Grid Connection

Public Roads

- National Road
- Arterial Road
- Secondary Road

1:115,000 Scale @ A3

0 2.25 4.5 km

NORTH

Produced By: KM	Ref: 0684401-GIS-017
Checked By: AA	Date: 6/9/2024

Preferred
Site Development Plan
Figure 1-2

Sheepmoor WEF
Scoping Report

G:\SA-GIS\Environment\0684401 Mulilo WEFs\0684401 Mulilo WEFs.aprx\0684401-GIS-017 Fig 3 Sheepmoor Preferred Site Development Plan Map

From: ERM Arcus Amsterdam
To: Josua Meyer; ERM Arcus Amsterdam
Subject: RE: SHEEPMOOR, EMVELO WIND ENERGIE PROJEKTE
Date: Tuesday, 06 August 2024 12:09:54
Attachments: image001.png

Good day,

Thank you for your comment, you will now be added to the I&AP database.

Below is a link to the Aida form, there will be no need to register in order to fill out the form:

https://mulilowef.aidaform.com/public-participation-form

Thank you,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Tuesday, July 30, 2024 11:00 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Fwd: SHEEPMOOR, EMVELO WIND ENERGIE PROJEKTE

You don't often get email from meyerjosua55@gmail.com. Learn why this is important

EXTERNAL MESSAGE

---------- Forwarded message ---------
From: **Josua Meyer** <meyerjosua55@gmail.com>
Date: Tue, Jul 30, 2024 at 10:59 AM
Subject: SHEEPMOOR, EMVELO WIND ENERGIE PROJEKTE
To: <lucien.barbeau@erm.com>

VERSOEK VORM OM TE REGISTREER AS BELANGHEBBENDE PARTY OP BOGEMELDE PROJEKTE sodat kommentaar gelewer kan word.

Het nie rekening op aida om aanlyn te registreer nie en die foon nommer 011-798 5400 is foutief.

Waardeer

Josua Meyer
[redacted]

From: ERM Arcus Amsterdam
To: Robyn Luyt; ERM Arcus Amsterdam
Cc: cagenbach@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za; whector@dffe.gov.za; Gavin Cowden; Sindy Mbuyane; Celia.dewaal@mtpa.co.za; frans.krige@mtpa.co.za; mervyn@mtpa.co.za
Subject: RE: Consultation | Mlulio Wind Farms Mpumalanga
Date: Tuesday, 06 August 2024 13:43:17
Attachments: image001.png
image002.png
image003.png

Good day Robyn,

Please note that DARDLEA and MTPA were notified regarding the PP for the Draft scoping Phase on the 19th July 2024. Kindly see proof of notification below:



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

Dear Interested and Affected Party,

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

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

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

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner



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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

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

Thank you,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town
+27105963488

erm.com

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Saturday, August 3, 2024 3:09 PM
To: ERM Arcus Amsterdam <Erm.arcusamsterdam@erm.com>
Cc: cagenbach@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za; whector@dffe.gov.za; Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; Celia.dewaal@mtpa.co.za; frans.krige@mtpa.co.za; mervyn@mtpa.co.za
Subject: Consultation | Mlulio Wind Farms Mpumalanga
Importance: High

You don't often get email from rluyt@mpg.gov.za. Learn why this is important

EXTERNAL MESSAGE

Good day Ms Gopaul,

It has come to our attention, and not via any official notification from ERM, that draft Scoping Reports for the following wind farms proposed in the Gert Sibande District in Mpumalanga Province are out for public comment from 19 July 2024 to 20 August 2024 (as per ERM website), where ERM is the EAP:
1. Shepmoore WEF
2. Emvelo WEF
3. Rochdale WEF

Neither DARDLEA nor MTPA have been consulted to date, nor have we received copies of any of the draft Scoping Reports. Aside from the requirements of the EIA Regulations, DARDLEA and MTPA have through internal arrangements with DFFE requested to be included in all pre-application consultations for Renewable Energy projects in Mpumalanga, particularly wind energy facilities. DARDLEA and MTPA must be included during all pre-application meetings and in all in-process consultations.

For the purpose of commenting on draft reports during the regulatory periods, we request that hard copies of all reports are submitted to Ms Sindi Mbuyane in our Ermelo office (where projects are located in the Gert Sibande District), and sent electronically to me via WeTransfer. Please also ensure that MTPA receives the reports in the manner requested by them. For your records I include the contact details of all relevant officials to be consulted in DARDLEA (when an application is in the Gert Sibande District) and MTPA:

DARDLEA	DESIGNATION	EMAIL	PHONE
Robyn Luyt	Director: Environmental Impact Management (EIM)	rluyt@mpg.gov.za	[redacted]
Sindisiwe Mbuyane	Deputy Director: EIM Gert Sibande District	mbuyanesb@mpg.gov.za	[redacted]
Gavin Cowden	Deputy Director: Environmental Policy, Planning and Coordination	gcowden@mpg.gov.za	
MTPA	**DESIGNATION**	**EMAIL**	**PHONE**
Mervyn Lotter	Manager: Biodiversity Planning	Mervyn@mtpa.co.za	[redacted]
Frans Krige	Land Use Advisor	Frans.Krige@mtpa.co.za	
Khumbelo Malele	Land Use Advisor	Khumbelo.Malele@mtpa.co.za khumbelomalele@gmail.com	[redacted]
Celia de Waal	EIA Data Capturer LUA	celia.dewaal@mtpa.co.za	[redacted]

Please note that time frames for commenting on draft reports can only commence on the date that hard copies of the reports are received, and we request that our 30 day time frame aligns with DFFE's.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
Nelspruit, 1200
[redacted]

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From: Celia de Waal
To: ERM Arcus Amsterdam
Cc: Johan Eksteen; Frans Krige; Khumbelo Malele; Mervyn Lotter
Subject: FW: Consultation | Mlulio Wind Farms Mpumalanga
Date: Tuesday, 06 August 2024 15:16:03
Attachments: image001.png
image002.png
image003.png

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

EXTERNAL MESSAGE

Good afternoon

Kindly send us the MTPA a hard copy of the Draft Scoping report for the Mlulio Wind Farms, for our Scientists to comment on, to the following physical address:

To: Cecilia de Waal (EIA Data Capturer)
MTPA Office Buildings (Lydenburg)
End of Morgan Street
Lydenburg
1120

[redacted]

Kind regards

Celia de Waal

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
[redacted]
e-mail: celia.dewaal@mtpa.co.za

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Tuesday, August 6, 2024 1:43 PM
To: Robyn Luyt <rluyt@mpg.gov.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: cagenbach@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za; whector@dffe.gov.za; Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; Celia de Waal <Celia.dewaal@mtpa.co.za>; Frans Krige <frans.krige@mtpa.co.za>; Mervyn Lotter <mervyn@mtpa.co.za>
Subject: RE: Consultation | Mlulio Wind Farms Mpumalanga

Good day Robyn,

Please note that DARDLEA and MTPA were notified regarding the PP for the Draft scoping Phase on the 19th July 2024. Kindly see proof of notification below:



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

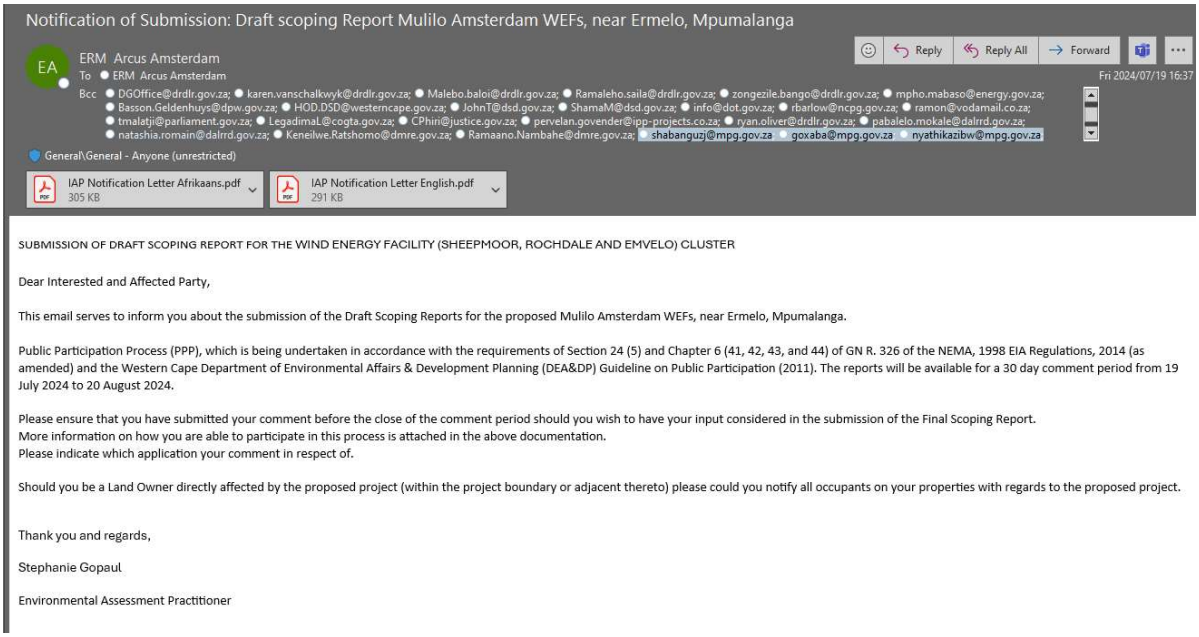
Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final Scoping Report.
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Please indicate which application your comment in respect of.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner



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Stephanie Gopaul

Environmental Assessment Practitioner

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Thank you,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Saturday, August 3, 2024 3:09 PM
To: ERM Arcus Amsterdam <Erm.arcusamsterdam@erm.com>
Cc: cagenbach@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za; whector@dffe.gov.za; Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; Celia.dewaal@mtpa.co.za; frans.krige@mtpa.co.za; mervyn@mtpa.co.za
Subject: Consultation | Mlulio Wind Farms Mpumalanga
Importance: High

You don't often get email from rluyt@mpg.gov.za. Learn why this is important
EXTERNAL MESSAGE

Good day Ms Gopaul,

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1. Shepmoore WEF
2. Emvelo WEF
3. Rochdale WEF

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DARDLEA	**DESIGNATION**	**EMAIL**	**PHONE**
Robyn Luyt	Director: Environmental Impact Management (EIM)	rluyt@mpg.gov.za	[redacted]
Sindisiwe Mbuyane	Deputy Director: EIM Gert Sibande District	mbuyanesb@mpg.gov.za	[redacted]
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Mervyn Lotter	Manager: Biodiversity Planning	Mervyn@mtpa.co.za	[redacted]
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Khumbelo Malele	Land Use Advisor	Khumbelo.Malele@mtpa.co.za khumbelomalele@gmail.com	[redacted]
Celia de Waal	EIA Data Capturer LUA	celia.dewaal@mtpa.co.za	[redacted]

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Kind Regards
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Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
Nelspruit, 1200
[redacted]

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From: ERM Arcus Amsterdam
To: Celia de Waal; ERM Arcus Amsterdam
Cc: Johan Eksteen; Frans Krige; Khumbelo Malele; Mervyn Lotter
Subject: RE: Consultation | Mlulio Wind Farms Mpumalanga
Date: Tuesday, 06 August 2024 15:27:29
Attachments: image001.png
image005.png
image006.png

Good day Cecilia,

Thank you for your email. The reports are on their way to the below address as we speak.

Kind Regards,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

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Subject: FW: Consultation | Mlulio Wind Farms Mpumalanga

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To: Cecilia de Waal (EIA Data Capturer)
MTPA Office Buildings (Lydenburg)
End of Morgan Street
Lydenburg
1120

[redacted]

Kind regards

Celia de Waal

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
[redacted]

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

Dear Interested and Affected Party,

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

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

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final Scoping Report.
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Please indicate which application your comment in respect of.

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner



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Stephanie Gopaul

Environmental Assessment Practitioner

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

Thank you,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town
+[redacted]

erm.com

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Subject: Consultation | Mlulio Wind Farms Mpumalanga
Importance: High

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From: Celia de Waal
To: ERM Arcus Amsterdam
Subject: RE: Consultation | Mlulio Wind Farms Mpumalanga
Date: Tuesday, 06 August 2024 15:37:14
Attachments: image001.png
image003.png
image004.png

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Thank you

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
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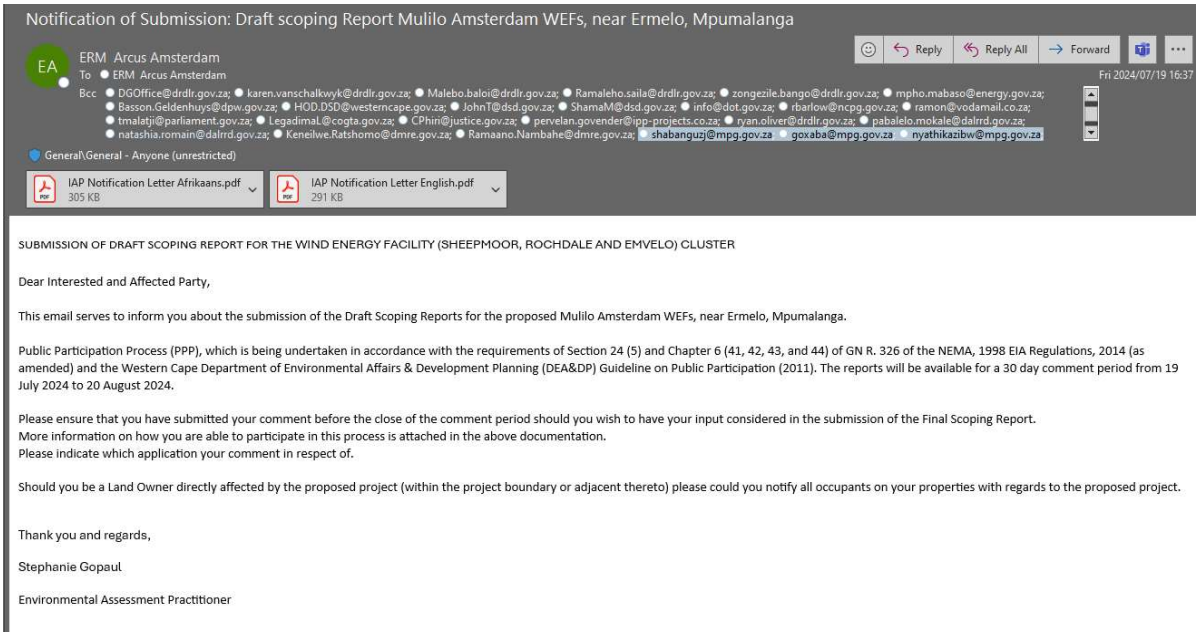
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Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

EA ERM Arcus Amsterdam

To ERM Arcus Amsterdam

Reply | Reply All | Forward

Fri 2024/07/19 16:37

Bcc DGOffice@drdlr.gov.za; karen.vanschalkwyk@drdlr.gov.za; Malebo.baloi@drdlr.gov.za; Ramaleho.saila@drdlr.gov.za; zongezile.bango@drdlr.gov.za; mpho.mabaso@energy.gov.za; Basson.Geldenhuys@dpw.gov.za; HOD.DSD@westerncape.gov.za; JohnT@dsd.gov.za; ShamaM@dsd.gov.za; info@dot.gov.za; rbarlow@ncpg.gov.za; ramon@vodamail.co.za; tmalatji@parliament.gov.za; LegadimaL@cogta.gov.za; CPhiri@justice.gov.za; pervelan.govender@ipp-projects.co.za; ryan.oliver@drdlr.gov.za; pabalelo.mokale@dalrrd.gov.za; natashia.romain@dalrrd.gov.za; KeneilweRatshomo@dmre.gov.za; Ramaano.Nambahe@dmre.gov.za; shabanguzj@mpg.gov.za goxaba@mpg.gov.za nyathikazibw@mpg.gov.za

General\General - Anyone (unrestricted)

IAP Notification Letter Afrikaans.pdf 305 KB

IAP Notification Letter English.pdf 291 KB

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Consultant

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Mbuyane	EIM Gert Sibande District		[redacted]
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Disclaimer

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Monday, 29 July 2024 17:57
To: John Geeringh <GeerinJH@ntcsa.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

Dear John,

Thank you for your e-mail. Please find attached a KMZ file of each WEF.

Thank You
Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: John Geeringh <GeerinJH@ntcsa.co.za>
Sent: Tuesday, July 23, 2024 11:50 AM
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Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

You don't often get email from geerinjh@ntcsa.co.za. Learn why this is important

EXTERNAL MESSAGE

Please send me KMZ files of the proposed developments and grid connection. Please find attached Eskom requirements for work at or near Eskom infrastructure and servitudes, as well as a setbacks guideline for RE Developments.

Kind regards

John Geeringh (Pr Sci Nat) Reg. EAP (EAPASA)
Senior Consultant Environmental Management
Grid Planning: Land and Rights
National Transmission Company South Africa SOC Ltd (NTCSA)
Megawatt Park, B2Y25, Maxwell Drive, Sunninghill, Sandton.
P O Box 1091, Johannesburg, 2000.
[redacted]
[redacted]co.za

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
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To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

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

Dear Interested and Affected Party,

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

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

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

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Consultant
Lucien Barbeau

ERM
240 Main Road, Rondebosch, Cape Town
T [redacted]
E lucien.barbeau@erm.com | **W** www.erm.com



From: John Geeringh <GeerinJH@ntcsa.co.za>
Sent: Wednesday, July 31, 2024 3:45 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

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EXTERNAL MESSAGE

Thanks, they will have to relook at their turbine layouts with regards to the setbacks requirements of 3 x tip height from TX lines and 1 x tip height from Dx lines. Lines connecting to power stations are extremely sensitive and chance are we may no grant setbacks relaxation.

Regards

John Geeringh (Pr Sci Nat) Reg. EAP (EAPASA)
Senior Consultant Environmental Management
Grid Planning: Land and Rights
National Transmission Company South Africa SOC Ltd (NTCSA)
Megawatt Park, B2Y25, Maxwell Drive, Sunninghill, Sandton.
P O Box 1091, Johannesburg, 2000.
[redacted]

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Monday, 29 July 2024 17:57
To: John Geeringh <GeerinJH@ntcsa.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

Dear John,

Thank you for your e-mail. Please find attached a KMZ file of each WEF.

Thank You
Kind Regards

Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: John Geeringh <GeerinJH@ntcsa.co.za>
Sent: Tuesday, July 23, 2024 11:50 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

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EXTERNAL MESSAGE

Please send me KMZ files of the proposed developments and grid connection. Please find attached Eskom requirements for work at or near Eskom infrastructure and servitudes, as well as a setbacks guideline for RE Developments.

Kind regards

John Geeringh (Pr Sci Nat) Reg. EAP (EAPASA)
Senior Consultant Environmental Management
Grid Planning: Land and Rights
National Transmission Company South Africa SOC Ltd (NTCSA)
Megawatt Park, B2Y25, Maxwell Drive, Sunninghill, Sandton.
P O Box 1091, Johannesburg, 2000.
[redacted]

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, 19 July 2024 16:40
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo

Amsterdam WEFs, near Ermelo, Mpumalanga

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Stephanie Gopaul

Environmental Assessment Practitioner

Consultant
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240 Main Road, Rondebosch, Cape Town
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ERM

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Grid Planning: Land and Rights
National Transmission Company South Africa SOC Ltd (NTCSA)
Megawatt Park, B2Y25, Maxwell Drive, Sunninghill, Sandton.
P O Box 1091, Johannesburg, 2000.
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Lucien Barbeau
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Senior Consultant Environmental Management
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Eskom	SCOT	Technology

Title:	**Renewable Energy Generation Plant Setbacks to Eskom Infrastructure**	Unique Identifier:	**240-65559775**
		Alternative Reference Number:	**N/A**
		Area of Applicability:	**Power Line Engineering**
		Documentation Type:	**Guideline**
		Revision:	**2**
		Total Pages:	**9**
		Next Review Date:	**N/A**
		Disclosure Classification:	**CONTROLLED DISCLOSURE**

Compiled by	Approved by	Authorised by
J W Chetty	**B Ntshuntsha**	**R A Vajeth**
Mechanical Engineer	**Chief Engineer (Lines)**	**Snr Manager (Lines) and SCOT/SC/ Chairperson**
Date: 15 / 09 / 2020	Date: 30/10/2020	Date: 30/10/2020

PCM Reference: 240-65132732 **LINE ENGINEERING SERVICES**
SCOT Study Committee Number/Name : **OVERHEAD LINES**

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EXECUTIVE SUMMARY

In recent decades, the use of wind turbines, concentrated solar plants and photovoltaic plants have been on the increase as it serves as an abundant source of energy. This document specifies proposed setbacks for wind turbines and the reasons for these setbacks from infrastructure as well as setbacks for concentrated solar plants and photovoltaic plants. Setbacks for wind turbines employed in other countries were compared and a general setback to be used by Eskom was suggested for use with wind turbines and other renewable energy generation plants.

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1. INTRODUCTION

During the last few decades, a large amount of wind turbines have been installed in wind farms to accommodate for the large demand of energy and depleting fossil fuels. Wind is one of the most abundant sources of renewable energy. Wind turbines harness the energy of this renewable resource for integration in electricity networks. The extraction of wind energy is its primary function and thus the aerodynamics of the wind turbine is important. There are many different types of wind turbines which will all exhibit different wind flow characteristics. The most common wind turbine used commercially is the Horizontal Axis Wind Turbine. Wind flow characteristics of this turbine are important to analyse as it may have an effect on surrounding infrastructure.

Wind turbines also cause large turbulence downwind that may affect existing infrastructure. Debris or parts of the turbine blade, in the case of a failure, may be tossed behind the turbine and may lead to damage of infrastructure in the wake path.

This document outlines the minimum distances that need to be introduced between a wind turbine and Eskom infrastructure to ensure that debris and / or turbulence would not negatively impact on the infrastructure and future expansion of infrastructure (lines and substation) as per the long term planning scenario.

Safety distances of wind turbines from other structures as implemented by other countries were also considered and the reasons for their selection were noted. All renewable energy developments are approved by The Department of Environmental Affairs, Forestry and Fisheries (DEFF) in terms of NEMA. The DEFF is aware of the setbacks guideline, however they cannot use it in terms of decision making since the setbacks document has no legal standing in SA and it would be outside of their mandate who have been advised to follow the guidelines herein.

Concentrated solar plants and photovoltaic plants setbacks away from substations were also to be considered to prevent restricting possible power line access routes to the substation and possible expansion of substations.

2. SUPPORTING CLAUSES

2.1 SCOPE

This document provides guidance on the safe distance that a wind turbine should be located from any Eskom power line or substation. Although it is not based on any legislative requirement, it is deemed important that Eskom’s infrastructure and future network expansion planning is not impeded. The document specifies proposed setback distances for transmission lines (220 kV to 765 kV), distribution lines

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(66 kV to 132 kV) and all Eskom substations. Proposed setbacks for concentrated solar plants and photovoltaic plants are also specified away from substations.

2.1.1 Purpose

Setbacks for wind turbines and power lines / substations are required for various reasons. These include possible catastrophic failure of the turbine blade that may release fragments and which may be thrown onto nearby power lines that may result in damage with associated unplanned outages. Turbulence behind the turbine may affect helicopter flight during routine Eskom live line maintenance and inspections that may lead to safety risk of the aircraft / personnel. Concentrated solar plants and photovoltaic plants setback away from substations were required to prevent substations from being boxed in by these renewable generation plants limiting line route access to the substations and possible future substation expansion.

2.1.2 Applicability

This document is applicable to the siting of all new and existing wind turbines, concentrated solar plants and photovoltaic plants near power lines and substations and in line of site between Eskom telecommunication infrastructure, including future Eskom renewable energy development.

2.2 NORMATIVE/INFORMATIVE REFERENCES

2.2.1 Normative

1. http://www.envir.ee/orb.aw/class=file/action=preview/id=1170403/Hiiumaa+turbulence+impact+EMD.pdf.
2. http://www.energy.ca.gov/2005publications/CEC-500-2005-184/CEC-500-2005-184.PDF
3. http://www.adamscountywind.com/Revised%20Site/Windmills/Adams%20County%20Ordinance/Adams%20County%20Wind%20Ord.htm
4. http://www.dsireusa.org/incentives/incentive.cfm?Incentive_Code=PA11R&RE=1&EE=1
5. http://www.wind-watch.org/documents/european-setbacks-minimum-distance-between-wind-turbines-and-habitations/
6. http://www.publications.parliament.uk/pa/ld201011/ldbills/017/11017.1-i.html
7. http://www.caw.ca/assets/pdf/Turbine_Safety_Report.pdf
8. Rogers J, Slegers N, Costello M. (2011) A method for defining wind turbine setback standards. Wind energy 10.1002/we.468

2.2.2 Informative

None

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2.3 DEFINITIONS

Definition	Description
Setback	The minimum distance between a wind turbine and boundary line/dwelling/road/infrastructure/servitude etc.
Flicker	Effect caused when rotating wind turbine blades periodically cast shadows
Tip Height	The total height of the wind turbine ie. Hub height plus half rotor diameter (see Figure1)

2.3.1 Disclosure Classification

Controlled disclosure: controlled disclosure to external parties (either enforced by law, or discretionary).

2.4 ABBREVIATIONS

Abbreviation	Description
None	

2.5 ROLES AND RESPONSIBILITIES

All parties involved in the positioning wind turbines, concentrated solar plants and photovoltaic plants near power lines/substations should endeavour to follow the setbacks outlined in this guideline.

2.6 PROCESS FOR MONITORING

Agreement by Eskom in writing on any encroachment of the setbacks distance should be requested via the Grid Access Unit. Eskom should ensure that every application for renewable energy (RE) developments are informed about the existence of the setbacks document early in the RE planning process to ensure maximum effect. This includes Eskom RE development.

2.7 RELATED/SUPPORTING DOCUMENTS

None

3. DOCUMENT CONTENT

3.1 INTERNATIONAL SETBACK COMPARISON

Wind Turbine setbacks employed by various countries were considered. It was found that setbacks were determined for various reasons that include noise, flicker, turbine blade failure and wind effects as well as

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future network expansion planning. The distances (setbacks) varied based on these factors and were influenced by the type of infrastructure

Wind turbine setbacks varied for roads, power lines, dwellings, buildings and property and it was noted that the largest setbacks were employed for reasons of noise and flicker related issues [1-7]. Very few countries specified setbacks for power lines.

The literature survey [1-7], yielded information about studies and experiments were conducted to determine the distance that a broken fragment from a wind turbine might be thrown. Even though of low probability of hitting a power line [$5.0x10^{-5}$ [8]], the distances recorded were significant [750m [8]]

Wind turbines may also cause changes in wind patterns with turbulent effects behind the hub. These factors influence the wind turbine setbacks specified in this document.

Setbacks were thus introduced to prevent any damage to Eskom infrastructure and impedance to operation and future network expansion planning.

Renewable energy plant can also limit access into substations for power lines of all voltages. A setback distance should therefore be employed to prevent substations from being boxed in by these generation plants and preventing future network expansion. These setback distances are specified in this document.

3.2 ESKOM RECOMMENDED SETBACKS

Any renewable energy applicant should engage with Eskom to determine if their plant layout or positioning of turbines, CSP or PV infrastructure would encroach on the proposed setbacks provided for in this guideline and to ensure that their planning and Eskom's future expansion planning is taken into account. Eskom must inform all renewable energy developers, including Eskom RE, of the existence of the setbacks guideline early in the development process. Should there be an encroachment, a formal request should be sent to and accepted by Eskom in writing if any of the below mentioned setback distances are infringed upon:

- Eskom requests a setback distance of 3 times the tip height of the wind turbine from the edge of the closest Eskom servitude (including vacant servitudes) for transmission lines (220kV to 765kV) and Substations.
- Eskom requests a setback distance of 1 times the tip height of the wind turbine from the edge of the closest Eskom servitude (including vacant servitudes) for distribution lines (66 kV to 132 kV) and Substations.

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- A written request should be sent to Eskom via the Grid Access Unit regarding any proposed wind turbine, concentrated solar plants and photovoltaic activity within a 5 km radius of a substation for Eskom to comment on.
- Where concentrated solar plants, photovoltaic structures, battery storage systems (BESS) and other renewable generation plants fall within a 2 km radius of the closest point of a transmission or distribution substation (66kV to 765kV), a written agreement with Eskom is recommended during the planning phase of such plant or structures to ensure Eskom's future planning is not impeded.
- Applicants should not position any wind turbine in the line of site between and two Eskom Radio Telecommunication masts. It should be proven that Eskom radio telecommunication systems (mainly microwave systems) will not be affected in any way by wind turbines due to the criticality of this infrastructure in terms of network operation. Eskom Telecommunications should be engaged on this matter.
- If the position or size of any turbine changes and subsequently infringes on any of the above stated setbacks, a request for relaxation must be sent through to Eskom as per the point mentioned above.

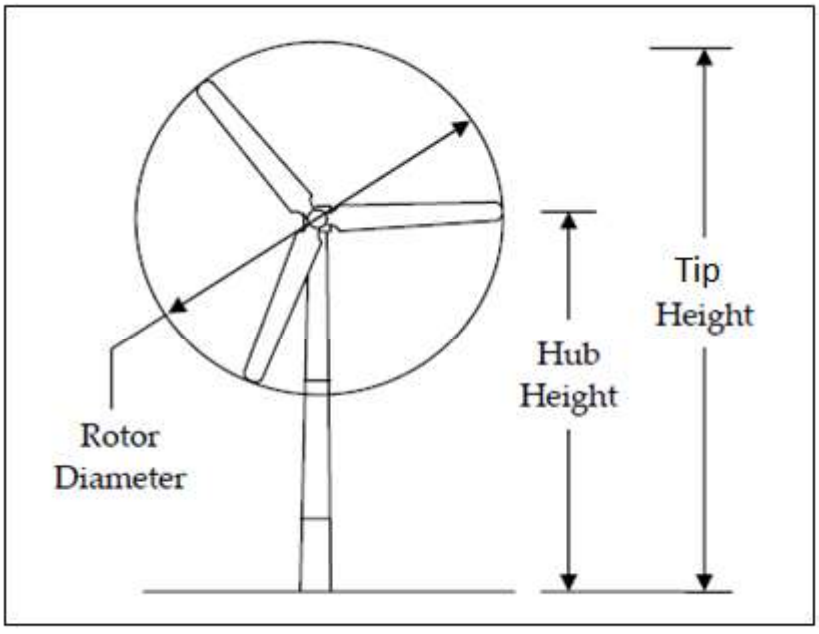


Figure 1: Horizontal Axis Wind Turbine [2]

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4. AUTHORISATION

This document has been seen and accepted by:

Name & Surname	Designation
V Naidoo	Chief Engineer
Dr P Pretorius	Electrical Specialist
J Geeringh	Snr Consultant Environ Mngt
B Haridass	Snr Consultant Engineer
B Ntshuntsha	Chief Engineer
R Vajeth	Snr Manager (Lines)
D A Tunnicliff	Snr Manager L&R (Acting)
B Branfield	Snr Consultant Engineer

5. REVISIONS

Date	Rev.	Compiler	Remarks
November 2013	0	J W Chetty	First Publication - No renewable energy generation plant setback specification in existence.
October 2018	1	JW Chetty	Modification to sub-section 3.2 to provide more clarity for application procedure.
June 2020	2	JW Chetty	Content within the guideline was re-worded to explain the benefits of mutual agreements between the applicants and ESKOM rather than the application being a legal obligation.

6. DEVELOPMENT TEAM

The following people were involved in the development of this document:

Jonathan Chetty (Mechanical Engineer)

Vivendhra Naidoo (Chief Engineer)

Dr Pieter Pretorius (Electrical Specialist)

John Geeringh (Snr Consultant Environ Mngt)

Bharat Haridass (Snr Consultant Engineer)

Riaz Vajeth (Snr Manager (Lines))

Bruce Ntshuntsha (Chief Engineer)

David Tunnicliff (Snr Manager L&R Acting)

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From:	Lloyd Barnes
To:	ERM Arcus Amsterdam; Gail Wheeler
Cc:	Stephen Burton; Stephanie Gopaul
Subject:	RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga
Date:	Wednesday, 07 August 2024 09:15:55
Attachments:	image002.png image004.png image005.png

EXTERNAL MESSAGE

That is sufficient, thanks Lucien!

Kind Regards,

Lloyd Barnes
Project Manager: Environmental
[redacted]
mulilo

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Wednesday, August 7, 2024 8:48 AM
To: Lloyd Barnes <Lloyd@mulilo.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Gail Wheeler <Gail@mulilo.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

Hi Lloyd,

I would like to respond with the following:

The layout will be revised, taking into account the WTG's that are within the proximity of the existing transmission lines. We will ensure that these turbines are 3x the Tip height from existing Electrical infrastructure.

Please let me know if you are happy with the above statement. I have attached the guidelines as well.

Thank you,

ERM
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Lucien Barbeau
Consultant

Cape Town **erm.com**

[redacted]

From: Lloyd Barnes <Lloyd@mulilo.com>
Sent: Tuesday, August 6, 2024 4:10 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Gail Wheeler <Gail@mulilo.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

EXTERNAL MESSAGE

Good day,

Thank you for bringing this to our attention.

What is your proposed response?

Kind Regards,

Lloyd Barnes
Project Manager: Environmental
[redacted]
mulilo

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Tuesday, August 6, 2024 4:01 PM
To: Lloyd Barnes <Lloyd@mulilo.com>
Cc: Gail Wheeler <Gail@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Subject: FW: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

Hi Lloyd,

I am forwarding this comment to you from a design perspective. Please see below response from National Transmission Company South Africa regarding turbine locations in relation to transmission lines.

Kind regards,

Lucien Barbeau
Consultant

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Cape Town [redacted] **erm.com**

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Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

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EXTERNAL MESSAGE

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Regards

John Geeringh (Pr Sci Nat) Reg. EAP (EAPASA)
Senior Consultant Environmental Management
Grid Planning: Land and Rights
National Transmission Company South Africa SOC Ltd (NTCSA)
Megawatt Park, B2Y25, Maxwell Drive, Sunninghill, Sandton.
P O Box 1091, Johannesburg, 2000.
[redacted]

Disclaimer

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Monday, 29 July 2024 17:57
To: John Geeringh <GeerinJH@ntcsa.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

Dear John,

Thank you for your e-mail. Please find attached a KMZ file of each WEF.

Thank You
Kind Regards



Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: John Geeringh <GeerinJH@ntcsa.co.za>
Sent: Tuesday, July 23, 2024 11:50 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

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EXTERNAL MESSAGE

Please send me KMZ files of the proposed developments and grid connection. Please find attached Eskom requirements for work at or near Eskom infrastructure and servitudes, as well as a setbacks guideline for RE Developments.

Kind regards

John Geeringh (Pr Sci Nat) Reg. EAP (EAPASA)
Senior Consultant Environmental Management
Grid Planning: Land and Rights
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Megawatt Park, B2Y25, Maxwell Drive, Sunninghill, Sandton.
P O Box 1091, Johannesburg, 2000.
[redacted]

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, 19 July 2024 16:40
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

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

Dear Interested and Affected Party,

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

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More information on how you are able to participate in this process is attached in the above documentation.
Please indicate which application your comment in respect of.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Consultant
Lucien Barbeau

ERM
240 Main Road, Rondebosch, Cape Town

T [redacted]
E lucien.barbeau@erm.com | W www.erm.com



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From:	ERM Arcus Amsterdam
To:	John Geeringh; ERM Arcus Amsterdam
Subject:	RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga
Date:	Wednesday, 07 August 2024 09:24:32
Attachments:	image001.png image002.png

Hi John,

Thank you for your email.

The layout will be revised, taking into account the WTG's that are within the proximity of the existing transmission lines. We will ensure that these turbines are 3x the Tip height from existing Electrical infrastructure.

Kind Regards,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: John Geeringh <GeerinJH@ntcsa.co.za>
Sent: Wednesday, July 31, 2024 3:45 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

You don't often get email from geerinjh@ntcsa.co.za. Learn why this is important

EXTERNAL MESSAGE

Thanks, they will have to relook at their turbine layouts with regards to the setbacks requirements of 3 x tip height from TX lines and 1 x tip height from Dx lines. Lines connecting to power stations are extremely sensitive and chance are we may no grant setbacks relaxation.

Regards

John Geeringh (Pr Sci Nat) Reg. EAP (EAPASA)
Senior Consultant Environmental Management
Grid Planning: Land and Rights
National Transmission Company South Africa SOC Ltd (NTCSA)
Megawatt Park, B2Y25, Maxwell Drive, Sunninghill, Sandton.
P O Box 1091, Johannesburg, 2000.
[redacted]

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Monday, 29 July 2024 17:57
To: John Geeringh <GeerinJH@ntcsa.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

Dear John,

Thank you for your e-mail. Please find attached a KMZ file of each WEF.

Thank You
Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: John Geeringh <GeerinJH@ntcsa.co.za>
Sent: Tuesday, July 23, 2024 11:50 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

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EXTERNAL MESSAGE

Please send me KMZ files of the proposed developments and grid connection. Please find attached Eskom requirements for work at or near Eskom infrastructure and servitudes, as well as

a setbacks guideline for RE Developments.

Kind regards

John Geeringh (Pr Sci Nat) Reg. EAP (EAPASA)
Senior Consultant Environmental Management
Grid Planning: Land and Rights
National Transmission Company South Africa SOC Ltd (NTCSA)
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P O Box 1091, Johannesburg, 2000.
[redacted]

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, 19 July 2024 16:40
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

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

Dear Interested and Affected Party,

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

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

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

Please indicate which application your comment in respect of.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Consultant
Lucien Barbeau

ERM
240 Main Road, Rondebosch, Cape Town
T [redacted]
E lucien.barbeau@erm.com | **W** www.erm.com



From:	Lloyd Barnes
To:	ERM Arcus Amsterdam; Gail Wheeler
Cc:	Stephen Burton; Stephanie Gopaul
Subject:	RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga
Date:	Wednesday, 07 August 2024 10:28:08
Attachments:	image001.png image002.png image003.png

EXTERNAL MESSAGE

Hi Lucien,

Could you please use the following instead:

The layout will be revised, taking into account the WTG's that are within the proximity of the existing transmission infrastructure. We will ensure that these turbines are 3x the Tip height from existing Transmission infrastructure.

Kind Regards,

Lloyd Barnes
Project Manager: Environmental
[redacted]
mulilo

[redacted] Lloyd Barnes
Sent: Wednesday, August 7, 2024 9:16 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Gail Wheeler <Gail@mulilo.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

That is sufficient, thanks Lucien!

Kind Regards,

Lloyd Barnes
Project Manager: Environmental
[redacted]
mulilo

[redacted] ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Wednesday, August 7, 2024 8:48 AM
To: Lloyd Barnes <Lloyd@mulilo.com>; ERM Arcus Amsterdam

<ERM.ArcusAmsterdam@erm.com>; Gail Wheeler <Gail@mulilo.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

Hi Lloyd,

I would like to respond with the following:

The layout will be revised, taking into account the WTG's that are within the proximity of the existing transmission lines. We will ensure that these turbines are 3x the Tip height from existing Electrical infrastructure.

Please let me know if you are happy with the above statement. I have attached the guidelines as well.

Thank you,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: Lloyd Barnes <Lloyd@mulilo.com>
Sent: Tuesday, August 6, 2024 4:10 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Gail Wheeler <Gail@mulilo.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

EXTERNAL MESSAGE

Good day,

Thank you for bringing this to our attention.

What is your proposed response?

Kind Regards,

Lloyd Barnes
Project Manager: Environmental
[redacted]

[redacted]

mulilo

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Tuesday, August 6, 2024 4:01 PM
To: Lloyd Barnes <Lloyd@mulilo.com>
Cc: Gail Wheeler <Gail@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Subject: FW: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

Hi Lloyd,

I am forwarding this comment to you from a design perspective. Please see below response from National Transmission Company South Africa regarding turbine locations in relation to transmission lines.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town **erm.com**
[redacted]

From: John Geeringh <GeerinJH@ntcsa.co.za>
Sent: Wednesday, July 31, 2024 3:45 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

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Senior Consultant Environmental Management
Grid Planning: Land and Rights
National Transmission Company South Africa SOC Ltd (NTCSA)

Megawatt Park, B2Y25, Maxwell Drive, Sunninghill, Sandton.
P O Box 1091, Johannesburg, 2000.
[redacted]

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Monday, 29 July 2024 17:57
To: John Geeringh <GeerinJH@ntcsa.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

Dear John,

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Thank You
Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: John Geeringh <GeerinJH@ntcsa.co.za>
Sent: Tuesday, July 23, 2024 11:50 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

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EXTERNAL MESSAGE

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Sent: Friday, 19 July 2024 16:40
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Consultant
Lucien Barbeau

ERM
240 Main Road, Rondebosch, Cape Town
T [redacted]
E lucien.barbeau@erm.com | **W** www.erm.com



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From: Robyn Luyt
To: ERM Arcus Amsterdam
Cc: Gavin Cowden; Sindy Mbuyane
Subject: Re: RE: Consultation | Mlulio Wind Farms Mpumalanga
Date: Sunday, 11 August 2024 16:18:47

You don't often get email from rluyt@mpg.gov.za. Learn why this is important

EXTERNAL MESSAGE

Good afternoon,
Please confirm whether you received the below email - I have deleted all graphics from the email thread to ensure this reaches you.
Regards
Robyn

>>> Robyn Luyt 08/11/24 9:51 AM >>>
Good day Stephanie,

As of 8 August 2024, neither DARDLEA nor MTPA have received draft Scoping Reports to review and comment on, nor have we received a response to the email below.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
Nelspruit, 1200
[redacted]

>>> Robyn Luyt 08/07/24 9:41 AM >>>
Good day Stephanie,

Be advised that the names of the officials at MTPA that you have highlighted in your below notification are **not the relevant officials** that are required to be notified or the relevant officials that must review and comment on draft Scoping or EIA reports, or any reports related to an EIA process. There are also no officials in the list of officials in your screenshots that are in the Environmental Affairs Chief Directorate in MDARDLEA - as far as I am aware they are in the section that deals with Agriculture, which is an entirely different mandate.

It would **not** be acceptable to not provide the commenting authority the mandatory 30 days to review and comment on draft reports, especially in light of the fact that there has been no prior notification. The Directorate Environmental Impact Management within DARDLEA represents the MEC as Competent Authority in Mpumalanga, and the commenting authority in respect projects administered by DFFE. MTPA has the mandate for biodiversity matters on behalf of DARDLEA. As per my email to you below (3 August), hard copies of all reports must be submitted to Ms Mbuyane (Environmental Impact Management) at our Ermelo office, and the documents must be made available to me (and in this instance to Mr Cowden and Mr Lotter) electronically at the same time. You will need to contact Ms De Waal and Mr Krige at MTPA to confirm how documents must be submitted to MTPA. Please provide shape files of the 3 proposed WEFs as well.

Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
Nelspruit, 1200
[redacted]

>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 08/06/24 1:43 PM >>>

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

Thank you,

Lucien Barbeau

ERM

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Saturday, August 3, 2024 3:09 PM
To: ERM Arcus Amsterdam <Erm.arcusamsterdam@erm.com>
Cc: cagenbach@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za; whector@dffe.gov.za; Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; Celia.dewaal@mtpa.co.za; frans.krige@mtpa.co.za; mervyn@mtpa.co.za
Subject: Consultation | Mlulio Wind Farms Mpumalanga
Importance: High

You don't often get email from rluyt@mpg.gov.za. Learn why this is important

EXTERNAL MESSAGE

Good day Ms Gopaul,

It has come to our attention, and not via any official notification from ERM, that draft Scoping Reports for the following wind farms proposed in the Gert Sibande District in Mpumalanga Province are out for public comment from 19 July 2024 to 20 August 2024 (as per ERM website), where ERM is the EAP:
1. Shepmoore WEF
2. Emvelo WEF
3. Rochdale WEF

Neither DARDLEA nor MTPA have been consulted to date, nor have we received copies of any of the draft Scoping Reports. Aside from the requirements of the EIA Regulations, DARDLEA and MTPA have through internal arrangements with DFFE requested to be included in all pre-application consultations for Renewable Energy projects in Mpumalanga, particularly wind energy facilities. DARDLEA and MTPA must be included during all pre-application meetings and in all in-process consultations.

For the purpose of commenting on draft reports during the regulatory periods, we request that hard copies of all reports are submitted to Ms Sindi Mbuyane in our Ermelo office (where projects are located in the Gert Sibande District), and sent electronically to me via WeTransfer. Please also ensure that MTPA receives the reports in the manner requested by them. For your records I include the contact details of all relevant officials to be consulted in DARDLEA (when an application is in the Gert Sibande District) and MTPA:

DARDLEA	DESIGNATION	EMAIL	PHONE
Robyn Luyt	Director: Environmental Impact Management (EIM)	rluyt@mpg.gov.za	[redacted]
Sindisiwe Mbuyane	Deputy Director: EIM Gert Sibande District	mbuyanesb@mpg.gov.za	[redacted]
Gavin Cowden	Deputy Director: Environmental Policy, Planning and Coordination	gcowden@mpg.gov.za	
MTPA	**DESIGNATION**	**EMAIL**	**PHONE**
Mervyn Lotter	Manager: Biodiversity Planning	Mervyn@mtpa.co.za	[redacted]
Frans Krige	Land Use Advisor	Frans.Krige@mtpa.co.za	
Khumbelo Malele	Land Use Advisor	Khumbelo.Malele@mtpa.co.za khumbelomalele@gmail.com	[redacted]
Celia de Waal	EIA Data Capturer LUA	celia.dewaal@mtpa.co.za	[redacted]

Please note that time frames for commenting on draft reports can only commence on the date that hard copies of the reports are received, and we request that our 30 day time frame aligns with DFFE's.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)

Director: Environmental Impact Management

Department of Agriculture, Rural Development, Land & Environmental Affairs

Mpumalanga Provincial Government

Riverside Office Park, Aqua Street (Cycad Building - Block 4)

Nelspruit, 1200

[redacted]

[redacted]

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From:	ERM Arcus Amsterdam
To:	Robyn Luyt; ERM Arcus Amsterdam
Cc:	Gavin Cowden; Sindy Mbuyane
Subject:	RE: RE: Consultation | Mlulio Wind Farms Mpumalanga
Date:	Sunday, 11 August 2024 16:22:58
Attachments:	RE Consultation Mlulio Wind Farms Mpumalanga.msg image001.png

Good day Robyn,

Emails have been received and responded to. Please see attached response.

Kind Regards

ERM

Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Sunday, August 11, 2024 4:19 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>
Subject: Re: RE: Consultation | Mlulio Wind Farms Mpumalanga

You don't often get email from rluyt@mpg.gov.za. Learn why this is important

EXTERNAL MESSAGE

Good afternoon,
Please confirm whether you received the below email - I have deleted all graphics from the email thread to ensure this reaches you.
Regards
Robyn

>>> Robyn Luyt 08/11/24 9:51 AM >>>
Good day Stephanie,

As of 8 August 2024, neither DARDLEA nor MTPA have received draft Scoping Reports to review and comment on, nor have we received a response to the email below.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)

[redacted]

>>> Robyn Luyt 08/07/24 9:41 AM >>>
Good day Stephanie,

Be advised that the names of the officials at MTPA that you have highlighted in your below notification are **not the relevant officials** that are required to be notified or the relevant officials that must review and comment on draft Scoping or EIA reports, or any reports related to an EIA process. There are also no officials in the list of officials in your screenshots that are in the Environmental Affairs Chief Directorate in MDARDLEA - as far as I am aware they are in the section that deals with Agriculture, which is an entirely different mandate.

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Regards
Robyn

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Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
[redacted]

>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 08/06/24 1:43 PM >>>

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

Thank you,

Lucien Barbeau

ERM

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Saturday, August 3, 2024 3:09 PM
To: ERM Arcus Amsterdam <Erm.arcusamsterdam@erm.com>
Cc: cagenbach@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za; whector@dffe.gov.za; Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>;

Celia.dewaal@mtpa.co.za; frans.krige@mtpa.co.za; mervyn@mtpa.co.za
Subject: Consultation | Mlulio Wind Farms Mpumalanga
Importance: High

You don't often get email from rluyt@mpg.gov.za. Learn why this is important

EXTERNAL MESSAGE

Good day Ms Gopaul,

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2. Emvelo WEF
3. Rochdale WEF

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Sindisiwe Mbuyane	Deputy Director: EIM Gert Sibande District	mbuyanesb@mpg.gov.za	[redacted]
Gavin Cowden	Deputy Director: Environmental Policy, Planning and Coordination	gcowden@mpg.gov.za	
MTPA	**DESIGNATION**	**EMAIL**	**PHONE**
Mervyn Lotter	Manager: Biodiversity Planning	Mervyn@mtpa.co.za	[redacted]
Frans Krige	Land Use Advisor	Frans.Krige@mtpa.co.za	
Khumbelo Malele	Land Use Advisor	Khumbelo.Malele@mtpa.co.za khumbelomalele@gmail.com	[redacted]

Celia de Waal	EIA Data Capturer LUA	celia.dewaal@mtpa.co.za	[redacted]

Please note that time frames for commenting on draft reports can only commence on the date that hard copies of the reports are received, and we request that our 30 day time frame aligns with DFFE's.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
[redacted]

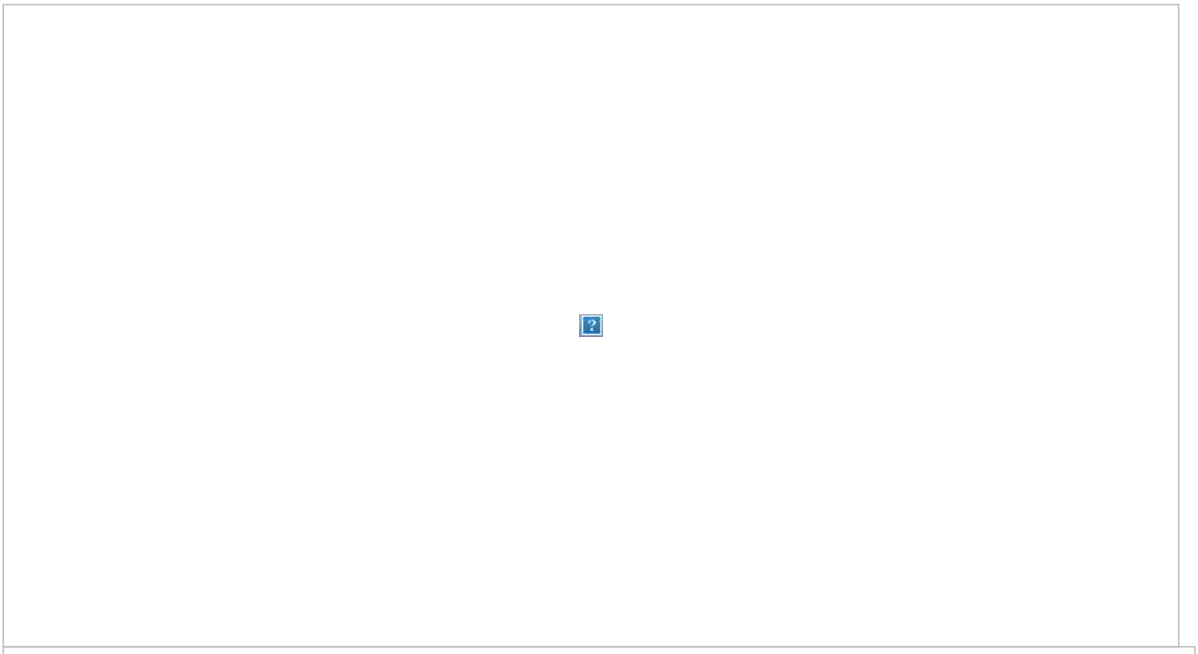
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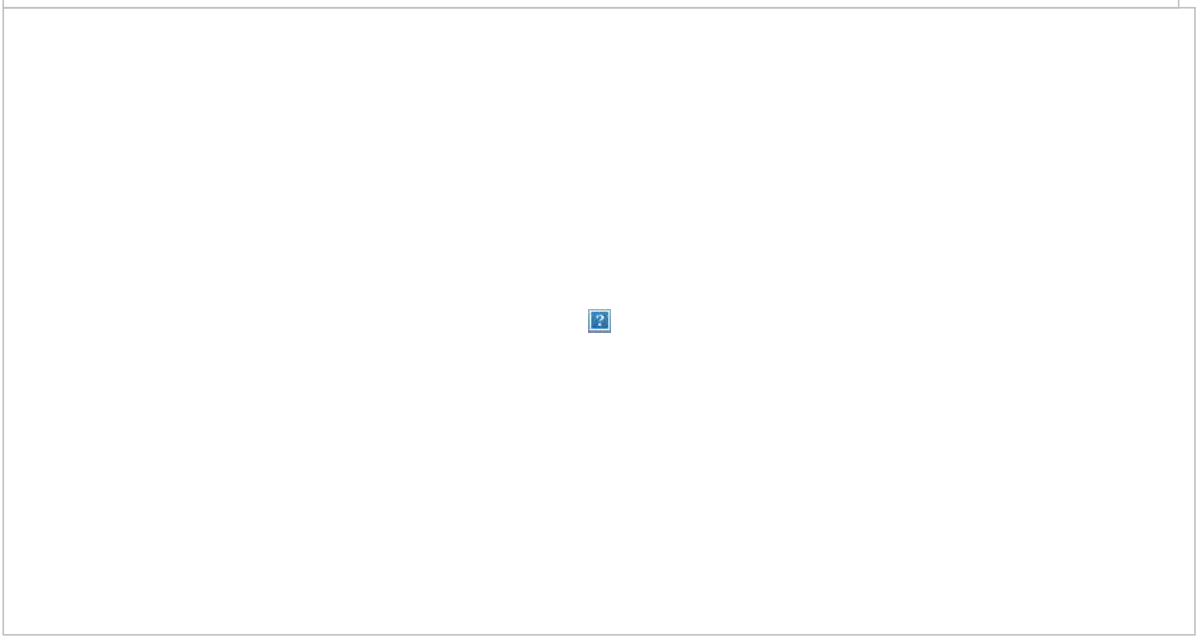
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From: ERM Arcus Amsterdam
To: Robyn Luyt; ERM Arcus Amsterdam
Cc: cagenbach@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za; whector@dffe.gov.za; Gavin Cowden; Sindy Mbuyane; Celia.dewaal@mtpa.co.za; frans.krige@mtpa.co.za; mervyn@mtpa.co.za
Subject: RE: Consultation | Mlulio Wind Farms Mpumalanga
Date: Tuesday, 06 August 2024 13:43:00
Attachments: image001.png
image002.png
image003.png

Good day Robyn,

Please note that DARDLEA and MTPA were notified regarding the PP for the Draft scoping Phase on the 19th July 2024. Kindly see proof of notification below:





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

Thank you,

ERM

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

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Subject: Consultation | Mlulio Wind Farms Mpumalanga
Importance: High

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EXTERNAL MESSAGE

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2. Emvelo WEF
3. Rochdale WEF

Neither DARDLEA nor MTPA have been consulted to date, nor have we received copies of any of the draft Scoping Reports. Aside from the requirements of the EIA Regulations, DARDLEA and MTPA have through internal arrangements with DFFE requested to be included in all pre-application consultations for Renewable Energy projects in Mpumalanga, particularly wind energy facilities. DARDLEA and MTPA must be included during all pre-application meetings and in all in-process consultations.

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Robyn Luyt	Director: Environmental Impact Management (EIM)	rluyt@mpg.gov.za	[redacted]
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Mervyn Lotter	Manager: Biodiversity Planning	Mervyn@mtpa.co.za	[redacted]
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Celia de Waal	EIA Data Capturer LUA	celia.dewaal@mtpa.co.za	[redacted]

Please note that time frames for commenting on draft reports can only commence on the date that hard copies of the reports are received, and we request that our 30 day time frame aligns with DFFE's.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
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From: Robyn Luyt
To: ERM Arcus Amsterdam
Cc: Gavin Cowden; Sindy Mbuyane
Subject: Re: RE: RE: Consultation | Mlulio Wind Farms Mpumalanga
Date: Sunday, 11 August 2024 16:56:10
Importance: High

EXTERNAL MESSAGE

Good day,

Please see my email response to you on 7 August as per below email thread. I have not had a response and we still await the draft reports for commenting. Please urgently advise how this is being addressed. I have just had an email from MTPA stating that you are busy sending them the draft reports. Please confirm when I will receive a link to the reports, and when our Ms Mbuyane will receive the hard copies. Please also confirm that we (both DARDLEA and MTPA) will be provided with the mandatory 30 days to comment.

Should you wish to discuss this further please call me on 0826727868.

Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
Nelspruit, 1200
[redacted]

>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 08/11/24 4:23 PM >>>
Good day Robyn,

Emails have been received and responded to. Please see attached response.

Kind Regards

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Sunday, August 11, 2024 4:19 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>
Subject: Re: RE: Consultation | Mlulio Wind Farms Mpumalanga

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EXTERNAL MESSAGE

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>>> Robyn Luyt 08/11/24 9:51 AM >>>
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Director: Environmental Impact Management

Department of Agriculture, Rural Development, Land & Environmental Affairs

Mpumalanga Provincial Government

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[redacted]

[redacted]

[redacted]

[redacted] Robyn Luyt 08/07/24 9:41 AM >>>
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Director: Environmental Impact Management

Department of Agriculture, Rural Development, Land & Environmental Affairs

Mpumalanga Provincial Government

Riverside Office Park, Aqua Street (Cycad Building - Block 4)

Nelspruit, 1200

[redacted]

[redacted]

[redacted] "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 08/06/24 1:43 PM >>>

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Subject: Consultation | Mlulio Wind Farms Mpumalanga
Importance: High

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Celia de Waal	EIA Data Capturer LUA	celia.dewaal@mtpa.co.za	[redacted]

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Nelspruit, 1200

[redacted]

[redacted]

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From: BC Admin
To: ERM Arcus Amsterdam
Subject: RE: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga
Date: Monday, 12 August 2024 13:06:50
Attachments: image002.png
image001.png
image005.png

You don't often get email from bcadmin@dffe.gov.za. Learn why this is important

EXTERNAL MESSAGE

Good day

Kindly share the link for the below project.



Tebego Kgaphola

Directorate: Biodiversity Mainstreaming and EIA
Branch: Biodiversity and Conservation
473 Steve Biko Road | Private Bag X477 | Pretoria | 001
[redacted]
Website:www.environment.gov.za



From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, 19 July 2024 16:37
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

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

Dear Interested and Affected Party,

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

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of

Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30 day comment period from 19 July 2024 to 20 August 2024.

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

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Consultant
Lucien Barbeau

ERM
240 Main Road, Rondebosch, Cape Town
T [redacted]
E lucien.barbeau@erm.com | **W** www.erm.com



From: ERM Arcus Amsterdam
To: BC Admin; ERM Arcus Amsterdam
Subject: RE: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga
Date: Monday, 12 August 2024 14:06:52
Attachments: image003.png
image004.png
image006.png
image007.png

Good day Tebego,

Please see below link to the proposed project:

https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/

Kindly navigate to the bottom of the page to download all reports and additional documentation related to the project.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town **erm.com**
+[redacted]

From: BC Admin <bcadmin@dffe.gov.za>
Sent: Monday, August 12, 2024 1:07 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

You don't often get email from bcadmin@dffe.gov.za. Learn why this is important

EXTERNAL MESSAGE

Good day

Kindly share the link for the below project.



Tebego Kgaphola

Directorate: Biodiversity Mainstreaming and EIA
Branch: Biodiversity and Conservation
473 Steve Biko Road | Private Bag X477 | Pretoria | 001
[redacted]
Website:www.environment.gov.za

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, 19 July 2024 16:37
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

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

Dear Interested and Affected Party,

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

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

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

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Consultant
Lucien Barbeau

ERM
240 Main Road, Rondebosch, Cape Town
[redacted]
E lucien.barbeau@erm.com | **W** www.erm.com



From:	Robyn Luyt
To:	ERM Arcus Amsterdam
Cc:	bncube@dffe.gov.za; OLetlalo@dffe.gov.za; Gavin Cowden; Sindy Mbuyane
Subject:	Re: RE: RE: Consultation | Mlulio Wind Farms Mpumalanga
Date:	Monday, 12 August 2024 14:14:08
Attachments:	DARDLEA - NEMA Application Form for EA [1 August 2023].doc
Importance:	High

EXTERNAL MESSAGE

Dear Lucien,

Our telephone discussion this morning refers.

I just wanted to confirm what we discussed in writing, ie. that MTPA and DARDLEA are different entities, and that MTPA and DARDLEA must each get reports for commenting. You confirmed that you dispatched documents to Ms Celia de Waal in Lydenburg last week (to arrive this week). Note that as per the table below, Ms de Waal will receive the documents for MTPA. DARDLEA must therefore still be provided with the documents. Hard copies to Ms Mbuyane at our Ermelo office, and a link to be sent to me. Please also send me the shapefiles. I have understood that you will be discussing this with your client and with Ms Gopaul, and that ERM would revert to me.

Please see page 2 of our application form attached where you will find the physical address of our Ermelo office (Gert Sibande District).

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
[redacted]

>>> Robyn Luyt 08/11/24 4:55 PM >>>
Good day,

Please see my email response to you on 7 August as per below email thread. I have not had a response and we still await the draft reports for commenting. Please urgently advise how this is being addressed. I have just had an email from MTPA stating that you are busy sending them the draft reports. Please confirm when I will receive a link to the reports, and when our Ms Mbuyane will receive the hard copies. Please also confirm that we (both DARDLEA and MTPA) will be provided with the mandatory 30 days to comment.

Should you wish to discuss this further please call me on 0826727868.

Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
Nelspruit, 1200
[redacted]

>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 08/11/24 4:23 PM >>>
Good day Robyn,

Emails have been received and responded to. Please see attached response.

Kind Regards

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Sunday, August 11, 2024 4:19 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>
Subject: Re: RE: Consultation | Mlulio Wind Farms Mpumalanga

You don't often get email from rluyt@mpg.gov.za. Learn why this is important

EXTERNAL MESSAGE

Good afternoon,
Please confirm whether you received the below email - I have deleted all graphics from the email thread to ensure this reaches you.
Regards
Robyn

>>> Robyn Luyt 08/11/24 9:51 AM >>>
Good day Stephanie,

As of 8 August 2024, neither DARDLEA nor MTPA have received draft Scoping Reports to review and comment on, nor have we received a response to the email below.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)

Director: Environmental Impact Management

Department of Agriculture, Rural Development, Land & Environmental Affairs

Mpumalanga Provincial Government

Riverside Office Park, Aqua Street (Cycad Building - Block 4)

Nelspruit, 1200

[redacted]

[redacted]

[redacted] Robyn Luyt 08/07/24 9:41 AM >>>
Good day Stephanie,

Be advised that the names of the officials at MTPA that you have highlighted in your below notification are**not the relevant officials** that are required to be notified or the relevant officials that must review and comment on draft Scoping or EIA reports, or any reports related to an EIA process. There are also

no officials in the list of officials in your screenshots that are in the Environmental Affairs Chief Directorate in MDARDLEA - as far as I am aware they are in the section that deals with Agriculture, which is an entirely different mandate.

It would **not**be acceptable to not provide the commenting authority the mandatory 30 days to review and comment on draft reports, especially in light of the fact that there has been no prior notification. The Directorate Environmental Impact Management within DARDLEA represents the MEC as Competent Authority in Mpumalanga, and the commenting authority in respect projects administered by DFFE. MTPA has the mandate for biodiversity matters on behalf of DARDLEA. As per my email to you below (3 August), hard copies of all reports must be submitted to Ms Mbuyane (Environmental Impact Management) at our Ermelo office, and the documents must be made available to me (and in this instance to Mr Cowden and Mr Lotter) electronically at the same time. You will need to contact Ms De Waal and Mr Krige at MTPA to confirm how documents must be submitted to MTPA. Please provide shape files of the 3 proposed WEFs as well.

Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)

Director: Environmental Impact Management

Department of Agriculture, Rural Development, Land & Environmental Affairs

Mpumalanga Provincial Government

Riverside Office Park, Aqua Street (Cycad Building - Block 4)

Nelspruit, 1200

[redacted]

[redacted]

>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 08/06/24 1:43 PM >>>

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

Thank you,

Lucien Barbeau

ERM

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Saturday, August 3, 2024 3:09 PM
To: ERM Arcus Amsterdam <Erm.arcusamsterdam@erm.com>
Cc: cagenbach@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za;whector@dffe.gov.za; Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>;Celia.dewaal@mtpa.co.za; frans.krige@mtpa.co.za; mervyn@mtpa.co.za
Subject: Consultation | Mlulio Wind Farms Mpumalanga
Importance: High

You don't often get email fromrluyt@mpg.gov.za.Learn why this is important

EXTERNAL MESSAGE

Good day Ms Gopaul,

It has come to our attention, and not via any official notification from ERM, that draft Scoping Reports for the following wind farms proposed in the Gert Sibande District in Mpumalanga Province are out for public comment from 19 July 2024 to 20 August 2024 (as per ERM website), where ERM is the EAP:
1. Shepmoore WEF
2. Emvelo WEF
3. Rochdale WEF

Neither DARDLEA nor MTPA have been consulted to date, nor have we received copies of any of the draft Scoping Reports. Aside from the requirements of the EIA Regulations, DARDLEA and MTPA have through internal arrangements with DFFE requested to be included in all pre-application consultations for Renewable Energy projects in Mpumalanga, particularly wind energy facilities. DARDLEA and MTPA must be included during all pre-application meetings and in all in-process consultations.

For the purpose of commenting on draft reports during the regulatory periods, we request that hard copies of all reports are submitted to Ms Sindi Mbuyane in our Ermelo office (where projects are located in the Gert Sibande District), and sent electronically to me via WeTransfer. Please also ensure that MTPA receives the reports in the manner requested by them. For your records I include the contact details of all relevant officials to be consulted in DARDLEA (when an application is in the Gert Sibande District) and MTPA:

DARDLEA	DESIGNATION	EMAIL	PHONE
Robyn Luyt	Director: Environmental Impact Management (EIM)	rluyt@mpg.gov.za	[redacted]
Sindisiwe Mbuyane	Deputy Director: EIM Gert Sibande District	mbuyanesb@mpg.gov.za	[redacted]
Gavin Cowden	Deputy Director: Environmental Policy, Planning and Coordination	gcowden@mpg.gov.za	
MTPA	**DESIGNATION**	**EMAIL**	**PHONE**
Mervyn Lotter	Manager: Biodiversity Planning	Mervyn@mtpa.co.za	[redacted]
Frans Krige	Land Use Advisor	Frans.Krige@mtpa.co.za	
Khumbelo Malele	Land Use Advisor	Khumbelo.Malele@mtpa.co.za khumbelomalele@gmail.com	[redacted]
Celia de Waal	EIA Data Capturer LUA	celia.dewaal@mtpa.co.za	[redacted]

Please note that time frames for commenting on draft reports can only commence on the date that hard copies of the reports are received, and we request that our 30 day time frame aligns with DFFE's.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)

Director: Environmental Impact Management

Department of Agriculture, Rural Development, Land & Environmental Affairs

Mpumalanga Provincial Government

Riverside Office Park, Aqua Street (Cycad Building - Block 4)

Nelspruit, 1200

[redacted]

[redacted]

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agriculture, rural development, land & environmental affairs
MPUMALANGA PROVINCE
REPUBLIC OF SOUTH AFRICA

Application for authorisation in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended and the Environmental Impact Assessment Regulations, 2014 (as amended)

	(For official use only)
File Reference Number:	
NEAS Reference Number:	
Date Received:	
Responsible Official:	

PROJECT TITLE

IMPORTANT INFORMATION

1. This application form is current as of 1 August 2023. It is the responsibility of the proponent to ascertain whether subsequent versions of the form have been published or produced by the competent authority.
2. Only a person registered as an environmental assessment practitioner may perform tasks in connection with an application for an environmental authorisation contemplated in Chapter 5 of NEMA, read with the Environmental Impact Assessment Regulations.
3. It is the responsibility of the proponent to confirm that DARDLEA is the competent authority to which this application must be submitted (refer to NEMA section 24C).
4. The required information must be typed within the spaces provided in the form. The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided. Where applicable **black out** the boxes that are not applicable in the form.
5. The use of the phrase "not applicable" in the form must be done with circumspection.
6. This application form **must** be accompanied by a screening report generated through the national web-based environmental screening tool at https://screening.environment.gov.za/screeningtool.
7. No faxed or e-mailed applications will be accepted.
8. **Proof of payment of the applicable fee for consideration and processing of applications must accompany the submission of this form, unless an exclusion applies.** If an exclusion applies, a **written motivation** must be attached to this application form.
9. If the proponent is not the owner or person in control of the land on which the activity is to be undertaken, written consent from the landowner or person in control of the land must be obtained and must be attached to this application form, unless Regulation 39(2) applies.
10. The original signed declarations by the applicant and by the EAP and any specialist, which EAP and specialist meet all the requirements contemplated in Regulation 13, must accompany this application form. Where specialists and review EAPs/specialists are appointed after the submission of this form, the relevant declaration forms in Section 10 must be completed, and the original signed forms must accompany the draft basic assessment or the draft environmental impact assessment reports, as well as final reports to be submitted to this Department.
11. Unless protected by law, all information contained in this application will become public information on receipt by the Department. Upon request, the applicant/EAP must provide any interested and affected party with the information contained in or submitted with this application form.
12. Where exemption is intended to be applied for, such application must be made in terms of the National Exemption Regulations, 2014, and must be finalised before lodging an application for environmental authorisation.
13. If, in addition to this application, you must also apply for a Waste Management Licence in terms of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) and/or an Atmospheric Emission Licence in terms of the National

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THE PLACE OF THE RISING SUN

Environmental: Air Quality Act, 2004 (Act No. 39 of 2004, then separate application forms in terms of the applicable legislation must be completed and submitted to the relevant licensing authorities.

14. An application for environmental authorisation lapses if the applicant fails to meet any of the timeframes prescribed in terms of the 2014 EIA Regulations (as amended).

15. **DARDLEA has not prescribed a format for Basic Assessment, Scoping or Environmental Impact Assessment Reports, or Environmental Management Programmes.** Said reports must however contain all the information set out in Appendices 1, 2, 3 and 4 of the EIA Regulations respectively.

16. This form, and all subsequent reports, **MUST BE SUBMITTED TO THE DEPARTMENT AT THE RELEVANT DISTRICT OFFICE** given below. Should the application form not be submitted at the relevant district office, it will not be considered:

EHLANZENI DISTRICT	NKANGALA DISTRICT	GERT SIBANDE DISTRICT
Environmental Impact Management Riverside Office Park Aqua Street (opposite Audi) Building 4, East Tower Nelspruit 1200 Tel: 013 759 4000	Environmental Impact Management Piet Koornhof Building 1 Justice Street Witbank 1035 Tel: 087 260 6468 / 6481	Environmental Impact Management 13 De Jager Street Ermelo 2351 Tel: 017 811 4830
Please note that the addresses provide above are subject to change. It is the responsibility of the applicant / EAP to verify the abovementioned details with the relevant District Offices prior to submission of all application forms and reports.		

PROOF OF PAYMENT

Tick the appropriate box below to indicate that either proof of payment is attached or that, in the applicant's view, an exclusion applies. Proof and motivations for exclusions must be attached to this application form.

Proof of payment attached: ☐

Exclusion applies: ☐

An applicant is excluded from paying fees if:

- The activity is a community based project funded by a government grant; or
- The applicant is an organ of state

TYPE OF EXCLUSION	Tick which is applicable and attach proof / motivation
The activity is a community based project funded by a government grant	
The applicant is an organ of state	

FEE AMOUNT		
APPLICATION TYPE	**FEE**	**Tick which is applicable**
Application for an environmental authorisation for which basic assessment is required	**R2000**	
Application for an environmental authorisation for which S&EIR is required	**R10 000**	

Details for the payment of application fees

Banking Details:
Account name: Department of Agriculture, Rural Development, Land and Environmental Affairs
Bank: ABSA Bank
Account Type: Current Account
Account number: 4103095253
Branch Name: Business Bank
Branch Code: 632005

Beneficiary reference number: **EIM + ABBREVIATED PROJECT DESCRIPTION**

Proof of payment must be attached to this application form.

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"Proof of payment" includes a receipt, a stamped deposit slip, electronic fund transfer copy or a payment advice.

NB: PAYMENT MUST BE MADE IN THE SAME MONTH THAT AN APPLICATION FORM IS TO BE SUBMITTED.

1. PROJECT TITLE

Provide a clear, accurate and detailed description of the development project and its associated infrastructure.

2. GENERAL INFORMATION

Applicant:			
Contact person:			
Physical address:			
Postal address:			
Postal code:		**Cell:**	
Telephone:		**Fax:**	
E-mail:			

In instances where there is more than one applicant, this section must be duplicated

Company name of EAP:			
EAP name and surname:			
Postal address:			
Postal code:		**Cell:**	
Telephone:		**Fax:**	
E-mail:			
Are you a Registered EAP in terms of 24H(3)(a) of NEMA (provide EAP Registration number):			

Landowner:			
Contact person:			
Postal address:			
Postal code:		**Cell:**	
Telephone:		**Fax:**	
E-mail:			

In instances where there is more than one landowner, this section must be duplicated.

District Municipality in whose jurisdiction the proposed activity will fall (Delete which is not applicable):	**Ehlanzeni**	**Nkangala**	**Gert Sibande**
Local authority in whose jurisdiction the proposed activity will fall:			
Nearest town:			

In instances where there is more than one local authority involved, this section must be duplicated.

3. SITE DESCRIPTION

Property description:	

(Farm name, portion, number and registration division or Erf number etc.) Where a large number of properties are involved (e.g. linear activities), please attach a full list to this application.

Current land-use zoning:	

In instances where there is more than one current land-use zoning, please attach a list of current land use zonings that also indicate which portions each use pertains to, to this application.

Property size (m^2) of all proposed sites:	
Development footprint size (m^2):	

Project map:	A project map must be attached to this document. The map must accurately provide an indication of the project site position as well as the positions of the alternative sites, if any, and • road names or numbers of all major roads as well as the roads that provide access to the site(s); • a north arrow; • any sensitive geographic features (eg. watercourses)

Site co-ordinates:

Indicate the position of the activity using the latitude and longitude of the centre point of the preferred site alternative. The co-ordinates must be in degrees, minutes and seconds using the Hartebeesthoek94 WGS84 co-ordinate system.

Latitude (S):			Longitude (E):		
0	‘	“	0	‘	“

In the case of linear activities:

- Starting point of the activity
- Middle point of the activity
- End point of the activity

Latitude (S):			Longitude (E):		
o	’	“	o	‘	“
o	‘	“	o	‘	“
o	‘	“	o	‘	“

SG 21 Digit Code(s):

Indicate all the Surveyor-General 21 digit codes for all sites (including portions of sites) that are part of the application. If there are more than 4, attach a list with the rest of the codes.

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4. TYPE OF APPLICATION

4.1 Application for Basic Assessment

Is this an application for conducting a basic assessment (as defined in the Regulations)?	YES	NO

Please indicate when the final basic assessment report will be submitted:

4.2 Application for Scoping and Environmental Impact Assessment (S&EIR)

Is this an application for Scoping and EIR (as defined in the Regulations)?	YES	NO

Please indicate when the final Scoping Report (including the Plan of Study for EIA) will be submitted:

5. ACTIVITIES APPLIED FOR TO BE AUTHORISED

For an application for authorisation that involves more than one listed or specified activity that, together, make up one development proposal, all the listed activities pertaining to this application must be indicated.

Government Notice R983 (as amended) Activity No.	**Describe the relevant Basic Assessment Activity in writing as per Listing Notice 1 (GN No. R983, as amended)**	**Describe the extent to which the activity applied for requires authorisation (specify the threshold where applicable)**
Government Notice R985 (as amended) Activity No:	**Describe the relevant Basic Assessment Activity in writing as per Listing Notice 3 (GN No. R985, as amended)**	**Describe the extent to which the activity applied for requires authorisation (specify the threshold where applicable)**
Government Notice R984 Activity No:	**Describe the relevant Scoping and EIA Activity in writing as per Listing Notice 2 (GN No. R984)**	**Describe the extent to which the activity applied for requires authorisation (specify the threshold where applicable)**

Please note:
Only those activities listed above shall be considered for authorisation. The onus is on the applicant to ensure that all applicable listed activities are included in the application. Environmental Authorisation must be obtained prior to commencement with each applicable listed activity. If a specific listed activity is not included in an Environmental Authorisation, a new/separate application for Environmental Authorisation for such activity will have to be submitted.

6. PUBLIC PARTICIPATION

6.1 Public Participation undertaken to date

Where public participation in terms of Regulations 40, 41 and 42 was undertaken prior to submission of this application, please provide a summary of the steps followed to date. Please remember that in terms of Regulation 40(3), all potential or registered I&AP's **must** be provided with an opportunity to comment on draft reports once an application has been submitted to the CA.

6.2 State Departments identified in terms of S240

Provide a list of all State Departments / Organs of State that will be / have been consulted, and to whom draft reports will be submitted for comment. **Proof of submission / delivery of the draft report to all State Departments / Organs of State must be attached to the final BAR / S&EIR.**

Name of Department	Contact person	Address	Email Address	Phone number
Please note: In terms of Regulation (7)2, the EAP is responsible for consulting with all relevant State Departments / Organs of State in respect of the application (unless agreement to the contrary has been reached with the Department), and such State Departments must be provided with a 30 day comment period.				

7. OTHER AUTHORISATIONS

7.1 Do you need any authorisations in terms of the following legislation ?

National Environmental Management: Waste Act (NEMWA)	**YES**	**NO**
National Environmental Management: Air Quality Act (NEMAQA)	**YES**	**NO**
Have such applications been lodged already ?	**YES**	**NO**

If Yes, please attach proof of submission and provide a status update below. If no, then indicate when such applications will be submitted.

8. NATIONAL SECTOR CLASSIFICATION

Please indicate, by marking the appropriate box below, **the ONE sector** most applicable to the main development which forms the subject of this application

Infrastructure /Transport Services/Roads - Public		Services/Waste Management Services/Disposal facilities - Hazardous	
Infrastructure /Transport Services/Roads - Private		Services/Waste Management Services/Disposal facilities - Nuclear	
Infrastructure /Transport Services/Rail - Public		Services/Waste Management Services/Disposal facilities - General	
Infrastructure /Transport Services/Rail - Private		Services/Waste Management Services/Treatment facilities - Hazardous	
Infrastructure /Transport Services/Airport/Runways/Landing Strip/Helipad - Commercial		Services/Waste Management Services/Treatment facilities - General	
Infrastructure /Transport Services/Airport/Runways/Landing Strip/Helipad - Private		Services/Waste Management Services/Storage Facilities - General	
Infrastructure /Transport Services/Airport/Runways/Landing Strip/Helipad - Public Services		Services/Waste Management Services/Storage Facilities - Hazardous	
Infrastructure /Transport Services - Ports		Services/Waste Management Services/Storage Facilities - Nuclear	
Infrastructure /Transport Services - Inland Waterways		Services/Burial and cemeteries - Cemeteries	
Infrastructure /Transport Services - Marina		Services/Burial and cemeteries - Cremators	
Infrastructure /Transport Services - Canal		Services/Water services/Storage - Dams	
Infrastructure /Localised infrastructure - Infrastructure in the Sea/Estuary/Littoral Active Zone/Development Setback/100M Inland/or coastal public property.		Services/Water services/Storage - Reservoirs	
Infrastructure /Localised infrastructure - Zip Lines & Foefie Slides		Services/Water services - Desalination	
Infrastructure /Localised infrastructure - Cableway or Funiculars		Services/Water services - Treatment & Waste Water	
Infrastructure /Localised infrastructure - Billboards		Services - Hospitality	

Infrastructure /Localised infrastructure - Depot for dangerous goods		Mining - Prospecting rights	
Infrastructure /Localised infrastructure - Filling station or Tanks for dangerous goods		Mining - Mining Permit	
Utilities Infrastructure/Pipelines - Fresh/Storm Water Urban		Mining - Mining Right	
Utilities Infrastructure/Pipelines - Fresh/ Storm Water Rural		Mining/Exploration Right - Gas or Oil Marine	
Utilities Infrastructure/Pipelines - Waste Water		Mining/Exploration Right - Gas or Oil Terrestrial	
Utilities Infrastructure/Pipelines - Dangerous Goods Urban		Mining/Production Right - Gas or Oil Marine	
Utilities Infrastructure/Pipelines - Dangerous Goods Rural		Mining/Production Right - Gas or Oil Terrestrial	
Utilities Infrastructure/Telecommunications/ Radio Broadcasting - Tower		Mining/Underground gasification of coal - Oil	
Utilities Infrastructure/Telecommunications/ Radio Broadcasting - Mast		Mining/Beneficiation - Hydrocarbon	
Utilities Infrastructure/Telecommunications/ Radio Broadcasting - Receivers		Mining/Beneficiation - Mineral	
Utilities Infrastructure - Marine Cables		Agriculture/Forestry/ Fisheries - Crop Production	
Utilities Infrastructure/Electricity /Generation/Non Renewable/Hydrocarbon - Petroleum		Agriculture/Forestry/ Fisheries - Animal Production	
Utilities Infrastructure/Electricity /Generation/Non Renewable/Hydrocarbon - Coal		Agriculture/Forestry/ Fisheries - Afforestation	
Utilities Infrastructure/Electricity /Generation/Non Renewable - Nuclear		Agriculture/Forestry/ Fisheries - Aquaculture	
Utilities Infrastructure/Electricity /Generation/Renewable - Hydro		Agriculture/Forestry/ Fisheries - Agro-Processing	
Utilities Infrastructure/Electricity /Generation/Renewable/Solar - PV		Transformation of land - Indigenous vegetation	
Utilities Infrastructure/Electricity /Generation/Renewable/Solar - CSP		Transformation of land - From open space or Conservation	
Utilities Infrastructure/Electricity /Generation/Renewable - Wind		Transformation of land - From agriculture or afforestation	
Utilities Infrastructure/Electricity /Generation/Renewable - Biomass/ biofuels		Transformation of land - From mining or heavy industrial areas	
Utilities Infrastructure/Electricity /Generation/Renewable - Wave		Any activities within or close to a watercourse	
Utilities Infrastructure/Electricity /Distribution and Transmission - Power line		Any activity in an estuary, on the seashore, in the littoral active zone, or in the sea.	
Utilities Infrastructure/Electricity /Distribution and Transmission/Substation -		Activity requiring permit or licence in terms of National or Provincial legislation governing the release or generation of emissions - Emissions	
Release of Genetically Modified Organisms		Activity requiring permit or licence - Marine Effluent	
		Activity requiring permit or licence - Fresh Water Effluent	

8. CAPITAL VALUE AND JOB CREATION ESTIMATES (if applicable)

Capital value	**Job estimates**

9. LIST OF APPENDICES

		Submitted	
Appendix 1	Proof of payment, or	YES	N/A
	Written motivation where exclusion of payment applies	YES	N/A
Appendix 2	Land owner consent	YES	N/A
Appendix 3	Project map / plan	YES	N/A
Appendix 4	Screening Report	YES	NO

10. DECLARATIONS

10.1 The Applicant

Note: Duplicate this section where there is more than one applicant.

I……., in my personal capacity or duly authorised thereto hereby declare/affirm all the information submitted or to be submitted as part of the application is true and correct, and that I:

- am fully aware of my responsibilities in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment Regulations ("EIA Regulations") in terms of NEMA (Government Notice No. R. 982 refers) and any relevant specific environmental management act and that failure to comply with these requirements may constitute an offence in terms of relevant environmental legislation;
- appointed the environmental assessment practitioner and/or specialists, where applicable, which EAP and/or specialists meet all the requirements in terms of regulation 13 of GN No. R 982 to act as independent environmental assessment practitioner for this application;
- will provide the EAP, specialists and the competent authority with access to all information at my disposal that is relevant to the application;
- will be responsible for the costs incurred in complying with the NEMA EIA Regulations, 2014 and other environmental legislation including but not limited to –
  - costs incurred in connection with the appointment of the environmental assessment practitioner or any person contracted by the environmental assessment practitioner;
  - costs incurred in respect of independent reviews in terms of regulation 13(2) of GN No. R982;
  - costs incurred in respect of the undertaking of any process required in terms of the regulations;
  - costs in respect of any fee prescribed by the Minister or MEC in respect of the regulations;
  - costs in respect of specialist reviews, if the competent authority decides to recover costs; and
  - the provision of security to ensure compliance with applicable management and mitigation measures;
- am responsible for complying with conditions that may be attached to any decision(s) issued by the competent authority;
- will ensure that the environmental assessment practitioner is competent to comply with the requirements of the EIA Regulations, 2014;
- hereby indemnify the government of the Republic, the competent authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action for which the applicant or environmental assessment practitioner is responsible in terms of the NEMA EIA Regulations, 2014 and any specific environmental management act; and
- will not hold the competent authority responsible for any costs that may be incurred by the applicant in proceeding with an activity prior to an appeal being decided in terms of the NEMA Regulations, 2014.

Note: If acting in a representative capacity, a certified copy of the resolution or power of attorney must be attached.

Signature of the applicant

Name of company

Date

10.2 The Environmental Assessment Practitioner (EAP)

I ....., as the appointed environmental assessment practitioner ("EAP") hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that I:

- in terms of the general requirement to be independent (tick which is applicable):

	other than fair remuneration for work performed/to be performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity; or

	am not independent, but another EAP that is independent and meets the general requirements set out in Regulation 13 has been appointed to review my work (Note: a declaration by the review EAP must be submitted);

- have expertise in conducting environmental impact assessments, including knowledge of the Act, regulations and any guidelines that have relevance to the proposed activity;
- will ensure compliance with the EIA Regulations 2014;
- will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the application;
- will take into account, to the extent possible, the matters listed in regulation **18** of the regulations when preparing the application and any report, plan or document relating to the application;
- will disclose to the proponent or applicant, registered interested and affected parties and the competent authority all material information in my possession that reasonably has or may have the potential of influencing any decision to be taken with respect to the application by the competent authority or the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority (unless access to that information is protected by law, in which case I will indicate that such protected information exists and is only provided to the competent authority);
- will ensure that information containing all relevant facts in respect of the application is distributed or made available to interested and affected parties and the public and that participation by interested and affected parties is facilitated in such a manner that all interested and affected parties will be provided with a reasonable opportunity to participate and to provide comments on documents that are produced to support the application;
- declare that all the particulars furnished by me in this form are true and correct;
- am aware that it is an offence in terms of Regulation 48 to provide incorrect or misleading information and that a person convicted of such an offence is liable to the penalties as contemplated in section 49B(2) of the National Environmental Management Act, 1998 (Act 107 of 1998).

_____

Signature of the environmental assessment practitioner

_____

Name of company

_____

Date

10.3 The Review Environmental Assessment Practitioner (REAP)

I ……., as the appointed review environmental assessment practitioner ("REAP") hereby declare/affirm the correctness of the information provided as part of the application, and that I:

- am independent, and other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity;
- am fully aware of and meet all of the requirements of Regulation 13, and that failure to comply with any the requirements may result in disqualification;
- have reviewed/will review all the work undertaken by the EAP;
- have disclosed/will disclose, to the applicant, the EAP, the specialist (if any), the Department and interested and affected parties, all material information that have or may have the potential to influence the decision of the Department or the objectivity of any report, plan or document prepared or to be prepared as part of the application; and
- am aware that a false declaration is an offence in terms of regulation 48 of the 2014 NEMA EIA Regulations.

Signature of the review environmental assessment practitioner

Name of company

Date

10.4 The Specialist

Note: Duplicate this section where there is more than one specialist.

I ....., as the appointed specialist hereby declare/affirm the correctness of the information provided as part of the application, and that I:

- in terms of the general requirement to be independent (tick which is applicable):

	other than fair remuneration for work performed/to be performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity; or

	am not independent, but another EAP that is independent and meets the general requirements set out in Regulation 13 has been appointed to review my work (Note: a declaration by the review specialist must be submitted);

- have expertise in conducting specialist work as required, including knowledge of the Act, regulations and any guidelines that have relevance to the proposed activity;
- will ensure compliance with the EIA Regulations 2014;
- will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the application;
- will take into account, to the extent possible, the matters listed in regulation **18** of the regulations when preparing the application and any report, plan or document relating to the application;
- will disclose to the proponent or applicant, registered interested and affected parties and the competent authority all material information in my possession that reasonably has or may have the potential of influencing any decision to be taken with respect to the application by the competent authority or the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority (unless access to that information is protected by law, in which case I will indicate that such protected information exists and is only provided to the competent authority);
- declare that all the particulars furnished by me in this form are true and correct;
- am aware that it is an offence in terms of Regulation 48 to provide incorrect or misleading information and that a person convicted of such an offence is liable to the penalties as contemplated in section 49B(2) of the National Environmental Management Act, 1998 (Act 107 of 1998).

Signature of the specialist

Name of company

Date

10.5 The Review Specialist

I ……, as the appointed review specialist hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that I:

- am independent, and other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity;
- am fully aware of and meet all of the requirements of Regulation 13, and that failure to comply with any the requirements may result in disqualification;
- have reviewed/will review all the work undertaken by the specialist;
- have disclosed/will disclose, to the applicant, the EAP, other specialist (if any), the Department and interested and affected parties, all material information that have or may have the potential to influence the decision of the Department or the objectivity of any report, plan or document prepared or to be prepared as part of the application; and
- am aware that a false declaration is an offence in terms of regulation 48 of the 2014 NEMA EIA Regulations.

Signature of the review specialist

Name of company

Date

From:	ERM Arcus Amsterdam
To:	Robyn Luyt; ERM Arcus Amsterdam
Cc:	bncube@dffe.gov.za; OLetlalo@dffe.gov.za; Gavin Cowden; Sindy Mbuyane
Subject:	RE: RE: RE: Consultation | Mlulio Wind Farms Mpumalanga
Date:	Monday, 12 August 2024 16:09:24
Attachments:	image001.png Amsterdam (2023-07-12).kmz IAP Notification Letter Afrikaans.pdf IAP Notification Letter English.pdf

Hi Robyn,

Thank you for your call earlier. I wanted to inform you that we sent out the notification to all IAPs on July 19th, 2024. We are currently in the process of couriering the Draft Scoping Reports to Sindiswe Mbuyane in Ermelo.
We would greatly appreciate it if you could review the reports within the current PPP period. Additionally, we have added you to the IAP database for the Full Scoping and EIA Phase to afford you an opportunity to comment. We are keen to have you onboard and to ensure that you are up to speed with the proposed project, we would be happy to set up a call at your convenience.

We understand that you may not have received the reports yet, but if you could review them at your earliest convenience, it would be greatly appreciated. Below is a link to the electronic copies of the reports and attached the shapefiles of the development for your review.

https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/

Please let me know if you would like to discuss this further or if you have any questions.

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Monday, August 12, 2024 2:09 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: bncube@dffe.gov.za; OLetlalo@dffe.gov.za; Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>

Subject: Re: RE: RE: Consultation | Mlulio Wind Farms Mpumalanga
Importance: High

EXTERNAL MESSAGE

Dear Lucien,

Our telephone discussion this morning refers.

I just wanted to confirm what we discussed in writing, ie. that MTPA and DARDLEA are different entities, and that MTPA and DARDLEA must each get reports for commenting. You confirmed that you dispatched documents to Ms Celia de Waal in Lydenburg last week (to arrive this week). Note that as per the table below, Ms de Waal will receive the documents for MTPA. DARDLEA must therefore still be provided with the documents. Hard copies to Ms Mbuyane at our Ermelo office, and a link to be sent to me. Please also send me the shapefiles. I have understood that you will be discussing this with your client and with Ms Gopaul, and that ERM would revert to me.

Please see page 2 of our application form attached where you will find the physical address of our Ermelo office (Gert Sibande District).

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
Nelspruit, 1200
[redacted]

>>> Robyn Luyt 08/11/24 4:55 PM >>>
Good day,

Please see my email response to you on 7 August as per below email thread. I have not had a response and we still await the draft reports for commenting. Please urgently advise how this is being addressed. I have just had an email from MTPA stating that you are busy sending them the draft reports. Please confirm when I will receive a link to the reports, and when our Ms Mbuyane will receive the hard copies. Please also confirm that we (both DARDLEA and MTPA) will be provided with the mandatory 30 days to comment.

Should you wish to discuss this further please call me on 0826727868.

Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
Nelspruit, 1200
[redacted]

>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 08/11/24 4:23 PM >>>
Good day Robyn,

Emails have been received and responded to. Please see attached response.

Kind Regards

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Sunday, August 11, 2024 4:19 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>
Subject: Re: RE: Consultation | Mlulio Wind Farms Mpumalanga

You don't often get email from rluyt@mpg.gov.za. Learn why this is important

EXTERNAL MESSAGE

Good afternoon,
Please confirm whether you received the below email - I have deleted all graphics from the email thread to ensure this reaches you.
Regards
Robyn

>>> Robyn Luyt 08/11/24 9:51 AM >>>
Good day Stephanie,

As of 8 August 2024, neither DARDLEA nor MTPA have received draft Scoping Reports to review and comment on, nor have we received a response to the email below.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
Nelspruit, 1200
[redacted]

>>> Robyn Luyt 08/07/24 9:41 AM >>>
Good day Stephanie,

Be advised that the names of the officials at MTPA that you have highlighted in your below notification are**not the relevant officials** that are required to be notified or the relevant officials that must review and comment on draft Scoping or EIA reports, or any reports related to an EIA process. There are also no officials in the list of officials in your screenshots that are in the Environmental Affairs Chief Directorate in MDARDLEA - as far as I am aware they are in the section that deals with Agriculture, which is an entirely different mandate.

It would **not**be acceptable to not provide the commenting authority the mandatory 30 days to review and comment on draft reports, especially in light of the fact that there has been no prior notification. The Directorate Environmental Impact Management within DARDLEA represents the MEC as Competent Authority in Mpumalanga, and the commenting authority in respect projects administered

by DFFE. MTPA has the mandate for biodiversity matters on behalf of DARDLEA. As per my email to you below (3 August), hard copies of all reports must be submitted to Ms Mbuyane (Environmental Impact Management) at our Ermelo office, and the documents must be made available to me (and in this instance to Mr Cowden and Mr Lotter) electronically at the same time. You will need to contact Ms De Waal and Mr Krige at MTPA to confirm how documents must be submitted to MTPA. Please provide shape files of the 3 proposed WEFs as well.

Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
Nelspruit, 1200
[redacted]

[redacted] <ERM.ArcusAmsterdam@erm.com> 08/06/24 1:43 PM >>>

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

Thank you,

Lucien Barbeau

ERM

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Saturday, August 3, 2024 3:09 PM
To: ERM Arcus Amsterdam <Erm.arcusamsterdam@erm.com>
Cc: cagenbach@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za;whector@dffe.gov.za; Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>;Celia.dewaal@mtpa.co.za; frans.krige@mtpa.co.za; mervyn@mtpa.co.za
Subject: Consultation | Mlulio Wind Farms Mpumalanga
Importance: High

You don't often get email fromrluyt@mpg.gov.za.Learn why this is important

EXTERNAL MESSAGE

Good day Ms Gopaul,

It has come to our attention, and not via any official notification from ERM, that draft Scoping Reports for the following wind farms proposed in the Gert Sibande District in Mpumalanga Province are out for public comment from 19 July 2024 to 20 August 2024 (as per ERM website), where ERM is the EAP:
1. Shepmoore WEF
2. Emvelo WEF
3. Rochdale WEF

Neither DARDLEA nor MTPA have been consulted to date, nor have we received copies of any of the

draft Scoping Reports. Aside from the requirements of the EIA Regulations, DARDLEA and MTPA have through internal arrangements with DFFE requested to be included in all pre-application consultations for Renewable Energy projects in Mpumalanga, particularly wind energy facilities. DARDLEA and MTPA must be included during all pre-application meetings and in all in-process consultations.

For the purpose of commenting on draft reports during the regulatory periods, we request that hard copies of all reports are submitted to Ms Sindi Mbuyane in our Ermelo office (where projects are located in the Gert Sibande District), and sent electronically to me via WeTransfer. Please also ensure that MTPA receives the reports in the manner requested by them. For your records I include the contact details of all relevant officials to be consulted in DARDLEA (when an application is in the Gert Sibande District) and MTPA:

DARDLEA	**DESIGNATION**	**EMAIL**	**PHONE**
Robyn Luyt	Director: Environmental Impact Management (EIM)	rluyt@mpg.gov.za	[redacted]
Sindisiwe Mbuyane	Deputy Director: EIM Gert Sibande District	mbuyanesb@mpg.gov.za	[redacted]
Gavin Cowden	Deputy Director: Environmental Policy, Planning and Coordination	gcowden@mpg.gov.za	
MTPA	**DESIGNATION**	**EMAIL**	**PHONE**
Mervyn Lotter	Manager: Biodiversity Planning	Mervyn@mtpa.co.za	[redacted]
Frans Krige	Land Use Advisor	Frans.Krige@mtpa.co.za	
Khumbelo Malele	Land Use Advisor	Khumbelo.Malele@mtpa.co.za khumbelomalele@gmail.com	[redacted]
Celia de Waal	EIA Data Capturer LUA	celia.dewaal@mtpa.co.za	[redacted]

Please note that time frames for commenting on draft reports can only commence on the date that hard copies of the reports are received, and we request that our 30 day time frame aligns with DFFE's.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
Nelspruit, 1200
[redacted]

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www.erm.com

a19 Julie 2024

ERM Verwysing: 0684401

Geagte Belanghebbende en Geaffekteerde Party, Belanghebbende, Staats orgaan

KENNISGEWING VAN BESKIKBAARHEID VAN DIE KONSEP-OMVANGS VERSLAE VIR OPENBARE HERSIENING EN KOMMENTAAR VAN DIE VOORGESTELDE AMSTERDAM WIND ENERGIE FASILITEIT (EMVELO, ROCHDALE EN SHEEPMOOR) CLUSTER, NABY ERMELO, MPUMALANGA

Kennis word hiermee gegee van 'n openbare deelname proses (ODP) wat in gevolge die Wet op Nasionale Omgewingsbestuur, 1998 (Wet No. 107 van 1998) (NEMA, 1998), soos gewysig, onderneem moet word.

DFFE-verwysing(s): Om bevestig te word

Aard van aktiwiteit: Emvelo Windenergie fasiliteit Bpk, Rochdale Windenergie fasiliteit Bpk en Sheepmoor Windenergie fasiliteit Bpk ('die Projek aansoekers') stel voor dat drie (3) Wind energie fasiliteite (WEF) opgerig en bedryf word. Die potensiële opwekkingsvermoë van Emvelo WEF is tot 200 MW, Rochdale WEF is tot 220 MW en Sheepmoor tot 360 MW. Elke WEF sal bestaan uit verskeie geboue, toegangspaaie, 'n battery-energieberging stelsel (BESS) en 'n substasie naaf met gepaardgaande elektriese netwerk infrastruktuur soos, maar nie beperk tot 'n 132kV oorhoofse transmissie kraglyn wat die WEF met die nasionale elektriese netwerk verbind.

Ontwikkelings ligging: Die voorgestelde Amsterdam WEF se cluster is 30 km oos van Ermelo binne die Msukaligwa Plaaslike Munisipaliteit en Gert Sibande Distriksmunisipaliteit geleë.

Aansoek proses: Ingevolge Hoofstuk 5 van die Wet op Nasionale Omgewingsbestuur, 1998 (Wet 107 van 1998 – NEMA), Omgewings Impak studie (EIA) Regulasies, 2014 (soos gewysig), het die Projek aansoekers, Environmental Resources Management (Edms) Bpk (ERM) aangestel om as projek bestuurder op te tree en die Omvang- en Omgewings Impak bepalings prosesse (S&EIA) as die onafhanklike omgewings impak bepalings praktisyn (EAP) te onderneem.

ERM het drie afsonderlike omgewings aansoeke ingedien, waaronder afsonderlike konsep-omvang verslae aan die departement van bosbou, visserye en die omgewing (DFFE).

Uitnodiging om kommentaar te lewer: Lede van die publiek, plaaslike gemeenskappe en belanghebbendes word uitgenooi om kommentaar te lewer op die konsep-omvang verslae, wat beskikbaar is vir openbare hersiening en kommentaar, vanaf **Vrydag, 19 Julie 2024 tot die 20 Augustus 2024 (albei dae ingesluit),** soos per Tabel 1 hieronder.

Tabel 1: Liggings vir openbare oorsig en kommentaar

Ligging	Fisiese adres
Elektroniese kopie lokasies (beskikbaar vir aflaai hieronder)	
Via One Drive	I &AP's kan versoek dat kopieë via een gedeelde gids van One Drive gestuur word.

Geregistreerde kantoor
Omgewingshulpbronbestuur
Suider-Afrika (Edms) Bpk
1ste verdieping, gebou 32
Die Woodlands-kantoorpark
Woodlandsrylaan, Woodmead
2148, Johannesburg, Suid-Afrika

Geregistreerde nommer: 2003/001404/07
BTW-registrasie: 4780205482

Kantore wêreldwyd

Direkteure
Claudio Bertora
Urmila Bob (nie-uitvoerende)
Tania Swanepoel
Marinda Rasmussen

Harde kopie ligging	
Ermelo Openbare Biblioteek	Ermelo, 2350
CD-kopieë sal op versoek aan die EAP gemaak word.	

Indien u as 'n I&AP geregistreer wil wees en / of kommentaar wil lewer, dien asseblief u naam, belangstelling in die projek of kommentaar, e-pos adres en pos adres en telefoon nommer skriftelik by die onderstaande adres in:	
Environmental Resources Management Southern Africa (Edms) Bpk	
Projek verwysing: 0684401 Mulilo WEF-cluster	**Kontak persoon:** Lucien Barbeau
E-pos: ERM.ArcusAmsterdam@erm.com	**Telefoon:** +27117985400
Pos: Postnet Suite 90, Privaatsak X12, Tokai, 7966	**Aanlyn:**https://mulilowef.aidaform.com/public-participation-form

Na afloop van die openbare deelname van 30 dae, sal die kommentaar aangespreek en opgeneem word in die Finale Omvang verslae, wat aan die DFFE voorgelê sal word vir goedkeuring om na die EIA-fase te vorder.

Let wel, met betrekking tot die Wet op die Beskerming van Persoonlike Inligting (PoPI Wet 4 van 2013, soos gewysig): Indien u versoek om as 'n I&AP te registreer, sal u persoonlike inligting aan 'n appel kandidaat beskikbaar gestel word in die geval van 'n appèl, en 'n aansoeker/EAP/onafhanklike persoon vir doeleindes daarvan om ingelig te word en toegang tot 'n ouditverslag te kry.

Korrespondensie gedurende die aansoek proses sal slegs aan geregistreerde I &AP's versprei word. Registrasie is moontlik gedurende die aansoek proses.

Dankie vir die belangstelling in die projek.

Sadiya Salie
Omgewings konsultant

Environmental Resources Management Southern Africa (Edms) Bpk

ERM

Suite S005
17 The Boulevard
Westway Office Park
Westville, 3635
Durban, South Africa

Telephone: +27 31 265 0033
Fax: +27 31 265 0150

www.erm.com

19 July 2024

ERM Reference: 0684401

Dear Interested and Affected Party, Stakeholder, Organ of State

NOTIFICATION OF AVAILABILITY OF THE DRAFT SCOPING REPORTS FOR PUBLIC REVIEW AND COMMENT OF THE PROPOSED AMSTERDAM WIND ENERGY FACILITY (EMVELO, ROCHDALE AND SHEEPMOOR) CLUSTER, NEAR ERMELO, MPUMALANGA

Notice is hereby given of a Public Participation Process (PPP) to be undertaken in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA, 1998), as amended.

DFFE Reference(s): To Be Confirmed

Nature of Activity: Emvelo Wind Energy Facility (Pty) Ltd, Rochdale Wind Energy Facility (Pty) Ltd and Sheepmoor Wind Energy Facility (Pty) Ltd ('the Project Applicants') are proposing the construction and operation of three (3) Wind Energy Facilities (WEF). The potential generation capacity of Emvelo WEF is up to 200 MW, Rochdale WEF is up to 220 MW and Sheepmoor up to 360 MW. Each WEF will comprise various buildings, access roads, a battery energy storage system (BESS), and a substation hub with associated electrical grid infrastructure such as but not limited to a 132kV overhead transmission powerline connecting the WEF to the national electrical grid network.

Development Location: The proposed Amsterdam WEF's Cluster are located 30 km east of Ermelo within the Msukaligwa Local Municipality, and Gert Sibande District Municipality.

Application Process: In terms of Chapter 5 of the National Environmental Management Act, 1998 (Act 107 of 1998 – NEMA), Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), the Project Applicants appointed Environmental Resources Management (Pty) Ltd (ERM), to act as the project manager and to undertake the Scoping and Environmental Impact Assessment (S&EIA) processes as the independent environmental impact assessment practitioner (EAP).

ERM has submitted three separate Environmental Applications, including separate Draft Scoping Reports to the Department of Forestry, Fisheries and the Environment (DFFE).

Invitation to Comment: Members of the public, local communities, and stakeholders are invited to comment on the Draft Scoping Reports, which is available for public review and comment, from **Friday, 19 July 2024 to the 20 August 2024 (both days inclusive)**, as per Table 1 below.

Table 1: Public Review and Comment Locations

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Electronic Copy Locations (Available for download below)	
Via One Drive	I&APs can request for copies to be sent via one drive shared folder.
Hard Copy Location	

Registered office
Environmental Resources Management
Southern Africa (Pty) Ltd
1st Floor, Building 32
The Woodlands Office Park
Woodlands Drive, Woodmead
2148, Johannesburg, South Africa

Registered number: 2003/001404/07
VAT registration: 4780205482

Offices worldwide

Directors
Claudio Bertora
Urmilla Bob (Non-Executive)
Tania Swanepoel
Marinda Rasmussen

Ermelo Public Library	Ermelo, 2350
CD Copies will be made upon request to the EAP.	

Should you wish to be registered as an I&AP and / or would like comment please submit your name, interest in the project or comment, email and postal address and telephone number in writing to the below address:	
Environmental Resources Management Southern Africa (Pty) Ltd	
Project Reference: 0684401 Mulilo WEF Cluster	**Contact Person:** Lucien Barbeau
Email: ERM.ArcusAmsterdam@erm.com	**Telephone:** +27117985400
Post: Postnet Suite 90, Private Bag X12, Tokai, 7966	**Online:** https://mulilowef.aidaform.com/public-participation-form

Following the 30-day public participation, the comments will be addressed and incorporated into the Final Scoping Reports, which will be submitted to the DFFE for approval to progress to the EIA Phase.

Please note, regarding the Protection of Personal Information Act (PoPI Act 4 of 2013, as amended): If you request to register as an I&AP, your personal information will be made available to an appellant in the case of an appeal, and an applicant/EAP/independent person for purposes of being informed and given access to an audit report.

Correspondence throughout the Application Process will only be distributed to Registered I&APs. Registration is possible throughout the Application Process.

Thank you for the interest in the project.



Sadiya Salie
Environmental Consultant
Environmental Resources Management (Pty) Ltd

From:	Bathandwa Ncube
To:	Stephanie Gopaul; ERM Arcus Amsterdam
Cc:	Masina Morudu; mervyn.lotter@gmail.com; GCowden; SB. Mbuyane; celia@mtpa.co.za; R Luyt
Subject:	14/12/16/3/3/2/2591; 2592; 2593: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP
Date:	Monday, 12 August 2024 16:14:10

EXTERNAL MESSAGE

Goodday Lucien

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

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

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

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

Following our telephone conversation earlier today regarding the public participation process, please be informed that comments on the draft Scoping Report (SR) are due to you on 22 August 2024. It is noted that there are organs of state who have jurisdiction in respect of the proposed activity, which requires that they be added to the I&AP Database and given an opportunity to comment on the draft SR.

The applicant is requested to submit the final SR to the Department on or before the due date (05 September 2024) and may submit comments from MTPA and DARDLEA as addendums, subsequent to the submission of the final SR to the Department.

MTPA and Mpumalanga DARDLEA are requested to cc this Department when submitting comments to the EAP.

Kind regards
Ms Bathandwa Ncube (EAPASA)
Department of Forestry, Fisheries and the Environment (DFFE)
Integrated Environmental Authorisations
[redacted]7
(E) BNcube@dffe.gov.za

From:	ERM Arcus Amsterdam
To:	ERM Arcus Amsterdam
Cc:	nyathikazibheki@gmail.com; shabanguzj@mpg.gov.za
Subject:	Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga
Date:	Monday, 12 August 2024 16:59:46
Attachments:	image001.png IAP Notification Letter English.pdf IAP Notification Letter Afrikaans.pdf

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Hi Bheki,

Our telephonic discussion earlier refers. Understandably, you mentioned IT related issues in terms of receiving e-mails and forwarding them, hence I have copied your gmail address as requested.

Please see below notification that was sent on the 19th of July 2024.

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

Dear Interested and Affected Party,

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

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

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

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Sustainability is our business

Lucien Barbeau
Consultant

Cape Town
+[redacted]

erm.com



ERM

Suite S005
17 Die Boulevard
Westway Kantoorpark
Westville, 3635
Durban, Suid-Afrika

Telefoon: +27 31 265 0033
Faks: +27 31 265 0150

www.erm.com

a19 Julie 2024

ERM Verwysing: 0684401

Geagte Belanghebbende en Geaffekteerde Party, Belanghebbende, Staats orgaan

KENNISGEWING VAN BESKIKBAARHEID VAN DIE KONSEP-OMVANGS VERSLAE VIR OPENBARE HERSIENING EN KOMMENTAAR VAN DIE VOORGESTELDE AMSTERDAM WIND ENERGIE FASILITEIT (EMVELO, ROCHDALE EN SHEEPMOOR) CLUSTER, NABY ERMELO, MPUMALANGA

Kennis word hiermee gegee van 'n openbare deelname proses (ODP) wat in gevolge die Wet op Nasionale Omgewingsbestuur, 1998 (Wet No. 107 van 1998) (NEMA, 1998), soos gewysig, onderneem moet word.

DFFE-verwysing(s): Om bevestig te word

Aard van aktiwiteit: Emvelo Windenergie fasiliteit Bpk, Rochdale Windenergie fasiliteit Bpk en Sheepmoor Windenergie fasiliteit Bpk ('die Projek aansoekers') stel voor dat drie (3) Wind energie fasiliteite (WEF) opgerig en bedryf word. Die potensiële opwekkingsvermoë van Emvelo WEF is tot 200 MW, Rochdale WEF is tot 220 MW en Sheepmoor tot 360 MW. Elke WEF sal bestaan uit verskeie geboue, toegangspaaie, 'n battery-energieberging stelsel (BESS) en 'n substasie naaf met gepaardgaande elektriese netwerk infrastruktuur soos, maar nie beperk tot 'n 132kV oorhoofse transmissie kraglyn wat die WEF met die nasionale elektriese netwerk verbind.

Ontwikkelings ligging: Die voorgestelde Amsterdam WEF se cluster is 30 km oos van Ermelo binne die Msukaligwa Plaaslike Munisipaliteit en Gert Sibande Distriksmunisipaliteit geleë.

Aansoek proses: Ingevolge Hoofstuk 5 van die Wet op Nasionale Omgewingsbestuur, 1998 (Wet 107 van 1998 – NEMA), Omgewings Impak studie (EIA) Regulasies, 2014 (soos gewysig), het die Projek aansoekers, Environmental Resources Management (Edms) Bpk (ERM) aangestel om as projek bestuurder op te tree en die Omvang- en Omgewings Impak bepalings prosesse (S&EIA) as die onafhanklike omgewings impak bepalings praktisyn (EAP) te onderneem.

ERM het drie afsonderlike omgewings aansoeke ingedien, waaronder afsonderlike konsep-omvang verslae aan die departement van bosbou, visserye en die omgewing (DFFE).

Uitnodiging om kommentaar te lewer: Lede van die publiek, plaaslike gemeenskappe en belanghebbendes word uitgenooi om kommentaar te lewer op die konsep-omvang verslae, wat beskikbaar is vir openbare hersiening en kommentaar, vanaf **Vrydag, 19 Julie 2024 tot die 20 Augustus 2024 (albei dae ingesluit),** soos per Tabel 1 hieronder.

Tabel 1: Liggings vir openbare oorsig en kommentaar

Ligging	Fisiese adres
Elektroniese kopie lokasies (beskikbaar vir aflaai hieronder)	
Via One Drive	I &AP's kan versoek dat kopieë via een gedeelde gids van One Drive gestuur word.

Geregistreerde kantoor
Omgewingshulpbronbestuur
Suider-Afrika (Edms) Bpk
1ste verdieping, gebou 32
Die Woodlands-kantoorpark
Woodlandsrylaan, Woodmead
2148, Johannesburg, Suid-Afrika

Geregistreerde nommer: 2003/001404/07
BTW-registrasie: 4780205482

Kantore wêreldwyd

Direkteure
Claudio Bertora
Urmila Bob (nie-uitvoerende)
Tania Swanepoel
Marinda Rasmussen

Harde kopie ligging	
Ermelo Openbare Biblioteek	Ermelo, 2350
CD-kopieë sal op versoek aan die EAP gemaak word.	

Indien u as 'n I&AP geregistreer wil wees en / of kommentaar wil lewer, dien asseblief u naam, belangstelling in die projek of kommentaar, e-pos adres en pos adres en telefoon nommer skriftelik by die onderstaande adres in:	
Environmental Resources Management Southern Africa (Edms) Bpk	
Projek verwysing: 0684401 Mulilo WEF-cluster	**Kontak persoon:** Lucien Barbeau
E-pos: ERM.ArcusAmsterdam@erm.com	**Telefoon:** +27117985400
Pos: Postnet Suite 90, Privaatsak X12, Tokai, 7966	**Aanlyn:**https://mulilowef.aidaform.com/public-participation-form

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Korrespondensie gedurende die aansoek proses sal slegs aan geregistreerde I &AP's versprei word. Registrasie is moontlik gedurende die aansoek proses.

Dankie vir die belangstelling in die projek.

Sadiya Salie
Omgewings konsultant

Environmental Resources Management Southern Africa (Edms) Bpk

ERM

Suite S005
17 The Boulevard
Westway Office Park
Westville, 3635
Durban, South Africa

Telephone: +27 31 265 0033
Fax: +27 31 265 0150

www.erm.com

19 July 2024

ERM Reference: 0684401

Dear Interested and Affected Party, Stakeholder, Organ of State

NOTIFICATION OF AVAILABILITY OF THE DRAFT SCOPING REPORTS FOR PUBLIC REVIEW AND COMMENT OF THE PROPOSED AMSTERDAM WIND ENERGY FACILITY (EMVELO, ROCHDALE AND SHEEPMOOR) CLUSTER, NEAR ERMELO, MPUMALANGA

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DFFE Reference(s): To Be Confirmed

Nature of Activity: Emvelo Wind Energy Facility (Pty) Ltd, Rochdale Wind Energy Facility (Pty) Ltd and Sheepmoor Wind Energy Facility (Pty) Ltd ('the Project Applicants') are proposing the construction and operation of three (3) Wind Energy Facilities (WEF). The potential generation capacity of Emvelo WEF is up to 200 MW, Rochdale WEF is up to 220 MW and Sheepmoor up to 360 MW. Each WEF will comprise various buildings, access roads, a battery energy storage system (BESS), and a substation hub with associated electrical grid infrastructure such as but not limited to a 132kV overhead transmission powerline connecting the WEF to the national electrical grid network.

Development Location: The proposed Amsterdam WEF's Cluster are located 30 km east of Ermelo within the Msukaligwa Local Municipality, and Gert Sibande District Municipality.

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ERM has submitted three separate Environmental Applications, including separate Draft Scoping Reports to the Department of Forestry, Fisheries and the Environment (DFFE).

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2148, Johannesburg, South Africa

Registered number: 2003/001404/07
VAT registration: 4780205482

Offices worldwide

Directors
Claudio Bertora
Urmilla Bob (Non-Executive)
Tania Swanepoel
Marinda Rasmussen

Ermelo Public Library	Ermelo, 2350
CD Copies will be made upon request to the EAP.	

Should you wish to be registered as an I&AP and / or would like comment please submit your name, interest in the project or comment, email and postal address and telephone number in writing to the below address:	
Environmental Resources Management Southern Africa (Pty) Ltd	
Project Reference: 0684401 Mulilo WEF Cluster	**Contact Person:** Lucien Barbeau
Email: ERM.ArcusAmsterdam@erm.com	**Telephone:** +27117985400
Post: Postnet Suite 90, Private Bag X12, Tokai, 7966	**Online:** https://mulilowef.aidaform.com/public-participation-form

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Thank you for the interest in the project.



Sadiya Salie
Environmental Consultant
Environmental Resources Management (Pty) Ltd

From:	Celia de Waal
To:	Stephanie Gopaul; ERM Arcus Amsterdam
Cc:	Masina Morudu; mervyn.lotter@gmail.com; GCowden; SB. Mbuyane; Bathandwa Ncube; R Luyt; Frans Krige; Johan Eksteen
Subject:	MTPA Acknowledgement of receipt RE: 14/12/16/3/3/2/2591; 2592; 2593: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP
Date:	Tuesday, 13 August 2024 08:16:19

Some people who received this message don't often get email from celia@mtpa.co.za. Learn why this is important

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

EXTERNAL MESSAGE

Good day Stephanie

The MTPA acknowledge the receipt of the following 3 documents. It was delivered yesterday 12 August 2024.

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

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

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

The commenting scientist is Mr. Frans Krige who is copied in this e-mail.

Kind regards

Celia de Waal

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer

Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
[redacted]

From: Bathandwa Ncube <BNcube@dffe.gov.za>
Sent: Monday, August 12, 2024 4:14 PM
To: stephanie.gopaul@erm.com; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Masina Morudu <memorudu@dffe.gov.za>; mervyn.lotter@gmail.com; GCowden <GCowden@mpg.gov.za>; SB. Mbuyane <MbuyaneSB@mpg.gov.za>; Celia de Waal <celia@mtpa.co.za>; R Luyt <rluyt@mpg.gov.za>
Subject: 14/12/16/3/3/2/2591; 2592; 2593: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP

Goodday Lucien

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

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

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

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

Following our telephone conversation earlier today regarding the public participation process, please be informed that comments on the draft Scoping Report (SR) are due to you on 22 August 2024. It is noted that there are organs of state who have jurisdiction in respect of the proposed activity, which requires that they be added to the I&AP Database and given an opportunity to comment on the draft SR.

The applicant is requested to submit the final SR to the Department on or before the due date (05 September 2024) and may submit comments from MTPA and DARDLEA as addendums, subsequent to the submission of the final SR to the Department.

MTPA and Mpumalanga DARDLEA are requested to cc this Department when submitting comments to the EAP.

Kind regards

Ms Bathandwa Ncube (EAPASA)
Department of Forestry, Fisheries and the Environment (DFFE)
Integrated Environmental Authorisations
[redacted]

From:	Robyn Luyt
To:	BNcube@dffe.gov.za; ERM Arcus Amsterdam; Stephanie Gopaul
Cc:	cagenbach@dffe.gov.za; memorudu@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za; mervyn.lotter@gmail.com; Gavin Cowden; Sindy Mbuyane; celia@mtpa.co.za
Subject:	Re: 14/12/16/3/3/2/2591; 2592; 2593: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP
Date:	Tuesday, 13 August 2024 08:49:57
Importance:	High

EXTERNAL MESSAGE

Good Morning all,

I am extremely concerned with the agreement reached between ERM and DFFE. DARDLEA, as the Provincial Department responsible for environmental affairs in Mpumalanga Province, **has to date not yet received any of the draft documents for review and comment.** In accordance with the requirements of Regulation 40(1)(b), the scoping report is required to be subjected to all I&APs for a period of at least 30 days for comment. Further to this, Regulation 40(2)(b) states that the public participation process must provide access to all information ...and must include consultation with every State department that administers a law relating to a matter affecting the environment relevant to an application for an environmental authorisation.

Regulation 21(1) is very clear in the requirement that a final Scoping Report must, within 44 days of submitting an application to the CA, be submitted to the CA (ie. DFFE), which report has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received. The arrangement below is not in line with this requirement, which amounts to an administrative flaw, and I fail to see how DFFE would be in a position to consider a final Scoping report that does not include the input from DARDLEA. The arrangement would also preclude the requirement for the applicant to incorporate the comments received from DARDLEA into the final Scoping report.

As stated above, DARDLEA still awaits the documents for comment.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
Nelspruit, 1200
[redacted]

>>> Bathandwa Ncube <BNcube@dffe.gov.za> 08/12/24 4:14 PM >>>
Goodday Lucien

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

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

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

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Following our telephone conversation earlier today regarding the public participation process, please be informed that comments on the draft Scoping Report (SR) are due to you on 22 August 2024. It is noted that there are organs of state who have jurisdiction in respect of the proposed activity, which requires that they be added to the I&AP Database and given an opportunity to comment on the draft SR.

The applicant is requested to submit the final SR to the Department on or before the due date (05 September 2024) and may submit comments from MTPA and DARDLEA as addendums, subsequent to the submission of the final SR to the Department.

MTPA and Mpumalanga DARDLEA are requested to cc this Department when submitting comments to the EAP.

Kind regards

Ms Bathandwa Ncube (EAPASA)
Department of Forestry, Fisheries and the Environment (DFFE)
Integrated Environmental Authorisations
[redacted]

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From:	ERM Arcus Amsterdam
To:	memorudu@dffe.gov.za; Bathandwa Ncube
Cc:	Stephanie Gopaul; Stephen Burton
Subject:	FW: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga
Date:	Tuesday, 13 August 2024 10:30:00
Attachments:	image001.png IAP Notification Letter English.pdf IAP Notification Letter Afrikaans.pdf

Hi Masina,

Thank you for your call earlier.

As discussed, ERM sent out the notification to the Mpumalanga Tourism and Parks Agency, as well as the Mpumalanga Province Department of Agriculture, Rural Development, Land, and Environmental Affairs on July 19th.

Unfortunately, Mr. Bheki Nyathikazi has been experiencing IT-related issues with his mailbox, which have impacted his ability to receive and forward emails. To address this, I have resent the notification to his Gmail account to ensure it can be forwarded for relevant circulation.

Please let me know if there are any additional actions needed or if you require further information.

Best regards,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Monday, August 12, 2024 4:58 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: nyathikazibheki@gmail.com; shabanguzj@mpg.gov.za
Subject: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

Hi Bheki,

Our telephonic discussion earlier refers. Understandably, you mentioned IT related issues in terms of receiving e-mails and forwarding them, hence I have copied your gmail address as requested.

Please see below notification that was sent on the 19th of July 2024.

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

Dear Interested and Affected Party,

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

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

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

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

ERM

Suite S005
17 Die Boulevard
Westway Kantoorpark
Westville, 3635
Durban, Suid-Afrika

Telefoon: +27 31 265 0033
Faks: +27 31 265 0150

www.erm.com

a19 Julie 2024

ERM Verwysing: 0684401

Geagte Belanghebbende en Geaffekteerde Party, Belanghebbende, Staats orgaan

KENNISGEWING VAN BESKIKBAARHEID VAN DIE KONSEP-OMVANGS VERSLAE VIR OPENBARE HERSIENING EN KOMMENTAAR VAN DIE VOORGESTELDE AMSTERDAM WIND ENERGIE FASILITEIT (EMVELO, ROCHDALE EN SHEEPMOOR) CLUSTER, NABY ERMELO, MPUMALANGA

Kennis word hiermee gegee van 'n openbare deelname proses (ODP) wat in gevolge die Wet op Nasionale Omgewingsbestuur, 1998 (Wet No. 107 van 1998) (NEMA, 1998), soos gewysig, onderneem moet word.

DFFE-verwysing(s): Om bevestig te word

Aard van aktiwiteit: Emvelo Windenergie fasiliteit Bpk, Rochdale Windenergie fasiliteit Bpk en Sheepmoor Windenergie fasiliteit Bpk ('die Projek aansoekers') stel voor dat drie (3) Wind energie fasiliteite (WEF) opgerig en bedryf word. Die potensiële opwekkingsvermoë van Emvelo WEF is tot 200 MW, Rochdale WEF is tot 220 MW en Sheepmoor tot 360 MW. Elke WEF sal bestaan uit verskeie geboue, toegangspaaie, 'n battery-energieberging stelsel (BESS) en 'n substasie naaf met gepaardgaande elektriese netwerk infrastruktuur soos, maar nie beperk tot 'n 132kV oorhoofse transmissie kraglyn wat die WEF met die nasionale elektriese netwerk verbind.

Ontwikkelings ligging: Die voorgestelde Amsterdam WEF se cluster is 30 km oos van Ermelo binne die Msukaligwa Plaaslike Munisipaliteit en Gert Sibande Distriksmunisipaliteit geleë.

Aansoek proses: Ingevolge Hoofstuk 5 van die Wet op Nasionale Omgewingsbestuur, 1998 (Wet 107 van 1998 – NEMA), Omgewings Impak studie (EIA) Regulasies, 2014 (soos gewysig), het die Projek aansoekers, Environmental Resources Management (Edms) Bpk (ERM) aangestel om as projek bestuurder op te tree en die Omvang- en Omgewings Impak bepalings prosesse (S&EIA) as die onafhanklike omgewings impak bepalings praktisyn (EAP) te onderneem.

ERM het drie afsonderlike omgewings aansoeke ingedien, waaronder afsonderlike konsep-omvang verslae aan die departement van bosbou, visserye en die omgewing (DFFE).

Uitnodiging om kommentaar te lewer: Lede van die publiek, plaaslike gemeenskappe en belanghebbendes word uitgenooi om kommentaar te lewer op die konsep-omvang verslae, wat beskikbaar is vir openbare hersiening en kommentaar, vanaf **Vrydag, 19 Julie 2024 tot die 20 Augustus 2024 (albei dae ingesluit),** soos per Tabel 1 hieronder.

Tabel 1: Liggings vir openbare oorsig en kommentaar

Ligging	Fisiese adres
Elektroniese kopie lokasies (beskikbaar vir aflaai hieronder)	
Via One Drive	I &AP's kan versoek dat kopieë via een gedeelde gids van One Drive gestuur word.

Geregistreerde kantoor
Omgewingshulpbronbestuur
Suider-Afrika (Edms) Bpk
1ste verdieping, gebou 32
Die Woodlands-kantoorpark
Woodlandsrylaan, Woodmead
2148, Johannesburg, Suid-Afrika

Geregistreerde nommer: 2003/001404/07
BTW-registrasie: 4780205482

Kantore wêreldwyd

Direkteure
Claudio Bertora
Urmila Bob (nie-uitvoerende)
Tania Swanepoel
Marinda Rasmussen

Harde kopie ligging	
Ermelo Openbare Biblioteek	Ermelo, 2350
CD-kopieë sal op versoek aan die EAP gemaak word.	

Indien u as 'n I&AP geregistreer wil wees en / of kommentaar wil lewer, dien asseblief u naam, belangstelling in die projek of kommentaar, e-pos adres en pos adres en telefoon nommer skriftelik by die onderstaande adres in:	
Environmental Resources Management Southern Africa (Edms) Bpk	
Projek verwysing: 0684401 Mulilo WEF-cluster	**Kontak persoon:** Lucien Barbeau
E-pos: ERM.ArcusAmsterdam@erm.com	**Telefoon:** +27117985400
Pos: Postnet Suite 90, Privaatsak X12, Tokai, 7966	**Aanlyn:**https://mulilowef.aidaform.com/public-participation-form

Na afloop van die openbare deelname van 30 dae, sal die kommentaar aangespreek en opgeneem word in die Finale Omvang verslae, wat aan die DFFE voorgelê sal word vir goedkeuring om na die EIA-fase te vorder.

Let wel, met betrekking tot die Wet op die Beskerming van Persoonlike Inligting (PoPI Wet 4 van 2013, soos gewysig): Indien u versoek om as 'n I&AP te registreer, sal u persoonlike inligting aan 'n appel kandidaat beskikbaar gestel word in die geval van 'n appèl, en 'n aansoeker/EAP/onafhanklike persoon vir doeleindes daarvan om ingelig te word en toegang tot 'n ouditverslag te kry.

Korrespondensie gedurende die aansoek proses sal slegs aan geregistreerde I &AP's versprei word. Registrasie is moontlik gedurende die aansoek proses.

Dankie vir die belangstelling in die projek.

Sadiya Salie
Omgewings konsultant

Environmental Resources Management Southern Africa (Edms) Bpk

ERM

Suite S005
17 The Boulevard
Westway Office Park
Westville, 3635
Durban, South Africa

Telephone: +27 31 265 0033
Fax: +27 31 265 0150

www.erm.com

19 July 2024

ERM Reference: 0684401

Dear Interested and Affected Party, Stakeholder, Organ of State

NOTIFICATION OF AVAILABILITY OF THE DRAFT SCOPING REPORTS FOR PUBLIC REVIEW AND COMMENT OF THE PROPOSED AMSTERDAM WIND ENERGY FACILITY (EMVELO, ROCHDALE AND SHEEPMOOR) CLUSTER, NEAR ERMELO, MPUMALANGA

Notice is hereby given of a Public Participation Process (PPP) to be undertaken in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA, 1998), as amended.

DFFE Reference(s): To Be Confirmed

Nature of Activity: Emvelo Wind Energy Facility (Pty) Ltd, Rochdale Wind Energy Facility (Pty) Ltd and Sheepmoor Wind Energy Facility (Pty) Ltd ('the Project Applicants') are proposing the construction and operation of three (3) Wind Energy Facilities (WEF). The potential generation capacity of Emvelo WEF is up to 200 MW, Rochdale WEF is up to 220 MW and Sheepmoor up to 360 MW. Each WEF will comprise various buildings, access roads, a battery energy storage system (BESS), and a substation hub with associated electrical grid infrastructure such as but not limited to a 132kV overhead transmission powerline connecting the WEF to the national electrical grid network.

Development Location: The proposed Amsterdam WEF's Cluster are located 30 km east of Ermelo within the Msukaligwa Local Municipality, and Gert Sibande District Municipality.

Application Process: In terms of Chapter 5 of the National Environmental Management Act, 1998 (Act 107 of 1998 – NEMA), Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), the Project Applicants appointed Environmental Resources Management (Pty) Ltd (ERM), to act as the project manager and to undertake the Scoping and Environmental Impact Assessment (S&EIA) processes as the independent environmental impact assessment practitioner (EAP).

ERM has submitted three separate Environmental Applications, including separate Draft Scoping Reports to the Department of Forestry, Fisheries and the Environment (DFFE).

Invitation to Comment: Members of the public, local communities, and stakeholders are invited to comment on the Draft Scoping Reports, which is available for public review and comment, from **Friday, 19 July 2024 to the 20 August 2024 (both days inclusive)**, as per Table 1 below.

Table 1: Public Review and Comment Locations

Location	Physical Address
Electronic Copy Locations (Available for download below)	
Via One Drive	I&APs can request for copies to be sent via one drive shared folder.
Hard Copy Location	

Registered office
Environmental Resources Management
Southern Africa (Pty) Ltd
1st Floor, Building 32
The Woodlands Office Park
Woodlands Drive, Woodmead
2148, Johannesburg, South Africa

Registered number: 2003/001404/07
VAT registration: 4780205482

Offices worldwide

Directors
Claudio Bertora
Urmilla Bob (Non-Executive)
Tania Swanepoel
Marinda Rasmussen

Ermelo Public Library	Ermelo, 2350
CD Copies will be made upon request to the EAP.	

Should you wish to be registered as an I&AP and / or would like comment please submit your name, interest in the project or comment, email and postal address and telephone number in writing to the below address:	
Environmental Resources Management Southern Africa (Pty) Ltd	
Project Reference: 0684401 Mulilo WEF Cluster	**Contact Person:** Lucien Barbeau
Email: ERM.ArcusAmsterdam@erm.com	**Telephone:** +27117985400
Post: Postnet Suite 90, Private Bag X12, Tokai, 7966	**Online:** https://mulilowef.aidaform.com/public-participation-form

Following the 30-day public participation, the comments will be addressed and incorporated into the Final Scoping Reports, which will be submitted to the DFFE for approval to progress to the EIA Phase.

Please note, regarding the Protection of Personal Information Act (PoPI Act 4 of 2013, as amended): If you request to register as an I&AP, your personal information will be made available to an appellant in the case of an appeal, and an applicant/EAP/independent person for purposes of being informed and given access to an audit report.

Correspondence throughout the Application Process will only be distributed to Registered I&APs. Registration is possible throughout the Application Process.

Thank you for the interest in the project.



Sadiya Salie
Environmental Consultant
Environmental Resources Management (Pty) Ltd

From:	Tebego Kgaphola
To:	ERM Arcus Amsterdam
Cc:	Portia Makitla
Subject:	COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED MULILO AMSTERDAM WEFS CLUSTER, NEAR ERMELO, MPUMALANGA PROVINCE
Date:	Tuesday, 13 August 2024 12:48:31
Attachments:	image008.png image009.png Mulilo Amsterdam WEFS DSR Comments.pdf

You don't often get email from tkgaphola1@dffe.gov.za. Learn why this is important

EXTERNAL MESSAGE

Good day

Kindly find the attached comments for the aforementioned project.



Tebego Kgaphola

Directorate: Biodiversity Mainstreaming and EIA
Branch: Biodiversity and Conservation
473 Steve Biko Road|Private Bag X477|Pretoria|001
[redacted]
Website:www.environment.gov.za



From: Lloyd Barnes <Lloyd@mulilo.com>
Sent: Monday, August 12, 2024 2:22 PM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Cc: Andrew Pearson <Andrew@mulilo.com>; Gail Wheeler <Gail@mulilo.com>
Subject: RE: Amsterdam WEF Final Scoping prep

EXTERNAL MESSAGE

Good day Stephen and Lucien,

I trust you had a good long weekend.

Following up on my mail below. By when should we expect to receive the Final Scoping reports for review?
Could I please request that the Final Scoping Reports be provided for review by COB on Wednesday?
Please note the tight timelines related to this project.

Kind Regards,

Lloyd Barnes
Project Manager: Environmental
[redacted]
mulilo

From: Lloyd Barnes
Sent: Thursday, August 8, 2024 5:00 PM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>; Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Cc: Andrew Pearson <Andrew@mulilo.com>; Gail Wheeler <Gail@mulilo.com>
Subject: Amsterdam WEF Final Scoping prep

Good day ERM team,

Please see the attached updated layout to be considered for Final Scoping.
Please may you review the layout and raise any questions or queries if necessary.

Please note that as a result of the Enviro sensitivities, we have to drop Rochdale, and merge the properties with the Emvelo application.

Please may you confirm by when you will be able to provide first drafts of the Final Scoping reports for our review.

From:	Bathandwa Ncube
To:	Stephanie Gopaul; ERM Arcus Amsterdam
Cc:	Masina Morudu; mervyn.lotter@gmail.com; GCowden; SB. Mbuyane; celia@mtpa.co.za; R Luyt
Subject:	14/12/16/3/3/2/2591; 2592; 2593: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP
Date:	Monday, 12 August 2024 16:14:10

EXTERNAL MESSAGE

Goodday Lucien

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

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

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

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

Following our telephone conversation earlier today regarding the public participation process, please be informed that comments on the draft Scoping Report (SR) are due to you on 22 August 2024. It is noted that there are organs of state who have jurisdiction in respect of the proposed activity, which requires that they be added to the I&AP Database and given an opportunity to comment on the draft SR.

The applicant is requested to submit the final SR to the Department on or before the due date (05 September 2024) and may submit comments from MTPA and DARDLEA as addendums, subsequent to the submission of the final SR to the Department.

MTPA and Mpumalanga DARDLEA are requested to cc this Department when submitting comments to the EAP.

Kind regards

Ms Bathandwa Ncube (EAPASA)
Department of Forestry, Fisheries and the Environment (DFFE)
Integrated Environmental Authorisations
[redacted]

From:	ERM Arcus Amsterdam
To:	Stephanie Gopaul
Subject:	FW: Pre-Application Meeting Minutes for MPG Approval: Associated Grid Connection for the WEF Cluster and Auxiliary Infrastructure, near Ermelo, MP Province
Date:	Tuesday, 13 August 2024 15:36:00
Attachments:	IMAGE.png IMAGE.png Pre-app.pdf

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: Sindy Mbuyane <mbuyanesb@mpg.gov.za>
Sent: Friday, August 11, 2023 12:24 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Aneesah Alwie <Aneesah.Alwie@erm.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: Re: Pre-Application Meeting Minutes for MPG Approval: Associated Grid Connection for the WEF Cluster and Auxiliary Infrastructure, near Ermelo, MP Province

EXTERNAL MESSAGE

Good day Alwie,

Attached is signed minutes.

Kind Regards,

Sindisiwe Mbuyane, EAPASA Reg: 2021/3509
Environmental Officer Control Grade B
Gert Sibande District (13 De Jager Street)
[redacted]
[redacted]

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>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 2023/08/03 14:20 >>>
Dear Sindy,

PROVINCIAL PRE-APPLICATION MEETING REFERENCE: TBC

PROJECT TITLE: PROPOSED GRID CONNECTION FOR THE PROPOSED MULILO WEF CLUSTER, MPUMALANGA PROVINCE, NEAR ERMELO, MPUMALANGA PROVINCE

Following the meeting with the MPG held on 31 May 2023, please find attached the draft of the meeting minutes, including a copy of the presentation, for MPG to review and approve. As discussed during the meeting, and included in the attached meeting minutes, when providing approval of the minutes, please could MPG confirm that the applications will be accepted.

Please do not hesitate to contact the undersigned should you have any questions or require any further documentation to assist with the review and approval of the pre-application meeting minutes.

Thank you for your consideration.

Thank You
Kind Regards
Aneesah Samodien (*nee Alwie*)
Consultant II

ERM
1st Floor | Great Westerford | 240 Main Road | Rondebosch | 7700 | South Africa
[redacted]

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ERM Southern Africa Pty Ltd is a Level 1 B-BBEE contributor. View our B-BBEE Certificate here.

From: Sindy Mbuyane <mbuyanesb@mpg.gov.za>
Sent: Monday, May 29, 2023 10:55 AM
To: Aneesah Alwie <Aneesah.Alwie@erm.com>
Cc: Gavin Cowden <GCowden@mpg.gov.za>; Pamella Ntuli <PNNtuli@mpg.gov.za>; SHlatswayo@mpg.gov.za
Subject: RE: Response on request sent to Surgeon

EXTERNAL MESSAGE

Good morning Alwie,

Thank you for the email.
Yes, my Directorate is responsible for the application and as communicated with you on 19 May 2023. 31 May 2023 at 11H00 via ms teams.

Kind Regards
Sindisiwe Mbuyane

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>>> Aneesah Alwie <Aneesah.Alwie@erm.com> 2023/05/26 15:29 >>>
Dear Sindy,

I hope this e-mail finds you well. While we await confirmation of process to follow for the meeting. Our proposed dates are the 30th May 2023, 31 May 2023 and / or 01 June 2023. Alternatively, we will accommodate a date and time that will suit the Department.

Your response is appreciated.

Thank You

Kind Regards

Aneesah Alwie
Environmental Consultant, South Africa

[redacted]

Arcus Consultancy Services South Africa (Pty) Ltd

From: Aneesah Alwie
Sent: Friday, May 19, 2023 12:43 PM
To: Sindy Mbuyane <mbuyanesb@mpg.gov.za>
Cc: pnntuli@mpg.gov.za; gcowden@mpg.gov.za; SHlatswayo@mpg.gov.za
Subject: RE: Response on request sent to Surgeon

Dear Sindy,

Thank you getting in contact. Arcus (an ERM group company) have been appointed by a

Developer to undertake the EIA process for 3 proposed WEFs near Ermelo in the Mpumalanga Province. During the pre-application meeting with the National Department (DFFE), we have been advised that the Provincial Authority, in this case, Mpumalanga Department: Agriculture, Rural Development, Land and Environmental Affairs, will be the Competent Authority for the 3 proposed Applications for EA of the Associated Grid Infrastructure for the 3 Proposed WEFs.

In terms of regional locality, the proposed WEFs are located between the town of Ermelo and Amsterdam, and falls within the Msukaligwa Local Municipality and the Gert Sibande District Municipality, in the Mpumalanga Province

Please could you confirm that your directorate is responsible for this proposed application, and if the meeting can take place via MS Teams or Zoom. Once confirmed we will provide 3 proposed dates and times for the meeting.

Looking forward to your response and assistance.

Please do not hesitate to contact the undersigned should you have any questions.

Thank You

Kind Regards

Aneesah Alwie
Environmental Consultant, South Africa

[redacted]

Arcus Consultancy Services South Africa (Pty) Ltd

From: Sindy Mbuyane <mbuyanesb@mpg.gov.za>
Sent: Friday, May 19, 2023 12:14 PM
To: Aneesah Alwie <Aneesah.Alwie@erm.com>
Subject: Response on request sent to Surgeon

You don't often get email from mbuyanesb@mpg.gov.za. Learn why this is important

EXTERNAL MESSAGE

Good day Aneesah,

Thank you for contacting Mr. Surgeon Marebane for a meeting proposal on wind farm facilities near Ermelo.
May you please provide us with 3 possible dates that you wish to have the meeting on, and we will let you know of the date that will be suitable for the Department.

Thank you,

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Great Westerford
240 Main Road, Rondebosch
7700 Cape Town, South Africa

Telephone +27 21 681 5400
Fax +27 21 686 0736

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ERM

Subject	Pre-Application Meeting
Project Title	Associated Infrastructure for the proposed Mulilo WEF Cluster, near Ermelo, Mpumalanga Province
Project Developer	Mulilo Renewable Project Developments (Pty) Ltd
Provincial Authority Pre-Application Meeting Reference	TBC
Date	31 May 2023

Minutes and Actions

Virtual Meeting: MS Teams 14h00 – 14h45

Meeting Attendees

Organisation		Name of Attendee		Designation
Mpumalanga Provincial Government	(MPG)	Sindisiwe Mbuyane	(SM)	Case Officer
Environmental Resource Management Southern Africa (Pty) Ltd[1]	(ERM)	Ashlin Bodasing	(AB)	Project Director and EAP
Environmental Resource Management Southern Africa (Pty) Ltd	(ERM)	Aneesah Alwie	(AAL)	Project Consultant
Environmental Resource Management Southern Africa (Pty) Ltd[2]	(ERM)	Tebogo Mapinga	(TM)	Project Consultant
Mulilo Renewable Project Developments (Pty) Ltd	(Mulilo)	Lloyd Barnes	(LB)	Project Manager
Mulilo Renewable Project Developments (Pty) Ltd	(Mulilo)	Gail Wheeler	(GW)	Development Engineer

Approval of Meeting Minutes

Provincial Department sign off by : GB Mbuyane

Signature :

Date : 08/08/2023

[1] Ashlin Bodasing has subsequently left the company. The project will be led by a new EAP when submitted.
[2] Tebogo Mapinga has subsequently left the company.

ORGANISATION	COMMENT RAISED	NOTES / RESPONSES / ACTIONS	PERSON	DUE DATE
WELCOME AND MEETING PURPOSE				
ERM	AAL welcomed attendees, and all present introduced themselves and their roles in the proposed development application process.	Please refer to Appendix A for a copy of the attendance register as downloaded from MS Teams after the meeting.	-	-
ERM	For minute purposes, the meeting was recorded using the MS Teams record option.	Please refer to Appendix B for a copy of the presentation.	-	-
ERM	AAL listed the meeting agenda.	No objections were raised to the meeting agenda.	-	-
ERM	AAL explained the meeting must be considered a formal consultation. AAL confirmed the purpose of the meeting.	The meeting was considered a formal consultation in terms of the requirements as stipulated in the Environmental Impact Assessment Regulations, 2014 (as amended), as promulgated in terms of the Nation Environmental Management ACT, 1998 (Act No. 107 of 1998) (NEMA). The purpose of this meeting is to discuss the Application(s) for Environmental Authorisation of the Associated Infrastructures for the proposed WEF Cluster in the Mpumalanga Province in terms of Regulation 31 and 32 of the NEMA EIA Regulations, 2014 (as amended).	-	-
PROJECT LOCALITY, SPECIFICATIONS AND MOTIVATION FOR THE MULILO WEF APPLICATIONS				
ERM	The project locality was explained and presented in a map to all attendees.	The project locality was explained (The proposed WEFs is located between 15-30 km east of the town of Ermelo in the Mpumalanga Province, South Africa. It falls within the Msukaligwa local municipality and Gert Sibande district municipality) and a map was presented to the attendees. The proposed grid infrastructure was presented. Each WEF has 1 preferred and 3 alternative OHPL routes (4 in total to be assessed in a 300 m corridor). Four slides of maps were shown to the attendees. Slide 1 presented the Mulilo WEF cluster location. Slide 2 to 4 presented each WEF and associated infrastructure individually.	-	-
ERM	The technical specifications of the proposed developments were presented.	Technical specifications were presented in table format. Three WEFs (proposed facilities) were outlined according to project name, applicant, total MW, number of turbines, proximity to Eskom Camden Substation (SS). Each Mulilo WEF will be	-	-

 S.B

ORGANISATION	COMMENT RAISED	NOTES / RESPONSES / ACTIONS	PERSON	DUE DATE
		applied for in separate Application forms, including accompanying assessment reports – 3 Applications for Scoping and EIA Process equals 3 EAs. The grid connection for each WEF will be applied for in a separate application – 3 applications following a Basic Assessment (BA) process equals 3 EAs.		
ERM	The motivation for the proposed development was explained to the DFFE.	Developer intends to bid the facilities in the seventh bidding window of the REIPPPP (Renewable Energy Independent Power Producer Procurement Programme) with the aim of evacuating the generated power from the WEFs into the National Eskom Grid. Aid in the diversification and stabilisation of the country's electrical supply in line with the objective of the IRP.	-	-
LEGISLATIVE FRAMEWORK AND PUBLIC PARTICIPATION PROCESS				
ERM	Legislative Framework and Public Participation Process was outlined to DFFE, including consideration of the Directions of 5 June 2020 regarding the COVID-19 Pandemic, i.e., to submit the Applications electronically to the DFFE.	Application for the BA will be in accordance with the EIA Regulations of December 2014 as amended, published in terms of regulation 31 and 32 NEMA, 1998. The project process will be: initiation and review, public participation, reporting and decision-making phase.	-	-
ERM	Public participation process.	Initial phase public consultation includes site notices, poster notices at local stores in the town of Ermelo and Amsterdam and email notification to the pre-identified I&APs. The EAP will conduct a PP process during the draft phase in accordance with Chapter 6 of the EIA regulations, 2017 as amended, and the PP guidelines.	-	-
SPECIALIST REPORTING AND TEAM				
ERM	Site visits will be / has been conducted by specialists, as required, following the requirement of GN 43110 of NEMA: Environmental Themes Reporting Criteria and the Relevant Protocols Gazetted.	DFFE screening reports were sent to all specialists. Specialists' will produce separate BA reports which will consider the results of the screening reports. The 12-month bird monitoring is currently in process and will conclude following the winter season 2023. All specialist visits will be conducted following the requirements of the protocols and any other relevant guidelines applicable.	-	-

S.B

ORGANISATION	COMMENT RAISED	NOTES / RESPONSES / ACTIONS	PERSON	DUE DATE
DISCUSSIONS / QUESTIONS/ GENERAL TOPICS				
MPG	SM queried with the project team if the national department was consulted to establish if they are not the competent authority ('CA'). If not, the provincial authority would process the applications	LB responded that the development will be handed over to Eskom once approved. The initial strategy was for the national department to act as the CA as they are the CA for the WEF applications and it would have made sense for one CA to authorise for one project. The national department did acknowledge the preference however stated that a pre application meeting would still be required with the provincial department as the provincial department would decide if they want to be the CA or allow for the national department to be the CA.		-
MPG	SM informed the project team that the Mpumalanga Department is in the process of writing a request to the Minister to deal with these applications. Therefore, all the applications might go to the national department. If the national department says the provincial department must decide, the provincial department cannot decline the challenge of exposure to other environmental aspect that come with the project. The application can be submitted to the provincial department but note that the applications might be delegated to the national department especially those transferred to Eskom.	LB confirmed that the applications will be transferred to Eskom. He queried that now knowing about the delegation letter, in the interest of time would it not be better submit the applications to the national authority to ensure that the project developers can meet the different deadlines to get all project components authorised at the same time. On a case-by-case basis, the provincial department can request the national department to be the component authority. He expressed concern that the decision making of who the CA is, might cause delays on the Applications.		-
MPG	SM commented that she does not think there will be any delays if the application is submitted to the provincial authority. They will be advised to process the application and not undertake more applications. Alternatively, if the national department is the CA, then the provincial department can be a commenting authority.	LB responded that his concern was if there were changes after submitting the application however he is happy to submit the applications and have them continue with one CA. SM stated that they hope there will not be a need to send the applications to the national department if they are done by the provincial government.		-
Mulilo	LB queried that in terms of the application, the developers would like to have the proposed route, the layout and EMPr approved with the environmental authorisation to avoid doing future processes. Having the layout approved at the planning stage is sometimes tricky so is there anything that can be done to out the project developers in a good position to have the layout approved?	SM responded that what would assist is contacting Mpumalanga Tourism and Parks agency since they are the main custodians of biodiversity in Mpumalanga and their guidelines will provide guidance on avoiding biodiversity sensitive areas. As well as BirdLife SA for any birds that might be present in the area.		-

ORGANISATION	COMMENT RAISED	NOTES / RESPONSES / ACTIONS	PERSON	DUE DATE
Mulilo	LB stated that one year monitoring is already being conducted for birds and bats. All the specialists have been to site recently to identify any sensitivities and those two I&APs will be identified and notified. By obtaining comments from them, it puts the project in a good position to obtain approval for final layout	SM confirmed that they will be able to assist with avoiding biodiversity sensitive areas. SM also advised including national department of rural development and land reform for agricultural fields, and the Gert Sibande District Municipality.		-
ERM	AAL asked that if SM has more people who can be included on the I&AP database to please let the project team know and they will add them. AAL asked SM to confirm if she is happy to review and approve the minutes and when the application is ready if it should be sent to the provincial authority.	SM confirmed she will review the minutes. SM asked that before the application is sent, she would like to check with her supervisor if they can accept the application and would inform the project team of the response. AAL proposed that when SM responds to the minutes she can then confirm if the department has the capacity to take on the applications. SM confirmed that she will do so.		-
GENERAL				
ERM	Confirmation of the Pre-Application Meeting reference. Minutes of the meeting will be distributed to all attendees and included in the Application Form(s) to the CA.	SM to confirm pre-application meeting reference	-	-

The meeting was concluded at 14h45 by AAL with no further discussion or questions.

S·B

From:	Stephanie Gopaul
To:	Robyn Luyt; BNcube@dffe.gov.za
Cc:	cagenbach@dffe.gov.za; memorudu@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za; mervyn.lotter@gmail.com; Gavin Cowden; Sindy Mbuyane; celia@mtpa.co.za; Lloyd Barnes; Stephen Burton; ERM Arcus Amsterdam; Lucien Barbeau
Subject:	RE: 14/12/16/3/3/2/2591; 2592; 2593: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP
Date:	Tuesday, 13 August 2024 15:56:40
Attachments:	image001.png FW Consultation Mlulio Wind Farms Mpumalanga.msg MTPA Acknowledgement of receipt RE 14121633225 91; 2592; 2593 Proposed Emvelo Rochdale and Sheepmoor WEFs MP.msg Pre-app.pdf

Dear Robyn

Thank you for your email in response to that of Bathandwa's in the email trail.
Apologies that the draft documents did not reach your desk, however these were submitted and made accessible to DARDLEA on 19th July (see email attached). Following your email on 3rd August 2024, we responded to you on 6th August (as per the email attached) and advised you that DARDLEA were in fact notified of the availability.

Your email on 8th August refers:
Good day Stephanie,
"*Be advised that the names of the officials at MTPA that you have highlighted in your below notification arenot the relevant officials that are required to be notified or the relevant officials that must review and comment on draft Scoping or EIA reports, or any reports related to an EIA process. There are also no officials in the list of officials in your screenshots that are in the Environmental Affairs Chief Directorate in MDARDLEA - as far as I am aware they are in the section that deals with Agriculture, which is an entirely different mandate.*
It would notbe acceptable to not provide the commenting authority the mandatory 30 days to review and comment on draft reports, especially in light of the fact that there has been no prior notification. The Directorate Environmental Impact Management within DARDLEA represents the MEC as Competent Authority in Mpumalanga, and the commenting authority in respect projects administered by DFFE. MTPA has the mandate for biodiversity matters on behalf of DARDLEA. As per my email to you below (3 August), hard copies of all reports must be submitted to Ms Mbuyane (Environmental Impact Management) at our Ermelo office, and the documents must be made available to me (and in this instance to Mr Cowden and Mr Lotter) electronically at the same time. You will need to contact Ms De Waal and Mr Krige at MTPA to confirm how documents must be submitted to MTPA. Please provide shape files of the 3 proposed WEFs as well."

We then responded to you with the links to access the documents electronically and couriered hard copies to Ms Sindi Mbuyane as per your request on 3rd August - we will follow up with the courier if these haven't been received by her as yet. MTPA received their hard copies yesterday (refer to email attached from Celia de Waa for proof of receipt).

Importantly, in your email of 3rd August, you state that "*DARDLEA and MTPA have through internal arrangements with DFFE requested to be included in all pre-application consultations for Renewable Energy projects in Mpumalanga, particularly wind energy facilities.*" You also state in your email of 8th August (referenced in the para above) that "*especially in light of the fact that there has been no prior notification*".
I would like to point out that Ms Sindi Mbuyane was in fact involved in the pre-app meeting – please see attached the pre-app meeting minutes that Ms Sindi signed.
Prior consultation therefore did happen and we kindly request that in light of this, you consider

completing your review of the DSR to meet the public participation deadline of 22 August 2024.

Should you be unable to provide your comments by this date, we would agree to the way forward stipulated in the email by Ms Bathandwa Ncube on 12 august 2024- ie. this would mean that the FSR would progress and get submitted without DARDLEA and MTPA comments if these are not available at the time, and for comments from these departments to be submitted as an addendum to the FSR.

We thank you for your engagement to date and look forward to your response.

ERM
Sustainability is our business

Stephanie Gopaul
Partner
She/Her/Hers

Durban [redacted] **erm.com**

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Tuesday, August 13, 2024 8:50 AM
To: BNcube@dffe.gov.za; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <stephanie.gopaul@erm.com>
Cc: cagenbach@dffe.gov.za; memorudu@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za; mervyn.lotter@gmail.com; Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; celia@mtpa.co.za
Subject: Re: 14/12/16/3/3/2/2591; 2592; 2593: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP
Importance: High

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EXTERNAL MESSAGE

Good Morning all,

I am extremely concerned with the agreement reached between ERM and DFFE. DARDLEA, as the Provincial Department responsible for environmental affairs in Mpumalanga Province, **has to date not yet received any of the draft documents for review and comment.** In accordance with the requirements of Regulation 40(1)(b), the scoping report is required to be subjected to all I&APs for a period of at least 30 days for comment. Further to this, Regulation 40(2)(b) states that the public participation process must provide access to all information ...and must include consultation with every State department that administers a law relating to a matter affecting the environment relevant to an application for an environmental authorisation.

Regulation 21(1) is very clear in the requirement that a final Scoping Report must, within 44 days of submitting an application to the CA, be submitted to the CA (ie. DFFE), which report has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received. The arrangement below is not in line with this requirement, which amounts to an administrative flaw, and I fail to see how DFFE would be in a position to consider a final Scoping report that does not include the input from DARDLEA. The arrangement would also preclude the requirement for the applicant to incorporate the comments received from DARDLEA into the final Scoping report.

As stated above, DARDLEA still awaits the documents for comment.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
Nelspruit, 1200
[redacted]

>>> Bathandwa Ncube <BNcube@dffe.gov.za> 08/12/24 4:14 PM >>>
Goodday Lucien

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

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

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

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

Following our telephone conversation earlier today regarding the public participation process, please be informed that comments on the draft Scoping Report (SR) are due to you on 22 August 2024. It is noted that there are organs of state who have jurisdiction in respect of the proposed activity, which requires that they be added to the I&AP Database and given an opportunity to comment on the draft SR.

The applicant is requested to submit the final SR to the Department on or before the due date (05 September 2024) and may submit comments from MTPA and DARDLEA as addendums, subsequent to the submission of the final SR to the Department.

MTPA and Mpumalanga DARDLEA are requested to cc this Department when submitting comments to the EAP.

Kind regards
Ms Bathandwa Ncube (EAPASA)
Department of Forestry, Fisheries and the Environment (DFFE)
Integrated Environmental Authorisations
[redacted]

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From: ERM Arcus Amsterdam
To: Stephanie Gopaul
Subject: FW: Consultation | Mlulio Wind Farms Mpumalanga
Date: Tuesday, 13 August 2024 15:12:36
Attachments: image001.png
image002.png
image003.png

Lucien Barbeau
Consultant

Cape Town
+27105963488

erm.com

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Tuesday, August 6, 2024 1:43 PM
To: Robyn Luyt <rluyt@mpg.gov.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: cagenbach@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za; whector@dffe.gov.za; Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; Celia.dewaal@mtpa.co.za; frans.krige@mtpa.co.za; mervyn@mtpa.co.za
Subject: RE: Consultation | Mlulio Wind Farms Mpumalanga

Good day Robyn,

Please note that DARDLEA and MTPA were notified regarding the PP for the Draft scoping Phase on the 19th July 2024. Kindly see proof of notification below:

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

Thank you,

ERM

Lucien Barbeau
Consultant

Cape Town **erm.com**
[redacted]

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Saturday, August 3, 2024 3:09 PM
To: ERM Arcus Amsterdam <Erm.arcusamsterdam@erm.com>
Cc: cagenbach@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za; whector@dffe.gov.za; Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; Celia.dewaal@mtpa.co.za; frans.krige@mtpa.co.za; mervyn@mtpa.co.za
Subject: Consultation | Mlulio Wind Farms Mpumalanga
Importance: High

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EXTERNAL MESSAGE

Good day Ms Gopaul,

It has come to our attention, and not via any official notification from ERM, that draft Scoping Reports for the following wind farms proposed in the Gert Sibande District in Mpumalanga Province are out for public comment from 19 July 2024 to 20 August 2024 (as per ERM website), where ERM is the EAP:
1. Shepmoore WEF
2. Emvelo WEF
3. Rochdale WEF

Neither DARDLEA nor MTPA have been consulted to date, nor have we received copies of any of the draft Scoping Reports. Aside from the requirements of the EIA Regulations, DARDLEA and MTPA have through internal arrangements with DFFE requested to be included in all pre-application consultations for Renewable Energy projects in Mpumalanga, particularly wind energy facilities. DARDLEA and MTPA must be included during all pre-application meetings and in all in-process consultations.

For the purpose of commenting on draft reports during the regulatory periods, we request that hard copies of all reports are submitted to Ms Sindi Mbuyane in our Ermelo office (where projects are located in the Gert Sibande District), and sent electronically to me via WeTransfer. Please also ensure that MTPA receives the reports in the manner requested by them. For your records I include the contact details of all relevant officials to be consulted in DARDLEA (when an application is in the Gert Sibande District) and MTPA:

DARDLEA	DESIGNATION	EMAIL	PHONE
Robyn Luyt	Director: Environmental Impact Management (EIM)	rluyt@mpg.gov.za	[redacted]
Sindisiwe	Deputy Director:	mbuyanesb@mpg.gov.za	[redacted]

Mbuyane	EIM Gert Sibande District		[redacted]
Gavin Cowden	Deputy Director: Environmental Policy, Planning and Coordination	gcowden@mpg.gov.za	
MTPA	**DESIGNATION**	**EMAIL**	**PHONE**
Mervyn Lotter	Manager: Biodiversity Planning	Mervyn@mtpa.co.za	[redacted]
Frans Krige	Land Use Advisor	Frans.Krige@mtpa.co.za	
Khumbelo Malele	Land Use Advisor	Khumbelo.Malele@mtpa.co.za khumbelomalele@gmail.com	[redacted]
Celia de Waal	EIA Data Capturer LUA	celia.dewaal@mtpa.co.za	[redacted]

Please note that time frames for commenting on draft reports can only commence on the date that hard copies of the reports are received, and we request that our 30 day time frame aligns with DFFE's.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
[redacted]

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From:	Celia de Waal
To:	Stephanie Gopaul; ERM Arcus Amsterdam
Cc:	Masina Morudu; mervyn.lotter@gmail.com; GCowden; SB. Mbuyane; Bathandwa Ncube; R Luyt; Frans Krige; Johan Eksteen
Subject:	MTPA Acknowledgement of receipt RE: 14/12/16/3/3/2/2591; 2592; 2593: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP
Date:	Tuesday, 13 August 2024 08:16:19

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

EXTERNAL MESSAGE

Good day Stephanie

The MTPA acknowledge the receipt of the following 3 documents. It was delivered yesterday 12 August 2024.

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

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

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

The commenting scientist is Mr. Frans Krige who is copied in this e-mail.

Kind regards

Celia de Waal



Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer

Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
[redacted]

From: Bathandwa Ncube <BNcube@dffe.gov.za>
Sent: Monday, August 12, 2024 4:14 PM
To: stephanie.gopaul@erm.com; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Masina Morudu <memorudu@dffe.gov.za>; mervyn.lotter@gmail.com; GCowden <GCowden@mpg.gov.za>; SB. Mbuyane <MbuyaneSB@mpg.gov.za>; Celia de Waal <celia@mtpa.co.za>; R Luyt <rluyt@mpg.gov.za>
Subject: 14/12/16/3/3/2/2591; 2592; 2593: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP

Goodday Lucien

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

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

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

Following our telephone conversation earlier today regarding the public participation process, please be informed that comments on the draft Scoping Report (SR) are due to you on 22 August 2024. It is noted that there are organs of state who have jurisdiction in respect of the proposed activity, which requires that they be added to the I&AP Database and given an opportunity to comment on the draft SR.

The applicant is requested to submit the final SR to the Department on or before the due date (05 September 2024) and may submit comments from MTPA and DARDLEA as addendums, subsequent to the submission of the final SR to the Department.

MTPA and Mpumalanga DARDLEA are requested to cc this Department when submitting comments to the EAP.

Kind regards

Ms Bathandwa Ncube (EAPASA)
Department of Forestry, Fisheries and the Environment (DFFE)
Integrated Environmental Authorisations
[redacted]

ERM

1st Floor
Great Westerford
240 Main Road, Rondebosch
7700 Cape Town, South Africa

Telephone +27 21 681 5400
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www.erm.com

ERM

Subject	Pre-Application Meeting
Project Title	Associated Infrastructure for the proposed Mulilo WEF Cluster, near Ermelo, Mpumalanga Province
Project Developer	Mulilo Renewable Project Developments (Pty) Ltd
Provincial Authority Pre-Application Meeting Reference	TBC
Date	31 May 2023

Minutes and Actions

Virtual Meeting: MS Teams 14h00 – 14h45

Meeting Attendees

Organisation		Name of Attendee		Designation
Mpumalanga Provincial Government	(MPG)	Sindisiwe Mbuyane	(SM)	Case Officer
Environmental Resource Management Southern Africa (Pty) Ltd[1]	(ERM)	Ashlin Bodasing	(AB)	Project Director and EAP
Environmental Resource Management Southern Africa (Pty) Ltd	(ERM)	Aneesah Alwie	(AAL)	Project Consultant
Environmental Resource Management Southern Africa (Pty) Ltd[2]	(ERM)	Tebogo Mapinga	(TM)	Project Consultant
Mulilo Renewable Project Developments (Pty) Ltd	(Mulilo)	Lloyd Barnes	(LB)	Project Manager
Mulilo Renewable Project Developments (Pty) Ltd	(Mulilo)	Gail Wheeler	(GW)	Development Engineer

Approval of Meeting Minutes

Provincial Department sign off by : GB Mbuyane

Signature :

Date : 08/08/2023

[1] Ashlin Bodasing has subsequently left the company. The project will be led by a new EAP when submitted.
[2] Tebogo Mapinga has subsequently left the company.

ORGANISATION	COMMENT RAISED	NOTES / RESPONSES / ACTIONS	PERSON	DUE DATE
WELCOME AND MEETING PURPOSE				
ERM	AAL welcomed attendees, and all present introduced themselves and their roles in the proposed development application process.	Please refer to Appendix A for a copy of the attendance register as downloaded from MS Teams after the meeting.	-	-
ERM	For minute purposes, the meeting was recorded using the MS Teams record option.	Please refer to Appendix B for a copy of the presentation.	-	-
ERM	AAL listed the meeting agenda.	No objections were raised to the meeting agenda.	-	-
ERM	AAL explained the meeting must be considered a formal consultation. AAL confirmed the purpose of the meeting.	The meeting was considered a formal consultation in terms of the requirements as stipulated in the Environmental Impact Assessment Regulations, 2014 (as amended), as promulgated in terms of the Nation Environmental Management ACT, 1998 (Act No. 107 of 1998) (NEMA). The purpose of this meeting is to discuss the Application(s) for Environmental Authorisation of the Associated Infrastructures for the proposed WEF Cluster in the Mpumalanga Province in terms of Regulation 31 and 32 of the NEMA EIA Regulations, 2014 (as amended).	-	-
PROJECT LOCALITY, SPECIFICATIONS AND MOTIVATION FOR THE MULILO WEF APPLICATIONS				
ERM	The project locality was explained and presented in a map to all attendees.	The project locality was explained (The proposed WEFs is located between 15-30 km east of the town of Ermelo in the Mpumalanga Province, South Africa. It falls within the Msukaligwa local municipality and Gert Sibande district municipality) and a map was presented to the attendees. The proposed grid infrastructure was presented. Each WEF has 1 preferred and 3 alternative OHPL routes (4 in total to be assessed in a 300 m corridor). Four slides of maps were shown to the attendees. Slide 1 presented the Mulilo WEF cluster location. Slide 2 to 4 presented each WEF and associated infrastructure individually.	-	-
ERM	The technical specifications of the proposed developments were presented.	Technical specifications were presented in table format. Three WEFs (proposed facilities) were outlined according to project name, applicant, total MW, number of turbines, proximity to Eskom Camden Substation (SS). Each Mulilo WEF will be	-	-

 S.B

ORGANISATION	COMMENT RAISED	NOTES / RESPONSES / ACTIONS	PERSON	DUE DATE
		applied for in separate Application forms, including accompanying assessment reports – 3 Applications for Scoping and EIA Process equals 3 EAs. The grid connection for each WEF will be applied for in a separate application – 3 applications following a Basic Assessment (BA) process equals 3 EAs.		
ERM	The motivation for the proposed development was explained to the DFFE.	Developer intends to bid the facilities in the seventh bidding window of the REIPPPP (Renewable Energy Independent Power Producer Procurement Programme) with the aim of evacuating the generated power from the WEFs into the National Eskom Grid. Aid in the diversification and stabilisation of the country's electrical supply in line with the objective of the IRP.	-	-
LEGISLATIVE FRAMEWORK AND PUBLIC PARTICIPATION PROCESS				
ERM	Legislative Framework and Public Participation Process was outlined to DFFE, including consideration of the Directions of 5 June 2020 regarding the COVID-19 Pandemic, i.e., to submit the Applications electronically to the DFFE.	Application for the BA will be in accordance with the EIA Regulations of December 2014 as amended, published in terms of regulation 31 and 32 NEMA, 1998. The project process will be: initiation and review, public participation, reporting and decision-making phase.	-	-
ERM	Public participation process.	Initial phase public consultation includes site notices, poster notices at local stores in the town of Ermelo and Amsterdam and email notification to the pre-identified I&APs. The EAP will conduct a PP process during the draft phase in accordance with Chapter 6 of the EIA regulations, 2017 as amended, and the PP guidelines.	-	-
SPECIALIST REPORTING AND TEAM				
ERM	Site visits will be / has been conducted by specialists, as required, following the requirement of GN 43110 of NEMA: Environmental Themes Reporting Criteria and the Relevant Protocols Gazetted.	DFFE screening reports were sent to all specialists. Specialists' will produce separate BA reports which will consider the results of the screening reports. The 12-month bird monitoring is currently in process and will conclude following the winter season 2023. All specialist visits will be conducted following the requirements of the protocols and any other relevant guidelines applicable.	-	-

S.B

ORGANISATION	COMMENT RAISED	NOTES / RESPONSES / ACTIONS	PERSON	DUE DATE
DISCUSSIONS / QUESTIONS/ GENERAL TOPICS				
MPG	SM queried with the project team if the national department was consulted to establish if they are not the competent authority ('CA'). If not, the provincial authority would process the applications	LB responded that the development will be handed over to Eskom once approved. The initial strategy was for the national department to act as the CA as they are the CA for the WEF applications and it would have made sense for one CA to authorise for one project. The national department did acknowledge the preference however stated that a pre application meeting would still be required with the provincial department as the provincial department would decide if they want to be the CA or allow for the national department to be the CA.		-
MPG	SM informed the project team that the Mpumalanga Department is in the process of writing a request to the Minister to deal with these applications. Therefore, all the applications might go to the national department. If the national department says the provincial department must decide, the provincial department cannot decline the challenge of exposure to other environmental aspect that come with the project. The application can be submitted to the provincial department but note that the applications might be delegated to the national department especially those transferred to Eskom.	LB confirmed that the applications will be transferred to Eskom. He queried that now knowing about the delegation letter, in the interest of time would it not be better submit the applications to the national authority to ensure that the project developers can meet the different deadlines to get all project components authorised at the same time. On a case-by-case basis, the provincial department can request the national department to be the component authority. He expressed concern that the decision making of who the CA is, might cause delays on the Applications.		-
MPG	SM commented that she does not think there will be any delays if the application is submitted to the provincial authority. They will be advised to process the application and not undertake more applications. Alternatively, if the national department is the CA, then the provincial department can be a commenting authority.	LB responded that his concern was if there were changes after submitting the application however he is happy to submit the applications and have them continue with one CA. SM stated that they hope there will not be a need to send the applications to the national department if they are done by the provincial government.		-
Mulilo	LB queried that in terms of the application, the developers would like to have the proposed route, the layout and EMPr approved with the environmental authorisation to avoid doing future processes. Having the layout approved at the planning stage is sometimes tricky so is there anything that can be done to out the project developers in a good position to have the layout approved?	SM responded that what would assist is contacting Mpumalanga Tourism and Parks agency since they are the main custodians of biodiversity in Mpumalanga and their guidelines will provide guidance on avoiding biodiversity sensitive areas. As well as BirdLife SA for any birds that might be present in the area.		-

ORGANISATION	COMMENT RAISED	NOTES / RESPONSES / ACTIONS	PERSON	DUE DATE
Mulilo	LB stated that one year monitoring is already being conducted for birds and bats. All the specialists have been to site recently to identify any sensitivities and those two I&APs will be identified and notified. By obtaining comments from them, it puts the project in a good position to obtain approval for final layout	SM confirmed that they will be able to assist with avoiding biodiversity sensitive areas. SM also advised including national department of rural development and land reform for agricultural fields, and the Gert Sibande District Municipality.		-
ERM	AAL asked that if SM has more people who can be included on the I&AP database to please let the project team know and they will add them. AAL asked SM to confirm if she is happy to review and approve the minutes and when the application is ready if it should be sent to the provincial authority.	SM confirmed she will review the minutes. SM asked that before the application is sent, she would like to check with her supervisor if they can accept the application and would inform the project team of the response. AAL proposed that when SM responds to the minutes she can then confirm if the department has the capacity to take on the applications. SM confirmed that she will do so.		-
GENERAL				
ERM	Confirmation of the Pre-Application Meeting reference. Minutes of the meeting will be distributed to all attendees and included in the Application Form(s) to the CA.	SM to confirm pre-application meeting reference	-	-

The meeting was concluded at 14h45 by AAL with no further discussion or questions.

S·B

From:	Mervyn Lotter
To:	Stephanie Gopaul
Cc:	Robyn Luyt; BNcube@dffe.gov.za; cagenbach@dffe.gov.za; memorudu@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za; Gavin Cowden; Sindy Mbuyane; celia@mtpa.co.za; Lloyd Barnes; Stephen Burton; ERM Arcus Amsterdam; Lucien Barbeau; Frans Krige
Subject:	Re: 14/12/16/3/3/2/2591; 2592; 2593: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP
Date:	Tuesday, 13 August 2024 20:34:41
Attachments:	image001.png

EXTERNAL MESSAGE

DDear Stephanie,

I am writing to clarify several points regarding the recent applications:

The appropriate MTPA staff members responsible for reviewing these three applications only received the links on August 6th and hard copies on August 12th.

The two MTPA staff members you contacted in July are involved in permitting processes (such as issuing permits for collecting protected species) and are not responsible for reviewing development applications. As they were blind copied, they would have been unaware if the correct staff had been included in the correspondence.

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

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

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

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

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

We can only try and do our best.

Regards,
Mervyn

On Tue, 13 Aug 2024 at 15:56, Stephanie Gopaul <stephanie.gopaul@erm.com> wrote:

> Dear Robyn

Thank you for your email in response to that of Bathandwa's in the email trail.

Apologies that the draft documents did not reach your desk, however these were submitted and made accessible to DARDLEA on 19th July (see email attached). Following your email on 3rd August 2024, we responded to you on 6th August (as per the email attached) and advised you that DARDLEA were in fact notified of the availability.

Your email on 8th August refers:

Good day Stephanie,

"*Be advised that the names of the officials at MTPA that you have highlighted in your below notification arenot the relevant officials that are required to be notified or the relevant officials that must review and comment on draft Scoping or EIA reports, or any reports related to an EIA process. There are also no officials in the list of officials in your screenshots that are in the Environmental Affairs Chief Directorate in MDARDLEA - as far as I am aware they are in the section that deals with Agriculture, which is an entirely different mandate.*

It would notbe acceptable to not provide the commenting authority the mandatory 30 days to review and comment on draft reports, especially in light of the fact that there has been no prior notification. The Directorate Environmental Impact Management within DARDLEA represents the MEC as Competent Authority in Mpumalanga, and the commenting authority in respect projects administered by DFFE. MTPA has the mandate for biodiversity matters on behalf of DARDLEA. As per my email to you below (3 August), hard copies of all reports must be submitted to Ms Mbuyane (Environmental Impact Management) at our Ermelo office, and the documents must be made available to me (and in this instance to Mr Cowden and Mr Lotter) electronically at the same time. You will need to contact Ms De Waal and Mr Krige at MTPA to confirm how documents must be submitted to MTPA. Please provide shape files of the 3 proposed WEFs as well."

We then responded to you with the links to access the documents electronically and couriered hard copies to Ms Sindi Mbuyane as per your request on 3rd August - we will follow up with the courier if these haven't been received by her as yet. MTPA received their hard copies yesterday (refer to email attached from Celia de Waa for proof of receipt).

Importantly, in your email of 3rd August, you state that "*DARDLEA and MTPA have through internal arrangements with DFFE requested to be included in all pre-application consultations for Renewable Energy projects in Mpumalanga, particularly wind energy facilities.*" You also state in your email of 8th August (referenced in the para above) that "*especially in light of the fact that there has been no prior notification*".

I would like to point out that Ms Sindi Mbuyane was in fact involved in the pre-app meeting – please see attached the pre-app meeting minutes that Ms Sindi signed.

Prior consultation therefore did happen and we kindly request that in light of this, you consider completing your review of the DSR to meet the public participation deadline of 22 August 2024.

Should you be unable to provide your comments by this date, we would agree to the way forward stipulated in the email by Ms Bathandwa Ncube on 12 august 2024- ie. this would mean that the FSR would progress and get submitted without DARDLEA and MTPA comments if these are not available at the time, and for comments from these departments to be submitted as an addendum to the FSR.

We thank you for your engagement to date and look forward to your response.

ERM
Sustainability is our business

Stephanie Gopaul
Partner
She/Her/Hers

Durban [redacted] **erm.com**

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Tuesday, August 13, 2024 8:50 AM
To: BNcube@dffe.gov.za; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Stephanie Gopaul <stephanie.gopaul@erm.com>
Cc: cagenbach@dffe.gov.za; memorudu@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za; mervyn.lotter@gmail.com; Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; celia@mtpa.co.za
Subject: Re: 14/12/16/3/3/2/2591; 2592; 2593: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP
Importance: High

You don't often get email from rluyt@mpg.gov.za. Learn why this is important

EXTERNAL MESSAGE

Good Morning all,

I am extremely concerned with the agreement reached between ERM and DFFE. DARDLEA, as the

Provincial Department responsible for environmental affairs in Mpumalanga Province, **has to date not yet received any of the draft documents for review and comment.** In accordance with the requirements of Regulation 40(1)(b), the scoping report is required to be subjected to all I&APs for a period of at least 30 days for comment. Further to this, Regulation 40(2)(b) states that the public participation process must provide access to all information ...and must include consultation with every State department that administers a law relating to a matter affecting the environment relevant to an application for an environmental authorisation.

Regulation 21(1) is very clear in the requirement that a final Scoping Report must, within 44 days of submitting an application to the CA, be submitted to the CA (ie. DFFE), which report has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received. The arrangement below is not in line with this requirement, which amounts to an administrative flaw, and I fail to see how DFFE would be in a position to consider a final Scoping report that does not include the input from DARDLEA. The arrangement would also preclude the requirement for the applicant to incorporate the comments received from DARDLEA into the final Scoping report.

As stated above, DARDLEA still awaits the documents for comment.

Kind Regards

Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)

Director: Environmental Impact Management

Department of Agriculture, Rural Development, Land & Environmental Affairs

Mpumalanga Provincial Government

Riverside Office Park, Aqua Street (Cycad Building - Block 4)

[redacted]

[redacted]

[redacted]

>>> Bathandwa Ncube <BNcube@dffe.gov.za> 08/12/24 4:14 PM >>>

Goodday Lucien

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

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

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

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

Following our telephone conversation earlier today regarding the public participation process, please be informed that comments on the draft Scoping Report (SR) are due to you on 22 August 2024. It is noted that there are organs of state who have jurisdiction in respect of the proposed activity, which requires that they be added to the I&AP Database and given an opportunity to comment on the draft SR.

The applicant is requested to submit the final SR to the Department on or before the due date (05 September 2024) and may submit comments from MTPA and DARDLEA as addendums, subsequent to the submission of the final SR to the Department.

MTPA and Mpumalanga DARDLEA are requested to cc this Department when submitting comments to the EAP.

Kind regards

Ms Bathandwa Ncube (EAPASA)

Department of Forestry, Fisheries and the Environment (DFFE)

Integrated Environmental Authorisations

([redacted]

[redacted]

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--

Dr Mervyn Lötter
Control Scientist: Biodiversity Planning
Mpumalanga Tourism and Parks Agency
South Africa

[redacted]com
Postal: P/Bag X1088, Lydenburg, 1120
Website: www.mpumalanga.com

Useful links
http://mtpa.maps.arcgis.com/
MBSP Storymap
MBSP Web Map
Climate change corridors
MTPA Nature Reserves

From:	Masina Morudu
To:	Stephanie Gopaul
Cc:	Coenrad Agenbach; Olivia Letlalo; Sindiswa Dlomo; mervyn.lotter@gmail.com; GCowden; SB. Mbuyane; celia@mtpa.co.za; R Luyt; Bathandwa Ncube; ERM Arcus Amsterdam; Andrew Pearson
Subject:	RE: 14/12/16/3/3/2/2591; 2592; 2593: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP
Date:	Wednesday, 14 August 2024 17:30:49
Attachments:	image001.png Re RE Consultation Mlulio Wind Farms Mpumalanga.msg

EXTERNAL MESSAGE

Dear Stephanie,

Following the discussion between the Provincial Department (DARDLEA) and the EAP earlier this morning, it was confirmed that the EAP did notify the province about the proposed wind energy developments but unfortunately the notification was sent to the Agriculture section within the department and the environmental section did not get the notification/draft reports. The Provincial Department was made aware of the public review of the draft scoping reports of the proposed developments by other interested and affected parties and Ms Luyt contacted ERM and requested the draft reports for comment on 03 August 2024 (see attached email). The EAP/Applicant failed to submit the requested reports until this week. The Provincial Department and MTPA must be afforded 30 days to comment as per EIA Regulations 2014 as amended otherwise the process will be viewed as being procedural flawed.

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

Regards,

MASINA MORUDU

Integrated Environmental Authorisations
EAPASA Registration: 2019/1805
[redacted]

"We all have few failures in life, it's what makes us ready for the success".

forestry, fisheries & the environment
Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Tuesday, August 13, 2024 8:50 AM
To: Bathandwa Ncube <BNcube@dffe.gov.za>; ERM.ArcusAmsterdam@erm.com; stephanie.gopaul@erm.com
Cc: Coenrad Agenbach <CAGENBACH@dffe.gov.za>; Masina Morudu <memorudu@dffe.gov.za>; Olivia Letlalo <OLetlalo@dffe.gov.za>; Sindiswa Dlomo <SDLOMO@dffe.gov.za>; mervyn.lotter@gmail.com; GCowden <GCowden@mpg.gov.za>; SB. Mbuyane <MbuyaneSB@mpg.gov.za>; celia@mtpa.co.za
Subject: Re: 14/12/16/3/3/2/2591; 2592; 2593: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP
Importance: High

Good Morning all,

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As stated above, DARDLEA still awaits the documents for comment.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
Nelspruit, 1200
[redacted]

>>> Bathandwa Ncube <BNcube@dffe.gov.za> 08/12/24 4:14 PM >>>
Goodday Lucien

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

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

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The applicant is requested to submit the final SR to the Department on or before the due date (05 September 2024) and may submit comments from MTPA and DARDLEA as addendums, subsequent to the submission of the final SR to the Department.

MTPA and Mpumalanga DARDLEA are requested to cc this Department when submitting comments to the EAP.

Kind regards

Ms Bathandwa Ncube (EAPASA)
Department of Forestry, Fisheries and the Environment (DFFE)
Integrated Environmental Authorisations
[redacted]

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From: R Luyt
To: ERM Arcus Amsterdam
Cc: Bathandwa Ncube; Coenrad Agenbach; Masina Morudu; Olivia Letlalo; Sindiswa Dlomo; Wayne Hector; GCowden; SB. Mbuyane; Celia.dewaal@mtpa.co.za; frans.krige@mtpa.co.za; mervyn@mtpa.co.za
Subject: Re: RE: Consultation | Mlulio Wind Farms Mpumalanga
Date: Sunday, 11 August 2024 09:51:38
Importance: High

Good day Stephanie,

As of 8 August 2024, neither DARDLEA nor MTPA have received draft Scoping Reports to review and comment on, nor have we received a response to the email below.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
[redacted]

>>> Robyn Luyt 08/07/24 9:41 AM >>>
Good day Stephanie,

Be advised that the names of the officials at MTPA that you have highlighted in your below notification are **not the relevant officials** that are required to be notified or the relevant officials that must review and comment on draft Scoping or EIA reports, or any reports related to an EIA process. There are also no officials in the list of officials in your screenshots that are in the Environmental Affairs Chief Directorate in MDARDLEA - as far as I am aware they are in the section that deals with Agriculture, which is an entirely different mandate.

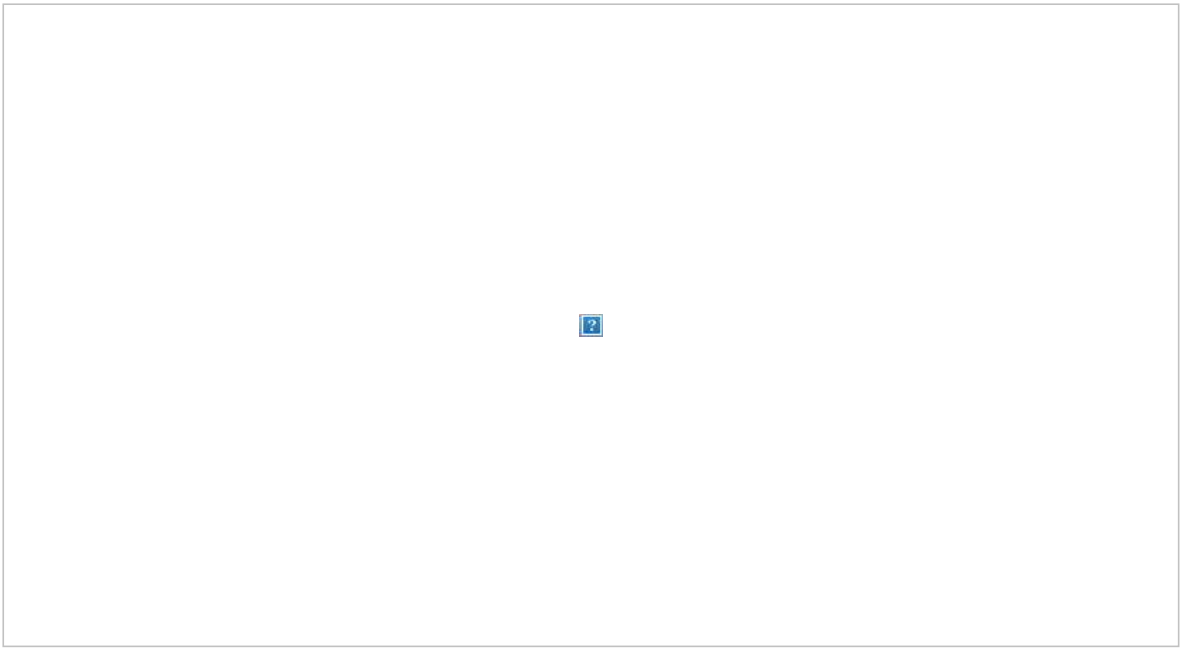
It would **not** be acceptable to not provide the commenting authority the mandatory 30 days to review and comment on draft reports, especially in light of the fact that there has been no prior notification. The Directorate Environmental Impact Management within DARDLEA represents the MEC as Competent Authority in Mpumalanga, and the commenting authority in respect projects administered by DFFE. MTPA has the mandate for biodiversity matters on behalf of DARDLEA. As per my email to you below (3 August), hard copies of all reports must be submitted to Ms Mbuyane (Environmental Impact Management) at our Ermelo office, and the documents must be made available to me (and in this instance to Mr Cowden and Mr Lotter) electronically at the same time. You will need to contact Ms De Waal and Mr Krige at MTPA to confirm how documents must be submitted to MTPA. Please provide shape files of the 3 proposed WEFs as well.

Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
[redacted]

>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 08/06/24 1:43 PM >>>
Good day Robyn,

Please note that DARDLEA and MTPA were notified regarding the PP for the Draft scoping Phase on the 19th July 2024. Kindly see proof of notification below:



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

Thank you,

Lucien Barbeau

ERM

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Saturday, August 3, 2024 3:09 PM
To: ERM Arcus Amsterdam <Erm.arcusamsterdam@erm.com>
Cc: cagenbach@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za; whector@dffe.gov.za; Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; Celia.dewaal@mtpa.co.za; frans.krige@mtpa.co.za; mervyn@mtpa.co.za
Subject: Consultation | Mlulio Wind Farms Mpumalanga
Importance: High

You don't often get email from rluyt@mpg.gov.za. Learn why this is important

EXTERNAL MESSAGE

Good day Ms Gopaul,

It has come to our attention, and not via any official notification from ERM, that draft Scoping Reports for the following wind farms proposed in the Gert Sibande District in Mpumalanga Province are out for public comment from 19 July 2024 to 20 August 2024 (as per ERM website), where ERM is the EAP:
1. Shepmoore WEF
2. Emvelo WEF
3. Rochdale WEF

Neither DARDLEA nor MTPA have been consulted to date, nor have we received copies of any of the draft Scoping Reports. Aside from the requirements of the EIA Regulations, DARDLEA and MTPA have through internal arrangements with DFFE requested to be included in all pre-application consultations for Renewable Energy projects in Mpumalanga, particularly wind energy facilities. DARDLEA and MTPA must be included during all pre-application meetings and in all in-process consultations.

For the purpose of commenting on draft reports during the regulatory periods, we request that hard copies of all reports are submitted to Ms Sindi Mbuyane in our Ermelo office (where projects are located in the Gert Sibande District), and sent electronically to me via WeTransfer. Please also ensure that MTPA receives the reports in the manner requested by them. For your records I include the contact details of all relevant officials to be consulted in DARDLEA (when an application is in the Gert Sibande District) and MTPA:

DARDLEA	DESIGNATION	EMAIL	PHONE
Robyn Luyt	Director: Environmental Impact Management (EIM)	rluyt@mpg.gov.za	[redacted]
Sindisiwe Mbuyane	Deputy Director: EIM Gert Sibande District	mbuyanesb@mpg.gov.za	[redacted]
Gavin Cowden	Deputy Director: Environmental Policy, Planning and Coordination	gcowden@mpg.gov.za	

MTPA	DESIGNATION	EMAIL	PHONE
Mervyn Lotter	Manager: Biodiversity Planning	Mervyn@mtpa.co.za	[redacted]
Frans Krige	Land Use Advisor	Frans.Krige@mtpa.co.za	
Khumbelo Malele	Land Use Advisor	Khumbelo.Malele@mtpa.co.za khumbelomalele@gmail.com	[redacted]
Celia de Waal	EIA Data Capturer LUA	celia.dewaal@mtpa.co.za	[redacted]

Please note that time frames for commenting on draft reports can only commence on the date that hard copies of the reports are received, and we request that our 30 day time frame aligns with DFFE's.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)

Director: Environmental Impact Management

Department of Agriculture, Rural Development, Land & Environmental Affairs

Mpumalanga Provincial Government

Riverside Office Park, Aqua Street (Cycad Building - Block 4)

Nelspruit, 1200

[redacted]

[redacted]

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From:	Stephanie Gopaul
To:	Masina Morudu
Cc:	Coenrad Agenbach; Olivia Letlalo; Sindiswa Dlomo; mervyn.lotter@gmail.com; GCowden; SB. Mbuyane; celia@mtpa.co.za; R Luyt; Bathandwa Ncube; ERM Arcus Amsterdam; Andrew Pearson; Stephen Burton; Lucien Barbeau; Lloyd Barnes
Subject:	RE: 14/12/16/3/3/2/2591; 2592; 2593: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP
Date:	Wednesday, 14 August 2024 20:06:30
Attachments:	image002.png image003.png

Dear Masina

Thank you for your emails. We will discuss with the proponent and get back to you.

Regards,

ERM
Sustainability is our business

Stephanie Gopaul
Partner
She/Her/Hers

Durban [redacted] **erm.com**

From: Masina Morudu <memorudu@dffe.gov.za>
Sent: Tuesday, August 13, 2024 12:00 PM
To: Stephanie Gopaul <stephanie.gopaul@erm.com>
Cc: Coenrad Agenbach <CAGENBACH@dffe.gov.za>; Olivia Letlalo <OLetlalo@dffe.gov.za>; Sindiswa Dlomo <SDLOMO@dffe.gov.za>; mervyn.lotter@gmail.com; GCowden <GCowden@mpg.gov.za>; SB. Mbuyane <MbuyaneSB@mpg.gov.za>; celia@mtpa.co.za; R Luyt <rluyt@mpg.gov.za>; Bathandwa Ncube <BNcube@dffe.gov.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Andrew Pearson <andrew@mulilo.com>
Subject: RE: 14/12/16/3/3/2/2591; 2592; 2593: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP

EXTERNAL MESSAGE

Dear Stephanie,

Following the discussion between the Provincial Department (DARDLEA) and the EAP earlier this morning, it was confirmed that the EAP did notify the province about the proposed wind energy developments but unfortunately the notification was sent to the Agriculture section within the department and the environmental section did not get the notification/draft reports. The Provincial Department was made aware of the public review of the draft scoping reports of the proposed developments by other interested and affected parties and Ms Luyt contacted ERM and requested the draft reports for comment on 03 August 2024 (see attached email). The EAP/Applicant failed to submit the requested reports until this week. The Provincial Department and MTPA must be afforded 30 days to comment as per EIA Regulations 2014 as amended otherwise the process will be viewed as being procedural flawed.

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

Regards,

MASINA MORUDU

Integrated Environmental Authorisations
EAPASA Registration: 2019/1805
[redacted]

"We all have few failures in life, it's what makes us ready for the success".

forestry, fisheries & the environment
Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Tuesday, August 13, 2024 8:50 AM
To: Bathandwa Ncube <BNcube@dffe.gov.za>; ERM.ArcusAmsterdam@erm.com; stephanie.gopaul@erm.com
Cc: Coenrad Agenbach <CAGENBACH@dffe.gov.za>; Masina Morudu <memorudu@dffe.gov.za>; Olivia Letlalo <OLetlalo@dffe.gov.za>; Sindiswa Dlomo <SDLOMO@dffe.gov.za>; mervyn.lotter@gmail.com; GCowden <GCowden@mpg.gov.za>; SB. Mbuyane <MbuyaneSB@mpg.gov.za>; celia@mtpa.co.za
Subject: Re: 14/12/16/3/3/2/2591; 2592; 2593: Proposed Emvelo, Rochdale and Sheepmoor WEFs, MP
Importance: High

Good Morning all,

I am extremely concerned with the agreement reached between ERM and DFFE. DARDLEA, as the Provincial Department responsible for environmental affairs in Mpumalanga Province, **has to date not yet received any of the draft documents for review and comment.** In accordance with the requirements of Regulation 40(1)(b), the scoping report is required to be subjected to all I&APs for a period of at least 30 days for comment. Further to this, Regulation 40(2)(b) states that the public participation process must provide access to all information ...and must include consultation with every State department that administers a law relating to a matter affecting the environment relevant to an application for an environmental authorisation.

Regulation 21(1) is very clear in the requirement that a final Scoping Report must, within 44 days of submitting an application to the CA, be submitted to the CA (ie. DFFE), which report has been

subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received. The arrangement below is not in line with this requirement, which amounts to an administrative flaw, and I fail to see how DFFE would be in a position to consider a final Scoping report that does not include the input from DARDLEA. The arrangement would also preclude the requirement for the applicant to incorporate the comments received from DARDLEA into the final Scoping report.

As stated above, DARDLEA still awaits the documents for comment.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
[redacted]

>>> Bathandwa Ncube <BNcube@dffe.gov.za> 08/12/24 4:14 PM >>>
Goodday Lucien

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

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

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

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

Following our telephone conversation earlier today regarding the public participation process, please be informed that comments on the draft Scoping Report (SR) are due to you on 22 August 2024. It is noted that there are organs of state who have jurisdiction in respect of the proposed activity, which requires that they be added to the I&AP Database and given an opportunity to comment on the draft SR.

The applicant is requested to submit the final SR to the Department on or before the due date (05 September 2024) and may submit comments from MTPA and DARDLEA as addendums, subsequent to the submission of the final SR to the Department.

MTPA and Mpumalanga DARDLEA are requested to cc this Department when submitting comments to the EAP.

Kind regards
Ms Bathandwa Ncube (EAPASA)
Department of Forestry, Fisheries and the Environment (DFFE)
Integrated Environmental Authorisations
[redacted]

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From:	ERM Arcus Amsterdam
To:	Tebego Kgaphola; ERM Arcus Amsterdam
Cc:	Portia Makitla
Subject:	RE: COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED MULILO AMSTERDAM WEFS CLUSTER, NEAR ERMELO, MPUMALANGA PROVINCE
Date:	Thursday, 15 August 2024 09:57:15
Attachments:	image001.png image002.png image003.png

Good day,

Your comments are well received.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town
+27105963488

erm.com

From: Tebego Kgaphola <tkgaphola1@dffe.gov.za>
Sent: Tuesday, August 13, 2024 12:47 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Portia Makitla <PMakitla@dffe.gov.za>
Subject: COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED MULILO AMSTERDAM WEFS CLUSTER, NEAR ERMELO, MPUMALANGA PROVINCE

You don't often get email from tkgaphola1@dffe.gov.za. Learn why this is important

EXTERNAL MESSAGE

Good day

Kindly find the attached comments for the aforementioned project.



Tebego Kgaphola

Directorate: Biodiversity Mainstreaming and EIA
Branch: Biodiversity and Conservation
473 Steve Biko Road | Private Bag X477 | Pretoria | 001
[redacted]
Website:www.environment.gov.za


forestry, fisheries
& the environment
Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

From:	ERM Arcus Amsterdam
To:	Tebego Kgaphola; ERM Arcus Amsterdam
Cc:	Portia Makitla
Subject:	RE: COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED MULILO AMSTERDAM WEFS CLUSTER, NEAR ERMELO, MPUMALANGA PROVINCE
Date:	Thursday, 15 August 2024 09:57:00
Attachments:	image001.png image002.png image003.png

Good day,

Your comments are well received.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town
+27105963488

erm.com

From: Tebego Kgaphola <tkgaphola1@dffe.gov.za>
Sent: Tuesday, August 13, 2024 12:47 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Portia Makitla <PMakitla@dffe.gov.za>
Subject: COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED MULILO AMSTERDAM WEFS CLUSTER, NEAR ERMELO, MPUMALANGA PROVINCE

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EXTERNAL MESSAGE

Good day

Kindly find the attached comments for the aforementioned project.



Tebego Kgaphola

Directorate: Biodiversity Mainstreaming and EIA
Branch: Biodiversity and Conservation
473 Steve Biko Road | Private Bag X477 | Pretoria | 001
[redacted]
Website:www.environment.gov.za


forestry, fisheries
& the environment
Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

From: ERM Arcus Amsterdam
To: Lloyd Barnes; Andrew Pearson
Cc: Stephanie Gopaul; Stephen Burton
Subject: FW: Register for the Zephyr WEF Meeting and site visit
Date: Thursday, 15 August 2024 10:28:00
Attachments: image002.png

Hi Lloyd and Andrew,

I have come across information (please see email trail below) indicating that Mervyn from MTPA had accessed our reports from EDF renewables on August 2, 2024.

Could you please advise on how you would like to proceed with this information? Specifically, should we inform Masina about this development? Additionally, it would be helpful to receive feedback from DARDLEA and MTPA by tomorrow so we can plan our next steps accordingly.

Thank you for your attention to this matter.

Kind regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town
+27105963488

erm.com

From: Celia de Waal <celia@mtpa.co.za>
Sent: Tuesday, August 6, 2024 9:35 AM
To: ERM Arcus Amsterdam <erm.arcusamsterdam@erm.com>
Cc: Mervyn Lotter <Mervyn.Lotter@mtpa.co.za>; Johan Eksteen <johan@mtpa.co.za>; Frans Krige <frans@mtpa.co.za>; Khumbelo Malele <Khumbelo.Malele@mtpa.co.za>
Subject: FW: Register for the Zephyr WEF Meeting and site visit

You don't often get email from celia@mtpa.co.za. Learn why this is important

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

EXTERNAL MESSAGE

Good morning

Kindly send us, the MTPA, hard copies of the 3 Wind Farm reports, for our Scientists to comment on, to the following physical address:

To: Cecilia de Waal (EIA Data Capturer)
MTPA Office Building (Lydenburg)
End of Morgan street
Lydenburg 1120

[redacted]

Kind regards

Celia de Waal

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
[redacted]

From: Mervyn Lotter <mervyn@mtpa.co.za>
Sent: Saturday, August 3, 2024 9:00 AM
To: Frans Krige <frans@mtpa.co.za>; Celia de Waal <celia@mtpa.co.za>; Robyn Luyt (rluyt@mpg.gov.za) <rluyt@mpg.gov.za>; Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>
Subject: FW: Register for the Zephyr WEF Meeting and site visit

Hi there

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

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

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

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

Best wishes
Mervyn

From: Christophe Pajonk <Christophe.Pajonk@edf-re.co.za>
Sent: Friday, August 2, 2024 12:19 PM
To: Mervyn Lotter <mervyn@mtpa.co.za>
Subject: RE: Register for the Zephyr WEF Meeting and site visit

Hi Mervyn,

Many thanks for reaching out.

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

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

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

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

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

I hope this helps.

Kind regards,

Christophe

From: Mervyn Lotter <mervyn@mtpa.co.za>
Sent: Thursday, August 1, 2024 8:25 PM
To: Christophe Pajonk <Christophe.Pajonk@edf-re.co.za>
Subject: RE: Register for the Zephyr WEF Meeting and site visit

EXTERNAL MAIL
Hi Christophe

Thank you for writing. Would you please send me an image or shapefile for the Mulilo WEF

boundaries when you get a chance?

Best wishes
Mervyn

From: Christophe Pajonk <Christophe.Pajonk@edf-re.co.za>
Sent: Thursday, August 1, 2024 4:50 PM
To: Sindy Mbuyane <mbuyanesb@mpg.gov.za>; Gavin Cowden <GCowden@mpg.gov.za>; Robyn Luyt <RLuyt@mpg.gov.za>; Frans Krige <frans@mtpa.co.za>; hlatshwayo.mixo@mtpa.co.za; Mervyn Lotter <mervyn@mtpa.co.za>; Rockey Nkosi <rockey.nkosi@mtpa.co.za>
Cc: Ryan David-Andersen <ryan@amdadevelopments.co.za>
Subject: RE: Register for the Zephyr WEF Meeting and site visit

Good afternoon everyone,

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

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

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

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

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

Kind regards,

Christophe

From: Sindy Mbuyane <mbuyanesb@mpg.gov.za>
Sent: Wednesday, July 31, 2024 11:23 AM
To: Ryan David-Andersen <ryan@amdadevelopments.co.za>; Christophe Pajonk <Christophe.Pajonk@edf-re.co.za>; Gavin Cowden <GCowden@mpg.gov.za>; Robyn Luyt <RLuyt@mpg.gov.za>; Frans Krige <frans@mtpa.co.za>; hlatshwayo.mixo@mtpa.co.za; mervyn@mtpa.co.za; rockey.nkosi@mtpa.co.za
Subject: Register for the Zephyr WEF Meeting and site visit

EXTERNAL MAIL
Good day All,

Find attached for your attention.

Kind Regards,

Sindisiwe Mbuyane

EAPASA Reg: 2021/3509, IAIAsa 2040304

Environmental Officer Control Grade B

Gert Sibande District (13 De Jager Street, Ermelo 2350)

[redacted]

[redacted]

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Lucien Barbeau
Consultant

Cape Town
+27105963488

erm.com

From: Celia de Waal <celia@mtpa.co.za>
Sent: Tuesday, August 6, 2024 9:35 AM
To: ERM Arcus Amsterdam <erm.arcusamsterdam@erm.com>
Cc: Mervyn Lotter <Mervyn.Lotter@mtpa.co.za>; Johan Eksteen <johan@mtpa.co.za>; Frans Krige <frans@mtpa.co.za>; Khumbelo Malele <Khumbelo.Malele@mtpa.co.za>
Subject: FW: Register for the Zephyr WEF Meeting and site visit

You don't often get email from celia@mtpa.co.za. Learn why this is important

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

EXTERNAL MESSAGE

Good morning

Kindly send us, the MTPA, hard copies of the 3 Wind Farm reports, for our Scientists to comment on, to the following physical address:

To: Cecilia de Waal (EIA Data Capturer)
MTPA Office Building (Lydenburg)
End of Morgan street
Lydenburg 1120

[redacted]

Kind regards

Celia de Waal

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
Landline: 013 065 0062
Cell: 082 841 7163
e-mail: celia.dewaal@mtpa.co.za

From: Mervyn Lotter <mervyn@mtpa.co.za>
Sent: Saturday, August 3, 2024 9:00 AM
To: Frans Krige <frans@mtpa.co.za>; Celia de Waal <celia@mtpa.co.za>; Robyn Luyt (rluyt@mpg.gov.za) <rluyt@mpg.gov.za>; Gavin Cowden <GCowden@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>
Subject: FW: Register for the Zephyr WEF Meeting and site visit

Hi there

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

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

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

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

Best wishes
Mervyn

From: Christophe Pajonk <Christophe.Pajonk@edf-re.co.za>
Sent: Friday, August 2, 2024 12:19 PM
To: Mervyn Lotter <mervyn@mtpa.co.za>
Subject: RE: Register for the Zephyr WEF Meeting and site visit

Hi Mervyn,

Many thanks for reaching out.

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

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

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

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

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

I hope this helps.

Kind regards,

Christophe

From: Mervyn Lotter <mervyn@mtpa.co.za>
Sent: Thursday, August 1, 2024 8:25 PM
To: Christophe Pajonk <Christophe.Pajonk@edf-re.co.za>
Subject: RE: Register for the Zephyr WEF Meeting and site visit

EXTERNAL MAIL
Hi Christophe

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

Best wishes
Mervyn

From: Christophe Pajonk <Christophe.Pajonk@edf-re.co.za>
Sent: Thursday, August 1, 2024 4:50 PM
To: Sindy Mbuyane <mbuyanesb@mpg.gov.za>; Gavin Cowden <GCowden@mpg.gov.za>; Robyn Luyt <RLuyt@mpg.gov.za>; Frans Krige <frans@mtpa.co.za>; hlatshwayo.mixo@mtpa.co.za; Mervyn Lotter <mervyn@mtpa.co.za>; Rockey Nkosi <rockey.nkosi@mtpa.co.za>
Cc: Ryan David-Andersen <ryan@amdadevelopments.co.za>
Subject: RE: Register for the Zephyr WEF Meeting and site visit

Good afternoon everyone,

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

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

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

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

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

Kind regards,

Christophe

From: Sindy Mbuyane <mbuyanesb@mpg.gov.za>
Sent: Wednesday, July 31, 2024 11:23 AM
To: Ryan David-Andersen <ryan@amdadevelopments.co.za>; Christophe Pajonk <Christophe.Pajonk@edf-re.co.za>; Gavin Cowden <GCowden@mpg.gov.za>; Robyn Luyt <RLuyt@mpg.gov.za>; Frans Krige <frans@mtpa.co.za>; hlatshwayo.mixo@mtpa.co.za; mervyn@mtpa.co.za; rockey.nkosi@mtpa.co.za
Subject: Register for the Zephyr WEF Meeting and site visit

EXTERNAL MAIL
Good day All,

Find attached for your attention.

Kind Regards,

Sindisiwe Mbuyane
EAPASA Reg: 2021/3509, IAIAsa 2040304
Environmental Officer Control Grade B
Gert Sibande District (13 De Jager Street, Ermelo 2350)
[redacted]
[redacted]

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From:	EIA Applications
To:	ERM Arcus Amsterdam
Cc:	Stephen Burton; Stephanie Gopaul; Bathandwa Ncube; Masina Morudu
Subject:	RE: Withdrawal of Draft Scoping applications - 14/12/16/3/3/2/2593; 14/12/16/3/3/2/2592; 14/12/16/3/3/2/2591
Date:	Thursday, 22 August 2024 09:24:49
Attachments:	image001.png

EXTERNAL MESSAGE

Dear Lucien.

We acknowledge receipt of the withdrawal email for the above-mentioned applications received on 21 August 2024.

The applications for EAs with the reference numbers 14/12/16/3/3/2/2593; 14/12/16/3/3/2/2592; 14/12/16/3/3/2/2591 are now deemed withdrawn and the applications are closed on the Departments side.

EIA Applications
Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment

Please note that this email is for the receipt and processing of online applications only, and is not monitored for responses. All queries must be directed to EIAadmin@dffe.gov.za.

You are advised that this mailbox has a 48 hour response time.

Please note that this mailbox has a 5mb mail limit. No zip files are to be attached in any email.

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Wednesday, August 21, 2024 2:24 PM
To: EIA Applications <EIAApplications@dffe.gov.za>
Cc: Stephen Burton <Stephen.Burton@erm.com>; Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Bathandwa Ncube <BNcube@dffe.gov.za>
Subject: Withdrawal of Draft Scoping applications - 14/12/16/3/3/2/2593; 14/12/16/3/3/2/2592; 14/12/16/3/3/2/2591

Dear EIA Applications,

DFFE Reference: 14/12/16/3/3/2/2593; 14/12/16/3/3/2/2592; 14/12/16/3/3/2/2591

Please can we ask that the Draft Scoping Applications for Sheepmoor, Rochdale and Emvelo Wind energy facilities (DFFE Reference - 14/12/16/3/3/2/2593; 14/12/16/3/3/2/2592; 14/12/16/3/3/2/2591) submitted to yourselves on the 19th July 2024 be withdrawn.

We will be restarting the process.

Please let me know if you have any queries.

Kind regards

Lucien Barbeau
Consultant

Cape Town [redacted]

erm.com



From: Aviation Environmental Compliance
To: ERM Arcus Amsterdam
Cc: Pamela Madondo; Evelyn Shogole
Subject: RE: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga
Date: Thursday, 22 August 2024 14:15:48
Attachments: image009.png
image012.png
image013.png
image019.png
image004.png

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EXTERNAL MESSAGE

Good day,

I hope this email finds you well. Kindly note that the SACAA has transferred all obstacle assessments and applications responsibilities to Air Traffic and Navigation Services (ATNS) as published on the SACAA website: www.caa.co.za/industryinformation/obstacles/ . A formal application must be lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted. The list and contact details of the approved obstacles assessment services providers can be obtained from the CAA website: www.caa.co.za.

Kind regards
Nrateng Mashiloane
Aviation Environmental Compliance Department
Aviation Safety Infrastructure (ASI)- Aviation Environmental Compliance
[redacted]
www.caa.co.za
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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Friday, July 19, 2024 4:37 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft scoping Report Mulilo Amsterdam WEFs, near Ermelo, Mpumalanga

"This message was sent from outside of SACAA. Please use caution when opening links and/ or attachments"

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

Dear Interested and Affected Party,

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

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

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

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

Consultant
Lucien Barbeau

ERM
240 Main Road, Rondebosch, Cape Town
T [redacted]
E lucien.barbeau@erm.com | **W** www.erm.com



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From: Morgan Griffiths
To: ERM Arcus Amsterdam
Subject: Automatic reply: Notification of Submission: Draft scoping Report Amsterdam WEFs, near Ermelo, Mpumalanga
Date: Thursday, 22 August 2024 17:31:54

You don't often get email from morgan.griffiths@wessa.co.za. Learn why this is important

EXTERNAL MESSAGE

Hi there

I am away on long leave until until Monday **2nd September**. I will only attend to your email on my return.
* For critical EIA, pollution, advocacy or environmental governance issues, please redirect to: **shenen.rikhotso@wessa.co.za**
* Media enquiries can be directed to: **communications@wessa.co.za**
*WESSA Membership enquiries can be directed to: **membership@wessalife.org.za**
* Blue Flag enquiries can be directed to: **blueflag@wessa.co.za**

"For urgent queries and assistance, please contact Lindo Mkhize on 082 459 6454 or Lindokuhle.mkhize@wessa.co.za"

Kind regards
Morgan Griffiths

Morgan Griffiths
Senior Manager: Advocacy, Membership and Governance

[redacted] | [redacted]co.za

WESSA logo

WESSA
The Wildlife and Environment Society of South Africa
www.wessa.org.za #PeopleCaringForTheEarth

From:	ERM Arcus Amsterdam
To:	ERM Arcus Amsterdam
Subject:	Notification of Submission: Draft scoping Report Amsterdam WEFs, near Ermelo, Mpumalanga
Date:	Thursday, 22 August 2024 17:33:28
Attachments:	image001.png I&AP Notification Letter Afrikaans.pdf I&AP Notification Letter English.pdf

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

Dear Interested and Affected Party,

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

The previous applications for these proposed projects have been withdrawn to allow for an additional comment period for all I&AP's. Please note that all comments received during the previous comment period will still be incorporated in the comments and responses for these new applications. Should you wish to confirm that your comment is being incorporated, please feel free to email us.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30 day comment period from 22 August to 21 September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final Scoping Report.

More information on how you are able to participate in this process is attached in the above documentation.
Please indicate which application your comment in respect of.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM

Sustainability is our business



ERM

Suite S005
17 Die Boulevard
Westway Kantoorpark
Westville, 3635
Durban, Suid-Afrika

Telefoon: +27 31 265 0033
Faks: +27 31 265 0150

www.erm.com

22 Augustus 2024

ERM Verwysing: 0684401

Geagte Belanghebbende en Geaffekteerde Party, Belanghebbende, Staats orgaan

KENNISGEWING VAN BESKIKBAARHEID VAN DIE KONSEP-OMVANGS VERSLAE VIR OPENBARE HERSIENING EN KOMMENTAAR VAN DIE VOORGESTELDE AMSTERDAM WIND ENERGIE FASILITEIT (EMVELO, ROCHDALE EN SHEEPMOOR) CLUSTER, NABY ERMELO, MPUMALANGA

Kennis word hiermee gegee van 'n openbare deelname proses (ODP) wat in gevolge die Wet op Nasionale Omgewingsbestuur, 1998 (Wet No. 107 van 1998) (NEMA, 1998), soos gewysig, onderneem moet word.

DFFE-verwysing(s): Om bevestig te word

Aard van aktiwiteit: Emvelo (Edms) Bpk, Rochdale (Edms) Bpk en Sheepmoor (Edms) Bpk ('die Projek aansoekers') stel voor dat drie (3) Wind energie fasiliteite (WEF) opgerig en bedryf word. Die potensiële opwekkingsvermoë van Emvelo WEF is tot 200 MW, Rochdale WEF is tot 220 MW en Sheepmoor tot 360 MW. Elke WEF sal bestaan uit verskeie geboue, toegangspaaie, 'n battery-energieberging stelsel (BESS) en 'n substasie naaf met gepaardgaande elektriese netwerk infrastruktuur soos, maar nie beperk tot 'n 132kV oorhoofse transmissie kraglyn wat die WEF met die nasionale elektriese netwerk verbind.

Ontwikkelings ligging: Die voorgestelde Amsterdam WEF se cluster is 30 km oos van Ermelo binne die Msukaligwa Plaaslike Munisipaliteit en Gert Sibande Distriksmunisipaliteit geleë.

Aansoek proses: Ingevolge Hoofstuk 5 van die Wet op Nasionale Omgewingsbestuur, 1998 (Wet 107 van 1998 – NEMA), Omgewings Impak studie (EIA) Regulasies, 2014 (soos gewysig), het die Projek aansoekers, Environmental Resources Management (Edms) Bpk (ERM) aangestel om as projek bestuurder op te tree en die Omvang- en Omgewings Impak bepalings prosesse (S&EIA) as die onafhanklike omgewings impak bepalings praktisyn (EAP) te onderneem.

ERM het drie afsonderlike omgewings aansoeke ingedien, waaronder afsonderlike konsep-omvang verslae aan die departement van bosbou, visserye en die omgewing (DFFE).

Uitnodiging om kommentaar te lewer: Lede van die publiek, plaaslike gemeenskappe en belanghebbendes word uitgenooi om kommentaar te lewer op die konsep-omvang verslae, wat beskikbaar is vir openbare hersiening en kommentaar, vanaf **Donderdag, 22 Augustus 2024 tot Saterdag die 21 September 2024 (albei dae ingesluit),** soos per Tabel 1 hieronder.

Tabel 1: Liggings vir openbare oorsig en kommentaar

Ligging	Fisiese adres
Elektroniese kopie lokasies (beskikbaar vir aflaai hieronder)	
Via One Drive	I &AP's kan versoek dat kopieë via een gedeelde gids van One Drive gestuur word.

Geregistreerde kantoor
Omgewingshulpbronbestuur
Suider-Afrika (Edms) Bpk
1ste verdieping, gebou 32
Die Woodlands-kantoorpark
Woodlandsrylaan, Woodmead
2148, Johannesburg, Suid-Afrika

Geregistreerde nommer: 2003/001404/07
BTW-registrasie: 4780205482

Kantore wêreldwyd

Direkteure
Claudio Bertora
Urmila Bob (nie-uitvoerende)
Tania Swanepoel
Marinda Rasmussen

Harde kopie ligging	
Ermelo Openbare Biblioteek	Ermelo, 2350
CD-kopieë sal op versoek aan die EAP gemaak word.	

Indien u as 'n I&AP geregistreer wil wees en / of kommentaar wil lewer, dien asseblief u naam, belangstelling in die projek of kommentaar, e-pos adres en pos adres en telefoon nommer skriftelik by die onderstaande adres in:	
Environmental Resources Management Southern Africa (Edms) Bpk	
Projek verwysing: 0684401 Mulilo WEF-cluster	**Kontak persoon:** Lucien Barbeau
E-pos: ERM.ArcusAmsterdam@erm.com	**Telefoon:** +27117985400
Pos: Postnet Suite 90, Privaatsak X12, Tokai, 7966	**Aanlyn:** https://amsterdamclusterwef.aidaform.com/stakeholder-engagement
ERM webtuiste *(beskikbaar vir aflaai)*	Proposed Amsterdam wind energy facility and auxiliary infrastructure cluster in Mpumalanga (erm.com)

Na afloop van die openbare deelname van 30 dae, sal die kommentaar aangespreek en opgeneem word in die Finale Omvang verslae, wat aan die DFFE voorgelê sal word vir goedkeuring om na die EIA-fase te vorder.

Let wel, met betrekking tot die Wet op die Beskerming van Persoonlike Inligting (PoPI Wet 4 van 2013, soos gewysig): Indien u versoek om as 'n I&AP te registreer, sal u persoonlike inligting aan 'n appel kandidaat beskikbaar gestel word in die geval van 'n appèl, en 'n aansoeker/EAP/onafhanklike persoon vir doeleindes daarvan om ingelig te word en toegang tot 'n ouditverslag te kry.

Korrespondensie gedurende die aansoek proses sal slegs aan geregistreerde I &AP's versprei word. Registrasie is moontlik gedurende die aansoek proses.

Dankie vir die belangstelling in die projek.

Lucien Barbeau
Omgewings consultant
Environmental Resources Management Southern Africa (Edms) Bpk

ERM

Suite S005
17 The Boulevard
Westway Office Park
Westville, 3635
Durban, South Africa

Telephone: +27 31 265 0033
Fax: +27 31 265 0150

www.erm.com

22 August 2024

ERM Reference: 0684401

Dear Interested and Affected Party, Stakeholder, Organ of State

NOTIFICATION OF AVAILABILITY OF THE DRAFT SCOPING REPORTS FOR PUBLIC REVIEW AND COMMENT OF THE PROPOSED AMSTERDAM WIND ENERGY FACILITY (EMVELO, ROCHDALE AND SHEEPMOOR) CLUSTER, NEAR ERMELO, MPUMALANGA

Notice is hereby given of a Public Participation Process (PPP) to be undertaken in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA, 1998), as amended.

DFFE Reference(s): To Be Confirmed

Nature of Activity: Emvelo Wind Energy Facility (Pty) Ltd, Rochdale Wind Energy Facility (Pty) Ltd and Sheepmoor Wind Energy Facility (Pty) Ltd ('the Project Applicants') are proposing the construction and operation of three (3) Wind Energy Facilities (WEF). The potential generation capacity of Emvelo WEF is up to 200 MW, Rochdale WEF is up to 220 MW and Sheepmoor up to 360 MW. Each WEF will comprise various buildings, access roads, a battery energy storage system (BESS), and a substation hub with associated electrical grid infrastructure such as but not limited to a 132kV overhead transmission powerline connecting the WEF to the national electrical grid network.

Development Location: The proposed Mulilo WEF's Cluster are located 30 km east of Ermelo within the Msukaligwa Local Municipality, and Gert Sibande District Municipality.

Application Process: In terms of Chapter 5 of the National Environmental Management Act, 1998 (Act 107 of 1998 – NEMA), Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), the Project Applicants appointed Environmental Resources Management (Pty) Ltd (ERM), to act as the project manager and to undertake the Scoping and Environmental Impact Assessment (S&EIA) processes as the independent environmental impact assessment practitioner (EAP).

ERM has submitted three separate Environmental Applications, including separate Draft Scoping Reports to the Department of Forestry, Fisheries and the Environment (DFFE).

Invitation to Comment: Members of the public, local communities, and stakeholders are invited to comment on the Draft Scoping Reports, which is available for public review and comment, from **Thursday, 22 August 2024 until the Saturday, 21 September 2024 (both days inclusive)**, as per Table 1 below.

Table 1: Public Review and Comment Locations

Location	Physical Address
Electronic Copy Locations (Available for download below)	
Via One Drive	I&APs can request for copies to be sent via one drive shared folder.
Hard Copy Location	

Registered office
Environmental Resources Management
Southern Africa (Pty) Ltd
1st Floor, Building 32
The Woodlands Office Park
Woodlands Drive, Woodmead
2148, Johannesburg, South Africa

Registered number: 2003/001404/07
VAT registration: 4780205482

Offices worldwide

Directors
Claudio Bertora
Urmilla Bob (Non-Executive)
Tania Swanepoel
Marinda Rasmussen

Ermelo Public Library	Ermelo, 2350
CD Copies will be made upon request to the EAP.	

Should you wish to be registered as an I&AP and / or would like comment please submit your name, interest in the project or comment, email and postal address and telephone number in writing to the below address:	
Environmental Resources Management Southern Africa (Pty) Ltd	
Project Reference: 0684401 Mulilo WEF Cluster	**Contact Person:** Lucien Barbeau
Email: ERM.ArcusAmsterdam@erm.com	**Telephone:** +27117985400
Post: Postnet Suite 90, Private Bag X12, Tokai, 7966	**Online:** https://amsterdamclusterwef.aidaform.com/stakeholder-engagement
ERM Website *(available for download)*	Proposed Amsterdam wind energy facility and auxiliary infrastructure cluster in Mpumalanga (erm.com)

Following the 30-day public participation, the comments will be addressed and incorporated into the Final Scoping Reports, which will be submitted to the DFFE for approval to progress to the EIA Phase.

Please note, regarding the Protection of Personal Information Act (PoPI Act 4 of 2013, as amended): If you request to register as an I&AP, your personal information will be made available to an appellant in the case of an appeal, and an applicant/EAP/independent person for purposes of being informed and given access to an audit report.

Correspondence throughout the Application Process will only be distributed to Registered I&APs. Registration is possible throughout the Application Process.

Thank you for the interest in the project.

Sadiya Salie
Environmental Consultant
Environmental Resources Management (Pty) Ltd

From:	Lucien Barbeau
To:	ERM Arcus Amsterdam
Subject:	Automatic reply: Notification of Submission: Draft scoping Report Amsterdam WEFs, near Ermelo, Mpumalanga
Date:	Thursday, 22 August 2024 17:33:36

Good day, I am currently out of office and will be returning on 27/08. For urgent queries please contact the Office on 021 681 5400. I will be able to respond upon my return. Many Thanks!

This e-mail and any attachments may contain proprietary, confidential and/or privileged information. No confidentiality or privilege is waived or lost by any transmission errors. This communication is intended solely for the intended recipient, and if you are not the intended recipient, please notify the sender immediately, delete it from your system and do not copy, distribute, disclose, or otherwise act upon any part of this email communication or its attachments. To find out how the ERM Group manages personal data please review our Privacy Policy

From: Craig Barnes, Vodacom
To: ERM Arcus Amsterdam
Subject: Automatic reply: Notification of Submission: Draft scoping Report Amsterdam WEFs, near Ermelo, Mpumalanga
Date: Thursday, 22 August 2024 17:33:52

You don't often get email from craig.barnes@vodacom.co.za. Learn why this is important

EXTERNAL MESSAGE

I am on sick leave. Please expect delays in email reponses.

From: Sindy Mbuyane
To: ERM Arcus Amsterdam
Cc: Gavin Cowden; Robyn Luyt; "Mervyn Lotter"
Subject: Re: Notification of Submission: Draft scoping Report Amsterdam WEFs, near Ermelo, Mpumalanga
Date: Friday, 23 August 2024 12:58:08
Attachments: IMAGE.png

EXTERNAL MESSAGE

Good day Stephanie,

Thank you for the resubmission notification.
Are the reports submitted to our Office the updated versions or we need to await submission of the updates before considering receipt of such reports? I recall an email by Lloyd that there will be updates on the reports.

Kind Regards,
SIndi

This message and any attachments relating to official business of the Mpumalanga Provincial Government (MPG) is proprietary to the MPG and intended for the original addressee only. The message may contain information that is confidential and subject to legal privilege. Any views expressed in this message are those of the individual sender. If you receive this message in error, please notify the original sender immediately and destroy the original message. If you are not the intended recipient of this message, you are hereby notified that you must not disseminate, copy, use, distribute, or take any action in connection therewith. The MPG cannot insure that the integrity of this communication has been maintained, nor that it is free of errors, viruses, interception and / or interference. The MPG is not liable whatsoever for loss or damage resulting from the opening of this message and / or attachments and / or the use of the information contained in this message and / or attachments.
>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 2024/08/22 5:31 PM >>>
RESUBMISSION OF DRAFT SCOPING REPORT FOR THE WIND ENERGY FACILITY (SHEEPMOOR, ROCHDALE AND EMVELO) CLUSTER

Dear Interested and Affected Party,

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

The previous applications for these proposed projects have been withdrawn to allow for an additional comment period for all I&AP's. Please note that all comments received during the previous comment period will still be incorporated in the comments and responses for these new applications. Should you wish to confirm that your comment is being incorporated, please feel free to email us.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30 day comment period from 22 August to 21 September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final Scoping Report.

More information on how you are able to participate in this process is attached in the above documentation.
Please indicate which application your comment in respect of.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM

Sustainability is our business



From:	ERM Arcus Amsterdam
To:	Sindy Mbuyane; ERM Arcus Amsterdam
Cc:	Gavin Cowden; Robyn Luyt; "Mervyn Lotter"; Lloyd Barnes; Stephanie Gopaul; Lucien Barbeau; Andrew Pearson; Gail Wheeler
Subject:	RE: Notification of Submission: Draft scoping Report Amsterdam WEFs, near Ermelo, Mpumalanga
Date:	Friday, 23 August 2024 13:22:02
Attachments:	image001.png image002.png

Good day Sindy,

Thank you for your query.

The report content of the versions you have has not changed with the resubmission, other than the amendment of the dates of public participation (PP), and thus the versions you have can be used to confirm receipt if you are happy to do so. Additional copies of the reports (including the amended dates for PP) have been couriered to you and should be with you soon.

Please let me know if you have any queries regarding the above.

Kind regards,

ERM
Sustainability is our business

Stephen Burton
Principal Consultant: Ecology and Biodiversity Pr. Sci.Nat.
He/Him/His

Ground Floor, Building 27, The woodlands Office Park, Woodlands Drive, Woodmead, 2148, Johannesburg, South Africa
[redacted]

erm.com

If I am sending this email outside of regular working hours, it is because it suits my schedule, but I don't expect you to read, respond or action it outside of your regular hours.

From: Sindy Mbuyane <mbuyanesb@mpg.gov.za>
Sent: Friday, August 23, 2024 12:58 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Gavin Cowden <GCowden@mpg.gov.za>; Robyn Luyt <RLuyt@mpg.gov.za>; 'Mervyn Lotter' <Mervyn.Lotter@mtpa.co.za>
Subject: Re: Notification of Submission: Draft scoping Report Amsterdam WEFs, near Ermelo, Mpumalanga

EXTERNAL MESSAGE

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Kind Regards,

SIndi

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>>> "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com> 2024/08/22 5:31 PM >>>

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM

Sustainability is our business



From: Aviation Environmental Compliance
To: ERM Arcus Amsterdam
Cc: Nrateng Mashiloane
Subject: RE: Notification of Submission: Draft scoping Report Amsterdam WEFs, near Ermelo, Mpumalanga
Date: Monday, 26 August 2024 09:11:00
Attachments: image003.png
image004.png
image005.png
image006.png
image007.png
image008.png
image010.png

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EXTERNAL MESSAGE

Good day,

I hope this email finds you well. Kindly note that the SACAA has transferred all obstacle assessments and applications responsibilities to Air Traffic and Navigation Services (ATNS) as published on the SACAA website: www.caa.co.za/industryinformation/obstacles/ . A formal application must be lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted. The list and contact details of the approved obstacles assessment services providers can be obtained from the CAA website: www.caa.co.za.

Kind regards,

Pamela Madondo
Environment Compliance Specialist
Aviation Environmental Protection
[redacted]

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www.caa.co.za SACAA @OfficialSACAA OfficialSACAA South African Civil Aviation Authority – SACAA

Report fraud and corruption: 0800 204 911 | sacaa@thehotline.co.za | SMS: 30916

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, August 22, 2024 5:32 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft scoping Report Amsterdam WEFs, near Ermelo, Mpumalanga

"This message was sent from outside of SACAA. Please use caution when opening links and/ or attachments"

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

Dear Interested and Affected Party,

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Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30 day comment period from 22 August to 21 September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final Scoping Report.

More information on how you are able to participate in this process is attached in the above documentation.
Please indicate which application your comment in respect of.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM

Sustainability is our business



From: BC Admin
To: ERM Arcus Amsterdam
Subject: RE: Notification of Submission: Draft scoping Report Amsterdam WEFs, near Ermelo, Mpumalanga
Date: Monday, 26 August 2024 10:18:35
Attachments: image003.png
image001.png

You don't often get email from bcadmin@dffe.gov.za. Learn why this is important

EXTERNAL MESSAGE

Good morning

Kindly note that our comments still stands.



Tebego Kgaphola

Directorate: Biodiversity Mainstreaming and EIA
Branch: Biodiversity and Conservation
473 Steve Biko Road | Private Bag X477 | Pretoria | [redacted]
Website:www.environment.gov.za



From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, 22 August 2024 17:32
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission: Draft scoping Report Amsterdam WEFs, near Ermelo, Mpumalanga

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

Dear Interested and Affected Party,

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The previous applications for these proposed projects have been withdrawn to allow for an additional comment period for all I&AP's. Please note that all comments received during the previous comment period will still be incorporated in the comments and responses for these new applications. Should you wish to confirm that your comment is being

incorporated, please feel free to email us.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of Environmental Affairs & Development Planning (DEA&DP) Guideline on Public Participation (2011). The reports will be available for a 30 day comment period from 22 August to 21 September 2024.

Please ensure that you have submitted your comment before the close of the comment period should you wish to have your input considered in the submission of the Final Scoping Report.

More information on how you are able to participate in this process is attached in the above documentation.
Please indicate which application your comment in respect of.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM

Sustainability is our business



From:	Salome Mambane
To:	ERM Arcus Amsterdam; Stephanie Gopaul
Cc:	EIAadmin; Andrew Pearson; goxaba@mpg.gov.za; complaints@msukaligwa.gov.za; Bathandwa Ncube
Subject:	14/12/16/3/3/2/2611
Date:	Monday, 26 August 2024 11:48:59

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EXTERNAL MESSAGE

Dear Sir/Madam

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

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

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

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

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

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

Kind Regards,
Salome Mambane
Integrated Environmental Authorisations:
Priority Infrastructure Developments
[redacted]

From:	Salome Mambane
To:	ERM Arcus Amsterdam; Stephanie Gopaul
Cc:	EIAadmin; Andrew Pearson; goxaba@mpg.gov.za; complaints@msukaligwa.gov.za; Bathandwa Ncube
Subject:	14/12/16/3/3/2/2612
Date:	Monday, 26 August 2024 12:00:20

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EXTERNAL MESSAGE

Dear Sir/Madam

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

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

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

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

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

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

Kind Regards,
Salome Mambane
Integrated Environmental Authorisations:
Priority Infrastructure Developments
[redacted]

From:	Salome Mambane
To:	Stephanie Gopaul; ERM Arcus Amsterdam
Cc:	EIAadmin; Andrew Pearson; goxaba@mpg.gov.za; complaints@msukaligwa.gov.za; Bathandwa Ncube
Subject:	14/12/16/3/3/2/2613
Date:	Monday, 26 August 2024 12:13:16

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EXTERNAL MESSAGE

Dear Sir/Madam

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

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

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

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

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

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

Kind Regards,
Salome Mambane
Integrated Environmental Authorisations:
Priority Infrastructure Developments
[redacted]

From: Mpilo Masondo
To: ERM Arcus Amsterdam
Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Amsterdam WEFs, near Ermelo, Mpumalanga
Date: Monday, 02 September 2024 21:58:17

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EXTERNAL MESSAGE

Good day,

Please could you send the kmz files of the proposed projects to see whether any of our current or future projects will be affected.

Regards,
Mpilo

Disclaimer

NB: This Email and its contents are subject to the NTCSA EMAIL LEGAL NOTICE which can be viewed here.

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, 22 August 2024 17:33
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Amsterdam WEFs, near Ermelo, Mpumalanga

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

Dear Interested and Affected Party,

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The previous applications for these proposed projects have been withdrawn to allow for an additional comment period for all I&AP's. Please note that all comments received during the previous comment period will still be incorporated in the comments and responses for these new applications. Should you wish to confirm that your comment is being incorporated, please feel free to email us.

Public Participation Process (PPP), which is being undertaken in accordance with the requirements of Section 24 (5) and Chapter 6 (41, 42, 43, and 44) of GN R. 326 of the NEMA, 1998 EIA Regulations, 2014 (as amended) and the Western Cape Department of

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Please indicate which application your comment in respect of.

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

Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

ERM

Sustainability is our business



From:	ERM Arcus Amsterdam
To:	Mpilo Masondo; ERM Arcus Amsterdam
Subject:	RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Amsterdam WEFs, near Ermelo, Mpumalanga
Date:	Tuesday, 03 September 2024 09:56:47
Attachments:	image001.png Amsterdam (2023-08-16).kmz

Good day,

Please see attached KMZ files as requested.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town
+27105963488

erm.com

From: Mpilo Masondo <MasondMM@ntcsa.co.za>
Sent: Monday, September 2, 2024 9:58 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Amsterdam WEFs, near Ermelo, Mpumalanga

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Regards,
Mpilo

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From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, 22 August 2024 17:33

To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Amsterdam WEFs, near Ermelo, Mpumalanga

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

From:	ERM Arcus Amsterdam
To:	Mpilo Masondo; ERM Arcus Amsterdam
Subject:	RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Amsterdam WEFs, near Ermelo, Mpumalanga
Date:	Tuesday, 03 September 2024 09:55:00
Attachments:	image001.png Amsterdam (2023-08-16).kmz

Good day,

Please see attached KMZ files as requested.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: Mpilo Masondo <MasondMM@ntcsa.co.za>
Sent: Monday, September 2, 2024 9:58 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Amsterdam WEFs, near Ermelo, Mpumalanga

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Sent: Thursday, 22 August 2024 17:33

To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: [CAUTION:EXTERNAL EMAIL] Notification of Submission: Draft scoping Report Amsterdam WEFs, near Ermelo, Mpumalanga

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Thank you and regards,

Stephanie Gopaul

Environmental Assessment Practitioner

From: Josua Meyer
To: ERM Arcus Amsterdam
Subject: Re: VOORGESTELDE ERMELO WINDPLASE
Date: Tuesday, 10 September 2024 20:22:03
Attachments: image001.png

EXTERNAL MESSAGE

Dankie vir uit maar EIENDOM GRENSE word nie getoon nie.
Uitleg dus nutteloos aangesien grense noodsaaklik is om enige kommentaar te lewer voor periode daarvoor verstryk (20/9/24)
VERSOEK DUS DRINGEND UITLEG WAT EIENDOM GRENSE EN PAAIE DUIDELIK TOON
Vertrou op u spoedige reaksie
By voorbaat dank

On Tue, Aug 6, 2024 at 9:45 AM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Good day,
>
> Kindly see attached Layout of Proposed WEF's. Additional information on the project can be found in the link below:
>
> https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/
>
> Kind Regards,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town
+[redacted]

erm.com

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Thursday, August 1, 2024 9:06 PM
To: ERM Arcus Amsterdam <erm.arcusamsterdam@erm.com>
Subject: VOORGESTELDE ERMELO WINDPLASE

You don't often get email from meyerjosua55@gmail.com. Learn why this is important

EXTERNAL MESSAGE

Plasing, groottes van turbines onduidelik

Versoek duidelike kaart waar turbines geplaas gaan word. Eiendom grense en distrikspaaie moet duidelik getoon word.

From: Josua Meyer
To: ERM Arcus Amsterdam
Subject: Re: SHEEPMOOR, EMVELO WIND ENERGIE PROJEKTE
Date: Tuesday, 10 September 2024 20:29:05
Attachments: image001.png

EXTERNAL MESSAGE

Het ongelukkig nie toegang tot Aida nie
Kan u vorm asb aanstuur
Wys u egter daarop dat as aangrensende eienaar aan u beoogde ontwikkeling registrasie outomaties deur u ontwikkelaar gedoen moet word.
Graag verneem ek of sodanige registrasie wel gedoen is aangesien nog geen korrespondensie in die verband ontvang is nie
Vertrou op spoedige en gunstige reaksie op bogemelde

On Tue, Aug 6, 2024 at 12:09 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Good day,
>
> Thank you for your comment, you will now be added to the I&AP database.
>
> Below is a link to the Aida form, there will be no need to register in order to fill out the form:
>
> https://mulilowef.aidaform.com/public-participation-form
>
> Thank you,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town
+[redacted]

erm.com

From: Josua Meyer <meyerjosua55@gmail.com>
Sent: Tuesday, July 30, 2024 11:00 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Fwd: SHEEPMOOR, EMVELO WIND ENERGIE PROJEKTE

You don't often get email from meyerjosua55@gmail.com. Learn why this is important

EXTERNAL MESSAGE

---------- Forwarded message ---------
From: Josua Meyer <meyerjosua55@gmail.com>
Date: Tue, Jul 30, 2024 at 10:59 AM
Subject: SHEEPMOOR, EMVELO WIND ENERGIE PROJEKTE
To: <lucien.barbeau@erm.com>

VERSOEK VORM OM TE REGISTREER AS BELANGHEBBENDE PARTY OP BOGEMELDE PROJEKTE sodat kommentaar gelewer kan word.

Het nie rekening op aida om aanlyn te registreer nie en die foon nommer 011-798 5400 is foutief.

Waardeer

Josua Meyer

[redacted]

From:	Robyn Luyt
To:	Gavin Cowden; frans.krige@mtpa.co.za; Andrew Pearson; khma@mulilo.com; Lloyd Barnes
Cc:	ERM Arcus Amsterdam; Lucien Barbeau; Stephen Burton; albert.froneman@gmail.com; Clifford Kubheka; Sindy Mbuyane; Okwethu Fakude; Florah.Lekaka@mtpa.co.za; mervyn@mtpa.co.za; Mixo.hlatshwayo@mtpa.co.za; rockey.nkosi@mtpa.co.za
Subject:	Attendance Register | Mulilo Renewable Energies engagement
Date:	Wednesday, 11 September 2024 14:52:58
Attachments:	Mulilo Amsterdam WEF_Attendance Register_11Sep2024.pdf

EXTERNAL MESSAGE

Good afternoon everyone,

Herewith the attendance register of physical attendees at today's meeting for your records.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
Nelspruit, 1200
[redacted]

>>> Lloyd Barnes 09/09/24 11:48 AM >>>

Microsoft Teams Need help?

Join the meeting now

Meeting ID: 322 541 047 894

Passcode: MwqPTG

Dial in by phone

[redacted] Denmark, All locations

Find a local number

Phone conference ID: 790 267 687#

For organizers: Meeting options | Reset dial-in PIN

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agriculture, rural development, land & environmental affairs
MPUMALANGA PROVINCE
REPUBLIC OF SOUTH AFRICA

MPUMALANGA
THE PLACE OF THE RISING SUN

ATTENDANCE REGISTER:
DEPARTMENT OF AGRICULTURE, RURAL DEV, LAND AND ENVIROMENTAL AFFAIRS

A.MEETING DETAILS:

Name of Meeting	MULILO WEF MEETING
District	
Venue	2ND FLOOR, CYCAD BOARDROOM
Date/Time	11 SEPTEMBER 2024
Meeting No	

B.SUMMARY OF PARTICIPATION

	GENDER		AGE				POPULATION					PWDs		PARTICIPANTS	FACILITATOR
	MALE	FEMALE	0-18	19-35	36-59	60+	African	Coloured	Asian	White		Yes	No		
TOTAL															

R. Luyt
INITIAL &SURNAME OF PROGRAMME MANAGER/FACILITATOR

SIGNATURE

11/09/2024
DATE

MULILO WEF MEETING
2ND FLOOR, CYCAD BOARDROOM
11 SEPTEMBER 2024

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NAME & SURNAME	ORGANIZATION	CONTACT	E-MAIL	GENDER		AGE			RACE				PWDs		SIGNATURE
				MALE	FEMALE	19-35	36-59	60+	AFRICAN	COLOURED	ASIAN	WHITE	YES	NO	
1. Robyn Luyt	Dardlea EIM	[redacted]	[redacted]		✓		✓					✓		✓	
2. GAVIN COWDEN	DAEDLEA(EPPC)	[redacted]	[redacted]	✓			✓		✓			✓	✓	✓	
3. Floran Lekaka	MTPA	[redacted]	[redacted]		✓	✓			✓					✓	
4. Mixo Hlatshwayo	MTPA	[redacted]	[redacted] @mtpa.co.za		✓	✓			✓					✓	
5. Rockey Nkosi	MTPA	[redacted]	[redacted] Mtpa.co.za	✓		✓			✓					✓	
6. Meroyn Lotter	MTPA	[redacted]	[redacted]	✓			✓					✓			
7. [redacted]	MTPA	[redacted]	[redacted]	✓				✓	✓					✓	
8. Sindisiwe Mbuyane	DARDLEA: EIM	[redacted]	[redacted] mps.gov.za		✓		✓		✓					✓	
9. Lloyd Barnes	Mulilo	[redacted]	[redacted]	✓		✓						✓		✓	
10. CLIFFORD KUBHEKA	DARDLEA	[redacted]	[redacted]	✓		✓			✓					✓	
11. Okwethu Fatude	DARDLEA	[redacted]	[redacted]		✓		✓		✓					✓	

MULILO WEF MEETING
2ND FLOOR, CYCAD BOARDROOM
11 SEPTEMBER 2024

From: Khanyisile Mabunda
To: ERM Arcus Amsterdam
Subject: Automatic reply: Mulilo Sheepmoor, Rochdale and Emvelo EIA Phase Methodology
Date: Wednesday, 11 September 2024 15:28:30

EXTERNAL MESSAGE

Good day,
Thank you for your email.

Kindly note that I am out of office and unavailable until 16 September 2024.
I will respond to correspondence upon my return.

Best Regards,
Khanyisile.
CONFIDENTIALITY AND DATA PROTECTION. This email is intended only for the use of the intended recipient(s) and may contain information which is privileged and confidential, or personal data which is subject to data protection legislation. If you are not the intended recipient, any disclosure, copying and/or distribution of the content of this email, or reliance upon or other use of the contents of this email is strictly prohibited. If you have received this email in error, please erase all copies of it, including all attachments, do not forward it to anybody, and please also notify the sender immediately.

From:	ERM Arcus Amsterdam
To:	Gavin Cowden; frans.krige@mtpa.co.za; Andrew Pearson; khma@mulilo.com; Lloyd Barnes; Robyn Luyt
Cc:	ERM Arcus Amsterdam; Stephen Burton; albert.froneman@gmail.com; Clifford Kubheka; Sindy Mbuyane; Okwethu Fakude; Florah.Lekaka@mtpa.co.za; mervyn@mtpa.co.za; Mixo.hlatshwayo@mtpa.co.za; rockey.nkosi@mtpa.co.za; Sindy Mbuyane
Subject:	Mulilo Sheepmoor, Rochdale and Emvelo EIA Phase Methodology
Date:	Wednesday, 11 September 2024 15:28:50
Attachments:	image001.png EIA Phase_Methodology.docx

Good day,

Kindly see attached Impact Assessment Phase Methodology as requested.

Thank you,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town
+27105963488

erm.com



1 IMPACT ASSESSMENT METHODOLOGY

The purpose of the assessment of impacts in an EIA is to evaluate the likely extent and overall significance that a potential impact may have on an identified receptor or resource. Another important aspect of the assessment of impacts is to quantify those impacts that are not scientific-based or evidence-based and include the opinions of others (i.e., the involvement and comment from I&APs).

A successful assessment of the potential significance of impacts will include the description and development of measures that will be taken to avoid, minimise or compensate for any adverse environmental impacts, to enhance positive impacts, and to report the significance of residual impacts that occur following mitigation.

A 7-step approach for the determination of significance of potential impacts was developed by ERM to align with the requirements of Appendix 3 of the EIA Regulations, 2014 (as amended). The approach is both objective and scientific based to allow appointed specialists and EAPs to retain independence throughout the assessment process.

ERM has adapted this 7-step approach from standard ranking metrics such as the Hacking Method, Crawford Method etc. The ERM 7-step approach complies with the method provided in the EIA guideline document (GN 654 of 2010) and considers international EIA Regulatory reporting standards such as the newly amended European Environmental Impact Assessment (EIA) Directive (2014/52/EU).

The 7-Step approach for determining the significance of impacts pre, and post mitigation, is described below:

- **Step 1:** Predict potential impacts by means of an appraisal of:
    - Site Surveys,
    - Project-related components and infrastructure,
    - Activities related with the project life-cycle,
    - The nature and profile of the receiving environment and potential sensitive environmental features and attributes,
    - Input received during public participation from all stakeholders, and
    - The relevant legal framework applicable to the proposed development
- **Step 2**: Determination of whether the potential impacts identified in **Step 1** will be *direct* (caused by construction, operation, decommissioning or maintenance activities on the proposed development site or immediate surroundings of the site), *indirect* (not immediately observable or do not occur on the proposed development site or immediate surroundings of the site), *residual* (those impacts which remain after post mitigation) and *cumulative* (the combined impact of the project when considered in conjunction with similar projects in proximity).
- **Step 3:** Description and determination of the significance of the predicted impacts in terms of the criteria below to ensure a consistent and systematic basis for the decision-making process. Significance is numerically quantified on the basis score of the following impact parameters:
    1. *Extent* **(E)** of the impact: The geographical extent of the impact on a given environmental receptor.
    2. *Duration* **(D)** of the impact: The length of permanence of the impact on the environmental receptor.
    3. *Reversibility* **(R) of the impact**: The ability of the environmental receptor to rehabilitate or restore after the activity has caused environmental change

4. *Magnitude* **(M)** of the impact: The degree of alteration of the affected environmental receptor.
5. *Probability* **(P)** of the impact: The likelihood of the impact actually occurring.

A widely accepted numerical quantification of significance is the formula:

S=(E+D+R+M)*P

Where: *Significance=(Extent+Duration+Reversibility+Magnitude) * Probability*

The following has also been considered when determining the significance of a potential impact.

6. **Nature (N)** of the impact: A description of what causes the effect, what will be affected, and how it will be affected.
7. **Status (S)** of the impact: described as either positive, negative or neutral
8. **Cumulative impacts**.
9. Inclusion of **Public comment.**

The significance of environmental impacts is determined and ranked by considering the criteria presented in **Table 1** below. All criteria are rank according to 'Very Low', 'Low', 'Moderate', 'High' and 'Very High' and are assigned scores of 1 to 5 respectively.

Table 1: Defining the significant in terms of the impact criteria.

Impact Criteria	Definition	Score	Criteria Description
Extent (E)	Site	1	Impact is on the site only
	Local	2	Impact is localized inside the activity area
	Regional	3	Impact is localized outside the activity area
	National	4	Widespread impact beyond site boundary. May be defined in various ways, e.g. cadastral, catchment, topographic
	International	5	Impact widespread far beyond site boundary. Nationally or beyond
Duration (D)	Immediate	1	On impact only
	Short term	2	Quickly reversible, less than project life. Usually up to 5 years.
	Medium term	3	Reversible over time. Usually between 5 and 15 years.
	Long term	4	Longer than 10 years. Usually for the project life.
	Permanent	5	Indefinite
Magnitude (M)	Very Low	1	No impact on processes
	Low	2	Qualitative: Minor deterioration, nuisance or irritation, minor change in species/habitat/diversity or resource, no or very little quality deterioration. Quantitative: No measurable change; Recommended level will never be exceeded.
	Moderate	3	Qualitative: Moderate deterioration, discomfort, Partial loss of habitat /biodiversity /resource or slight or alteration. Quantitative: Measurable deterioration; Recommended level will occasionally be exceeded.

Impact Criteria	Definition	Score	Criteria Description
	High	4	Qualitative: Substantial deterioration death, illness or injury, loss of habitat /diversity or resource, severe alteration or disturbance of important processes. Quantitative: Measurable deterioration; Recommended level will often be exceeded(e.g. pollution)
	Very High	5	Permanent cessation of processes
Reversibility (R)	Reversible	1	Recovery which does not require rehabilitation and/or mitigation.
	Recoverable	3	Recovery which does require rehabilitation and/or mitigation.
	Irreversible	5	Not possible, despite action. The impact will still persist, and no mitigation will remedy or reverse the impact.
Probability (P)	Improbable	1	Not likely at all. No known risk or vulnerability to natural or induced hazards
	Low Probability	2	Unlikely; low likelihood; Seldom; low risk or vulnerability to natural or induced hazards
	Probable	3	Possible, distinct possibility, frequent; medium risk or vulnerability to natural or induced hazards.
	Highly Probable	4	Highly likely that there will be a continuous impact. High risk or vulnerability to natural or induced hazards
	Definite	5	Definite, regardless of prevention measures.

The *significance* (s) of potential impacts identified according to the criteria above has been colour coded for the purpose of comparison. This colour coding will be used in impact tables.

Significance is deemed Negative (-)			Significance is deemed Positive (+)		
0 - 30	**31 - 60**	**61 - 100**	**0 - 30**	**31 - 60**	**61 - 100**
Low	**Moderate**	**High**	**Low**	**Moderate**	**High**

- **Step 4:** Determination of practical and reasonable mitigation measures based on specialists' inputs and field observations following the mitigation hierarchy (avoid, minimise, manage, mitigate, or rehabilitate).

- **Step 5:** Evaluation of predicted residual impacts after implementation of mitigation measures.

- **Step 6:** Determination of the significance of the impact taking into consideration the predicted residual impacts after implementation of mitigation measures.

- **Step 7:** Based on an acceptable significance of the impact, determination of the need and desirability of the proposed development and an opinion as to whether the development should proceed or not.

The Assessment of the significance of potential impacts is then populated in an Impact Summary Table.

2 IMPACT SUMMARY TABLE

Please copy the below table into your reports for any impact assessments required.

Impact Phase: Detail if the impact will take place during Construction/ Operation/Decommissioning					
Nature of the impact: Name of impact					
Description of Impact: Detailed description of impact xxxx …					
Impact Status: Detail of the impact is Positive, Neutral or Negative					
	E	**D**	**R**	**M**	**P**
Without Mitigation	Local	Medium Term	x	x	x
Score	2	3	x	x	x
With Mitigation	Site	Short Term	x	x	x
Score	1	2	x	x	x
Significance Calculation	**Without Mitigation**		**With Mitigation**		
S=(E+D+R+M)*P	Moderate Negative Impact (42)		Low Negative Impact (25)		
Was public comment received?	YES/NO. If yes, provide a bullet summary of main concerns.				
Has public comment been included in mitigation measures?	YES/NO, if NO then WHY? If YES then HOW/WHERE				
Mitigation measures to reduce residual risk or enhance opportunities: *List and describe* *Aaa* *Aaa* *Aaa* *Aaa* *Aaaa* …					
Residual impact	*Describe the impact.*				

3 ASSESSMENT OF CUMULATIVE IMPACTS

In relation to an activity, cumulative impact means *"the past, current and reasonably foreseeable future impact of an activity, considered together with the impact of activities associated with that activity, that in itself may not be significant, but may be significant when added to the existing and reasonably foreseeable impacts eventuating from similar or diverse activities"* (NEMA EIA Reg GN R982 of 2014).

Specialists are required to assess cumulative impacts associated with similar developments within a 35 km radius of the proposed developments. The purpose of the cumulative assessment is to test if such impacts are relevant to the proposed developments in the proposed locations (i.e. whether the addition of the proposed project in the area will increase the impact). In this regard, specialist studies considered whether the construction of the proposed development will result in:

- Unacceptable risk
- Unacceptable loss
- Complete or whole-scale changes to the environment or sense of place
- Unacceptable increase in impact

Cumulative Impacts will be assessed and populate in a cumulative impact summary table.

Please copy the below table into your reports for any impact assessments required.

Cumulative Impact: Name of impact					
Description of Cumulative Impact: Detailed description of cumulative impact xxxx …					
Impact Status: Detail of the impact is Positive, Neutral or Negative					
	E	**D**	**R**	**M**	**P**
Without Enhancement	Local	Medium Term	x	x	x
Score	2	3	x	x	x
With Enhancement	Site	Short Term	x	x	x
Score	1	2	x	x	x
Significance Calculation	**Without Enhancement**		**With Enhancement**		
S=(E+D+R+M)*P	Moderate Negative Impact (42)		Low Negative Impact (25)		
Can Impacts be Enhanced?	YES/NO and HOW/WHY				
Enhancement: *List and describe* *Aaa* *Aaa* *Aaa* *Aaa* *Aaaa* …					
Residual impact	*Describe the impact.*				

What's your name?

First Name

Last Name

Who do you represent?

Organisation

Designation

Your Email

Your Phone Number

Alternative Phone Number

Your Address

Street Address

Street Address Line 2

City

State/Province

Zip Code

Country

What is your interest in the projects?

Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website?

Please copy and paste the link onto a browser (https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/)

- ○ Yes
- ○ No

What are your comments regarding the Rochdale, Emvelo and Sheepmoor WEF Cluster?

Protection of Personal Information (POPI) Act, Act 4 of 2013

Do you consent to your information being published in the public domain, and being used as part of the Public Participation Process?

- ○ Yes
- ○ No

Report abuse

Form Creator

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From: Ryan David-Andersen
To: ERM Arcus Amsterdam
Subject: Registration as I&AP for Mpumalanga Projects
Date: Friday, 13 September 2024 08:24:04
Attachments: image001.png

> You don't often get email from ryan@amdadevelopments.co.za. Learn why this is important

EXTERNAL MESSAGE

Dear ERM

Please may you register my details in signature below for any Mpumalanga projects - including Amsterdam - we are developing a wind farm near Ermelo named Zephyr.

Thanks very much

Ryan David-Andersen
Senior Development Manager
AMDA Developments (Pty) Ltd

[redacted]

AMDA developments

302E Sunclare
[redacted]
PO Box 2681, Cape Town, 8000

From: ERM Arcus Amsterdam
To: Ryan David-Andersen; ERM Arcus Amsterdam
Subject: RE: Registration as I&AP for Mpumalanga Projects
Date: Friday, 13 September 2024 10:12:58
Attachments: image002.png
image003.png

Good day Ryan,

Thank you for reaching out, your details will be captured.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: Ryan David-Andersen <ryan@amdadevelopments.co.za>
Sent: Friday, September 13, 2024 8:24 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Registration as I&AP for Mpumalanga Projects

You don't often get email from ryan@amdadevelopments.co.za. Learn why this is important

EXTERNAL MESSAGE

Dear ERM

Please may you register my details in signature below for any Mpumalanga projects - including Amsterdam - we are developing a wind farm near Ermelo named Zephyr.

Thanks very much

Ryan David-Andersen
Senior Development Manager
AMDA Developments (Pty) Ltd

[redacted]

AMDA
developments

302E Sunclare
[redacted]

PO Box 2681, Cape Town, 8000

From:	Robyn Luyt
To:	ERM Arcus Amsterdam
Cc:	energy@birdlife.org.za; cagenbach@dffe.gov.za; MEMorudu@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za; Tebogom@gsibande.gov.za; Gavin Cowden; Clifford Kubheka; Sindy Mbuyane; frans.krige@mtpa.co.za; mervyn@mtpa.co.za; Lloyd Barnes
Subject:	SR Comments | Emvelo WEF Amsterdam Cluster
Date:	Tuesday, 17 September 2024 14:43:31
Attachments:	Comments SR_Emvelo WEF_5G-30.pdf
Importance:	High

EXTERNAL MESSAGE

Dear Stephanie,

Please find herewith DARDLEAs comments on the draft Scoping Report for the Emvelo WEF and Grid Connection.

Comments for Sheepmoor and Rochdale to follow.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
[redacted]

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REPUBLIC OF SOUTH AFRICA

13 De Jager Street, Ermelo, 2350, Private Bag X 2777, Ermelo, 2350
Tel: +27 (013) 004 0766

LitikoLetekulima, Kutfutfukiswa KwetindzawoTasemakhaya, Temhlaba Netesimondzawo

Departement van Landbou, LandelikeOntwikkeling, GrondenOngewing Sake

umNyangoweZelimo UkuThuthukiswakweeNdawozemaKhaya, iNarhaneeNdabazeBhoduluko

Enquiries : **R. Luyt / O. Fakude**
Telephone : **(013) 004 1099**
Reference : **1/3/1/16/5G-30**

Stephanie Gopaul
ERM Southern Africa (Pty) Ltd
240 Main Road
Rondebosch
7700

Email: ERM.ArcusAmsterdam@erm.com

Dear Madam,

DRAFT SCOPING REPORT: ACTIVITIES ASSOCIATED WITH THE EMVELO WIND ENERGY FACILITY AND ASSOCIATED GRID CONNECTION ON VARIOUS PORTIONS OF THE FARMS SCHIEDAM 274 IT, VAALBANK 285 IT, WAALHOEK 286 IT, KLIPFONTEIN 283 IT, BOSJESSPRUIT 291 IT, ONVERWACHT 273 IT, ZWARTWATER 288 IT, WELTEVREDEN 289 IT, WITPUT AND MOOIPLAATS 290 IT AND CAMDEN POWER STATION 329 IT, ERMELO, MSUKALIGWA LOCAL MUNICIPALITY

The draft scoping report which was submitted by you in respect of the abovementioned application and received by the Department on 27 August 2024 has reference. The Department has considered the content of the report, and has the following comments:

1. The proposed Emvelo Wind Energy Facility and associated grid infrastructure is located in areas identified as CBA Irreplaceable and Optimal **(over 21%)**, Intact Grassland Patches **(33%)**, Key Biodiversity Areas **(21.4%)**, ESAs, Priority Focus Areas, Freshwater Ecosystem Priority Areas and Threatened Ecosystems (Endangered). Furthermore, 43% of the site falls within Grasslands SA020 Important Bird Area (IBA), and close to two other Important Bird Areas.
2. The proposed Emvelo WEF and associated grid connection is located in an area comprising a high diversity of threatened bird species, including the following confirmed on site: African Marsh Harrier (Regionally Endangered); Denham's Bustard (Globally Near Threatened, Regionally Vulnerable); Secretary bird (Globally Endangered, Regionally Vulnerable); White-bellied Bustard (Regionally Vulnerable), Blue Crane (Globally Vulnerable, Regionally Near Threatened); Grey Crowned Crane (Globally and Regionally Endangered); Martial Eagle (Globally and Regionally Endangered); Lanner Falcon (Regionally Vulnerable); Greater Flamingo (Regionally Near Threatened); Southern Bald Ibis (Regionally and Globally Vulnerable); Cape Vulture (Globally Vulnerable and Regionally Endangered); and Yellow-breasted Pipit (Regionally and Globally Vulnerable).
3. Furthermore, intact grassland patches make up a third of the site footprint. DARDLEA does not support the development of WEFs (or any non-compatible land use) within intact grassland patches. The MBSP specifically incorporated climate change into spatial priorities through the prioritisation of the connectivity of remaining intact grassland patches in the province, as they provide habitat for species to thrive, and allow for their dispersal. Intact grasslands are crucial for supporting threatened avifauna.
4. DARDLEA is therefore concerned that the proposed location of the Emvelo Wind Energy Facility and associated grid infrastructure is not compatible with the desired land use. The WEF and all associated infrastructure is not a land use, in accordance with the Mpumalanga Biodiversity Sector Plan (MBSP), that will support the inherent biodiversity values of CBAs.

5. It is acknowledged that the layout plan in the draft Scoping Report is preliminary, and that you have confirmed that it will be revised further during the EIA phase to be informed by buffers and constraints provided by specialists. Such constraints identified to date include the location of turbines in areas identified in the Faunal Assessment as High Sensitivity and High Sensitivity Escarpment, the location of turbines and associated infrastructure in bat sensitive and bat no-go areas, the location of the laydown area in a sensitive aquatic feature, and the location of a number of turbines in avifaunal exclusion zones. It must be noted though that in addition to the exclusion zones identified in the specialist studies, a number of turbines as well as associated substation and laydown areas are still be located in Key Biodiversity Areas and IBAs (i.e. turbines 4, 8, 11, 18, 19, 22, 24, 26, 31, 33 and 35), Intact Grassland Patches (including turbines 1-6 9 and 13), and CBA Irreplaceable areas (12, 14, 16, 17, 29, 32 and 33) and CBA optimal areas (8, 18 and 19), which is very concerning.
6. We are concerned that cumulative impacts will not be dealt with adequately. While the Department of Fisheries, Forestry and the Environment has set a limit of 30km for the assessment of cumulative impacts, this should be viewed as a minimum requirement. Due to the extremely sensitive habitat within which all wind farms in the region have either been authorised or are currently in process, it is our view that all authorised and in-process wind farms in the Gert Sibande District should be included in the assessment of cumulative impacts. Currently, these include Ujekamanzi WEF 1, Ujekamanzi WEF 2, Ummbila Emoyeni WEF (authorised, and within 55km); Phefumula Emoyeni WEF (within 40km); Mukondeleli WEF (authorised), Zephyr WEF (within 30km), as well as Camden I and II, Sheepmoor WEF and Rochdale WEF. The cumulative assessment must, *inter alia*, identify the species and habitats most at risk of cumulative impacts, and identify key uncertainties. The definition of cumulative impacts as per the EIA Regulations is "the past, current and reasonably foreseeable future impact of an activity, considered together with the impact of activities associated with that activity, that in itself may not be significant, but may be significant when added to the existing and reasonably foreseeable impacts eventuating from similar or diverse activities". A comparative assessment of the impacts of this proposed facility, in relation to and in conjunction with, adjacent and surrounding renewable energy facilities should therefore be provided in the EIA Report.
7. Roads must be included in the draft layout plan, and must be incorporated in the impact analysis.
8. The plan of study for EIA must include and address the following:
   8.1 Terrestrial Biodiversity:
      - Intact Grassland Patches and Key Biodiversity Areas must be identified and considered in the analysis of impacts on terrestrial biodiversity.
      - Where infrastructure is to be developed in CBAs and Intact Grassland Patches, the impact of the loss of CBAs and intact grassland habitat in terms of metapopulation dynamics (i.e. how the loss of source areas will impact areas of low quality habitat that cannot support a population of species on its own) must be assessed.
      - The Site Ecological Importance methodology, as per the requirements of the Species Environmental Assessment Guidelines, must be demonstrated to have been applied.
      - The impact of the potential loss of ecological drivers on ecological processes must be analysed i.e. fire, which is an important driver for the maintenance of grassland biodiversity.
   8.2 Avifauna: DARDLEA supports the avifaunal specialists' recommendations to remove turbines from the "exclusion zones" identified during pre-construction monitoring. However, in the proposed re-assessment of the layout, the Avifaunal Assessment must consider and include the following:
      - The Birds and Wind-Energy Best-Practice Guidelines state that the duration of pre-construction monitoring should be extended (beyond 12 months) where there is a high risk of significant impacts on priority species. Sufficient evidence of high risk of significant impact on avifauna on site and within the Project Area of Influence exists to extend minimum pre-construction monitoring requirements to adequately assess impacts and determine appropriate mitigation measures. Where the layout of the proposed wind farm does not avoid all sensitive features, corridors and buffers (e.g. CBAs, intact grasslands patches, KBAs, pans and all waterbodies, and provide shaped buffers for such features), additional monitoring must be undertaken to

confirm the full spectrum of prevailing environmental conditions to ensure avoidance of significant impacts.

- Intact grassland patches are important habitat for foraging, and facilitate avifauna breeding and movement. Intact grassland patches must be considered and incorporated in the analysis of impact zones applicable to avifauna.
- Buffers for waterbodies / aquatic features – confirm the rationale in their determination and how their sizes (210m around drainage lines, and 110m around wetland no-go zones) were determined to be sufficient to account for movement of birds through the site, and protection of roosting areas and flight behaviours (approaching and leaving roost sites, foraging sites etc).
- DARDLEA is especially concerned that the site comprises habitat suitable for species with low detection probability, including the Globally Vulnerable Yellow-breasted Pipit, and Endangered Rudd's Lark, and the Critically Endangered Species 23. The precautionary principle must be applied in the undertaking of comprehensive habitat-based assessments in order to robustly delineate flyways and movement corridors for these species.
- Confirmation of compliance with vantage point requirements. Based on our viewshed analysis it appears that only 45-50% of the site is covered vs the required 75%, and that some turbines have been located outside of vantage point visibility.
- DARDLEAs position is that blade painting will be a non-negotiable, compulsory requirement for all authorised wind farms in the province, and Shut Down on Demand (SDoD) would be a compulsory adaptive management requirement. However, since neither of these measures are effective for night flying birds, which have been confirmed on and adjacent to the site, a separate operational impact analysis must be undertaken for "Mortality of priority night flying species due to collisions with the wind turbines".
- The night-flying greater flamingo was confirmed on site, and there is currently no known technology to mitigate for the collision of night flying birds.
- Due to the sensitivity of avifauna using the area, and the presence of pans and wetlands on and adjacent to the site, as well as the presence of night-flying birds, tracking data should be acquired to augment the 2D models used.
- Surveys and tracking should be undertaken to determine the collision risks for nocturnal species.
- A site-specific list of priority avifaunal species for wind farms for this particular region must be developed, which must include all wetland species (noting that the priority species list published by BirdLife South Africa in 2012 does not include most wetland species, and did not include Mpumalanga).
- Appropriate fatality thresholds (turbine collision, as well as power line collision and electrocution) need to be defined and agreed on **within and as part of the EIA process**, which must then be incorporated into the impact analysis.
- It is acknowledged that the Martial Eagle nest turbine no-go buffer is currently being investigated further with detailed modelling and additional survey work, to inform the final no-go area during the EIA phase. Latest available information from literature, specialists and BirdLife must be consulted during this exercise. This must include BirdLife's and EWT's recommendations of 5-6km buffer for Martial Eagle nests, noting however that Martial Eagles are known to have large breeding territories, and any buffer must be supported by the birds' actual use of an area.

8.3 Bat Assessment

- Appropriate fatality thresholds need to be defined and agreed on within the EIA process and incorporated in the impact analysis.
- Separate mitigation measures need to be considered in more detail for high-flying bat species (i.e. Egyptian Free-Tailed bat) and lower-level bat species (e.g. Cape Serotine) in the EIA, i.e. different turbine design, blade / rotor sweep size and height, should be investigated for the specific wind turbines located adjacent to areas where these different bat species occur.

8.4 Microclimate Impact Assessment

- Research has demonstrated that turbines can affect the conditions required for mist formation, and that wind farms warm the land surface, especially at night. Altered microclimates will affect the conditions that support the highveld grasslands. Biodiversity and agricultural potential will potentially be affected. A Microclimate Impact Assessment must be undertaken, which must inform the terrestrial biodiversity study as well as the Agricultural Assessment. The impact of this WEF on the micro-climate, in particular the potential impact on precipitation, soil moisture, soil temperature, etc. therefore also needs to be assessed as part of the EIA.

9. All relevant stakeholders, including but not limited to, BirdLife SA, Mpumalanga Tourism and Parks Agency (MTPA), Gert Sibande District Municipality (GSDM), Department of Agriculture, Land Reform and Rural Development (DALRRD), Department of Public Works, Roads and Transport (DPWRT), and Msukaligwa Local Municipality must be must be consulted and provided with an opportunity of at least 30 days to submit comments.
10. The public participation process must be demonstrated to have been conducted in accordance with Regulations 39 – 44 of the EIA Regulations, 2014 (as amended).
11. Please provide this Department with an opportunity to review and engage with your response to these comments prior to the submission the final scoping report.
12. We are concerned that the proposed development site is not suitable for the development of wind energy infrastructure, and do not support the layout in its current form.

Please do not hesitate to contact this office if there are any enquiries.

Sincerely,

MS. R. LUYT
DIRECTOR: ENVIRONMENTAL IMPACT MANAGEMENT
DATE: 17/09/2024

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From:	Robyn Luyt
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Cc:	energy@birdlife.org.za; cagenbach@dffe.gov.za; MEMorudu@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za; Tebogom@gsibande.gov.za; Gavin Cowden; Clifford Kubheka; Sindy Mbuyane; frans.krige@mtpa.co.za; mervyn@mtpa.co.za; Lloyd Barnes
Subject:	SR Comments | Rochdale WEF Amsterdam Cluster
Date:	Tuesday, 17 September 2024 14:46:30
Attachments:	Comments SR_Rochdale WEF 5G-29.pdf

EXTERNAL MESSAGE

Dear Stephanie,

Please find herewith DARDLEAs comments on the draft Scoping Report for the Rochdale WEF and Grid Connection.

Comments for Sheepmoor to follow.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
Nelspruit, 1200
[redacted]

>>> Robyn Luyt 09/17/24 2:42 PM >>>
Dear Stephanie,

Please find herewith DARDLEAs comments on the draft Scoping Report for the Emvelo WEF and Grid Connection.

Comments for Sheepmoor and Rochdale to follow.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
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Departement van Landbou, LandelikeOntwikkeling, GrondenOngewing Sake

umNyangoweZelimo UkuThuthukiswakweeNdawozemaKhaya, iNarhaneeNdabazeBhoduluko

Enquiries : **R. Luyt / C. Kubheka**
Telephone : **(013) 004 0766**
Reference : **1/3/1/16/5G-29**

Stephanie Gopaul
ERM Southern Africa (Pty) Ltd
240 Main Road
Rondebosch
7700

Email: ERM.ArcusAmsterdam@erm.com

Dear Madam,

DRAFT SCOPING REPORT: ACTIVITIES ASSOCIATED WITH THE ROCHDALE WIND ENERGY FACILITY AND ASSOCIATED GRID CONNECTION ON PORTIONS 1, 2 & 5 OF THE FARM SCHIMMELHOEK 272 IT, PORTIONS 3, 6, 7, 8 & 13 OF THE FARM ONVERWACHT 273 IT, PORTION 3 OF THE FARM ONVERWACHT 287 IT, PORTIONS 1, 2, 9 & 10 OF THE FARM ZWARTWATER 288 IT, PORTIONS 6, 10, 11 & RE/3 OF THE FARM WELTEVREDEN 289 IT, AND PORTION RE/7 OF THE FARM WITPUNT 267 IT, ERMELO, MSUKALIGWA LOCAL MUNICIPALITY

The draft scoping report which was submitted by you in respect of the abovementioned application and received by the Department on 27 August 2024 has reference. The Department has considered the content of the report, and has the following comments:

1. The proposed Rochdale Wind Energy Facility and associated grid infrastructure is located in areas identified as CBA Irreplaceable and Optimal **(over 66%)**, Intact Grassland Patches, Key Biodiversity Areas **(79.7%)**, ESAs, Priority Focus Areas, Freshwater Ecosystem Priority Areas and Threatened Ecosystems (Endangered), and the northern, southern, and western borders of the site fall close to three different Important Bird Areas.
2. The proposed development is within a 30km radius of four (4) nature reserves i.e. Ahlers, Langcarel, Josua Moolman, and Laughing Waters Private Nature Reserves. The Chrissiesmeer Protected Environment **is within 5km** of the proposed site.
3. The proposed Rochdale WEF and associated grid connection is located in an area comprising a high diversity of threatened bird species, including the following confirmed on site: African Marsh Harrier (Regionally Endangered), Denham's Bustard (Globally Near Threatened, Regionally Vulnerable), Secretarybird (Globally Endangered, Regionally Vulnerable), White-bellied Bustard (Regionally Vulnerable), Blue Crane (Globally Vulnerable, Regionally Near Threatened), Grey Crowned Crane (Globally and Regionally Endangered), Martial Eagle (Globally and Regionally Endangered), Lanner Falcon (Regionally Vulnerable), Greater Flamingo (Regionally Near Threatened), Southern Bald Ibis (Regionally and Globally Vulnerable), Cape Vulture (Globally Vulnerable and Regionally Endangered), and Yellow-breasted Pipit (Regionally and Globally Vulnerable).
4. DARDLEA is therefore concerned that the location of the Rochdale Wind Energy Facility and associated grid infrastructure is not compatible with the desired land use. The WEF and all associated infrastructure is not a land use, in accordance with the Mpumalanga Biodiversity Sector Plan (MBSP), that will support the inherent biodiversity values of CBAs.
5. Furthermore, **intact grassland patches** are located within the site footprint. DARDLEA does not support the development of WEFs (or any non-compatible land use) within intact grassland

patches. The MBSP specifically incorporated climate change into spatial priorities through the prioritisation of the connectivity of remaining intact grassland patches in the province, as they provide habitat for species to thrive, and allow for their dispersal. Intact grasslands are crucial for supporting threatened avifauna.

6. It is acknowledged that the layout plan in the draft Scoping Report is preliminary, and that you have confirmed that it will be revised further during the EIA phase to be informed by buffers and constraints provided by specialists. Such constraints identified in the specialist reports to date include: the laydown areas in bat sensitive areas; the location of the substation and O&M buildings in sensitive aquatic areas; and the location of all but 3 turbines in avifaunal exclusion zones. It must be noted though, that these 3 turbines are all still located in **Key Biodiversity Areas (KBAs)**, and one of them (WTG5) is in a CBA Irreplaceable area. Furthermore, all associated infrastructure (laydown areas, transmission lines, substation) is located in KBAs, and the laydown areas are in CBA Irreplaceable areas. The location of turbines and associated infrastructure in KBAs and CBA Irreplaceable areas is not supported.
7. We are concerned that cumulative impacts will not be dealt with adequately. While the Department of Fisheries, Forestry and the Environment has set a limit of 30km for the assessment of cumulative impacts, this should be viewed as a minimum requirement. Due to the extremely sensitive habitat within which all wind farms in the region have either been authorised or are currently in process, it is our view that all authorised and in-process wind farms in the Gert Sibande District should be included in the assessment of cumulative impacts. Currently these include Ujekamanzi WEF 1, Ujekamanzi WEF 2, Ummbila Emoyeni WEF (authorised, and within 55km); Phefumula Emoyeni WEF (within 40km); Zephyr WEF (within 30km), Mukondeleli WEF (authorised) as well as Camden I and II, Sheepmoor WEF and Emvelo WEF. The cumulative assessment must, *inter alia*, identify the species and habitats most at risk of cumulative impacts, and identify key uncertainties. The definition of cumulative impacts as per the EIA Regulations is "the past, current and reasonably foreseeable future impact of an activity, considered together with the impact of activities associated with that activity, that in itself may not be significant, but may be significant when added to the existing and reasonably foreseeable impacts eventuating from similar or diverse activities". A comparative assessment of the impacts of this proposed facility, in relation to and in conjunction with, adjacent and surrounding renewable energy facilities should therefore be provided in the EIA Report.
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shaped buffers for such features), additional monitoring must be undertaken to confirm the full spectrum of prevailing environmental conditions to ensure avoidance of significant impacts.

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10. All relevant stakeholders, including but not limited to, BirdLife SA, Mpumalanga Tourism and Parks Agency (MTPA), Gert Sibande District Municipality (GSDM), Department of Agriculture, Land Reform and Rural Development (DALRRD), Department of Public Works, Roads and Transport (DPWRT), and Msukaligwa Local Municipality must be must be consulted and provided with an opportunity of at least 30 days to submit comments.
11. The public participation process must be demonstrated to have been conducted in accordance with Regulations 39 – 44 of the EIA Regulations, 2014 (as amended).
12. Please provide this Department with an opportunity to review and engage with your response to these comments prior to the submission the final scoping report.
13. We are concerned that the proposed development site is not suitable for the development of wind energy infrastructure, and do not support the layout in its current form.

Please do not hesitate to contact this office if there are any enquiries.

Sincerely,

MS. R. LUYT
DIRECTOR: ENVIRONMENTAL IMPACT MANAGEMENT
DATE: 17/09/2024.

Cc: Mr L Barnes Lloyd@mulilo.com
Dr Mervyn Lotter mervyn.lotter@mtpa.co.za
Mr Frans Krige frans.krige@mtpa.co.za
Ms S Dlomo sdlomo@dffe.gov.za
Ms O Letlalo oletlalo@dffe.gov.za
Ms M Morudu memorudu@dffe.gov.za
Mr C Agenbach cagenbach@dffe.gov.za
Mr G Cowden gcowden@mpg.gov.za
Ms S Mbuyane mbuyanesb@mpg.gov.za
Ms T Mogakabe tebogom@gsibande.gov.za

From:	Robyn Luyt
To:	ERM Arcus Amsterdam
Cc:	energy@birdlife.org.za; cagenbach@dffe.gov.za; MEMorudu@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za; Tebogom@gsibande.gov.za; Gavin Cowden; Clifford Kubheka; Sindy Mbuyane; frans.krige@mtpa.co.za; mervyn@mtpa.co.za; Lloyd Barnes
Subject:	SR Comments | Sheepmoor WEF Amsterdam Cluster
Date:	Tuesday, 17 September 2024 14:46:29
Attachments:	Comments SR_Sheepmoor WEF 5G-28.pdf

EXTERNAL MESSAGE

Dear Stephanie,

Please find herewith DARDLEAs comments on the draft Scoping Report for the Sheepmoor WEF and Grid Connection.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
Nelspruit, 1200
[redacted]

>>> Robyn Luyt 09/17/24 2:43 PM >>>
Dear Stephanie,

Please find herewith DARDLEAs comments on the draft Scoping Report for the Rochdale WEF and Grid Connection.

Comments for Sheepmoor to follow.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
[redacted]

>>> Robyn Luyt 09/17/24 2:42 PM >>>
Dear Stephanie,

Please find herewith DARDLEAs comments on the draft Scoping Report for the Emvelo WEF and Grid Connection.

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Robyn

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Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
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Riverside Office Park, Aqua Street (Cycad Building - Block 4)
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Departement van Landbou, LandelikeOntwikkeling, GrondenOngewing Sake

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Enquiries : **R. Luyt / S. Mbuyane**
Telephone : **076 870 5543**
Reference : **1/3/1/16/5G-28**

Ms. Stephanie Gopaul
ERM Southern Africa (Pty) Ltd
240 Main Road
Rondebosch
7700

Email: ERM.ArcusAmsterdam@erm.com

Dear Madam,

DRAFT SCOPING REPORT: ACTIVITIES ASSOCIATED WITH THE SHEEPMOOR WIND ENERGY FACILITY AND ASSOCIATED GRID CONNECTION ON VARIOUS PORTIONS OF THE FARMS ONVERWACHT 273 IT, ONVERWACHT 287 IT, WAAIHOEK 286 IT, WINDHOEK291 IT, ZWARTWATER 288 IT, WELTERVREDEN 289 IT, WELTERVREDEN 290 IT, MOOIPLAATS 290 IT, WITPUNT 267 IT AND CAMDEN POWER STATION 329 IT, ERMELO, MSUKALIGWA LOCAL MUNICIPALITY

The draft scoping report which was submitted by you in respect of the abovementioned application and received by the Department on 27 August 2024 has reference. The Department has considered the content of the report, and has the following comments:

1. The proposed Sheepmoor Wind Energy Facility and associated grid infrastructure is located in areas identified as CBA Irreplaceable and Optimal **(over 28%)**, Intact Grassland Patches **(36%),** Key Biodiversity Areas **(9.3%)**, ESAs, Priority Focus Areas, Freshwater Ecosystem Priority Areas and Threatened Ecosystems (Endangered). Furthermore, 84% of the site falls within Grasslands SA020, Important Bird Area (IBA), and close to two other Important Bird Areas.
2. The proposed Sheepmoor WEF and associated grid connection is located in an area comprising a high diversity of threatened bird species, including the following confirmed on site: African Marsh Harrier (Regionally Endangered); Denham's Bustard (Globally Near Threatened, Regionally Vulnerable); Secretarybird (Globally Endangered, Regionally Vulnerable); White-bellied Bustard (Regionally Vulnerable), Blue Crane (Globally Vulnerable, Regionally Near Threatened); Grey Crowned Crane (Globally and Regionally Endangered); Martial Eagle (Globally and Regionally Endangered); Lanner Falcon (Regionally Vulnerable); Greater Flamingo (Regionally Near Threatened); Southern Bald Ibis (Regionally and Globally Vulnerable); Cape Vulture (Globally Vulnerable and Regionally Endangered); and Yellow-breasted Pipit (Regionally and Globally Vulnerable).
4. Furthermore, **intact grassland patches** make up **36%** of the site footprint. DARDLEA does not support the development of WEFs (or any non-compatible land use) within intact grassland patches. The MBSP specifically incorporated climate change into spatial priorities through the prioritisation of the connectivity of remaining intact grassland patches in the province, as they provide habitat for species to thrive, and allow for their dispersal. Intact grasslands are crucial for supporting threatened avifauna.

5. The proposed Sheepmoor WEF development is within a 10km-30km radius of three protected private nature reserves (Ahlers, Langcarel and Josua Moolman), and the Chrissiesmeer Protected Environment is within 10km of the proposed site.
6. DARDLEA is therefore concerned that the proposed location of the Sheepmoor Wind Energy Facility and associated grid infrastructure is not compatible with the desired land use. The WEF and all associated infrastructure is not a land use, in accordance with the Mpumalanga Biodiversity Sector Plan (MBSP), that will support the inherent biodiversity values of CBAs.
7. It is acknowledged that the layout plan in the draft Scoping Report is preliminary, and that you have confirmed that it will be revised further during the EIA phase to be informed by buffers and constraints provided by specialists. Such constraints identified in the specialist reports to date include: the location of laydown areas, O&M Buildings and a substation in avian exclusion zones; the location of the substation and O&M Buildings in a sensitive aquatic area; the location of infrastructure within areas of High faunal sensitivity; the location of the Laydown Area, O&M buildings and the Alternative substation within in no-go bat areas; and the location of all but 3 turbines in avifaunal exclusion zones. It must be noted also that the substation, laydown area, and at least 13 turbines are located in intact grassland patches, and all but 6 turbines are located in an IBA, which is very concerning.
8. We are concerned that cumulative impacts will not be dealt with adequately. While the Department of Fisheries, Forestry and the Environment has set a limit of 30km for the assessment of cumulative impacts, this should be viewed as a minimum requirement. Due to the extremely sensitive habitat within which all wind farms in the region have either been authorised or are currently in process, it is our view that all authorised and in-process wind farms in the Gert Sibande District should be included in the assessment of cumulative impacts. These include Ujekamanzi WEF 1, Ujekamanzi WEF 2, Ummbila Emoyeni WEF (authorised, and within 55km); Phefumula Emoyeni WEF (within 40km); Zephyr WEF (within 30km), as well as Camden I and II, Emvelo WEF and Rochdale WEF. The cumulative assessment must, *inter alia*, identify the species and habitats most at risk of cumulative impacts, and identify key uncertainties. The definition of cumulative impacts as per the EIA Regulations is "the past, current and reasonably foreseeable future impact of an activity, considered together with the impact of activities associated with that activity, that in itself may not be significant, but may be significant when added to the existing and reasonably foreseeable impacts eventuating from similar or diverse activities". A comparative assessment of the impacts of this proposed facility, in relation to and in conjunction with, adjacent and surrounding renewable energy facilities should therefore be provided in the EIA Report.
9. Roads to be developed must be included in the draft layout plan, and must be incorporated in the impact analysis.
10. The plan of study for EIA must include and address the following:
    10.1 Terrestrial Biodiversity:
        - Intact Grassland Patches and Key Biodiversity Areas must be identified and considered in the analysis of impacts on terrestrial biodiversity.
        - Where infrastructure is to be developed in CBAs and Intact Grassland Patches, the impact of the loss of CBAs and intact grassland habitat in terms of metapopulation dynamics (ie. how the loss of source areas will impact areas of low quality habitat that cannot support a population of species on its own) must be assessed.
        - The Site Ecological Importance methodology, as per the requirements of the Species Environmental Assessment Guidelines, must be demonstrated to have been applied.
        - The impact of the potential loss of ecological drivers on ecological processes must be analysed ie. fire, which is an important driver for the maintenance of grassland biodiversity.
    10.2 Avifauna: DARDLEA supports the supports the avifaunal specialists' recommendations to remove turbines from the "exclusion zones" identified during pre-construction monitoring. However, in the proposed re-assessment of the layout, the Avifaunal Assessment must consider and include the following:

- The Birds and Wind-Energy Best-Practice Guidelines state that the duration of pre-construction monitoring should be extended (beyond 12 months) where there is a high risk of significant impacts on priority species. Sufficient evidence of high risk of significant impact on avifauna on site and within the Project Area of Influence exists to extend minimum pre-construction monitoring requirements to adequately assess impacts and determine appropriate mitigation measures. Where the layout of the proposed wind farm does not avoid all sensitive features, corridors and buffers (e.g. CBAs, intact grasslands patches, KBAs, pans and all waterbodies, and provide shaped buffers for such features), additional monitoring must be undertaken to confirm the full spectrum of prevailing environmental conditions to ensure avoidance of significant impacts.
- Intact grassland patches are important habitat for foraging, and facilitate avifauna breeding and movement. Intact grassland patches must be considered and incorporated in the analysis of impact zones applicable to avifauna.
- Buffers for waterbodies / aquatic features – confirm the rationale in their determination and how their sizes (210m around drainage lines, and 110m around wetland no-go zones) were determined to be sufficient to account for movement of birds through the site, and protection of roosting areas and flight behaviours (approaching and leaving roost sites, foraging sites etc).
- DARDLEA is especially concerned that the site comprises habitat suitable for species with low detection probability, including the Globally Vulnerable Yellow-breasted Pipit, and Endangered Rudd's Lark, and the Critically Endangered Species 23. The precautionary principle must be applied in the undertaking of comprehensive habitat-based assessments in order to robustly delineate flyways and movement corridors for these species.
- Confirmation of compliance with vantage point requirements. Based on our viewshed analysis it appears that only 45-50% of the site is covered vs the required 75%, and that some turbines have been located outside of vantage point visibility.
- DARDLEAs position is that blade painting will be a non-negotiable, compulsory requirement for all authorised wind farms in the province, and Shut Down on Demand (SDoD) would be a compulsory adaptive management requirement. However, since neither of these measures are effective for night flying birds, which have been confirmed on and adjacent to the site, a separate operational impact analysis must be undertaken for "Mortality of priority night flying species due to collisions with the wind turbines".
- The night-flying greater flamingo was confirmed on site, and there is currently no known technology to mitigate for the collision of night flying birds.
- Due to the sensitivity of avifauna using the area, and the presence of pans and wetlands on and adjacent to the site, as well as the presence of night-flying birds, tracking data should be acquired to augment the 2D models used.
- Surveys and tracking should be undertaken to determine the collision risks for nocturnal species.
- A site-specific list of priority avifaunal species for wind farms for this particular region must be developed, which must include all wetland species (noting that the priority species list published by BirdLife South Africa in 2012 does not include most wetland species, and did not include Mpumalanga).
- Appropriate fatality thresholds (turbine collision, as well as power line collision and electrocution) need to be defined and agreed on **within and as part of the EIA process**, which must then be incorporated into the impact analysis.
- It is acknowledged that the Martial Eagle nest turbine no-go buffer is currently being investigated further with detailed modelling and additional survey work, to inform the final no-go area during the EIA phase. Latest available information from literature, specialists and BirdLife must be consulted during this exercise. This must include BirdLife's and EWT's recommendations of 5-6km buffer for Martial Eagle nests, noting

however that Martial Eagles are known to have large breeding territories, and any buffer must be supported by the birds' actual use of an area.

10.3 Bat Assessment

- Appropriate fatality thresholds need to be defined and agreed on within the EIA process and incorporated in the impact analysis.
- Separate mitigation measures need to be considered in more detail for high-flying bat species (i.e. Egyptian Free-Tailed bat) and lower-level bat species (e.g. Cape Serotine) in the EIA, i.e. different turbine design, blade / rotor sweep size and height, should be investigated for the specific wind turbines located adjacent to areas where these different bat species occur.

10.4 Microclimate Impact Assessment

- Research has demonstrated that turbines can affect the conditions required for mist formation, and that wind farms warm the land surface, especially at night. Altered microclimates will affect the conditions that support the highveld grasslands. Biodiversity and agricultural potential will potentially be affected. A Microclimate Impact Assessment must be undertaken, which must inform the terrestrial biodiversity study as well as the Agricultural Assessment. The impact of this WEF on the micro-climate, in particular the potential impact on precipitation, soil moisture, soil temperature, etc. therefore also needs to be assessed as part of the EIA.

11. All relevant stakeholders, including but not limited to, BirdLife SA, Mpumalanga Tourism and Parks Agency (MTPA), Gert Sibande District Municipality (GSDM), Department of Agriculture, Land Reform and Rural Development (DALRRD), Department of Public Works, Roads and Transport (DPWRT), and Msukaligwa Local Municipality must be must be consulted and provided with an opportunity of at least 30 days to submit comments.
12. The public participation process must be demonstrated to have been conducted in accordance with Regulations 39 – 44 of the EIA Regulations, 2014 (as amended).
13. Please provide this Department with an opportunity to review and engage with your response to these comments prior to the submission the final scoping report.
14. We are concerned that the proposed development site is not suitable for the development of wind energy infrastructure, and do not support the layout in its current form.

Please do not hesitate to contact this office if there are any enquiries.

Sincerely,

MS. R. LUYT
DIRECTOR: ENVIRONMENTAL IMPACT MANAGEMENT
DATE: 17/09/2024

Cc: Mr L Barnes Lloyd@mulilo.com
Dr Mervyn Lotter mervyn.lotter@mtpa.co.za
Mr Frans Krige frans.krige@mtpa.co.za
Ms S Dlomo sdlomo@dffe.gov.za
Ms O Letlalo oletlalo@dffe.gov.za
Ms M Morudu memorudu@dffe.gov.za
Mr C Agenbach cagenbach@dffe.gov.za
Mr G Cowden gcowden@mpg.gov.za
Ms S Mbuyane mbuyanesb@mpg.gov.za
Ms T Mogakabe tebogom@gsibande.gov.za

From:	Lloyd Barnes
To:	ERM Arcus Amsterdam; Andrew Pearson; Stephen Burton; Lucien Barbeau
Cc:	Gail Wheeler
Subject:	RE: SR Comments | Emvelo WEF Amsterdam Cluster
Date:	Tuesday, 17 September 2024 14:57:39
Attachments:	image001.png Comments SR_Emvelo WEF_5G-30.pdf Comments SR_Sheepmoor WEF 5G-28.pdf Comments SR_Rochdale WEF 5G-29.pdf

EXTERNAL MESSAGE

Good day team,

Please advise if we require a meeting to discuss these comments.

Noting that specialist responses will be required.

Please can we mobilise on this asap.

Kind Regards,

Lloyd Barnes
Project Manager: Environmental
[redacted]
mulilo

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Tuesday, September 17, 2024 2:42 PM
To: Erm.arcusamsterdam@erm.com
Cc: energy@birdlife.org.za; cagenbach@dffe.gov.za; MEMorudu@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za; Tebogom@gsibande.gov.za; Gavin Cowden <GCowden@mpg.gov.za>; Clifford Kubheka <KubhekaCZ@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; frans.krige@mtpa.co.za; mervyn@mtpa.co.za; Lloyd Barnes <Lloyd@mulilo.com>
Subject: SR Comments | Emvelo WEF Amsterdam Cluster
Importance: High

Dear Stephanie,

Please find herewith DARDLEAs comments on the draft Scoping Report for the Emvelo WEF and Grid Connection.

Comments for Sheepmoor and Rochdale to follow.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government

Riverside Office Park, Aqua Street (Cycad Building - Block 4)
[redacted]

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agriculture, rural development,
land & environmental affairs
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REPUBLIC OF SOUTH AFRICA

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LitikoLetekulima, Kutfutfukiswa KwetindzawoTasemakhaya, Temhlaba Netesimondzawo

Departement van Landbou, LandelikeOntwikkeling, GrondenOngewing Sake

umNyangoweZelimo UkuThuthukiswakweeNdawozemaKhaya, iNarhaneeNdabazeBhoduluko

Enquiries : **R. Luyt / O. Fakude**
Telephone : **(013) 004 1099**
Reference : **1/3/1/16/5G-30**

Stephanie Gopaul
ERM Southern Africa (Pty) Ltd
240 Main Road
Rondebosch
7700

Email: ERM.ArcusAmsterdam@erm.com

Dear Madam,

DRAFT SCOPING REPORT: ACTIVITIES ASSOCIATED WITH THE EMVELO WIND ENERGY FACILITY AND ASSOCIATED GRID CONNECTION ON VARIOUS PORTIONS OF THE FARMS SCHIEDAM 274 IT, VAALBANK 285 IT, WAALHOEK 286 IT, KLIPFONTEIN 283 IT, BOSJESSPRUIT 291 IT, ONVERWACHT 273 IT, ZWARTWATER 288 IT, WELTEVREDEN 289 IT, WITPUT AND MOOIPLAATS 290 IT AND CAMDEN POWER STATION 329 IT, ERMELO, MSUKALIGWA LOCAL MUNICIPALITY

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1. The proposed Emvelo Wind Energy Facility and associated grid infrastructure is located in areas identified as CBA Irreplaceable and Optimal **(over 21%)**, Intact Grassland Patches **(33%)**, Key Biodiversity Areas **(21.4%)**, ESAs, Priority Focus Areas, Freshwater Ecosystem Priority Areas and Threatened Ecosystems (Endangered). Furthermore, 43% of the site falls within Grasslands SA020 Important Bird Area (IBA), and close to two other Important Bird Areas.
2. The proposed Emvelo WEF and associated grid connection is located in an area comprising a high diversity of threatened bird species, including the following confirmed on site: African Marsh Harrier (Regionally Endangered); Denham's Bustard (Globally Near Threatened, Regionally Vulnerable); Secretary bird (Globally Endangered, Regionally Vulnerable); White-bellied Bustard (Regionally Vulnerable), Blue Crane (Globally Vulnerable, Regionally Near Threatened); Grey Crowned Crane (Globally and Regionally Endangered); Martial Eagle (Globally and Regionally Endangered); Lanner Falcon (Regionally Vulnerable); Greater Flamingo (Regionally Near Threatened); Southern Bald Ibis (Regionally and Globally Vulnerable); Cape Vulture (Globally Vulnerable and Regionally Endangered); and Yellow-breasted Pipit (Regionally and Globally Vulnerable).
3. Furthermore, intact grassland patches make up a third of the site footprint. DARDLEA does not support the development of WEFs (or any non-compatible land use) within intact grassland patches. The MBSP specifically incorporated climate change into spatial priorities through the prioritisation of the connectivity of remaining intact grassland patches in the province, as they provide habitat for species to thrive, and allow for their dispersal. Intact grasslands are crucial for supporting threatened avifauna.
4. DARDLEA is therefore concerned that the proposed location of the Emvelo Wind Energy Facility and associated grid infrastructure is not compatible with the desired land use. The WEF and all associated infrastructure is not a land use, in accordance with the Mpumalanga Biodiversity Sector Plan (MBSP), that will support the inherent biodiversity values of CBAs.

5. It is acknowledged that the layout plan in the draft Scoping Report is preliminary, and that you have confirmed that it will be revised further during the EIA phase to be informed by buffers and constraints provided by specialists. Such constraints identified to date include the location of turbines in areas identified in the Faunal Assessment as High Sensitivity and High Sensitivity Escarpment, the location of turbines and associated infrastructure in bat sensitive and bat no-go areas, the location of the laydown area in a sensitive aquatic feature, and the location of a number of turbines in avifaunal exclusion zones. It must be noted though that in addition to the exclusion zones identified in the specialist studies, a number of turbines as well as associated substation and laydown areas are still be located in Key Biodiversity Areas and IBAs (i.e. turbines 4, 8, 11, 18, 19, 22, 24, 26, 31, 33 and 35), Intact Grassland Patches (including turbines 1-6 9 and 13), and CBA Irreplaceable areas (12, 14, 16, 17, 29, 32 and 33) and CBA optimal areas (8, 18 and 19), which is very concerning.
6. We are concerned that cumulative impacts will not be dealt with adequately. While the Department of Fisheries, Forestry and the Environment has set a limit of 30km for the assessment of cumulative impacts, this should be viewed as a minimum requirement. Due to the extremely sensitive habitat within which all wind farms in the region have either been authorised or are currently in process, it is our view that all authorised and in-process wind farms in the Gert Sibande District should be included in the assessment of cumulative impacts. Currently, these include Ujekamanzi WEF 1, Ujekamanzi WEF 2, Ummbila Emoyeni WEF (authorised, and within 55km); Phefumula Emoyeni WEF (within 40km); Mukondeleli WEF (authorised), Zephyr WEF (within 30km), as well as Camden I and II, Sheepmoor WEF and Rochdale WEF. The cumulative assessment must, *inter alia*, identify the species and habitats most at risk of cumulative impacts, and identify key uncertainties. The definition of cumulative impacts as per the EIA Regulations is "the past, current and reasonably foreseeable future impact of an activity, considered together with the impact of activities associated with that activity, that in itself may not be significant, but may be significant when added to the existing and reasonably foreseeable impacts eventuating from similar or diverse activities". A comparative assessment of the impacts of this proposed facility, in relation to and in conjunction with, adjacent and surrounding renewable energy facilities should therefore be provided in the EIA Report.
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9. All relevant stakeholders, including but not limited to, BirdLife SA, Mpumalanga Tourism and Parks Agency (MTPA), Gert Sibande District Municipality (GSDM), Department of Agriculture, Land Reform and Rural Development (DALRRD), Department of Public Works, Roads and Transport (DPWRT), and Msukaligwa Local Municipality must be must be consulted and provided with an opportunity of at least 30 days to submit comments.
10. The public participation process must be demonstrated to have been conducted in accordance with Regulations 39 – 44 of the EIA Regulations, 2014 (as amended).
11. Please provide this Department with an opportunity to review and engage with your response to these comments prior to the submission the final scoping report.
12. We are concerned that the proposed development site is not suitable for the development of wind energy infrastructure, and do not support the layout in its current form.

Please do not hesitate to contact this office if there are any enquiries.

Sincerely,

MS. R. LUYT
DIRECTOR: ENVIRONMENTAL IMPACT MANAGEMENT
DATE: 17/09/2024

Cc: Mr L Barnes Lloyd@mulilo.com
Dr Mervyn Lotter mervyn.lotter@mtpa.co.za
Mr Frans Krige frans.krige@mtpa.co.za
Ms S Dlomo sdlomo@dffe.gov.za
Ms O Letlalo oletlalo@dffe.gov.za
Ms M Morudu memorudu@dffe.gov.za
Mr C Agenbach cagenbach@dffe.gov.za
Mr G Cowden gcowden@mpg.gov.za
Ms S Mbuyane mbuyanesb@mpg.gov.za
Ms T Mogakabe tebogom@gsibande.gov.za

agriculture, rural development,
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LitikoLetekulima, Kutfutfukiswa KwetindzawoTasemakhaya, Temhlaba Netesimondzawo

Departement van Landbou, LandelikeOntwikkeling, GrondenOngewing Sake

umNyangoweZelimo UkuThuthukiswakweeNdawozemaKhaya, iNarhaneeNdabazeBhoduluko

Enquiries : **R. Luyt / C. Kubheka**
Telephone : **(013) 004 0766**
Reference : **1/3/1/16/5G-29**

Stephanie Gopaul
ERM Southern Africa (Pty) Ltd
240 Main Road
Rondebosch
7700

Email: ERM.ArcusAmsterdam@erm.com

Dear Madam,

DRAFT SCOPING REPORT: ACTIVITIES ASSOCIATED WITH THE ROCHDALE WIND ENERGY FACILITY AND ASSOCIATED GRID CONNECTION ON PORTIONS 1, 2 & 5 OF THE FARM SCHIMMELHOEK 272 IT, PORTIONS 3, 6, 7, 8 & 13 OF THE FARM ONVERWACHT 273 IT, PORTION 3 OF THE FARM ONVERWACHT 287 IT, PORTIONS 1, 2, 9 & 10 OF THE FARM ZWARTWATER 288 IT, PORTIONS 6, 10, 11 & RE/3 OF THE FARM WELTEVREDEN 289 IT, AND PORTION RE/7 OF THE FARM WITPUNT 267 IT, ERMELO, MSUKALIGWA LOCAL MUNICIPALITY

The draft scoping report which was submitted by you in respect of the abovementioned application and received by the Department on 27 August 2024 has reference. The Department has considered the content of the report, and has the following comments:

1. The proposed Rochdale Wind Energy Facility and associated grid infrastructure is located in areas identified as CBA Irreplaceable and Optimal **(over 66%)**, Intact Grassland Patches, Key Biodiversity Areas **(79.7%)**, ESAs, Priority Focus Areas, Freshwater Ecosystem Priority Areas and Threatened Ecosystems (Endangered), and the northern, southern, and western borders of the site fall close to three different Important Bird Areas.
2. The proposed development is within a 30km radius of four (4) nature reserves i.e. Ahlers, Langcarel, Josua Moolman, and Laughing Waters Private Nature Reserves. The Chrissiesmeer Protected Environment **is within 5km** of the proposed site.
3. The proposed Rochdale WEF and associated grid connection is located in an area comprising a high diversity of threatened bird species, including the following confirmed on site: African Marsh Harrier (Regionally Endangered), Denham's Bustard (Globally Near Threatened, Regionally Vulnerable), Secretarybird (Globally Endangered, Regionally Vulnerable), White-bellied Bustard (Regionally Vulnerable), Blue Crane (Globally Vulnerable, Regionally Near Threatened), Grey Crowned Crane (Globally and Regionally Endangered), Martial Eagle (Globally and Regionally Endangered), Lanner Falcon (Regionally Vulnerable), Greater Flamingo (Regionally Near Threatened), Southern Bald Ibis (Regionally and Globally Vulnerable), Cape Vulture (Globally Vulnerable and Regionally Endangered), and Yellow-breasted Pipit (Regionally and Globally Vulnerable).
4. DARDLEA is therefore concerned that the location of the Rochdale Wind Energy Facility and associated grid infrastructure is not compatible with the desired land use. The WEF and all associated infrastructure is not a land use, in accordance with the Mpumalanga Biodiversity Sector Plan (MBSP), that will support the inherent biodiversity values of CBAs.
5. Furthermore, **intact grassland patches** are located within the site footprint. DARDLEA does not support the development of WEFs (or any non-compatible land use) within intact grassland

patches. The MBSP specifically incorporated climate change into spatial priorities through the prioritisation of the connectivity of remaining intact grassland patches in the province, as they provide habitat for species to thrive, and allow for their dispersal. Intact grasslands are crucial for supporting threatened avifauna.

6. It is acknowledged that the layout plan in the draft Scoping Report is preliminary, and that you have confirmed that it will be revised further during the EIA phase to be informed by buffers and constraints provided by specialists. Such constraints identified in the specialist reports to date include: the laydown areas in bat sensitive areas; the location of the substation and O&M buildings in sensitive aquatic areas; and the location of all but 3 turbines in avifaunal exclusion zones. It must be noted though, that these 3 turbines are all still located in **Key Biodiversity Areas (KBAs)**, and one of them (WTG5) is in a CBA Irreplaceable area. Furthermore, all associated infrastructure (laydown areas, transmission lines, substation) is located in KBAs, and the laydown areas are in CBA Irreplaceable areas. The location of turbines and associated infrastructure in KBAs and CBA Irreplaceable areas is not supported.
7. We are concerned that cumulative impacts will not be dealt with adequately. While the Department of Fisheries, Forestry and the Environment has set a limit of 30km for the assessment of cumulative impacts, this should be viewed as a minimum requirement. Due to the extremely sensitive habitat within which all wind farms in the region have either been authorised or are currently in process, it is our view that all authorised and in-process wind farms in the Gert Sibande District should be included in the assessment of cumulative impacts. Currently these include Ujekamanzi WEF 1, Ujekamanzi WEF 2, Ummbila Emoyeni WEF (authorised, and within 55km); Phefumula Emoyeni WEF (within 40km); Zephyr WEF (within 30km), Mukondeleli WEF (authorised) as well as Camden I and II, Sheepmoor WEF and Emvelo WEF. The cumulative assessment must, *inter alia*, identify the species and habitats most at risk of cumulative impacts, and identify key uncertainties. The definition of cumulative impacts as per the EIA Regulations is "the past, current and reasonably foreseeable future impact of an activity, considered together with the impact of activities associated with that activity, that in itself may not be significant, but may be significant when added to the existing and reasonably foreseeable impacts eventuating from similar or diverse activities". A comparative assessment of the impacts of this proposed facility, in relation to and in conjunction with, adjacent and surrounding renewable energy facilities should therefore be provided in the EIA Report.
8. Roads must be included in the draft layout plan, and must be incorporated in the impact analysis.
9. The plan of study for EIA must include and address the following:
   - 9.1 Terrestrial Biodiversity:
     - Intact Grassland Patches and Key Biodiversity Areas must be identified and considered in the analysis of impacts on terrestrial biodiversity.
     - Where infrastructure is to be developed in CBAs and Intact Grassland Patches, the impact of the loss of CBAs and intact grassland habitat in terms of metapopulation dynamics (ie. how the loss of source areas will impact areas of low quality habitat that cannot support a population of species on its own) must be assessed.
     - The Site Ecological Importance methodology, as per the requirements of the Species Environmental Assessment Guidelines, must be demonstrated to have been applied.
     - The impact of the potential loss of ecological drivers on ecological processes must be analysed ie. fire, which is an important driver for the maintenance of grassland biodiversity.
   - 9.2 Avifauna: DARDLEA supports the avifaunal specialists' recommendations to remove turbines from the "exclusion zones" identified during pre-construction monitoring. However, in the proposed re-assessment of the layout, the Avifaunal Assessment must consider and include the following:
     - The Birds and Wind-Energy Best-Practice Guidelines state that the duration of pre-construction monitoring should be extended (beyond 12 months) where there is a high risk of significant impacts on priority species. Sufficient evidence of high risk of significant impact on avifauna on site and within the Project Area of Influence exists to extend minimum pre-construction monitoring requirements to adequately assess impacts and determine appropriate mitigation measures. Where the layout of the proposed wind farm does not avoid all sensitive features, corridors and buffers (e.g. CBAs, intact grasslands patches, KBAs, pans and all waterbodies, and provide

shaped buffers for such features), additional monitoring must be undertaken to confirm the full spectrum of prevailing environmental conditions to ensure avoidance of significant impacts.

- Intact grassland patches are important habitat for foraging, and facilitate avifauna breeding and movement. Intact grassland patches must be considered and incorporated in the analysis of impact zones applicable to avifauna.
- Buffers for waterbodies / aquatic features – confirm the rationale in their determination and how their sizes (210m around drainage lines, and 110m around wetland no-go zones) were determined to be sufficient to account for movement of birds through the site, and protection of roosting areas and flight behaviours (approaching and leaving roost sites, foraging sites etc).
- DARDLEA is especially concerned that the site comprises habitat suitable for species with low detection probability, including the Globally Vulnerable Yellow-breasted Pipit, and Endangered Rudd's Lark, and the Critically Endangered Species 23. The precautionary principle must be applied in the undertaking of comprehensive habitat-based assessments in order to robustly delineate flyways and movement corridors for these species.
- Confirmation of compliance with vantage point requirements. Based on our viewshed analysis it appears that only 45-50% of the site is covered vs the required 75%, and that some turbines have been located outside of vantage point visibility.
- DARDLEAs position is that blade painting will be a non-negotiable, compulsory requirement for all authorised wind farms in the province, and Shut Down on Demand (SDoD) would be a compulsory adaptive management requirement. However, since neither of these measures are effective for night flying birds, which have been confirmed on and adjacent to the site, a separate operational impact analysis must be undertaken for "Mortality of priority night flying species due to collisions with the wind turbines".
- The night-flying greater flamingo was confirmed on site, and there is currently no known technology to mitigate for the collision of night flying birds.
- Due to the sensitivity of avifauna using the area, and the presence of pans and wetlands on and adjacent to the site, as well as the presence of night-flying birds, tracking data should be acquired to augment the 2D models used.
- Surveys and tracking should be undertaken to determine the collision risks for nocturnal species.
- A site-specific list of priority avifaunal species for wind farms for this particular region must be developed, which must include all wetland species (noting that the priority species list published by BirdLife South Africa in 2012 does not include most wetland species, and did not include Mpumalanga).
- Appropriate fatality thresholds (turbine collision, as well as power line collision and electrocution) need to be defined and agreed on **within and as part of the EIA process**, which must then be incorporated into the impact analysis.
- It is acknowledged that the Martial Eagle nest turbine no-go buffer is currently being investigated further with detailed modelling and additional survey work, to inform the final no-go area during the EIA phase. Latest available information from literature, specialists and BirdLife must be consulted during this exercise. This must include BirdLife's and EWT's recommendations of 5-6km buffer for Martial Eagle nests, noting however that Martial Eagles are known to have large breeding territories, and any buffer must be supported by the birds' actual use of an area.

9.3 Bat Assessment

- Appropriate fatality thresholds need to be defined and agreed on within the EIA process and incorporated in the impact analysis.
- Separate mitigation measures need to be considered in more detail for high-flying bat species (i.e. Egyptian Free-Tailed bat) and lower-level bat species (e.g. Cape Serotine) in the EIA, i.e. different turbine design, blade / rotor sweep size and height, should be investigated for the specific wind turbines located adjacent to areas where these different bat species occur.

9.4 Microclimate Impact Assessment

- Research has demonstrated that turbines can affect the conditions required for mist formation, and that wind farms warm the land surface, especially at night. Altered microclimates will affect the conditions that support the highveld grasslands. Biodiversity and agricultural potential will potentially be affected. A Microclimate Impact Assessment must be undertaken, which must inform the terrestrial biodiversity study as well as the Agricultural Assessment. The impact of this WEF on the micro-climate, in particular the potential impact on precipitation, soil moisture, soil temperature, etc. therefore also needs to be assessed as part of the EIA.

10. All relevant stakeholders, including but not limited to, BirdLife SA, Mpumalanga Tourism and Parks Agency (MTPA), Gert Sibande District Municipality (GSDM), Department of Agriculture, Land Reform and Rural Development (DALRRD), Department of Public Works, Roads and Transport (DPWRT), and Msukaligwa Local Municipality must be must be consulted and provided with an opportunity of at least 30 days to submit comments.
11. The public participation process must be demonstrated to have been conducted in accordance with Regulations 39 – 44 of the EIA Regulations, 2014 (as amended).
12. Please provide this Department with an opportunity to review and engage with your response to these comments prior to the submission the final scoping report.
13. We are concerned that the proposed development site is not suitable for the development of wind energy infrastructure, and do not support the layout in its current form.

Please do not hesitate to contact this office if there are any enquiries.

Sincerely,

MS. R. LUYT
DIRECTOR: ENVIRONMENTAL IMPACT MANAGEMENT
DATE: 17/09/2024.

Cc: Mr L Barnes Lloyd@mulilo.com
Dr Mervyn Lotter mervyn.lotter@mtpa.co.za
Mr Frans Krige frans.krige@mtpa.co.za
Ms S Dlomo sdlomo@dffe.gov.za
Ms O Letlalo oletlalo@dffe.gov.za
Ms M Morudu memorudu@dffe.gov.za
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Mr G Cowden gcowden@mpg.gov.za
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LitikoLetekulima, Kutfutfukiswa KwetindzawoTasemakhaya, Temhlaba Netesimondzawo

Departement van Landbou, LandelikeOntwikkeling, GrondenOngewing Sake

umNyangoweZelimo UkuThuthukiswakweeNdawozemaKhaya, iNarhaneeNdabazeBhoduluko

Enquiries : **R. Luyt / S. Mbuyane**
Telephone : **076 870 5543**
Reference : **1/3/1/16/5G-28**

Ms. Stephanie Gopaul
ERM Southern Africa (Pty) Ltd
240 Main Road
Rondebosch
7700

Email: ERM.ArcusAmsterdam@erm.com

Dear Madam,

DRAFT SCOPING REPORT: ACTIVITIES ASSOCIATED WITH THE SHEEPMOOR WIND ENERGY FACILITY AND ASSOCIATED GRID CONNECTION ON VARIOUS PORTIONS OF THE FARMS ONVERWACHT 273 IT, ONVERWACHT 287 IT, WAAIHOEK 286 IT, WINDHOEK291 IT, ZWARTWATER 288 IT, WELTERVREDEN 289 IT, WELTERVREDEN 290 IT, MOOIPLAATS 290 IT, WITPUNT 267 IT AND CAMDEN POWER STATION 329 IT, ERMELO, MSUKALIGWA LOCAL MUNICIPALITY

The draft scoping report which was submitted by you in respect of the abovementioned application and received by the Department on 27 August 2024 has reference. The Department has considered the content of the report, and has the following comments:

1. The proposed Sheepmoor Wind Energy Facility and associated grid infrastructure is located in areas identified as CBA Irreplaceable and Optimal **(over 28%)**, Intact Grassland Patches **(36%),** Key Biodiversity Areas **(9.3%)**, ESAs, Priority Focus Areas, Freshwater Ecosystem Priority Areas and Threatened Ecosystems (Endangered). Furthermore, 84% of the site falls within Grasslands SA020, Important Bird Area (IBA), and close to two other Important Bird Areas.
2. The proposed Sheepmoor WEF and associated grid connection is located in an area comprising a high diversity of threatened bird species, including the following confirmed on site: African Marsh Harrier (Regionally Endangered); Denham's Bustard (Globally Near Threatened, Regionally Vulnerable); Secretarybird (Globally Endangered, Regionally Vulnerable); White-bellied Bustard (Regionally Vulnerable), Blue Crane (Globally Vulnerable, Regionally Near Threatened); Grey Crowned Crane (Globally and Regionally Endangered); Martial Eagle (Globally and Regionally Endangered); Lanner Falcon (Regionally Vulnerable); Greater Flamingo (Regionally Near Threatened); Southern Bald Ibis (Regionally and Globally Vulnerable); Cape Vulture (Globally Vulnerable and Regionally Endangered); and Yellow-breasted Pipit (Regionally and Globally Vulnerable).
4. Furthermore, **intact grassland patches** make up **36%** of the site footprint. DARDLEA does not support the development of WEFs (or any non-compatible land use) within intact grassland patches. The MBSP specifically incorporated climate change into spatial priorities through the prioritisation of the connectivity of remaining intact grassland patches in the province, as they provide habitat for species to thrive, and allow for their dispersal. Intact grasslands are crucial for supporting threatened avifauna.

5. The proposed Sheepmoor WEF development is within a 10km-30km radius of three protected private nature reserves (Ahlers, Langcarel and Josua Moolman), and the Chrissiesmeer Protected Environment is within 10km of the proposed site.
6. DARDLEA is therefore concerned that the proposed location of the Sheepmoor Wind Energy Facility and associated grid infrastructure is not compatible with the desired land use. The WEF and all associated infrastructure is not a land use, in accordance with the Mpumalanga Biodiversity Sector Plan (MBSP), that will support the inherent biodiversity values of CBAs.
7. It is acknowledged that the layout plan in the draft Scoping Report is preliminary, and that you have confirmed that it will be revised further during the EIA phase to be informed by buffers and constraints provided by specialists. Such constraints identified in the specialist reports to date include: the location of laydown areas, O&M Buildings and a substation in avian exclusion zones; the location of the substation and O&M Buildings in a sensitive aquatic area; the location of infrastructure within areas of High faunal sensitivity; the location of the Laydown Area, O&M buildings and the Alternative substation within in no-go bat areas; and the location of all but 3 turbines in avifaunal exclusion zones. It must be noted also that the substation, laydown area, and at least 13 turbines are located in intact grassland patches, and all but 6 turbines are located in an IBA, which is very concerning.
8. We are concerned that cumulative impacts will not be dealt with adequately. While the Department of Fisheries, Forestry and the Environment has set a limit of 30km for the assessment of cumulative impacts, this should be viewed as a minimum requirement. Due to the extremely sensitive habitat within which all wind farms in the region have either been authorised or are currently in process, it is our view that all authorised and in-process wind farms in the Gert Sibande District should be included in the assessment of cumulative impacts. These include Ujekamanzi WEF 1, Ujekamanzi WEF 2, Ummbila Emoyeni WEF (authorised, and within 55km); Phefumula Emoyeni WEF (within 40km); Zephyr WEF (within 30km), as well as Camden I and II, Emvelo WEF and Rochdale WEF. The cumulative assessment must, *inter alia*, identify the species and habitats most at risk of cumulative impacts, and identify key uncertainties. The definition of cumulative impacts as per the EIA Regulations is "the past, current and reasonably foreseeable future impact of an activity, considered together with the impact of activities associated with that activity, that in itself may not be significant, but may be significant when added to the existing and reasonably foreseeable impacts eventuating from similar or diverse activities". A comparative assessment of the impacts of this proposed facility, in relation to and in conjunction with, adjacent and surrounding renewable energy facilities should therefore be provided in the EIA Report.
9. Roads to be developed must be included in the draft layout plan, and must be incorporated in the impact analysis.
10. The plan of study for EIA must include and address the following:
    10.1 Terrestrial Biodiversity:
        - Intact Grassland Patches and Key Biodiversity Areas must be identified and considered in the analysis of impacts on terrestrial biodiversity.
        - Where infrastructure is to be developed in CBAs and Intact Grassland Patches, the impact of the loss of CBAs and intact grassland habitat in terms of metapopulation dynamics (ie. how the loss of source areas will impact areas of low quality habitat that cannot support a population of species on its own) must be assessed.
        - The Site Ecological Importance methodology, as per the requirements of the Species Environmental Assessment Guidelines, must be demonstrated to have been applied.
        - The impact of the potential loss of ecological drivers on ecological processes must be analysed ie. fire, which is an important driver for the maintenance of grassland biodiversity.
    10.2 Avifauna: DARDLEA supports the supports the avifaunal specialists' recommendations to remove turbines from the "exclusion zones" identified during pre-construction monitoring. However, in the proposed re-assessment of the layout, the Avifaunal Assessment must consider and include the following:

- The Birds and Wind-Energy Best-Practice Guidelines state that the duration of pre-construction monitoring should be extended (beyond 12 months) where there is a high risk of significant impacts on priority species. Sufficient evidence of high risk of significant impact on avifauna on site and within the Project Area of Influence exists to extend minimum pre-construction monitoring requirements to adequately assess impacts and determine appropriate mitigation measures. Where the layout of the proposed wind farm does not avoid all sensitive features, corridors and buffers (e.g. CBAs, intact grasslands patches, KBAs, pans and all waterbodies, and provide shaped buffers for such features), additional monitoring must be undertaken to confirm the full spectrum of prevailing environmental conditions to ensure avoidance of significant impacts.
- Intact grassland patches are important habitat for foraging, and facilitate avifauna breeding and movement. Intact grassland patches must be considered and incorporated in the analysis of impact zones applicable to avifauna.
- Buffers for waterbodies / aquatic features – confirm the rationale in their determination and how their sizes (210m around drainage lines, and 110m around wetland no-go zones) were determined to be sufficient to account for movement of birds through the site, and protection of roosting areas and flight behaviours (approaching and leaving roost sites, foraging sites etc).
- DARDLEA is especially concerned that the site comprises habitat suitable for species with low detection probability, including the Globally Vulnerable Yellow-breasted Pipit, and Endangered Rudd's Lark, and the Critically Endangered Species 23. The precautionary principle must be applied in the undertaking of comprehensive habitat-based assessments in order to robustly delineate flyways and movement corridors for these species.
- Confirmation of compliance with vantage point requirements. Based on our viewshed analysis it appears that only 45-50% of the site is covered vs the required 75%, and that some turbines have been located outside of vantage point visibility.
- DARDLEAs position is that blade painting will be a non-negotiable, compulsory requirement for all authorised wind farms in the province, and Shut Down on Demand (SDoD) would be a compulsory adaptive management requirement. However, since neither of these measures are effective for night flying birds, which have been confirmed on and adjacent to the site, a separate operational impact analysis must be undertaken for "Mortality of priority night flying species due to collisions with the wind turbines".
- The night-flying greater flamingo was confirmed on site, and there is currently no known technology to mitigate for the collision of night flying birds.
- Due to the sensitivity of avifauna using the area, and the presence of pans and wetlands on and adjacent to the site, as well as the presence of night-flying birds, tracking data should be acquired to augment the 2D models used.
- Surveys and tracking should be undertaken to determine the collision risks for nocturnal species.
- A site-specific list of priority avifaunal species for wind farms for this particular region must be developed, which must include all wetland species (noting that the priority species list published by BirdLife South Africa in 2012 does not include most wetland species, and did not include Mpumalanga).
- Appropriate fatality thresholds (turbine collision, as well as power line collision and electrocution) need to be defined and agreed on **within and as part of the EIA process**, which must then be incorporated into the impact analysis.
- It is acknowledged that the Martial Eagle nest turbine no-go buffer is currently being investigated further with detailed modelling and additional survey work, to inform the final no-go area during the EIA phase. Latest available information from literature, specialists and BirdLife must be consulted during this exercise. This must include BirdLife's and EWT's recommendations of 5-6km buffer for Martial Eagle nests, noting

however that Martial Eagles are known to have large breeding territories, and any buffer must be supported by the birds' actual use of an area.

10.3 Bat Assessment

- Appropriate fatality thresholds need to be defined and agreed on within the EIA process and incorporated in the impact analysis.
- Separate mitigation measures need to be considered in more detail for high-flying bat species (i.e. Egyptian Free-Tailed bat) and lower-level bat species (e.g. Cape Serotine) in the EIA, i.e. different turbine design, blade / rotor sweep size and height, should be investigated for the specific wind turbines located adjacent to areas where these different bat species occur.

10.4 Microclimate Impact Assessment

- Research has demonstrated that turbines can affect the conditions required for mist formation, and that wind farms warm the land surface, especially at night. Altered microclimates will affect the conditions that support the highveld grasslands. Biodiversity and agricultural potential will potentially be affected. A Microclimate Impact Assessment must be undertaken, which must inform the terrestrial biodiversity study as well as the Agricultural Assessment. The impact of this WEF on the micro-climate, in particular the potential impact on precipitation, soil moisture, soil temperature, etc. therefore also needs to be assessed as part of the EIA.

11. All relevant stakeholders, including but not limited to, BirdLife SA, Mpumalanga Tourism and Parks Agency (MTPA), Gert Sibande District Municipality (GSDM), Department of Agriculture, Land Reform and Rural Development (DALRRD), Department of Public Works, Roads and Transport (DPWRT), and Msukaligwa Local Municipality must be must be consulted and provided with an opportunity of at least 30 days to submit comments.
12. The public participation process must be demonstrated to have been conducted in accordance with Regulations 39 – 44 of the EIA Regulations, 2014 (as amended).
13. Please provide this Department with an opportunity to review and engage with your response to these comments prior to the submission the final scoping report.
14. We are concerned that the proposed development site is not suitable for the development of wind energy infrastructure, and do not support the layout in its current form.

Please do not hesitate to contact this office if there are any enquiries.

Sincerely,

MS. R. LUYT
DIRECTOR: ENVIRONMENTAL IMPACT MANAGEMENT
DATE: 17/09/2024

Cc: Mr L Barnes Lloyd@mulilo.com
Dr Mervyn Lotter mervyn.lotter@mtpa.co.za
Mr Frans Krige frans.krige@mtpa.co.za
Ms S Dlomo sdlomo@dffe.gov.za
Ms O Letlalo oletlalo@dffe.gov.za
Ms M Morudu memorudu@dffe.gov.za
Mr C Agenbach cagenbach@dffe.gov.za
Mr G Cowden gcowden@mpg.gov.za
Ms S Mbuyane mbuyanesb@mpg.gov.za
Ms T Mogakabe tebogom@gsibande.gov.za

From: Gail Wheeler
To: ERM Arcus Amsterdam
Subject: Automatic reply: SR Comments | Emvelo WEF Amsterdam Cluster
Date: Wednesday, 18 September 2024 08:28:11

EXTERNAL MESSAGE

Good day,

Thank you for your email.

Please note that I am currently on site and will not be responding to emails. I will be back in office on Thursday and once I'm back in office, I will reply to your email as soon as possible.

If you have any urgent queries, please contact me on 063 082 9515.

Kind regards
Gail Wheeler

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From: ERM Arcus Amsterdam
To: Lloyd Barnes; ERM Arcus Amsterdam; Andrew Pearson; Stephen Burton; Lucien Barbeau
Cc: Gail Wheeler
Subject: RE: SR Comments | Emvelo WEF Amsterdam Cluster
Date: Wednesday, 18 September 2024 08:27:56
Attachments: image002.png
image003.png

Hi Lloyd,

We have gone through the comments and are happy to meet sometime during the course of today to discuss the way forward. Please would you let us know a suitable time today to meet.

Thank you,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town
+27105963488

erm.com

From: Lloyd Barnes <Lloyd@mulilo.com>
Sent: Tuesday, September 17, 2024 2:57 PM
To: ERM Arcus Amsterdam <Erm.arcusamsterdam@erm.com>; Andrew Pearson <Andrew@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: Gail Wheeler <Gail@mulilo.com>
Subject: RE: SR Comments | Emvelo WEF Amsterdam Cluster

EXTERNAL MESSAGE

Good day team,

Please advise if we require a meeting to discuss these comments.

Noting that specialist responses will be required.

Please can we mobilise on this asap.

Kind Regards,

Lloyd Barnes
Project Manager: Environmental
[redacted]

mulilo

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Tuesday, September 17, 2024 2:42 PM
To: Erm.arcusamsterdam@erm.com
Cc: energy@birdlife.org.za; cagenbach@dffe.gov.za; MEMorudu@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za; Tebogom@gsibande.gov.za; Gavin Cowden <GCowden@mpg.gov.za>; Clifford Kubheka <KubhekaCZ@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; frans.krige@mtpa.co.za; mervyn@mtpa.co.za; Lloyd Barnes <Lloyd@mulilo.com>
Subject: SR Comments | Emvelo WEF Amsterdam Cluster
Importance: High

Dear Stephanie,

Please find herewith DARDLEAs comments on the draft Scoping Report for the Emvelo WEF and Grid Connection.

Comments for Sheepmoor and Rochdale to follow.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)
[redacted]

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CONFIDENTIALITY AND DATA PROTECTION. This email is intended only for the use of the intended recipient(s) and may contain information which is privileged and confidential, or personal data which is subject to data protection legislation. If you are not the intended recipient, any disclosure, copying and/or distribution of the content of this email, or reliance upon or other use of the contents of this email is strictly prohibited. If you have received this email in error, please erase all copies of it, including all attachments, do not forward it to anybody, and please also notify the sender immediately.

From:	Lloyd Barnes
To:	ERM Arcus Amsterdam; Andrew Pearson; Stephen Burton; Lucien Barbeau
Cc:	Gail Wheeler
Subject:	RE: SR Comments | Emvelo WEF Amsterdam Cluster
Date:	Wednesday, 18 September 2024 09:26:30
Attachments:	image001.png image002.png

EXTERNAL MESSAGE

Hi Lucien,

Could we please meet between 2 and 4.

Please will you include the necessary specialists.

Kind Regards,

Lloyd Barnes
Project Manager: Environmental
[redacted]
mulilo

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Wednesday, September 18, 2024 8:28 AM
To: Lloyd Barnes <Lloyd@mulilo.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Andrew Pearson <Andrew@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: Gail Wheeler <Gail@mulilo.com>
Subject: RE: SR Comments | Emvelo WEF Amsterdam Cluster

Hi Lloyd,

We have gone through the comments and are happy to meet sometime during the course of today to discuss the way forward. Please would you let us know a suitable time today to meet.

Thank you,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town
+27105963488

erm.com

From: Lloyd Barnes <Lloyd@mulilo.com>

Sent: Tuesday, September 17, 2024 2:57 PM
To: ERM Arcus Amsterdam <Erm.arcusamsterdam@erm.com>; Andrew Pearson <Andrew@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>; Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: Gail Wheeler <Gail@mulilo.com>
Subject: RE: SR Comments | Emvelo WEF Amsterdam Cluster

EXTERNAL MESSAGE

Good day team,

Please advise if we require a meeting to discuss these comments.

Noting that specialist responses will be required.

Please can we mobilise on this asap.

Kind Regards,

Lloyd Barnes
Project Manager: Environmental
[redacted]
mulilo

From: Robyn Luyt <rluyt@mpg.gov.za>
Sent: Tuesday, September 17, 2024 2:42 PM
To: Erm.arcusamsterdam@erm.com
Cc: energy@birdlife.org.za; cagenbach@dffe.gov.za; MEMorudu@dffe.gov.za; OLetlalo@dffe.gov.za; sdlomo@dffe.gov.za; Tebogom@gsibande.gov.za; Gavin Cowden <GCowden@mpg.gov.za>; Clifford Kubheka <KubhekaCZ@mpg.gov.za>; Sindy Mbuyane <MbuyaneSB@mpg.gov.za>; frans.krige@mtpa.co.za; mervyn@mtpa.co.za; Lloyd Barnes <Lloyd@mulilo.com>
Subject: SR Comments | Emvelo WEF Amsterdam Cluster
Importance: High

Dear Stephanie,

Please find herewith DARDLEAs comments on the draft Scoping Report for the Emvelo WEF and Grid Connection.

Comments for Sheepmoor and Rochdale to follow.

Kind Regards
Robyn

Robyn Luyt B.A., B.Sc., B.Sc (Hons) M.Sc., Pr.Sci.Nat. (400327/11), EAPASA (2019/1293)
Director: Environmental Impact Management
Department of Agriculture, Rural Development, Land & Environmental Affairs
Mpumalanga Provincial Government
Riverside Office Park, Aqua Street (Cycad Building - Block 4)

[redacted]

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Departement van Landbou, LandelikeOntwikkeling, GrondenOngewing Sake

umNyangoweZelimo UkuThuthukiswakweeNdawozemaKhaya, iNarhaneeNdabazeBhoduluko

Enquiries : **R. Luyt / O. Fakude**
Telephone : **(013) 004 1099**
Reference : **1/3/1/16/5G-30**

Stephanie Gopaul
ERM Southern Africa (Pty) Ltd
240 Main Road
Rondebosch
7700

Email: ERM.ArcusAmsterdam@erm.com

Dear Madam,

DRAFT SCOPING REPORT: ACTIVITIES ASSOCIATED WITH THE EMVELO WIND ENERGY FACILITY AND ASSOCIATED GRID CONNECTION ON VARIOUS PORTIONS OF THE FARMS SCHIEDAM 274 IT, VAALBANK 285 IT, WAALHOEK 286 IT, KLIPFONTEIN 283 IT, BOSJESSPRUIT 291 IT, ONVERWACHT 273 IT, ZWARTWATER 288 IT, WELTEVREDEN 289 IT, WITPUT AND MOOIPLAATS 290 IT AND CAMDEN POWER STATION 329 IT, ERMELO, MSUKALIGWA LOCAL MUNICIPALITY

The draft scoping report which was submitted by you in respect of the abovementioned application and received by the Department on 27 August 2024 has reference. The Department has considered the content of the report, and has the following comments:

1. The proposed Emvelo Wind Energy Facility and associated grid infrastructure is located in areas identified as CBA Irreplaceable and Optimal **(over 21%)**, Intact Grassland Patches **(33%)**, Key Biodiversity Areas **(21.4%)**, ESAs, Priority Focus Areas, Freshwater Ecosystem Priority Areas and Threatened Ecosystems (Endangered). Furthermore, 43% of the site falls within Grasslands SA020 Important Bird Area (IBA), and close to two other Important Bird Areas.
2. The proposed Emvelo WEF and associated grid connection is located in an area comprising a high diversity of threatened bird species, including the following confirmed on site: African Marsh Harrier (Regionally Endangered); Denham's Bustard (Globally Near Threatened, Regionally Vulnerable); Secretary bird (Globally Endangered, Regionally Vulnerable); White-bellied Bustard (Regionally Vulnerable), Blue Crane (Globally Vulnerable, Regionally Near Threatened); Grey Crowned Crane (Globally and Regionally Endangered); Martial Eagle (Globally and Regionally Endangered); Lanner Falcon (Regionally Vulnerable); Greater Flamingo (Regionally Near Threatened); Southern Bald Ibis (Regionally and Globally Vulnerable); Cape Vulture (Globally Vulnerable and Regionally Endangered); and Yellow-breasted Pipit (Regionally and Globally Vulnerable).
3. Furthermore, intact grassland patches make up a third of the site footprint. DARDLEA does not support the development of WEFs (or any non-compatible land use) within intact grassland patches. The MBSP specifically incorporated climate change into spatial priorities through the prioritisation of the connectivity of remaining intact grassland patches in the province, as they provide habitat for species to thrive, and allow for their dispersal. Intact grasslands are crucial for supporting threatened avifauna.
4. DARDLEA is therefore concerned that the proposed location of the Emvelo Wind Energy Facility and associated grid infrastructure is not compatible with the desired land use. The WEF and all associated infrastructure is not a land use, in accordance with the Mpumalanga Biodiversity Sector Plan (MBSP), that will support the inherent biodiversity values of CBAs.

5. It is acknowledged that the layout plan in the draft Scoping Report is preliminary, and that you have confirmed that it will be revised further during the EIA phase to be informed by buffers and constraints provided by specialists. Such constraints identified to date include the location of turbines in areas identified in the Faunal Assessment as High Sensitivity and High Sensitivity Escarpment, the location of turbines and associated infrastructure in bat sensitive and bat no-go areas, the location of the laydown area in a sensitive aquatic feature, and the location of a number of turbines in avifaunal exclusion zones. It must be noted though that in addition to the exclusion zones identified in the specialist studies, a number of turbines as well as associated substation and laydown areas are still be located in Key Biodiversity Areas and IBAs (i.e. turbines 4, 8, 11, 18, 19, 22, 24, 26, 31, 33 and 35), Intact Grassland Patches (including turbines 1-6 9 and 13), and CBA Irreplaceable areas (12, 14, 16, 17, 29, 32 and 33) and CBA optimal areas (8, 18 and 19), which is very concerning.
6. We are concerned that cumulative impacts will not be dealt with adequately. While the Department of Fisheries, Forestry and the Environment has set a limit of 30km for the assessment of cumulative impacts, this should be viewed as a minimum requirement. Due to the extremely sensitive habitat within which all wind farms in the region have either been authorised or are currently in process, it is our view that all authorised and in-process wind farms in the Gert Sibande District should be included in the assessment of cumulative impacts. Currently, these include Ujekamanzi WEF 1, Ujekamanzi WEF 2, Ummbila Emoyeni WEF (authorised, and within 55km); Phefumula Emoyeni WEF (within 40km); Mukondeleli WEF (authorised), Zephyr WEF (within 30km), as well as Camden I and II, Sheepmoor WEF and Rochdale WEF. The cumulative assessment must, *inter alia*, identify the species and habitats most at risk of cumulative impacts, and identify key uncertainties. The definition of cumulative impacts as per the EIA Regulations is "the past, current and reasonably foreseeable future impact of an activity, considered together with the impact of activities associated with that activity, that in itself may not be significant, but may be significant when added to the existing and reasonably foreseeable impacts eventuating from similar or diverse activities". A comparative assessment of the impacts of this proposed facility, in relation to and in conjunction with, adjacent and surrounding renewable energy facilities should therefore be provided in the EIA Report.
7. Roads must be included in the draft layout plan, and must be incorporated in the impact analysis.
8. The plan of study for EIA must include and address the following:
   8.1 Terrestrial Biodiversity:
      - Intact Grassland Patches and Key Biodiversity Areas must be identified and considered in the analysis of impacts on terrestrial biodiversity.
      - Where infrastructure is to be developed in CBAs and Intact Grassland Patches, the impact of the loss of CBAs and intact grassland habitat in terms of metapopulation dynamics (i.e. how the loss of source areas will impact areas of low quality habitat that cannot support a population of species on its own) must be assessed.
      - The Site Ecological Importance methodology, as per the requirements of the Species Environmental Assessment Guidelines, must be demonstrated to have been applied.
      - The impact of the potential loss of ecological drivers on ecological processes must be analysed i.e. fire, which is an important driver for the maintenance of grassland biodiversity.
   8.2 Avifauna: DARDLEA supports the avifaunal specialists' recommendations to remove turbines from the "exclusion zones" identified during pre-construction monitoring. However, in the proposed re-assessment of the layout, the Avifaunal Assessment must consider and include the following:
      - The Birds and Wind-Energy Best-Practice Guidelines state that the duration of pre-construction monitoring should be extended (beyond 12 months) where there is a high risk of significant impacts on priority species. Sufficient evidence of high risk of significant impact on avifauna on site and within the Project Area of Influence exists to extend minimum pre-construction monitoring requirements to adequately assess impacts and determine appropriate mitigation measures. Where the layout of the proposed wind farm does not avoid all sensitive features, corridors and buffers (e.g. CBAs, intact grasslands patches, KBAs, pans and all waterbodies, and provide shaped buffers for such features), additional monitoring must be undertaken to

confirm the full spectrum of prevailing environmental conditions to ensure avoidance of significant impacts.

- Intact grassland patches are important habitat for foraging, and facilitate avifauna breeding and movement. Intact grassland patches must be considered and incorporated in the analysis of impact zones applicable to avifauna.
- Buffers for waterbodies / aquatic features – confirm the rationale in their determination and how their sizes (210m around drainage lines, and 110m around wetland no-go zones) were determined to be sufficient to account for movement of birds through the site, and protection of roosting areas and flight behaviours (approaching and leaving roost sites, foraging sites etc).
- DARDLEA is especially concerned that the site comprises habitat suitable for species with low detection probability, including the Globally Vulnerable Yellow-breasted Pipit, and Endangered Rudd's Lark, and the Critically Endangered Species 23. The precautionary principle must be applied in the undertaking of comprehensive habitat-based assessments in order to robustly delineate flyways and movement corridors for these species.
- Confirmation of compliance with vantage point requirements. Based on our viewshed analysis it appears that only 45-50% of the site is covered vs the required 75%, and that some turbines have been located outside of vantage point visibility.
- DARDLEAs position is that blade painting will be a non-negotiable, compulsory requirement for all authorised wind farms in the province, and Shut Down on Demand (SDoD) would be a compulsory adaptive management requirement. However, since neither of these measures are effective for night flying birds, which have been confirmed on and adjacent to the site, a separate operational impact analysis must be undertaken for "Mortality of priority night flying species due to collisions with the wind turbines".
- The night-flying greater flamingo was confirmed on site, and there is currently no known technology to mitigate for the collision of night flying birds.
- Due to the sensitivity of avifauna using the area, and the presence of pans and wetlands on and adjacent to the site, as well as the presence of night-flying birds, tracking data should be acquired to augment the 2D models used.
- Surveys and tracking should be undertaken to determine the collision risks for nocturnal species.
- A site-specific list of priority avifaunal species for wind farms for this particular region must be developed, which must include all wetland species (noting that the priority species list published by BirdLife South Africa in 2012 does not include most wetland species, and did not include Mpumalanga).
- Appropriate fatality thresholds (turbine collision, as well as power line collision and electrocution) need to be defined and agreed on **within and as part of the EIA process**, which must then be incorporated into the impact analysis.
- It is acknowledged that the Martial Eagle nest turbine no-go buffer is currently being investigated further with detailed modelling and additional survey work, to inform the final no-go area during the EIA phase. Latest available information from literature, specialists and BirdLife must be consulted during this exercise. This must include BirdLife's and EWT's recommendations of 5-6km buffer for Martial Eagle nests, noting however that Martial Eagles are known to have large breeding territories, and any buffer must be supported by the birds' actual use of an area.

8.3 Bat Assessment

- Appropriate fatality thresholds need to be defined and agreed on within the EIA process and incorporated in the impact analysis.
- Separate mitigation measures need to be considered in more detail for high-flying bat species (i.e. Egyptian Free-Tailed bat) and lower-level bat species (e.g. Cape Serotine) in the EIA, i.e. different turbine design, blade / rotor sweep size and height, should be investigated for the specific wind turbines located adjacent to areas where these different bat species occur.

8.4 Microclimate Impact Assessment

- Research has demonstrated that turbines can affect the conditions required for mist formation, and that wind farms warm the land surface, especially at night. Altered microclimates will affect the conditions that support the highveld grasslands. Biodiversity and agricultural potential will potentially be affected. A Microclimate Impact Assessment must be undertaken, which must inform the terrestrial biodiversity study as well as the Agricultural Assessment. The impact of this WEF on the micro-climate, in particular the potential impact on precipitation, soil moisture, soil temperature, etc. therefore also needs to be assessed as part of the EIA.

9. All relevant stakeholders, including but not limited to, BirdLife SA, Mpumalanga Tourism and Parks Agency (MTPA), Gert Sibande District Municipality (GSDM), Department of Agriculture, Land Reform and Rural Development (DALRRD), Department of Public Works, Roads and Transport (DPWRT), and Msukaligwa Local Municipality must be must be consulted and provided with an opportunity of at least 30 days to submit comments.
10. The public participation process must be demonstrated to have been conducted in accordance with Regulations 39 – 44 of the EIA Regulations, 2014 (as amended).
11. Please provide this Department with an opportunity to review and engage with your response to these comments prior to the submission the final scoping report.
12. We are concerned that the proposed development site is not suitable for the development of wind energy infrastructure, and do not support the layout in its current form.

Please do not hesitate to contact this office if there are any enquiries.

Sincerely,

MS. R. LUYT
DIRECTOR: ENVIRONMENTAL IMPACT MANAGEMENT
DATE: 17/09/2024

Cc: Mr L Barnes Lloyd@mulilo.com
Dr Mervyn Lotter mervyn.lotter@mtpa.co.za
Mr Frans Krige frans.krige@mtpa.co.za
Ms S Dlomo sdlomo@dffe.gov.za
Ms O Letlalo oletlalo@dffe.gov.za
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Mr C Agenbach cagenbach@dffe.gov.za
Mr G Cowden gcowden@mpg.gov.za
Ms S Mbuyane mbuyanesb@mpg.gov.za
Ms T Mogakabe tebogom@gsibande.gov.za

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Departement van Landbou, LandelikeOntwikkeling, GrondenOngewing Sake

umNyangoweZelimo UkuThuthukiswakweeNdawozemaKhaya, iNarhaneeNdabazeBhoduluko

Enquiries : **R. Luyt / C. Kubheka**
Telephone : **(013) 004 0766**
Reference : **1/3/1/16/5G-29**

Stephanie Gopaul
ERM Southern Africa (Pty) Ltd
240 Main Road
Rondebosch
7700

Email: ERM.ArcusAmsterdam@erm.com

Dear Madam,

DRAFT SCOPING REPORT: ACTIVITIES ASSOCIATED WITH THE ROCHDALE WIND ENERGY FACILITY AND ASSOCIATED GRID CONNECTION ON PORTIONS 1, 2 & 5 OF THE FARM SCHIMMELHOEK 272 IT, PORTIONS 3, 6, 7, 8 & 13 OF THE FARM ONVERWACHT 273 IT, PORTION 3 OF THE FARM ONVERWACHT 287 IT, PORTIONS 1, 2, 9 & 10 OF THE FARM ZWARTWATER 288 IT, PORTIONS 6, 10, 11 & RE/3 OF THE FARM WELTEVREDEN 289 IT, AND PORTION RE/7 OF THE FARM WITPUNT 267 IT, ERMELO, MSUKALIGWA LOCAL MUNICIPALITY

The draft scoping report which was submitted by you in respect of the abovementioned application and received by the Department on 27 August 2024 has reference. The Department has considered the content of the report, and has the following comments:

1. The proposed Rochdale Wind Energy Facility and associated grid infrastructure is located in areas identified as CBA Irreplaceable and Optimal **(over 66%)**, Intact Grassland Patches, Key Biodiversity Areas **(79.7%)**, ESAs, Priority Focus Areas, Freshwater Ecosystem Priority Areas and Threatened Ecosystems (Endangered), and the northern, southern, and western borders of the site fall close to three different Important Bird Areas.
2. The proposed development is within a 30km radius of four (4) nature reserves i.e. Ahlers, Langcarel, Josua Moolman, and Laughing Waters Private Nature Reserves. The Chrissiesmeer Protected Environment **is within 5km** of the proposed site.
3. The proposed Rochdale WEF and associated grid connection is located in an area comprising a high diversity of threatened bird species, including the following confirmed on site: African Marsh Harrier (Regionally Endangered), Denham's Bustard (Globally Near Threatened, Regionally Vulnerable), Secretarybird (Globally Endangered, Regionally Vulnerable), White-bellied Bustard (Regionally Vulnerable), Blue Crane (Globally Vulnerable, Regionally Near Threatened), Grey Crowned Crane (Globally and Regionally Endangered), Martial Eagle (Globally and Regionally Endangered), Lanner Falcon (Regionally Vulnerable), Greater Flamingo (Regionally Near Threatened), Southern Bald Ibis (Regionally and Globally Vulnerable), Cape Vulture (Globally Vulnerable and Regionally Endangered), and Yellow-breasted Pipit (Regionally and Globally Vulnerable).
4. DARDLEA is therefore concerned that the location of the Rochdale Wind Energy Facility and associated grid infrastructure is not compatible with the desired land use. The WEF and all associated infrastructure is not a land use, in accordance with the Mpumalanga Biodiversity Sector Plan (MBSP), that will support the inherent biodiversity values of CBAs.
5. Furthermore, **intact grassland patches** are located within the site footprint. DARDLEA does not support the development of WEFs (or any non-compatible land use) within intact grassland

patches. The MBSP specifically incorporated climate change into spatial priorities through the prioritisation of the connectivity of remaining intact grassland patches in the province, as they provide habitat for species to thrive, and allow for their dispersal. Intact grasslands are crucial for supporting threatened avifauna.

6. It is acknowledged that the layout plan in the draft Scoping Report is preliminary, and that you have confirmed that it will be revised further during the EIA phase to be informed by buffers and constraints provided by specialists. Such constraints identified in the specialist reports to date include: the laydown areas in bat sensitive areas; the location of the substation and O&M buildings in sensitive aquatic areas; and the location of all but 3 turbines in avifaunal exclusion zones. It must be noted though, that these 3 turbines are all still located in **Key Biodiversity Areas (KBAs)**, and one of them (WTG5) is in a CBA Irreplaceable area. Furthermore, all associated infrastructure (laydown areas, transmission lines, substation) is located in KBAs, and the laydown areas are in CBA Irreplaceable areas. The location of turbines and associated infrastructure in KBAs and CBA Irreplaceable areas is not supported.
7. We are concerned that cumulative impacts will not be dealt with adequately. While the Department of Fisheries, Forestry and the Environment has set a limit of 30km for the assessment of cumulative impacts, this should be viewed as a minimum requirement. Due to the extremely sensitive habitat within which all wind farms in the region have either been authorised or are currently in process, it is our view that all authorised and in-process wind farms in the Gert Sibande District should be included in the assessment of cumulative impacts. Currently these include Ujekamanzi WEF 1, Ujekamanzi WEF 2, Ummbila Emoyeni WEF (authorised, and within 55km); Phefumula Emoyeni WEF (within 40km); Zephyr WEF (within 30km), Mukondeleli WEF (authorised) as well as Camden I and II, Sheepmoor WEF and Emvelo WEF. The cumulative assessment must, *inter alia*, identify the species and habitats most at risk of cumulative impacts, and identify key uncertainties. The definition of cumulative impacts as per the EIA Regulations is "the past, current and reasonably foreseeable future impact of an activity, considered together with the impact of activities associated with that activity, that in itself may not be significant, but may be significant when added to the existing and reasonably foreseeable impacts eventuating from similar or diverse activities". A comparative assessment of the impacts of this proposed facility, in relation to and in conjunction with, adjacent and surrounding renewable energy facilities should therefore be provided in the EIA Report.
8. Roads must be included in the draft layout plan, and must be incorporated in the impact analysis.
9. The plan of study for EIA must include and address the following:
   - 9.1 Terrestrial Biodiversity:
     - Intact Grassland Patches and Key Biodiversity Areas must be identified and considered in the analysis of impacts on terrestrial biodiversity.
     - Where infrastructure is to be developed in CBAs and Intact Grassland Patches, the impact of the loss of CBAs and intact grassland habitat in terms of metapopulation dynamics (ie. how the loss of source areas will impact areas of low quality habitat that cannot support a population of species on its own) must be assessed.
     - The Site Ecological Importance methodology, as per the requirements of the Species Environmental Assessment Guidelines, must be demonstrated to have been applied.
     - The impact of the potential loss of ecological drivers on ecological processes must be analysed ie. fire, which is an important driver for the maintenance of grassland biodiversity.
   - 9.2 Avifauna: DARDLEA supports the avifaunal specialists' recommendations to remove turbines from the "exclusion zones" identified during pre-construction monitoring. However, in the proposed re-assessment of the layout, the Avifaunal Assessment must consider and include the following:
     - The Birds and Wind-Energy Best-Practice Guidelines state that the duration of pre-construction monitoring should be extended (beyond 12 months) where there is a high risk of significant impacts on priority species. Sufficient evidence of high risk of significant impact on avifauna on site and within the Project Area of Influence exists to extend minimum pre-construction monitoring requirements to adequately assess impacts and determine appropriate mitigation measures. Where the layout of the proposed wind farm does not avoid all sensitive features, corridors and buffers (e.g. CBAs, intact grasslands patches, KBAs, pans and all waterbodies, and provide

shaped buffers for such features), additional monitoring must be undertaken to confirm the full spectrum of prevailing environmental conditions to ensure avoidance of significant impacts.

- Intact grassland patches are important habitat for foraging, and facilitate avifauna breeding and movement. Intact grassland patches must be considered and incorporated in the analysis of impact zones applicable to avifauna.
- Buffers for waterbodies / aquatic features – confirm the rationale in their determination and how their sizes (210m around drainage lines, and 110m around wetland no-go zones) were determined to be sufficient to account for movement of birds through the site, and protection of roosting areas and flight behaviours (approaching and leaving roost sites, foraging sites etc).
- DARDLEA is especially concerned that the site comprises habitat suitable for species with low detection probability, including the Globally Vulnerable Yellow-breasted Pipit, and Endangered Rudd's Lark, and the Critically Endangered Species 23. The precautionary principle must be applied in the undertaking of comprehensive habitat-based assessments in order to robustly delineate flyways and movement corridors for these species.
- Confirmation of compliance with vantage point requirements. Based on our viewshed analysis it appears that only 45-50% of the site is covered vs the required 75%, and that some turbines have been located outside of vantage point visibility.
- DARDLEAs position is that blade painting will be a non-negotiable, compulsory requirement for all authorised wind farms in the province, and Shut Down on Demand (SDoD) would be a compulsory adaptive management requirement. However, since neither of these measures are effective for night flying birds, which have been confirmed on and adjacent to the site, a separate operational impact analysis must be undertaken for "Mortality of priority night flying species due to collisions with the wind turbines".
- The night-flying greater flamingo was confirmed on site, and there is currently no known technology to mitigate for the collision of night flying birds.
- Due to the sensitivity of avifauna using the area, and the presence of pans and wetlands on and adjacent to the site, as well as the presence of night-flying birds, tracking data should be acquired to augment the 2D models used.
- Surveys and tracking should be undertaken to determine the collision risks for nocturnal species.
- A site-specific list of priority avifaunal species for wind farms for this particular region must be developed, which must include all wetland species (noting that the priority species list published by BirdLife South Africa in 2012 does not include most wetland species, and did not include Mpumalanga).
- Appropriate fatality thresholds (turbine collision, as well as power line collision and electrocution) need to be defined and agreed on **within and as part of the EIA process**, which must then be incorporated into the impact analysis.
- It is acknowledged that the Martial Eagle nest turbine no-go buffer is currently being investigated further with detailed modelling and additional survey work, to inform the final no-go area during the EIA phase. Latest available information from literature, specialists and BirdLife must be consulted during this exercise. This must include BirdLife's and EWT's recommendations of 5-6km buffer for Martial Eagle nests, noting however that Martial Eagles are known to have large breeding territories, and any buffer must be supported by the birds' actual use of an area.

9.3 Bat Assessment

- Appropriate fatality thresholds need to be defined and agreed on within the EIA process and incorporated in the impact analysis.
- Separate mitigation measures need to be considered in more detail for high-flying bat species (i.e. Egyptian Free-Tailed bat) and lower-level bat species (e.g. Cape Serotine) in the EIA, i.e. different turbine design, blade / rotor sweep size and height, should be investigated for the specific wind turbines located adjacent to areas where these different bat species occur.

9.4 Microclimate Impact Assessment

- Research has demonstrated that turbines can affect the conditions required for mist formation, and that wind farms warm the land surface, especially at night. Altered microclimates will affect the conditions that support the highveld grasslands. Biodiversity and agricultural potential will potentially be affected. A Microclimate Impact Assessment must be undertaken, which must inform the terrestrial biodiversity study as well as the Agricultural Assessment. The impact of this WEF on the micro-climate, in particular the potential impact on precipitation, soil moisture, soil temperature, etc. therefore also needs to be assessed as part of the EIA.

10. All relevant stakeholders, including but not limited to, BirdLife SA, Mpumalanga Tourism and Parks Agency (MTPA), Gert Sibande District Municipality (GSDM), Department of Agriculture, Land Reform and Rural Development (DALRRD), Department of Public Works, Roads and Transport (DPWRT), and Msukaligwa Local Municipality must be must be consulted and provided with an opportunity of at least 30 days to submit comments.
11. The public participation process must be demonstrated to have been conducted in accordance with Regulations 39 – 44 of the EIA Regulations, 2014 (as amended).
12. Please provide this Department with an opportunity to review and engage with your response to these comments prior to the submission the final scoping report.
13. We are concerned that the proposed development site is not suitable for the development of wind energy infrastructure, and do not support the layout in its current form.

Please do not hesitate to contact this office if there are any enquiries.

Sincerely,

MS. R. LUYT
DIRECTOR: ENVIRONMENTAL IMPACT MANAGEMENT
DATE: 17/09/2024.

Cc: Mr L Barnes Lloyd@mulilo.com
Dr Mervyn Lotter mervyn.lotter@mtpa.co.za
Mr Frans Krige frans.krige@mtpa.co.za
Ms S Dlomo sdlomo@dffe.gov.za
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agriculture, rural development,
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MPUMALANGA PROVINCE
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LitikoLetekulima, Kutfutfukiswa KwetindzawoTasemakhaya, Temhlaba Netesimondzawo

Departement van Landbou, LandelikeOntwikkeling, GrondenOngewing Sake

umNyangoweZelimo UkuThuthukiswakweeNdawozemaKhaya, iNarhaneeNdabazeBhoduluko

Enquiries : **R. Luyt / S. Mbuyane**
Telephone : **076 870 5543**
Reference : **1/3/1/16/5G-28**

Ms. Stephanie Gopaul
ERM Southern Africa (Pty) Ltd
240 Main Road
Rondebosch
7700

Email: ERM.ArcusAmsterdam@erm.com

Dear Madam,

DRAFT SCOPING REPORT: ACTIVITIES ASSOCIATED WITH THE SHEEPMOOR WIND ENERGY FACILITY AND ASSOCIATED GRID CONNECTION ON VARIOUS PORTIONS OF THE FARMS ONVERWACHT 273 IT, ONVERWACHT 287 IT, WAAIHOEK 286 IT, WINDHOEK291 IT, ZWARTWATER 288 IT, WELTERVREDEN 289 IT, WELTERVREDEN 290 IT, MOOIPLAATS 290 IT, WITPUNT 267 IT AND CAMDEN POWER STATION 329 IT, ERMELO, MSUKALIGWA LOCAL MUNICIPALITY

The draft scoping report which was submitted by you in respect of the abovementioned application and received by the Department on 27 August 2024 has reference. The Department has considered the content of the report, and has the following comments:

1. The proposed Sheepmoor Wind Energy Facility and associated grid infrastructure is located in areas identified as CBA Irreplaceable and Optimal **(over 28%)**, Intact Grassland Patches **(36%),** Key Biodiversity Areas **(9.3%)**, ESAs, Priority Focus Areas, Freshwater Ecosystem Priority Areas and Threatened Ecosystems (Endangered). Furthermore, 84% of the site falls within Grasslands SA020, Important Bird Area (IBA), and close to two other Important Bird Areas.
2. The proposed Sheepmoor WEF and associated grid connection is located in an area comprising a high diversity of threatened bird species, including the following confirmed on site: African Marsh Harrier (Regionally Endangered); Denham's Bustard (Globally Near Threatened, Regionally Vulnerable); Secretarybird (Globally Endangered, Regionally Vulnerable); White-bellied Bustard (Regionally Vulnerable), Blue Crane (Globally Vulnerable, Regionally Near Threatened); Grey Crowned Crane (Globally and Regionally Endangered); Martial Eagle (Globally and Regionally Endangered); Lanner Falcon (Regionally Vulnerable); Greater Flamingo (Regionally Near Threatened); Southern Bald Ibis (Regionally and Globally Vulnerable); Cape Vulture (Globally Vulnerable and Regionally Endangered); and Yellow-breasted Pipit (Regionally and Globally Vulnerable).
4. Furthermore, **intact grassland patches** make up **36%** of the site footprint. DARDLEA does not support the development of WEFs (or any non-compatible land use) within intact grassland patches. The MBSP specifically incorporated climate change into spatial priorities through the prioritisation of the connectivity of remaining intact grassland patches in the province, as they provide habitat for species to thrive, and allow for their dispersal. Intact grasslands are crucial for supporting threatened avifauna.

5. The proposed Sheepmoor WEF development is within a 10km-30km radius of three protected private nature reserves (Ahlers, Langcarel and Josua Moolman), and the Chrissiesmeer Protected Environment is within 10km of the proposed site.
6. DARDLEA is therefore concerned that the proposed location of the Sheepmoor Wind Energy Facility and associated grid infrastructure is not compatible with the desired land use. The WEF and all associated infrastructure is not a land use, in accordance with the Mpumalanga Biodiversity Sector Plan (MBSP), that will support the inherent biodiversity values of CBAs.
7. It is acknowledged that the layout plan in the draft Scoping Report is preliminary, and that you have confirmed that it will be revised further during the EIA phase to be informed by buffers and constraints provided by specialists. Such constraints identified in the specialist reports to date include: the location of laydown areas, O&M Buildings and a substation in avian exclusion zones; the location of the substation and O&M Buildings in a sensitive aquatic area; the location of infrastructure within areas of High faunal sensitivity; the location of the Laydown Area, O&M buildings and the Alternative substation within in no-go bat areas; and the location of all but 3 turbines in avifaunal exclusion zones. It must be noted also that the substation, laydown area, and at least 13 turbines are located in intact grassland patches, and all but 6 turbines are located in an IBA, which is very concerning.
8. We are concerned that cumulative impacts will not be dealt with adequately. While the Department of Fisheries, Forestry and the Environment has set a limit of 30km for the assessment of cumulative impacts, this should be viewed as a minimum requirement. Due to the extremely sensitive habitat within which all wind farms in the region have either been authorised or are currently in process, it is our view that all authorised and in-process wind farms in the Gert Sibande District should be included in the assessment of cumulative impacts. These include Ujekamanzi WEF 1, Ujekamanzi WEF 2, Ummbila Emoyeni WEF (authorised, and within 55km); Phefumula Emoyeni WEF (within 40km); Zephyr WEF (within 30km), as well as Camden I and II, Emvelo WEF and Rochdale WEF. The cumulative assessment must, *inter alia*, identify the species and habitats most at risk of cumulative impacts, and identify key uncertainties. The definition of cumulative impacts as per the EIA Regulations is "the past, current and reasonably foreseeable future impact of an activity, considered together with the impact of activities associated with that activity, that in itself may not be significant, but may be significant when added to the existing and reasonably foreseeable impacts eventuating from similar or diverse activities". A comparative assessment of the impacts of this proposed facility, in relation to and in conjunction with, adjacent and surrounding renewable energy facilities should therefore be provided in the EIA Report.
9. Roads to be developed must be included in the draft layout plan, and must be incorporated in the impact analysis.
10. The plan of study for EIA must include and address the following:
    10.1 Terrestrial Biodiversity:
        - Intact Grassland Patches and Key Biodiversity Areas must be identified and considered in the analysis of impacts on terrestrial biodiversity.
        - Where infrastructure is to be developed in CBAs and Intact Grassland Patches, the impact of the loss of CBAs and intact grassland habitat in terms of metapopulation dynamics (ie. how the loss of source areas will impact areas of low quality habitat that cannot support a population of species on its own) must be assessed.
        - The Site Ecological Importance methodology, as per the requirements of the Species Environmental Assessment Guidelines, must be demonstrated to have been applied.
        - The impact of the potential loss of ecological drivers on ecological processes must be analysed ie. fire, which is an important driver for the maintenance of grassland biodiversity.
    10.2 Avifauna: DARDLEA supports the supports the avifaunal specialists' recommendations to remove turbines from the "exclusion zones" identified during pre-construction monitoring. However, in the proposed re-assessment of the layout, the Avifaunal Assessment must consider and include the following:

- The Birds and Wind-Energy Best-Practice Guidelines state that the duration of pre-construction monitoring should be extended (beyond 12 months) where there is a high risk of significant impacts on priority species. Sufficient evidence of high risk of significant impact on avifauna on site and within the Project Area of Influence exists to extend minimum pre-construction monitoring requirements to adequately assess impacts and determine appropriate mitigation measures. Where the layout of the proposed wind farm does not avoid all sensitive features, corridors and buffers (e.g. CBAs, intact grasslands patches, KBAs, pans and all waterbodies, and provide shaped buffers for such features), additional monitoring must be undertaken to confirm the full spectrum of prevailing environmental conditions to ensure avoidance of significant impacts.
- Intact grassland patches are important habitat for foraging, and facilitate avifauna breeding and movement. Intact grassland patches must be considered and incorporated in the analysis of impact zones applicable to avifauna.
- Buffers for waterbodies / aquatic features – confirm the rationale in their determination and how their sizes (210m around drainage lines, and 110m around wetland no-go zones) were determined to be sufficient to account for movement of birds through the site, and protection of roosting areas and flight behaviours (approaching and leaving roost sites, foraging sites etc).
- DARDLEA is especially concerned that the site comprises habitat suitable for species with low detection probability, including the Globally Vulnerable Yellow-breasted Pipit, and Endangered Rudd's Lark, and the Critically Endangered Species 23. The precautionary principle must be applied in the undertaking of comprehensive habitat-based assessments in order to robustly delineate flyways and movement corridors for these species.
- Confirmation of compliance with vantage point requirements. Based on our viewshed analysis it appears that only 45-50% of the site is covered vs the required 75%, and that some turbines have been located outside of vantage point visibility.
- DARDLEAs position is that blade painting will be a non-negotiable, compulsory requirement for all authorised wind farms in the province, and Shut Down on Demand (SDoD) would be a compulsory adaptive management requirement. However, since neither of these measures are effective for night flying birds, which have been confirmed on and adjacent to the site, a separate operational impact analysis must be undertaken for "Mortality of priority night flying species due to collisions with the wind turbines".
- The night-flying greater flamingo was confirmed on site, and there is currently no known technology to mitigate for the collision of night flying birds.
- Due to the sensitivity of avifauna using the area, and the presence of pans and wetlands on and adjacent to the site, as well as the presence of night-flying birds, tracking data should be acquired to augment the 2D models used.
- Surveys and tracking should be undertaken to determine the collision risks for nocturnal species.
- A site-specific list of priority avifaunal species for wind farms for this particular region must be developed, which must include all wetland species (noting that the priority species list published by BirdLife South Africa in 2012 does not include most wetland species, and did not include Mpumalanga).
- Appropriate fatality thresholds (turbine collision, as well as power line collision and electrocution) need to be defined and agreed on **within and as part of the EIA process**, which must then be incorporated into the impact analysis.
- It is acknowledged that the Martial Eagle nest turbine no-go buffer is currently being investigated further with detailed modelling and additional survey work, to inform the final no-go area during the EIA phase. Latest available information from literature, specialists and BirdLife must be consulted during this exercise. This must include BirdLife's and EWT's recommendations of 5-6km buffer for Martial Eagle nests, noting

however that Martial Eagles are known to have large breeding territories, and any buffer must be supported by the birds' actual use of an area.

10.3 Bat Assessment

- Appropriate fatality thresholds need to be defined and agreed on within the EIA process and incorporated in the impact analysis.
- Separate mitigation measures need to be considered in more detail for high-flying bat species (i.e. Egyptian Free-Tailed bat) and lower-level bat species (e.g. Cape Serotine) in the EIA, i.e. different turbine design, blade / rotor sweep size and height, should be investigated for the specific wind turbines located adjacent to areas where these different bat species occur.

10.4 Microclimate Impact Assessment

- Research has demonstrated that turbines can affect the conditions required for mist formation, and that wind farms warm the land surface, especially at night. Altered microclimates will affect the conditions that support the highveld grasslands. Biodiversity and agricultural potential will potentially be affected. A Microclimate Impact Assessment must be undertaken, which must inform the terrestrial biodiversity study as well as the Agricultural Assessment. The impact of this WEF on the micro-climate, in particular the potential impact on precipitation, soil moisture, soil temperature, etc. therefore also needs to be assessed as part of the EIA.

11. All relevant stakeholders, including but not limited to, BirdLife SA, Mpumalanga Tourism and Parks Agency (MTPA), Gert Sibande District Municipality (GSDM), Department of Agriculture, Land Reform and Rural Development (DALRRD), Department of Public Works, Roads and Transport (DPWRT), and Msukaligwa Local Municipality must be must be consulted and provided with an opportunity of at least 30 days to submit comments.
12. The public participation process must be demonstrated to have been conducted in accordance with Regulations 39 – 44 of the EIA Regulations, 2014 (as amended).
13. Please provide this Department with an opportunity to review and engage with your response to these comments prior to the submission the final scoping report.
14. We are concerned that the proposed development site is not suitable for the development of wind energy infrastructure, and do not support the layout in its current form.

Please do not hesitate to contact this office if there are any enquiries.

Sincerely,

MS. R. LUYT
DIRECTOR: ENVIRONMENTAL IMPACT MANAGEMENT
DATE: 17/09/2024

Cc: Mr L Barnes Lloyd@mulilo.com
Dr Mervyn Lotter mervyn.lotter@mtpa.co.za
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Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town
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From:	Jamie Pote
To:	ERM Arcus Amsterdam
Cc:	Stephen Burton
Subject:	Re: Terrestrial Biodiversity + Faunal Specialist - Mulilo Amsterdam CA Commenting Responses required
Date:	Wednesday, 18 September 2024 11:09:57
Attachments:	image001.png

EXTERNAL MESSAGE

Hi Lucien

Unfortunately I'm on the road today mostly off network and on a critical timeline so will not be available for 2pm. It was lucky I even received this email, I must have snuck past some network signal.

I'm also on a field trip in remote areas for almost the rest of the month, so looking at and addressing comments is likely to be a challenge before the 23rd.

I had actually archived this project as I queried a few times over the last few months without response, so had assumed it had been parked indefinately.

It seems characteristic of Mulilo to park things for months or years and then suddenly it pops up for immediate response and I cannot in good conscience now tell other clients that have well in advance planned timelines, that they must now wait because Mulilo wants a response immediately.

My apologies for being blunt about this but it happens every time and while I try and accommodate everyone including when urgent matters arise if one is going to follow this sort of approach sooner or later there is going to be a scheduling conflict.

In addition because it is parked so long I have to review all the reports to refresh myself of the specifics, which was not included in my budget or timeline.

Thank you and kind regards
Jamie

Mr Jamie Pote
Biodiversity – Environmental – GIS

BSc (Hons) Pr. Sci. Nat (115233)
[redacted]*Humewood - Port Elizabeth - South Africa*
[redacted]

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Wednesday, September 18, 2024 10:44:39 AM
To: jamiepote@live.co.za <jamiepote@live.co.za>; Jonathan Colville <jonathan.colville@gmail.com>; callanafrica@gmail.com <callanafrica@gmail.com>
Cc: Lloyd Barnes <lloyd@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: Terrestrial Biodiversity + Faunal Specialist - Mulilo Amsterdam CA Commenting Responses required

From:	Celia de Waal
To:	ERM Arcus Amsterdam
Cc:	Tommie Steyn; jjexteen@gmail.com; Johan Eksteen; Frans Krige; Khumbelo Malele; Thabile Mnisi; Phumla Nkosi; Fortunate Watkins; Mervyn Lotter
Subject:	MTPA"s comments LUA 24/3967 - Draft EIA Scoping Report for the proposed development of the Sheepmoor Wind Energy facility.
Date:	Wednesday, 18 September 2024 14:36:50
Attachments:	LUA 24-3967 MTPA objection DSR SHEEPMOOR WEF ERM.pdf

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EXTERNAL MESSAGE

Dear Ms. Gopaul

Kindly receive the attached comments from the MTPA regarding a Draft EIA Report for the proposed development of the Sheepmoore Wind Energy facility (WEF) with 23 wind turbines and Auxiliary infrastructure.

Your reference number: **Project 0684401** (DFFE: 14/12/16/3/3/2/2593)

Our EIA registration/reference number is **LUA 24/3967** (kindly use this number in any further correspondence to us regarding this project)

Kind regards

Celia de Waal

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
[redacted]

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

OFFICE OF BIODIVERSITY CONSERVATION

Ref: LUA 24/3967
Unit: LUA/SS
Inquiries: F.N. Krige & F.N. Lekaka
Email: frans@mtpa.co.za
Tel: 013- 0650286

Ms. Stephanie Gopaul

ERM Southern Africa (Pty) Ltd
240 Main Road
Great Westerford Building, 1st Floor
Rondebosch
CAPE TOWN
7700

Email: ERM.ArcusAmsterdam@erm.com

Dear Ms., Gopaul

SUBJECT: THE MTPA COMMENTS ON THE DRAFT ENVIRONMENTAL SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF THE SHEEPMOOR WIND ENERGY FACILITY (WEF) (23 WIND TURBINES) AND AUXILIARY INFRASTRUCTURE (1 ON-SITE SUBSTATION WITH A CAPACITY OF 132Kv, AND 1 OVER-HEAD POWERLINE OF APPROXIMATELY 22.3 KM) ON SEVERAL PORTIONS OF FARMS COVERING AN AREA OF 5 918 HA EAST OF ERMELO FOR SHEEPMOOR WIND ENERGY FACILITY (PTY) LTD, MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE. DFFE REFERENCE NUMBER TO BE PROVIDED.

With reference to your correspondence reference **Project no: 0684401** of August 2024, herewith the MTPA comments.

The application has been assessed by using the following tools: Mpumalanga Biodiversity Sector Plan (2014 as updated 2022) land use guidelines, the DFFE web-based sensitivity screening tool, Environmental legislation NEMA and EIA regulations 2014 as amended, Department of Water and Sanitation and Water Research Commission Guidelines on wetlands, the South African Heritage Resources Act and knowledge to assess Development Applications.

The sensitivity of the area, in which the prospecting activity is proposed and is likely to occur was assessed according to the Mpumalanga Biodiversity Sector plan (MBSP; MTPA, 2014). The sensitivity is assessed in terms of terrestrial and freshwater assessments. In the MBSP, sensitivity areas are identified in terms of *Critical Biodiversity Areas* (CBAs) and *Ecological Support Areas* (ESAs). CBAs and ESAs are deemed to be

necessary to ensure the protection of biodiversity, environmental sustainability and sustainable living and are to remain unaltered.

Comments with regards to the terms of reference for studies needed:

With reference to the assessment of your Draft Scoping Report the MTPA is concerned about the following issues raised with regards to the terms of reference for specialist studies to be done.

1. The alternative sites, although less sensitive to the preferred site, are still located in sensitive areas.
2. Ground truthing and on-site studying of areas regarded as degraded or sensitive and suitable for potential wind turbines must be done considering that cultivated/vegetated lands might be feeding areas for many Species of Conservation Concern. The Site sensitivity verification report must include the feeding areas for SCC.
3. The avoidance of large areas of critical biodiversity terrestrial and freshwater sensitivity areas and the preliminary project layout overlain area is a large concern especially in the southeastern part of the study area.
4. The threat of this WEF to the Important Bird Area and the status of globally threatened bird species such as the Southern Bald Ibis and Secretary bird is of concern. The onsite avifaunal study must include local knowledge of the distribution of large birds especially the Blue crane that is a local migrant during the wintertime.
5. Included in the MTPA's comments are the following discussion that illustrates the **need and desirability** of this proposal:

Renewable energy applications

- Given the energy needs of the country, significant emphasis is being placed on the need to transition away from coal towards renewable energy. However, the urgency and desire to approve nearly all renewable energy applications needs to be put into perspective considering the incredible investment and proliferation of new renewable energy projects within Mpumalanga.
- The MTPA and DARDLEA are maintaining a database of renewable energy projects, which include those in the pre-application phase. We can confirm that 61 renewable energy projects have now been submitted within Mpumalanga. Just over 50% of these have been approved to date. 18 of these are for Wind Energy Farms, which together make up for over 233 000 ha, and this amount is growing as the province is being inundated with renewable energy applications.
- The explosion of renewable energy applications does require careful consideration as to the likely impacts. There is no shortage of renewable energy projects within the Province and the Province has room to apply its mind and navigate this space carefully. The province has now over 300 000 ha of renewable energy applications, and the many more than are still to be submitted.

Mpumalanga Biodiversity Sector Plan (MBSP), Intact Grassland Patches and Important Bird Areas (IBAs)

- The project **footprint overlaps with a significant amount of Critical Biodiversity Areas** (CBA). 1 488.9 ha (over 28%) of the footprint area is identified as a CBA. Wind farms are not appropriate land uses within CBA areas. Two proposed wind turbines are placed in CBA Irreplaceable areas.
- The MBSP Terrestrial assessment indicates that the project footprint is within CBA: Irreplaceable, CBA: Optimal, ESA: Local Corridor, ESA: Landscape Corridor, ESA: Species Specific, Other Natural Areas, Moderately Modified, and Heavily Modified Areas.
- The MBSP Freshwater Assessment indicates that the project footprint is within ESA: Strategic Water Source Areas, and has CBA: Aquatic River, ESA: Wetland Clusters, ESA: Wetlands, ESA: Important Sub-catchments, Other Natural and Heavily Modified Areas.
- ESA: Strategic Water Source Area (SWSAs) maintain ecological integrity across the entire sub-catchment, paying particular attention to maintaining water quality, water quantity, and habitat integrity. They represent 10% of the surface area producing approximately 50% of Mpumalanga's water. The proposed WEF activity in the area might compromise the quality and quantity of the surface water resources through siltation.
- The whole of the proposed Sheepmoor wind farm falls within an Important Bird Area (IBA), which underscores the need to consider its implications on metapopulation dynamics and the need to avoid wind farms in "source" areas.
- The project area mainly falls within the Mesic Eastern Highveld Grassland (Endangered). A high proportion of this vegetation type is threatened and is generally poorly protected. Hence, it should be carefully managed for the persistence of biodiversity; large areas of natural habitat are needed for many bird species, plants, and numerous wetlands that the Mesic Highveld Grassland supports.
- The proposed project area has a portion of Wakkerstroom Montane Grassland (Least Concern). A variety of land-uses are supported by this area and the conservation and good management of this area depends on the continued land-uses practices that have been able to support this biodiversity. The importance of sustainable development is crucial to the long-term maintenance of the biodiversity and ecosystem services in this area.
- 2 143.6 ha (36 %) of the proposed wind farm is comprised of intact grassland patches. With only 51% of the grasslands remaining in a natural state, very little intact natural grasslands still occur in Mpumalanga. Three proposed wind turbines are placed in intact grassland patches.
- Intact grassland patches are areas larger than 100ha, with little or no gaps or edge effects. They were then prioritised according to their connectivity importance. These intact grasslands are "source" areas for avifaunal species where birth rates are expected to exceed death rates, and no wind farms should be placed anywhere near these intact grassland patches.
- The identification of actual avifaunal source areas may be difficult, but as these intact grassland patches occur within an Important Bird Area (IBA) where there are several nesting and roosting avifaunal species of conservation concern, it highlights their significance and our confidence in confirming these as "source" areas. The presence of these intact grassland patches, CBAs, and the IBAs, is probably the biggest concern that the MTPA may have about the proposed wind farm.

- 84 % of the proposed study area is Important Bird Area and 9.3% of the proposed study area is a Key Biodiversity Area.
- Wind farms are not to be placed in IBAs or intact grassland areas as these are important areas where avifauna should be allowed to thrive and then disperse to other areas.
- Approval of the project in such a location could have far-reaching consequences for threatened bird species, potentially disrupting vital source areas critical for population sustainability.
- The south of the project area falls within the National Protected Areas Expansion Strategy (NPAES) Focus Area (Moist Escarpment Grasslands). The Chrissiesmeer Protected Environment overlaps the north of the project area and Jericho Dam Nature Reserve overlaps the eastern part of the project area.
- It is imperative to adopt a precautionary approach and prioritize the conservation of these essential habitats.

Avifaunal concerns

- **Thirteen out of the 23 proposed wind turbines are placed within the 5 km buffer of a Martial Eagles' recommended buffer these should be removed.**
- 26% of the proposed wind turbines are not covered by vantage points.
- The presence of priority bird species for wind energy developments were recorded within the footprint area.
- Two Southern Bald Ibis colonies (Vulnerable) occur within footprint area.
- A Secretary bird nest (Endangered) was found within this area.
- Birds are very mobile and with the proposed turbine height and blade lengths, the current proposed buffers seem inadequate.
- This raises particular concern as these birds may continuously collide with the blades of the wind turbines and the continuous loss of several of these long-lived birds every year may have a significant impact on population status.
- The artificial water bodies within the footprint area may be important for flamingos and other water-dependent birds.

Site Sensitivity Verification

- The results of the Site Sensitivity Verification confirmed that:
    - The sensitivity for the Terrestrial biodiversity impact assessment as Very High in grassland and wetland habitat.
    - Aquatic Biodiversity Impact Assessment as Very High Sensitivity
    - Plant Species Assessment as Medium Sensitivity
    - Animal Species Assessment as High Sensitivity
    - Bat Assessment Very High/High Sensitivity
    - Avifaunal Assessment as Very High/High Sensitivity.

Additional concerns

- Not all the infrastructure has been included on the map or addressed in terms of likely impact, in this case, roads.

Recommendations:

- There should be a thorough Oribi census plan in place, and it should be included in the final EIA report as the project area is home to many Oribi antelope. (Red data species dependant on healthy highveld grasslands).
- Species 23 must be accounted for, and a management plan drawn up for it since the project area is a potential site for its occurrence.
- The EWT's recommended 5 km buffer for the Martial Eagle's nest is non-negotiable and should be adhered to throughout the project lifecycle.
- The current identified Avifaunal Sensitivities map of all 'no-go' areas (Figure (I)) indicates little area for available for the wind farm. With more appropriate buffers, more field work, and all the associated infrastructure (such as roads), we cannot see how it would be possible to establish a wind farm within the footprint area.
- Increase buffer zones for endangered bird nesting sites to reflect their wider flight ranges relative to the height of the turbines.
- Consider alternative locations with less ecological sensitivity, especially considering the numerous renewable energy projects already approved in Mpumalanga.

Conclusion:

The proposed Sheepmoor Wind Energy Facility poses a significant threat to a Critical Biodiversity Areas, intact grassland patches, Important Bird areas, and the habitat of numerous threatened bird species. Relying on the information presented to date, and the desktop assessments, **it is in the MTPA's opinion that this project is fatally flawed.** The anticipated impacts on biodiversity, particularly the avifauna, is too great to support this project. More ecological assessments and exploration of alternative locations are crucial before proceeding with this project.

Please do not hesitate to contact this office if there are any inquiries.

Kind Regards

MS. NOMCEBO KUNENE
EXECUTIVE MANAGER BIODIVERSITY CONSERVATION
DATE: 18 / 09 / 2024

From:	Stephen Burton
To:	ERM Arcus Amsterdam
Subject:	RE: MTPA"s comments LUA 24/3967 - Draft EIA Scoping Report for the proposed development of the Sheepmoor Wind Energy facility.
Date:	Wednesday, 18 September 2024 15:49:49

Better get these comments out to the specialists as well

Stephen Burton
Principal Consultant: Ecology and Biodiversity Pr. Sci.Nat.
He/Him/His

Ground Floor, Building 27, The woodlands Office Park, Woodlands Drive, Woodmead, 2148, Johannesburg, South Africa
[redacted]

erm.com

If I am sending this email outside of regular working hours, it is because it suits my schedule, but I don't expect you to read, respond or action it outside of your regular hours.

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Wednesday, September 18, 2024 3:46 PM
To: Stephen Burton <Stephen.Burton@erm.com>
Subject: FW: MTPA's comments LUA 24/3967 - Draft EIA Scoping Report for the proposed development of the Sheepmoor Wind Energy facility.

Lucien Barbeau
Consultant

Cape Town [redacted]

erm.com

From: Celia de Waal <celia@mtpa.co.za>
Sent: Wednesday, September 18, 2024 2:36 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Tommie Steyn <Tommie@mtpa.co.za>; jjexteen@gmail.com; Johan Eksteen <johan@mtpa.co.za>; Frans Krige <frans@mtpa.co.za>; Khumbelo Malele <Khumbelo.Malele@mtpa.co.za>; Thabile Mnisi <Thabile.Mnisi@mtpa.co.za>; Phumla Nkosi <Phumla.Nkosi@mtpa.co.za>; Fortunate Watkins <Fortunate.Watkins@mtpa.co.za>; Mervyn Lotter <Mervyn.Lotter@mtpa.co.za>
Subject: MTPA's comments LUA 24/3967 - Draft EIA Scoping Report for the proposed development of the Sheepmoor Wind Energy facility.

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EXTERNAL MESSAGE

Dear Ms. Gopaul

Kindly receive the attached comments from the MTPA regarding a Draft EIA Report for the proposed development of the Sheepmoore Wind Energy facility (WEF) with 23 wind turbines and Auxiliary infrastructure.

Your reference number: **Project 0684401** (DFFE: 14/12/16/3/3/2/2593)

Our EIA registration/reference number is **LUA 24/3967** (kindly use this number in any further correspondence to us regarding this project)

Kind regards

Celia de Waal

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
[redacted]

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From: Gavin Anderson
To: ERM Arcus Amsterdam
Subject: Re: Mulilo Amsterdam WEF Cluster (Sheepmoor, Rochdale and Emvelo)
Date: Wednesday, 18 September 2024 18:40:53
Attachments: image001.png

EXTERNAL MESSAGE

Hi Lucien
Highly unlikely that I can get comments by then. It is too short notice. If they require more than a sentence and if there are many it will take longer. I have been in the field for 3 weeks and have 3 weeks to go. Will see what I can do.
We still have not been paid that VO. Can you please look into it.
Regards
Gavin

On Wed, 18 Sept 2024 at 11:07, ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Hi there.
>
> I hope this email finds you well. Please see attached comments from the CA (DARDLEA/MTPA) pertaining to the Mulilo Amsterdam WEF cluster. Please read through all comments and respond to the comments directed at your speciality.
>
> If responses could please be provided by Monday the 23rd September that would be appreciated.
>
> Thank you,
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Consultant
>
> Cape Town [redacted] **erm.com**



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20 years of Heritage Impact Assessments

==========

UMLANDO: Archaeological Surveys & Heritage Management
PO Box 10153, Meerensee, KwaZulu-Natal 3901
[redacted]
[redacted]
Facebook: Umlando SouthAfrica
Email:umlando@gmail.com

From:	ERM Arcus Amsterdam
To:	Stephen Burton; ERM Arcus Amsterdam
Subject:	RE: MTPA"s comments LUA 24/3967 - Draft EIA Scoping Report for the proposed development of the Sheepmoor Wind Energy facility.
Date:	Thursday, 19 September 2024 06:57:37

Just waiting on Rochdale and Emvelo to come through and I'll send them out as well

Lucien Barbeau
Consultant

Cape Town
+27105963488

erm.com

From: Stephen Burton <Stephen.Burton@erm.com>
Sent: Wednesday, September 18, 2024 3:50 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: RE: MTPA's comments LUA 24/3967 - Draft EIA Scoping Report for the proposed development of the Sheepmoor Wind Energy facility.

Better get these comments out to the specialists as well

Stephen Burton
Principal Consultant: Ecology and Biodiversity Pr. Sci.Nat.
He/Him/His

Ground Floor, Building 27, The woodlands Office Park, Woodlands Drive, Woodmead, 2148, Johannesburg, South Africa
[redacted]

erm.com

If I am sending this email outside of regular working hours, it is because it suits my schedule, but I don't expect you to read, respond or action it outside of your regular hours.

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Wednesday, September 18, 2024 3:46 PM
To: Stephen Burton <Stephen.Burton@erm.com>
Subject: FW: MTPA's comments LUA 24/3967 - Draft EIA Scoping Report for the proposed development of the Sheepmoor Wind Energy facility.

Lucien Barbeau
Consultant

Cape Town
+27105963488

erm.com

From: Celia de Waal <celia@mtpa.co.za>
Sent: Wednesday, September 18, 2024 2:36 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Tommie Steyn <Tommie@mtpa.co.za>; jjexteen@gmail.com; Johan Eksteen <johan@mtpa.co.za>; Frans Krige <frans@mtpa.co.za>; Khumbelo Malele <Khumbelo.Malele@mtpa.co.za>; Thabile Mnisi <Thabile.Mnisi@mtpa.co.za>; Phumla Nkosi <Phumla.Nkosi@mtpa.co.za>; Fortunate Watkins <Fortunate.Watkins@mtpa.co.za>; Mervyn Lotter <Mervyn.Lotter@mtpa.co.za>
Subject: MTPA's comments LUA 24/3967 - Draft EIA Scoping Report for the proposed development of the Sheepmoor Wind Energy facility.

You don't often get email from celia@mtpa.co.za. Learn why this is important

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

EXTERNAL MESSAGE

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Mpumalanga
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Cecilia de Waal

Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
[redacted]
e-mail: celia.dewaal@mtpa.co.za

This e-mail and any attachments may contain proprietary, confidential and/or privileged information. No confidentiality or privilege is waived or lost by any transmission errors. This communication is intended solely for the intended recipient, and if you are not the intended recipient, please notify the sender immediately, delete it from your system and do not copy, distribute, disclose, or otherwise act upon any part of this email communication or its attachments. To find out how the ERM Group manages personal data please review our Privacy Policy

From: Celia de Waal
To: ERM Arcus Amsterdam
Cc: Tommie Steyn; Frans Krige; Tommie Steyn
Subject: RE: MTPA"s comments LUA 24/3967 - Draft EIA Scoping Report for the proposed development of the Sheepmoor Wind Energy facility.
Date: Thursday, 19 September 2024 11:07:20
Attachments: image001.png

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EXTERNAL MESSAGE

Good morning

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- The commenting scientist is currently still busy commenting on the Rochdale project (LUA 24/3965).

Kind regards

Celia

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, 19 September 2024 09:54
To: Celia de Waal <celia@mtpa.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Tommie Steyn <Tommie@mtpa.co.za>; jjexteen@gmail.com; Johan Eksteen <johan@mtpa.co.za>; Frans Krige <frans@mtpa.co.za>; Khumbelo Malele <Khumbelo.Malele@mtpa.co.za>; Thabile Mnisi <Thabile.Mnisi@mtpa.co.za>; Phumla Nkosi <Phumla.Nkosi@mtpa.co.za>; Fortunate Watkins <Fortunate.Watkins@mtpa.co.za>; Mervyn Lotter <Mervyn.Lotter@mtpa.co.za>
Subject: RE: MTPA's comments LUA 24/3967 - Draft EIA Scoping Report for the proposed development of the Sheepmoor Wind Energy facility.

Hi Celia,

Thank you for providing comment on the Sheepmoor WEF facility. Are you able to please indicate when we can expect comment on the remaining 2 facilities, namely Rochdale and Emvelo.

Kind regards
Lucien

ERM

Sustainability is our business

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Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
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[redacted]

From:	ERM Arcus Amsterdam
To:	Celia de Waal; ERM Arcus Amsterdam
Cc:	Tommie Steyn; Frans Krige; Tommie Steyn
Subject:	RE: MTPA"s comments LUA 24/3967 - Draft EIA Scoping Report for the proposed development of the Sheepmoor Wind Energy facility.
Date:	Thursday, 19 September 2024 11:15:22
Attachments:	image001.png

Hi Celia,

Thank you for the update,

Regards

ERM
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Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: Celia de Waal <celia@mtpa.co.za>
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Cc: Tommie Steyn <Tommie@mtpa.co.za>; Frans Krige <frans@mtpa.co.za>; Tommie Steyn <tommiesteyn63@gmail.com>
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Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
[redacted]

From: Postnet Ermelo
To: ERM Arcus Amsterdam
Cc: meyerjosua55@gmail.com
Date: Thursday, 19 September 2024 13:23:10
Attachments: SKM_C250i24091906550.pdf

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EXTERNAL MESSAGE

AAN: ERM Arcus Amsterdam ERM.ArcusAmsterdam@erm.com

VAN: Josua Meyer C.C: meyerjosua55@gmail.com

Datum: 18/09/2024

CC : Lucien.barbeau@erm.com

In Sake: SHEEPMOOR, EMVELO AND ROCHDALE WIND ENERGIE PROJEKTE

Ingesluit vind u Publieke deelname vorm (2 bladsye) en Kommentaar (Bylaag A) (3 bladsye)

BYLAAG A

KOMMENTAAR TOV ROCKDALE, EMVELO EN SHEEPMOOR WINDPLASE

Die volgende probleme word met ontwikkeling van bogemelde windplase voorsien

1. VERSTEURING VAN KLIMAAT EN REËNVAL

Die platorand het 'n unieke reënval patroon waar die oostewind vog in lae inbring en kondenseer as reën en/of presipiteer as mis en dou sodra dit oor die plato in beweeg. Die mis en dou wat op die wyse inkom saam met die ooste wind is krities belangrik en voorkom bestuiwings probleme veral gedurende mid-somer droogtes.

Turbulensie van roterende turbine rotors verhoog vertikale vermenging van hitte en water damp wat meteorologiese kondisies windaf nadelig beinvloed, ingesluit reënval

Wind turbines veroorsaak verder aansienlike uitdroging van grond deur dit die warmer bolug af grond toe trek om sodoende grond temperature te verhoog.

Turbines verander dus lokale wind patrone wat negatiewe impak op reenval, grondvog en selfs mikro klimaat het met lang termyn gevolge op vrugbaarheid en produktiviteit van landbou grond en grasvelde.

DIE PLASING VAN DIE WINDTURBINES AAN DIE ONDERKANT VAN DIE PLATORAND SAL DUS FATAAL WEES VIR DIE OMGEWING SE KLIMAAT EN PLANTEGROEI WAT OOK MY BOERDERY VOORUITSIGTE OP DIE LANGTERMYN NADELIG SAL BEINVLOED.

2. VOËL LEWE WORD BEDREIG

Area bestaan uit unieke grasveld wat ideale habitat vir verskeie skaars en bedreigde voël spesies bied. Dit huisves ook groot verkeidenheid klein grasveld spesies wat nie eers hier genoem word nie.

Aantal verskeie bedreigde en / of beskermde spesies wat hier voorkom sluit in :

- **Breekop arende.** Broei paar het vanjaar kuiken suksesvol uitgebroei.
- **Sekretaris voels.** Verskeie ou sowel as aktiewe neste kom in in die gebied. So onlangs as Mei '24 is 'n paar met kuiken by Waaihoek opgemerk.
- **Mahem** kom verspreid oor hele gebied voor wat ook aktief broei. 'n Kuiken word gereeld saam met volwasenes opgemerk.
- **Blou Kraanvoels** is aan die toeneem met tenminste een kuiken wat jaarliks waargeneem is.
- **Visarende** besoek ook gereeld die damme in die gebied.
- **Veldpou** kom voor maar raak tans skaars. Neste in die veld is ook al opgemerk.
- **Kalkoen Ibus** is algemeen met verskeie aktiewe broei kolonies.
- Daar is positiewe tekens dat **Aasvoels** ook na die terug beweeg. Broei kolonies is by Smithfield, nie ver van die area, se kranse aktief.

- Verskeie **uil** spesie wat miskien nie bedryg is nie maar uitters noodsaaklik is om ekologiese balans te verseker is ook in groot getalle teenwoordig

Al die voëlspesies, asook vlermuise en insekte, is noodsaaklik om balans in die ekologie te behou en staar gevaar om of gedood of te verskuif na ander gebiede a.g.v.

- Noodlottige botsing met turbine lemme
- Habitat versteurings deur verhoogte grond temperature.
- Lugdruk veranderinge voor turbines asook die werwels agter turbines.
- Baie gevoelig vir lae frekwensie elektromagnetiese druk golwe deur windturbines veroorsaak wat nadelig op hul inwerk
- Uitwis van neste en selfs doodskiet daarvan om goedkeuring hindernisse te elimineer soos reeds bewys is met die skiet van 'n breekop arend.

3. DIERELEWE WORD BEDREIG

Die volgende skaars en beskermde soog diere word o.a. hier aangetref

- Oorbietjie
- Bruinhiëna
- Miershoop tier
- Aardwolf

Die diere staan gevaar om weg te beweeg deur habitat vernietiging, vibrasie en geraas deur turbines veroorsaak. Vuil elektriseteit deur windkrag geproduseer kan deur kabels en in die grond beweeg. Die grond stroom het nadelige effek op die produktiwiteit en voortplanting van soogdiere.

4. GERAAS EN VIRTUELE BESOEDELING

Wind turbines produseer klankgolwe (drukgolwe) deur die roterende lemme en word gehoor as gedruis en / of waarneembaar as infraklanke asook elektromagnetiese golwe wat gegenereer word by omskakeling van wind energie na elektrisiteit. Die omskakeling produseer swak kwaliteit krag (dirty electricity and ground current) wat nadelig op gesondheid van mens en dier is. Die skadu flikkering van turbines is ook bydraende faktor tot gesondheids probleme.

Daar is 'n besliste verband tussen die 'ground current' deur turbines geproduseer en kanker. Dit is al gedokumenteer dat leukemia by kinders met 300% toegeneem het a.g.v. daarvan.

Bogemelde kan egter nog verskeie ander kliniese gesondheids toestande by die mens aktiveer.

By diere en insekte wat lae frekwensie geluide en vibrasies beter as mens waarneem bestaan groot gevaar dat as gevolg daarvan om uit gebied te beweeg en sodoende heeltemal te verdwyn.

IN DIE LIG VAN DIE FEITE MOET 'N TURBINE EN KABEL VRYE BUFFERSONE VAN MINSTENS 1,5KM VANAF MY EIENDOM SE GRENSDRADE GEHANHAAF WORD.

Die aantal hoe turbines dra by tot virtuele besoedeling van die natuur.

5. INFRASTRUKTUUR

Die verbeterde infrastruktuur sal lei tot toename in beweging en invloei van ongewenste elemente wat misdaad drasties sal verhoog. Veediefstal by my boerdery het gestop sedert ek opgehou het om distrikpad na Sheepmoor te skraap omdat dit moeilik begaanbaar geword het.

Gedurende die konstruksie fase kan arbeids onrus verwag word a.g.v. verwagtinge wat by lokale bevolking geskep word.

Die feit dat geen turbines op my eiendom toegelaat word nie gaan my eiendom nie vrywaar van die negatiewe newe effekte van die 3 windplase nie.

DEEGLIKE VERDERE ONDERSOEKE WORD DUS VERSOEK ALVORENS GOEDKEURING DEUR DIE OWERHEID AAN PROJEK VERLEEN WORD

- **LANGTERMYN INVLOED VAN BEPLANDE WINDPLASE OP LANDBOU, KLIMAAT EN REENVAL.**

- **IDENTIFISEERING EN BEWEGINGS VAN BEDREIGDE EN BESKERMDE VOËLSPESIE ASOOK WAAR NESTE VOORKOM, AKTIEWE EN OU NESTE.**

- **IDENTIFISERING VAN DIE SKAARS SOOGDIERE ASOOK HUL BEWEGINGS IN DIE GERBIED.**

Voorsien nadelige langtermyn vooruitsigte vir die landbou en omgewing en kan dus ontwikkeling van windplase nie ONVOORWAARLIK steun nie.

Die uwe

Namens JOSUA MEYER TRUST

From: kirsten@red-cap.co.za
To: ERM Arcus Amsterdam
Cc: "Francois le Roex"
Subject: Sheepmoor, Rochdale and Emvelo WEFs - Registration as I&AP
Date: Thursday, 19 September 2024 16:16:52
Attachments: image001.png

You don't often get email from kirsten@red-cap.co.za. Learn why this is important

EXTERNAL MESSAGE

Hi there,

Please could you register myself and colleague Francois le Roex (copied) as I&APs on these projects,

Kind regards

redcap

KIRSTEN JONES | SENIOR PROJECT MANAGER
[redacted]

From:	ERM Arcus Amsterdam
To:	kirsten@red-cap.co.za; ERM Arcus Amsterdam
Cc:	"Francois le Roex"
Subject:	RE: Sheepmoor, Rochdale and Emvelo WEFs - Registration as I&AP
Date:	Thursday, 19 September 2024 20:12:47
Attachments:	image002.png image003.png

Good day,

Thank you for your email, you will now be added as an I&AP to the proposed Sheepmoor, Rochdale and Emvelo WEFs.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: kirsten@red-cap.co.za <kirsten@red-cap.co.za>
Sent: Thursday, September 19, 2024 4:17 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: 'Francois le Roex' <francois@red-cap.co.za>
Subject: Sheepmoor, Rochdale and Emvelo WEFs - Registration as I&AP

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redcap

KIRSTEN JONES | SENIOR PROJECT [redacted]

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To: ERM Arcus Amsterdam
Cc: "Francois le Roex"
Subject: RE: Sheepmoor, Rochdale and Emvelo WEFs - Registration as I&AP
Date: Friday, 20 September 2024 09:55:56
Attachments: image001.png
image002.png

You don't often get email from kirsten@red-cap.co.za. Learn why this is important

EXTERNAL MESSAGE

Thanks Lucien,

Will you be uploading the FSR onto the website (and notifying I&APs) once it has been submitted to DFFE?

Kind regards
Kirsten

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, 19 September 2024 20:13
To: kirsten@red-cap.co.za; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: 'Francois le Roex' <francois@red-cap.co.za>
Subject: RE: Sheepmoor, Rochdale and Emvelo WEFs - Registration as I&AP

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[redacted]

From: Postnet Ermelo
To: ERM Arcus Amsterdam
Cc: meyerjosua55@gmail.com
Date: Friday, 20 September 2024 11:18:42
Attachments: SKM_C250i24092004520.pdf

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EXTERNAL MESSAGE

AAN: ERM Arcus Amsterdam ERM.ArcusAmsterdam@erm.com

VAN: Josua Meyer cc: meyerjosua55@gmail.com

Datum: 18/09/2024

CC : Lucien.barbeau@erm.com

In Sake: SHEEPMOOR, EMVELO AND ROCHDALE WIND ENERGIE PROJEKTE

Ingesluit vind u Publieke deelname vorm (2 bladsye) en Kommentaar (Bylaag A) (3 bladsye)

What's your name?

First Name: Josua

Last Name: Meyer

Who do you represent?

Organisation: Josua Meyer Trust

Designation: Trustee

Your Email

[redacted]

Your Phone Number

[redacted]

Alternative Phone Number

—

Your Address

Street Address: Plaas Onderwent.

Street Address Line 2: Plaas Windhoek

City: Fransdrift

State/Province: Namaqualand

Zip Code: —

Country: RSA

What is your interest in the projects?

LAND OWNER

Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website?

Please copy and paste the link onto a browser (https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/)

- ○ Yes
- ☒ No

What are your comments regarding the Rochdale, Emvelo and Sheepmoor WEF Cluster?

ALWAYS WA BLACK A MAGGOTS.

Protection of Personal Information (POPI) Act, Act 4 of 2013

Do you consent to your information being published in the public domain, and being used as part of the Public Participation Process?

- ☒ Yes
- ○ No

BYLAAG A

KOMMENTAAR TOV ROCKDALE, EMVELO EN SHEEPMOOR WINDPLASE

Die volgende probleme word met ontwikkeling van bogemelde windplase voorsien

1. VERSTEURING VAN KLIMAAT EN REËNVAL

Die platorand het 'n unieke reënval patroon waar die oostewind vog in lae inbring en kondenseer as reën en/of presipiteer as mis en dou sodra dit oor die plato in beweeg. Die mis en dou wat op die wyse inkom saam met die ooste wind is krities belangrik en voorkom bestuiwings probleme veral gedurende mid-somer droogtes.

Turbulensie van roterende turbine rotors verhoog vertikale vermenging van hitte en water damp wat meteorologiese kondisies windaf nadelig beinvloed, ingesluit reënval

Wind turbines veroorsaak verder aansienlike uitdroging van grond deur dit die warmer bolug af grond toe trek om sodoende grond temperature te verhoog.

Turbines verander dus lokale wind patrone wat negatiewe impak op reenval, grondvog en selfs mikro klimaat het met lang termyn gevolge op vrugbaarheid en produktiviteit van landbou grond en grasvelde.

DIE PLASING VAN DIE WINDTURBINES AAN DIE ONDERKANT VAN DIE PLATORAND SAL DUS FATAAL WEES VIR DIE OMGEWING SE KLIMAAT EN PLANTEGROEI WAT OOK MY BOERDERY VOORUITSIGTE OP DIE LANGTERMYN NADELIG SAL BEINVLOED.

2. VOËL LEWE WORD BEDREIG

Area bestaan uit unieke grasveld wat ideale habitat vir verskeie skaars en bedreigde voël spesies bied. Dit huisves ook groot verkeidenheid klein grasveld spesies wat nie eers hier genoem word nie.

Aantal verskeie bedreigde en / of beskermde spesies wat hier voorkom sluit in :

- **Breekop arende.** Broei paar het vanjaar kuiken suksesvol uitgebroei.
- **Sekretaris voëls.** Verskeie ou sowel as aktiewe neste kom in in die gebied. So onlangs as Mei '24 is 'n paar met kuiken by Waaihoek opgemerk.
- **Mahem** kom verspreid oor hele gebied voor wat ook aktief broei. 'n Kuiken word gereeld saam met volwasenes opgemerk.
- **Blou Kraanvoëls** is aan die toeneem met tenminste een kuiken wat jaarliks waargeneem is.
- **Visarende** besoek ook gereeld die damme in die gebied.
- **Veldpou** kom voor maar raak tans skaars. Neste in die veld is ook al opgemerk.
- **Kalkoen Ibus** is algemeen met verskeie aktiewe broei kolonies.
- Daar is positiewe tekens dat **Aasvoels** ook na die terug beweeg. Broei kolonies is by Smithfield, nie ver van die area, se kranse aktief.

- Verskeie **uil** spesie wat miskien nie bedryg is nie maar uitters noodsaaklik is om ekologiese balans te verseker is ook in groot getalle teenwoordig

Al die voëlspesies, asook vlermuise en insekte, is noodsaaklik om balans in die ekologie te behou en staar gevaar om of gedood of te verskuif na ander gebiede a.g.v.

- Noodlottige botsing met turbine lemme
- Habitat versteurings deur verhoogte grond temperature.
- Lugdruk veranderinge voor turbines asook die werwels agter turbines.
- Baie gevoelig vir lae frekwensie elektromagnetiese druk golwe deur windturbines veroorsaak wat nadelig op hul inwerk
- Uitwis van neste en selfs doodskiet daarvan om goedkeuring hindernisse te elimineer soos reeds bewys is met die skiet van 'n breekop arend.

3. DIERELEWE WORD BEDREIG

Die volgende skaars en beskermde soog diere word o.a. hier aangetref

- Oorbietjie
- Bruinhiëna
- Miershoop tier
- Aardwolf

Die diere staan gevaar om weg te beweeg deur habitat vernietiging, vibrasie en geraas deur turbines veroorsaak. Vuil elektriseteit deur windkrag geproduseer kan deur kabels en in die grond beweeg. Die grond stroom het nadelige effek op die produktiwiteit en voortplanting van soogdiere.

4. GERAAS EN VIRTUELE BESOEDELING

Wind turbines produseer klankgolwe (drukgolwe) deur die roterende lemme en word gehoor as gedruis en / of waarneembaar as infraklanke asook elektromagnetiese golwe wat gegenereer word by omskakeling van wind energie na elektrisiteit. Die omskakeling produseer swak kwaliteit krag (dirty electricity and ground current) wat nadelig op gesondheid van mens en dier is. Die skadu flikkering van turbines is ook bydraende faktor tot gesondheids probleme.

Daar is 'n besliste verband tussen die 'ground current' deur turbines geproduseer en kanker. Dit is al gedokumenteer dat leukemia by kinders met 300% toegeneem het a.g.v. daarvan.

Bogemelde kan egter nog verskeie ander kliniese gesondheids toestande by die mens aktiveer.

By diere en insekte wat lae frekwensie geluide en vibrasies beter as mens waarneem bestaan groot gevaar dat as gevolg daarvan om uit gebied te beweeg en sodoende heeltemal te verdwyn.

IN DIE LIG VAN DIE FEITE MOET 'N TURBINE EN KABEL VRYE BUFFERSONE VAN MINSTENS 1,5KM VANAF MY EIENDOM SE GRENSDRADE GEHANHAAF WORD.

Die aantal hoe turbines dra by tot virtuele besoedeling van die natuur.

5. INFRASTRUKTUUR

Die verbeterde infrastruktuur sal lei tot toename in beweging en invloei van ongewenste elemente wat misdaad drasties sal verhoog. Veediefstal by my boerdery het gestop sedert ek opgehou het om distrikpad na Sheepmoor te skraap omdat dit moeilik begaanbaar geword het.

Gedurende die konstruksie fase kan arbeids onrus verwag word a.g.v. verwagtinge wat by lokale bevolking geskep word.

Die feit dat geen turbines op my eiendom toegelaat word nie gaan my eiendom nie vrywaar van die negatiewe newe effekte van die 3 windplase nie.

DEEGLIKE VERDERE ONDERSOEKE WORD DUS VERSOEK ALVORENS GOEDKEURING DEUR DIE OWERHEID AAN PROJEK VERLEEN WORD

- **LANGTERMYN INVLOED VAN BEPLANDE WINDPLASE OP LANDBOU, KLIMAAT EN REENVAL.**

- **IDENTIFISEERING EN BEWEGINGS VAN BEDREIGDE EN BESKERMDE VOËLSPESIE ASOOK WAAR NESTE VOORKOM, AKTIEWE EN OU NESTE.**

- **IDENTIFISERING VAN DIE SKAARS SOOGDIERE ASOOK HUL BEWEGINGS IN DIE GERBIED.**

Voorsien nadelige langtermyn vooruitsigte vir die landbou en omgewing en kan dus ontwikkeling van windplase nie ONVOORWAARLIK steun nie.

Die uwe

Namens JOSUA MEYER TRUST

From: aidaform@aidaform.com
To: ERM Asia Anonymous
Subject: New Response for "Stakeholder Engagement Form"
Date: Saturday, 21 September 2024 19:59:22
Attachments: Mayi Ndi Ajisi' Anju.xmz.dd7165f1e01a.pdf

[You don't often get email from aidaform@aidaform.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

EXTERNAL MESSAGE

Dear AidaForm user,

Your form "Stakeholder Engagement Form" has a new response.

---

1. What's your name?
Moya Odondasl

2. Who do you represent?
Heya Lidri Pty Ltd Odondasl

[redacted]

Stuart Street 90, Amsterdam, Amsterdam, Mpumalanga, 2375, South Africa

7. What is your interest in the projects?
Environment

8. Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website?
Yes

9. What are your comments regarding the Rochdale, Envirolo and Shaepmoor WEF Cluster?
It will change the environment forever

10. Protection of Personal Information (POPI) Act, Act 4 of 2013
No (0)

You can turn off or manage notifications for this form at:
https://eur01.safelinks.protection.outlook.com/?
url=https%3A%2F%2Fmy.aidaform.com%2Fform%2Fmmg56gvmb8%2Fsettings%2Femail&data=05%7C02%7Cerm.arcoamsterdam%40erm.com%7C3060f0bbd46a0846e228c508da6a67008f%7C1f3fe0bd39c4a485baa69c1f820a8813.0%7C0%7C0%7C638625383413151760%7CUnknown%7CTWFpbGZsb3dpcyf8IjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%2D%7C0%7C%7C%7Cdata=QRCEO8DyUk4bwtkQTbW4mm4v8Tq8RuVjuSZzuhk8C%2BU%3D&reserved=0

Stay productive and take care!
Your AidaForm Team

Stakeholder Engagement Form

https://mulilowef.aidaform.com/public-participation-form

Saturday, September 21, 2024 17:58 UTC

What's your name?

First Name
Moya

Last Name
Odendaal

Who do you represent?

Organisation
Heya Lidri Pty Ltd

Designation
Odendaal

Your Email

[redacted]

Your Phone Number

[redacted]

Alternative Phone Number

[redacted]

Your Address

Street Address
Stuart Street 90

Street Address Line 2
Amsterdam

City
Amsterdam

State/Province
Mpumalanga

Zip Code
2375

Country
South Africa

What is your interest in the projects?

Environment

Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website?

Yes

What are your comments regarding the Rochdale, Emvelo and Sheepmoor WEF Cluster?

It will change the environment forever

Protection of Personal Information (POPI) Act, Act 4 of 2013

No (0)

From: aidaform@aidaform.com
To: [redacted]
Subject: New Response for "Stakeholder Engagement Form"
Date: Saturday, 21 September 2024 20:10:26
Attachments: [redacted].xlsx

[You don't often get email from aidaform@aidaform.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

EXTERNAL MESSAGE

Dear AidaForm user,

Your form "Stakeholder Engagement Form" has a new response.

---

1. What's your name?
Rona Odendaal

2. Who do you represent?
Individual, Affected party

3. [redacted]
4. [redacted]
5. [redacted]
6. Your Address
Atholz farm, Amsterdam, Mpumalanga, 2375, South Africa

7. What is your interest in the projects?
Strongly oppose

8. Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website?
No

9. What are your comments regarding the Rochdale, Envolo and Shaepmoor WEF Cluster?
Negative impact on the environment and bird life.

10. Protection of Personal Information (POPI) Act, Act 4 of 2013
No (0)

You can turn off or manage notifications for this form at:
https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fmy.aidaform.com%2Fform%2Fmmg56gvmb8%2Fsettings%2Femail&data=05%7C02%7Cerm.arcsaamsterdam%40erm.com%7Cbb9b8c7cbc8436d08430fdcda6880dd5%7C2f4e6bd39c4a485baa69c1f820a68116%7C0%7C0%7C638625390384030816%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=MopEXdPZ%2BYG%2BtFLa2IK152ssPbyFKdp9kTcoNY9aE%3D&reserved=0

Stay productive and take care!
Your AidaForm Team

Stakeholder Engagement Form

https://mulilowef.aidaform.com/public-participation-form

Saturday, September 21, 2024 18:09 UTC

What's your name?

First Name
Rone

Last Name
Odendaal

Who do you represent?

Organisation
Individual

Designation
Affected party

Your Email

petronellaodendaal@gmail.com

Your Phone Number

[redacted]

Alternative Phone Number

[redacted]

Your Address

Street Address
Athole farm

City
Amsterdam

State/Province
Mpumalanga

Zip Code
2375

Country
South Africa

What is your interest in the projects?

Strongly oppose

Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website?

No

What are your comments regarding the Rochdale, Emvelo and Sheepmoor WEF Cluster?

Negative impact on the environment and bird life.

Protection of Personal Information (POPI) Act, Act 4 of 2013

No (0)

From:	Bathandwa Ncube
To:	Stephanie Gopaul; ERM Arcus Amsterdam
Cc:	Andrew Pearson; goxaba@mpg.gov.za; R Luyt; SB. Mbuyane; mervyn.lotter@gmail.com; complaints@msukaligwa.gov.za; EIAadmin; Lydia Kutu; Ephron Maradwa; Salome Mambane
Subject:	14/12/16/3/3/2/2611; 14/12/16/3/3/2/2612; 14/12/16/3/3/2/2613
Date:	Tuesday, 24 September 2024 18:07:46
Attachments:	14-12-16-3-3-2-2611.pdf 14-12-16-3-3-2-2612.pdf 14-12-16-3-3-2-2613.pdf

EXTERNAL MESSAGE

Goodday

Please find attached, DSR comments for the proposed Emvelo, Rochdale and Sheepmoor WEF developments.

Kind regards
Ms Bathandwa Ncube (EAPASA)
Department of Forestry, Fisheries and the Environment (DFFE)
Integrated Environmental Authorisations
[redacted]
(E) BNcube@dffe.gov.za

forestry, fisheries
& the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 399 9000, Fax: +27 86 625 1042

DFFE Reference: 14/12/16/3/3/2/2611
Enquiries: Ms Bathandwa Ncube
Telephone: 012 399 9368 **E-mail:** BNcube@dffe.gov.za

Ms Stephanie Gopaul
Environmental Resource Management Southern Africa (Pty) Ltd
Regus, Floor -3
18 The Boulevard
Westway Office Park
WESTVILLE
Durban
7700

Telephone Number : [redacted]
Cellphone Number : [redacted]
Email Address : stephanie.gopaul@erm.com / erm.arcusamsterdam@erm.com

PER E-MAIL

Dear Ms Gopaul

COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF THE EMVELO WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE

The Application for Environmental Authorisation and Draft Scoping Report (SR) dated August 2024 and received by the Department on 22 August 2024, refer.

This letter serves to inform you that the following information must be included to the Final Scoping Report:

Application form

1. Please confirm that the postal code for the EAP's address is correct.
2. The screening tool report attached as Appendix 14 of the application form must be signed by the compiler.
3. Please ensure that all relevant listed activities are applied for, are specific and that it can be linked to the development activity or infrastructure as described in the project description. The onus is on the applicant and the environmental assessment practitioner (EAP) to ensure that all the applicable

The processing of personal information by the Department of Forestry, Fisheries and the Environment is done lawfully and not excessive to the purpose of processing in compliance with the POPI Act, any codes of conduct issued by the Information Regulator in terms of the POPI Act and / or relevant legislation providing appropriate security safeguards for the processing of personal information of others.

listed activities are included in the application form. Failure to do so may result in unnecessary delays in the processing of the application.

4. If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted with the final SR.
5. Please take note of GNR 4143, which was gazetted on the 04 December 2023, which requires a letter of consent from Eskom Holdings SOC Ltd if the proposed development is within a specific radius of a main electricity transmission or distribution substation. Should this gazette apply to the proposed development, please ensure the necessary documents are included.

Specialist Assessments

6. Page 4 of the meeting minutes of the pre-application meeting held on 26 April 2023 refers to the applicant undertaking a Geotechnical Assessment; however, this study is not included in the Specialist Plan of Study (PoS). All required specialist studies must be conducted as part of the EIA process. If there are development design constraints, a desktop Geotechnical Assessment must be included as part of the Specialist PoS.
7. The Civil Aviation Theme has a "Medium sensitivity" rating, as per the outcome of the screening tool provided. According to the protocols, a Civil Aviation Compliance Statement must be included in the PoS. Should a compliance statement not be included as part of the PoS, a motivation/explanation for its exclusion, must be provided [including proof of request for comments from the Air Traffic and Navigation Services (ATNS)].
8. You are requested to submit copies of signed Specialist Declaration of Interest forms (witnessed and signed by a Commissioner of Oaths) for all specialist studies conducted. The forms are available on Department's website (please use the Department template).
9. Please note that in terms of Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), it is a requirement for specialists to be registered with the South African Council for Natural Scientific Professions (SACNASP) in their respective fields.
10. The Heritage Survey, which has been included as part of this SR, must be submitted to the South African Heritage Resources Agency (SAHRA) for comments, via the South African Heritage Resources Information System (SAHRIS).

Public Participation Process

11. The Public Participation Process must be conducted in terms of Regulation 39, 40 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.
12. The proposed development site is within a Critical Biodiversity Area (CBA) and National Protected Areas Expansion Strategy (NPAES). Comments must be obtained from this Department's Biodiversity Conservation Section. The contact details are as follows:
    i. Biodiversity Conservation Directorate
    Attention: Mr. Seoka Lekota
    Email: BCAdmin@dffe.gov.za
    ii. Protected Areas Planning and Management Effectiveness Directorate
    Attention: Mr. Thivhulawi Nethononda
    Email: TNethononda@dffe.gov.za
13. Please ensure that all issues raised and comments received during the circulation of the draft SR from registered Interested and Affected Parties (I&APs) and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed and included in the final SR.

14. Copies of original comments received from I&APs and organs of state, which have jurisdiction in respect of the proposed activity are submitted to the Department with the final SR.
15. Proof of correspondence with the various stakeholders must be included in the final SR. This must indicate that this draft SR has been subjected to 30 days public participation process, stating the start and end date of the PPP. Should you be unable to obtain comments, proof must be submitted to the Department of the attempts that were made to obtain comments.
16. All issues raised and comments received during the circulation of the draft SR from I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final SR, including comments from this Department, and must be incorporated into the Comments and Response Report (CRR).
17. The CRR report must be a separate document from the main report and the format must be in the table format as indicated in *Annexure 1* of this comments letter.
18. Comments from I&APs must not be split and arranged into categories. Comments from each submission must be responded to individually.
19. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied *verbatim* and responded to clearly. Please note that a response such as "noted" is not regarded as an adequate response to an I&AP's comments.
20. The attendance register and minutes of any meetings held by the Environmental Assessment Practitioner (EAP) with Interested and Affected Parties (I&APs) and other role players must be included in the final SR.
21. Provide photo evidence of on-site notices, including the names of landmarks and/or GPS coordinates (in degrees, minutes, and seconds) of their placements.
22. Please submit a full page of the newspaper(s) containing the advertisement, ensuring that the information in the advert is legible and that the name of the newspaper and date are visible.

General

You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that:

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

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

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

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

Yours sincerely



Dr Sabelo Malaza
Chief Director: Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment
Signed by: Ms Bathandwa Ncube
Designation: Control Environmental Officer: National Integrated Authorisation
Date: 24/09/2024

cc:	Mr Andrew Pearson	Emvelo Wind Energy Facility (Pty) Ltd	Email: Andrew@mulilo.com
	Mr G.O Xaba	Mpumalanga DARDLEA	Email: goxaba@mpg.gov.za / rluyt@mpg.gov.za / mbuyanesb@mpg.gov.za
	Mr Mervyn Lotter	MTPA	Email: mervyn.lotter@gmail.com
	Ms Mapulane Nkosi	Msukaligwa Local Municipality	Email: complaints@msukaligwa.gov.za

Annexure 1

1. Format for Comments and Response Report:

Date of comment, format of comment name of organisation/I&AP,	**Comment**	**Response from EAP/Applicant/Specialist**
27/03/2021 Email Department of Forestry, Fisheries and the Environment: National Infrastructure Projects (Joe Soap)	Please record C&R trail report in this format Please update the contact details of the provincial environmental authority	EAP: (~~Noted~~)The C&R trail report has been updated into the desired format, see Appendix K EAP: Details of provincial authority have been updated, see page 16 of the Application form

forestry, fisheries
& the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 399 9000, Fax: +27 86 625 1042

DFFE Reference: 14/12/16/3/3/2/2612
Enquiries: Ms Bathandwa Ncube
Telephone: 012 399 9368 **E-mail:** BNcube@dffe.gov.za

Ms Stephanie Gopaul
Environmental Resource Management Southern Africa (Pty) Ltd
Regus, Floor -3
18 The Boulevard
Westway Office Park
WESTVILLE
Durban
7700

Telephone Number : [redacted]
Cellphone Number : [redacted]
Email Address : stephanie.gopaul@erm.com / erm.arcusamsterdam@erm.com

PER E-MAIL

Dear Ms Gopaul

COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF THE ROCHDALE WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE

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listed activities are included in the application form. Failure to do so may result in unnecessary delays in the processing of the application.

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    Attention: Mr. Seoka Lekota
    Email: BCAdmin@dffe.gov.za
    ii. Protected Areas Planning and Management Effectiveness Directorate
    Attention: Mr. Thivhulawi Nethononda
    Email: TNethononda@dffe.gov.za
13. Please ensure that all issues raised and comments received during the circulation of the draft SR from registered Interested and Affected Parties (I&APs) and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed and included in the final SR.

14. Copies of original comments received from I&APs and organs of state, which have jurisdiction in respect of the proposed activity are submitted to the Department with the final SR.
15. Proof of correspondence with the various stakeholders must be included in the final SR. This must indicate that this draft SR has been subjected to 30 days public participation process, stating the start and end date of the PPP. Should you be unable to obtain comments, proof must be submitted to the Department of the attempts that were made to obtain comments.
16. All issues raised and comments received during the circulation of the draft SR from I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final SR, including comments from this Department, and must be incorporated into the Comments and Response Report (CRR).
17. The CRR report must be a separate document from the main report and the format must be in the table format as indicated in *Annexure 1* of this comments letter.
18. Comments from I&APs must not be split and arranged into categories. Comments from each submission must be responded to individually.
19. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied *verbatim* and responded to clearly. Please note that a response such as "noted" is not regarded as an adequate response to an I&AP's comments.
20. The attendance register and minutes of any meetings held by the Environmental Assessment Practitioner (EAP) with Interested and Affected Parties (I&APs) and other role players must be included in the final SR.
21. Provide photo evidence of on-site notices, including the names of landmarks and/or GPS coordinates (in degrees, minutes, and seconds) of their placements.
22. Please submit a full page of the newspaper(s) containing the advertisement, ensuring that the information in the advert is legible and that the name of the newspaper and date are visible.

General

You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that:

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

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

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

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

Yours sincerely



Dr Sabelo Malaza
Chief Director: Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment
Signed by: Ms Bathandwa Ncube
Designation: Control Environmental Officer: National Integrated Authorisation
Date: 24/09/2024

cc:	Mr Andrew Pearson	Rochdale Wind Energy Facility (Pty) Ltd	Email: Andrew@mulilo.com
	Mr G.O Xaba	Mpumalanga DARDLEA	Email: goxaba@mpg.gov.za / rluyt@mpg.gov.za / mbuyanesb@mpg.gov.za
	Mr Mervyn Lotter	MTPA	Email: mervyn.lotter@gmail.com
	Ms Mapulane Nkosi	Msukaligwa Local Municipality	Email: complaints@msukaligwa.gov.za

Annexure 1

1. Format for Comments and Response Report:

Date of comment, format of comment name of organisation/I&AP,	**Comment**	**Response from EAP/Applicant/Specialist**
27/03/2021 Email Department of Forestry, Fisheries and the Environment: National Infrastructure Projects (Joe Soap)	Please record C&R trail report in this format Please update the contact details of the provincial environmental authority	EAP: (~~Noted~~)The C&R trail report has been updated into the desired format, see Appendix K EAP: Details of provincial authority have been updated, see page 16 of the Application form

forestry, fisheries
& the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 399 9000, Fax: +27 86 625 1042

DFFE Reference: 14/12/16/3/3/2/2613
Enquiries: Ms Bathandwa Ncube
Telephone: 012 399 9368 **E-mail:** BNcube@dffe.gov.za

Ms Stephanie Gopaul
Environmental Resource Management Southern Africa (Pty) Ltd
Regus, Floor -3
18 The Boulevard
Westway Office Park
WESTVILLE
Durban
7700

[redacted]
Email Address : stephanie.gopaul@erm.com / erm.arcusamsterdam@erm.com

PER E-MAIL

Dear Ms Gopaul

COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF THE SHEEPMOOR WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE

The Application for Environmental Authorisation and Draft Scoping Report (SR) dated August 2024 and received by the Department on 22 August 2024, refer.

This letter serves to inform you that the following information must be included to the Final Scoping Report:

Application form

1. Please confirm that the postal code for the EAP's address is correct.
2. The screening tool report attached as Appendix 14 of the application form must be signed by the compiler.
3. Please ensure that all relevant listed activities are applied for, are specific and that it can be linked to the development activity or infrastructure as described in the project description. The onus is on the applicant and the environmental assessment practitioner (EAP) to ensure that all the applicable

The processing of personal information by the Department of Forestry, Fisheries and the Environment is done lawfully and not excessive to the purpose of processing in compliance with the POPI Act, any codes of conduct issued by the Information Regulator in terms of the POPI Act and / or relevant legislation providing appropriate security safeguards for the processing of personal information of others.

listed activities are included in the application form. Failure to do so may result in unnecessary delays in the processing of the application.

4. If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted with the final SR.
5. Please take note of GNR 4143, which was gazetted on the 04 December 2023, which requires a letter of consent from Eskom Holdings SOC Ltd if the proposed development is within a specific radius of a main electricity transmission or distribution substation. Should this gazette apply to the proposed development, please ensure the necessary documents are included.

Specialist Assessments

6. Page 4 of the meeting minutes of the pre-application meeting held on 26 April 2023 refers to the applicant undertaking a Geotechnical Assessment; however, this study is not included in the Specialist Plan of Study (PoS). All required specialist studies must be conducted as part of the EIA process. If there are development design constraints, a desktop Geotechnical Assessment must be included as part of the Specialist PoS.
7. The Civil Aviation Theme has a "Medium sensitivity" rating, as per the outcome of the screening tool provided. According to the protocols, a Civil Aviation Compliance Statement must be included in the PoS. Should a compliance statement not be included as part of the PoS, a motivation/explanation for its exclusion, must be provided [including proof of request for comments from the Air Traffic and Navigation Services (ATNS)].
8. You are requested to submit copies of signed Specialist Declaration of Interest forms (witnessed and signed by a Commissioner of Oaths) for all specialist studies conducted. The forms are available on Department's website (please use the Department template).
9. Please note that in terms of Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), it is a requirement for specialists to be registered with the South African Council for Natural Scientific Professions (SACNASP) in their respective fields.
10. The Heritage Survey, which has been included as part of this SR, must be submitted to the South African Heritage Resources Agency (SAHRA) for comments, via the South African Heritage Resources Information System (SAHRIS).

Public Participation Process

11. The Public Participation Process must be conducted in terms of Regulation 39, 40 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.
12. The proposed development site is within a Critical Biodiversity Area (CBA) and National Protected Areas Expansion Strategy (NPAES). Comments must be obtained from this Department's Biodiversity Conservation Section. The contact details are as follows:
    i. Biodiversity Conservation Directorate
    Attention: Mr. Seoka Lekota
    Email: BCAdmin@dffe.gov.za
    ii. Protected Areas Planning and Management Effectiveness Directorate
    Attention: Mr. Thivhulawi Nethononda
    Email: TNethononda@dffe.gov.za
13. Please ensure that all issues raised and comments received during the circulation of the draft SR from registered Interested and Affected Parties (I&APs) and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed and included in the final SR.

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19. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied *verbatim* and responded to clearly. Please note that a response such as "noted" is not regarded as an adequate response to an I&AP's comments.
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22. Please submit a full page of the newspaper(s) containing the advertisement, ensuring that the information in the advert is legible and that the name of the newspaper and date are visible.

General

You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that:

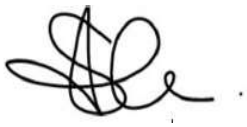
"If S&EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a scoping report which has been subjected to a public participation process of at least 30 days and which reflects the incorporation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

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

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

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

Yours sincerely



Dr Sabelo Malaza
Chief Director: Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment
Signed by: Ms Bathandwa Ncube
Designation: Control Environmental Officer: National Integrated Authorisation
Date: 24/09/2024

cc:	Mr Andrew Pearson	Sheepmoor Wind Energy Facility (Pty) Ltd	Email: Andrew@mulilo.com
	Mr G.O Xaba	Mpumalanga DARDLEA	Email: goxaba@mpg.gov.za / rluyt@mpg.gov.za / mbuyanesb@mpg.gov.za
	Mr Mervyn Lotter	MTPA	Email: mervyn.lotter@gmail.com
	Ms Mapulane Nkosi	Msukaligwa Local Municipality	Email: complaints@msukaligwa.gov.za

Annexure 1

1. Format for Comments and Response Report:

Date of comment, format of comment name of organisation/I&AP,	**Comment**	**Response from EAP/Applicant/Specialist**
27/03/2021 Email Department of Forestry, Fisheries and the Environment: National Infrastructure Projects (Joe Soap)	Please record C&R trail report in this format Please update the contact details of the provincial environmental authority	EAP: (~~Noted~~)The C&R trail report has been updated into the desired format, see Appendix K EAP: Details of provincial authority have been updated, see page 16 of the Application form

Cc: Tommie Steyn <Tommie@mtpa.co.za>; Frans Krige <frans@mtpa.co.za>; Tommie Steyn <tommiesteyn63@gmail.com>
Subject: RE: MTPA's comments LUA 24/3967 - Draft EIA Scoping Report for the proposed development of the Sheepmoor Wind Energy facility.

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

EXTERNAL MESSAGE

Good morning

Regarding your enquiry below, the following:

- The comments for the Emvelo project (our ref: LUA 24/3966) is currently at the Acting Manager: Scientific Service for review). The signed copy might be released today, which will be send to you as soon as I receive it.

- The commenting scientist is currently still busy commenting on the Rochdale project (LUA 24/3965).

Kind regards

Celia

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, 19 September 2024 09:54
To: Celia de Waal <celia@mtpa.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Tommie Steyn <Tommie@mtpa.co.za>; jjexteen@gmail.com; Johan Eksteen <johan@mtpa.co.za>; Frans Krige <frans@mtpa.co.za>; Khumbelo Malele <Khumbelo.Malele@mtpa.co.za>; Thabile Mnisi <Thabile.Mnisi@mtpa.co.za>; Phumla Nkosi <Phumla.Nkosi@mtpa.co.za>; Fortunate Watkins <Fortunate.Watkins@mtpa.co.za>; Mervyn Lotter <Mervyn.Lotter@mtpa.co.za>
Subject: RE: MTPA's comments LUA 24/3967 - Draft EIA Scoping Report for the proposed development of the Sheepmoor Wind Energy facility.

Hi Celia,

Thank you for providing comment on the Sheepmoor WEF facility. Are you able to please indicate when we can expect comment on the remaining 2 facilities, namely Rochdale and Emvelo.

Kind regards
Lucien

ERM

Sustainability is our business

From: Celia de Waal <celia@mtpa.co.za>
Sent: Wednesday, September 18, 2024 2:36 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Tommie Steyn <Tommie@mtpa.co.za>; jjexteen@gmail.com; Johan Eksteen <johan@mtpa.co.za>; Frans Krige <frans@mtpa.co.za>; Khumbelo Malele <Khumbelo.Malele@mtpa.co.za>; Thabile Mnisi <Thabile.Mnisi@mtpa.co.za>; Phumla Nkosi <Phumla.Nkosi@mtpa.co.za>; Fortunate Watkins <Fortunate.Watkins@mtpa.co.za>; Mervyn Lotter <Mervyn.Lotter@mtpa.co.za>
Subject: MTPA's comments LUA 24/3967 - Draft EIA Scoping Report for the proposed development of the Sheepmoor Wind Energy facility.

You don't often get email from celia@mtpa.co.za. Learn why this is important

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EXTERNAL MESSAGE

Dear Ms. Gopaul

Kindly receive the attached comments from the MTPA regarding a Draft EIA Report for the proposed development of the Sheepmoore Wind Energy facility (WEF) with 23 wind turbines and Auxiliary infrastructure.

Your reference number: **Project 0684401** (DFFE: 14/12/16/3/3/2/2593)

Our EIA registration/reference number is **LUA 24/3967** (kindly use this number in any further correspondence to us regarding this project)

Kind regards

Celia de Waal

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
[redacted]
e-mail: celia.dewaal@mtpa.co.za

From: ERM Arcus Amsterdam
To: kirsten@red-cap.co.za; ERM Arcus Amsterdam
Cc: "Francois le Roex"
Subject: RE: Sheepmoor, Rochdale and Emvelo WEFs - Registration as I&AP
Date: Monday, 30 September 2024 12:43:53
Attachments: image001.png
image002.png

Hi Kristen,

That is correct.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: kirsten@red-cap.co.za <kirsten@red-cap.co.za>
Sent: Friday, September 20, 2024 9:56 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: 'Francois le Roex' <francois@red-cap.co.za>
Subject: RE: Sheepmoor, Rochdale and Emvelo WEFs - Registration as I&AP

You don't often get email from kirsten@red-cap.co.za. Learn why this is important

EXTERNAL MESSAGE

Thanks Lucien,

Will you be uploading the FSR onto the website (and notifying I&APs) once it has been submitted to DFFE?

Kind regards
Kirsten

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, 19 September 2024 20:13
To: kirsten@red-cap.co.za; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: 'Francois le Roex' <francois@red-cap.co.za>
Subject: RE: Sheepmoor, Rochdale and Emvelo WEFs - Registration as I&AP

Good day,

Thank you for your email, you will now be added as an I&AP to the proposed Sheepmoor,

Rochdale and Emvelo WEFs.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: kirsten@red-cap.co.za <kirsten@red-cap.co.za>
Sent: Thursday, September 19, 2024 4:17 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: 'Francois le Roex' <francois@red-cap.co.za>
Subject: Sheepmoor, Rochdale and Emvelo WEFs - Registration as I&AP

You don't often get email from kirsten@red-cap.co.za. Learn why this is important
EXTERNAL MESSAGE

Hi there,

Please could you register myself and colleague Francois le Roex (copied) as I&APs on these projects,

Kind regards

redcap

KIRSTEN JONES | SENIOR PROJECT MANAGER
[redacted]

From: Lucien Barbeau
To: Lloyd Barnes
Cc: Stephanie Gopaul; Andrew Pearson; Stephen Burton
Subject: RE: Terrestrial Biodiversity + Faunal Specialist - Mulilo Amsterdam CA Commenting Responses required
Date: Monday, 30 September 2024 13:00:00
Attachments: image002.png
image004.png

Good day Lloyd,

At the moment we are still awaiting comment on Rochdale and Emvelo from MTPA, we have followed up and will update with any new development.

I am also following up with remaining specialists that have not provided feedback on departmental comments. I will aim to have the CRR and FSR's to you on Wednesday.

Thank you,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town **erm.com**
+[redacted]

From: Lloyd Barnes <Lloyd@mulilo.com>
Sent: Monday, September 30, 2024 11:11 AM
To: Lucien Barbeau <Lucien.Barbeau@erm.com>
Cc: Stephanie Gopaul <Stephanie.Gopaul@erm.com>; Andrew Pearson <Andrew@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: RE: Terrestrial Biodiversity + Faunal Specialist - Mulilo Amsterdam CA Commenting Responses required
Importance: High

EXTERNAL MESSAGE

Good day Lucien,

Do you perhaps have an update on the responses to the Provincial department's comments?

May we please have the CRR's and Final Scoping reports for review before COB on Wednesday?

Kind Regards,

Lloyd Barnes
Project Manager: Environmental
[redacted]
www.mulilo.com
21st Floor, Portside, 5 Buitengracht Street, Cape Town, 8001

From:	Celia de Waal
To:	ERM Arcus Amsterdam
Cc:	Frans Krige; Johan Eksteen
Subject:	FW: MTPA"s comments LUA 24/3966 - Draft Scoping for 45 wind turbines (Emvelo Wind Energy)
Date:	Tuesday, 01 October 2024 10:35:09
Attachments:	LUA24-3966 obj. Emvelo WEF infrastructure Draft SR ERM.pdf LUA 24-3967 MTPA objection DSR SHEEPMOOR WEF ERM.pdf

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

EXTERNAL MESSAGE

Good day

Kindly receive two of the letters as requested

I will follow up with Frans Krige on LUA 24/3965, Rochdale, as soon as he is done with his meeting.

Regards

Celia

From: Celia de Waal
Sent: 20 September 2024 09:56
To: stephanie.gopaul@erm.com
Cc: Tommie Steyn <Tommie@mtpa.co.za>; Johan Eksteen <johan@mtpa.co.za>; Frans Krige <frans@mtpa.co.za>; Khumbelo Malele <Khumbelo.Malele@mtpa.co.za>; Rockey Nkosi <Rockey.Nkosi@mtpa.co.za>; Thabile Mnisi <Thabile.Mnisi@mtpa.co.za>; Phumla Nkosi <Phumla.Nkosi@mtpa.co.za>; Fortunate Watkins <Fortunate.Watkins@mtpa.co.za>
Subject: MTPA's comments LUA 24/3966 - Draft Scoping for 45 wind turbines (Emvelo Wind Energy)

Dear Ms. Gopaul

Kindly receive the attached comments from the MTPA regarding a Draft Scoping report for 45 wind turbines for Emvelo Wind Energy Facility & auxiliary infrastructure.

Your project no: **0684401**

Our EIA reference number is **LUA 24/3966**

Kind regards

Celia de Waal

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
[redacted]

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

OFFICE OF BIODIVERSITY CONSERVATION

Ref: LUA 24/3967
Unit: LUA/SS
Inquiries: F.N. Krige & F.N. Lekaka
Email: frans@mtpa.co.za
Tel: 013- 0650286

Ms. Stephanie Gopaul

ERM Southern Africa (Pty) Ltd
240 Main Road
Great Westerford Building, 1st Floor
Rondebosch
CAPE TOWN
7700

Email: ERM.ArcusAmsterdam@erm.com

Dear Ms., Gopaul

SUBJECT: THE MTPA COMMENTS ON THE DRAFT ENVIRONMENTAL SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF THE SHEEPMOOR WIND ENERGY FACILITY (WEF) (23 WIND TURBINES) AND AUXILIARY INFRASTRUCTURE (1 ON-SITE SUBSTATION WITH A CAPACITY OF 132Kv, AND 1 OVER-HEAD POWERLINE OF APPROXIMATELY 22.3 KM) ON SEVERAL PORTIONS OF FARMS COVERING AN AREA OF 5 918 HA EAST OF ERMELO FOR SHEEPMOOR WIND ENERGY FACILITY (PTY) LTD, MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE. DFFE REFERENCE NUMBER TO BE PROVIDED.

With reference to your correspondence reference **Project no: 0684401** of August 2024, herewith the MTPA comments.

The application has been assessed by using the following tools: Mpumalanga Biodiversity Sector Plan (2014 as updated 2022) land use guidelines, the DFFE web-based sensitivity screening tool, Environmental legislation NEMA and EIA regulations 2014 as amended, Department of Water and Sanitation and Water Research Commission Guidelines on wetlands, the South African Heritage Resources Act and knowledge to assess Development Applications.

The sensitivity of the area, in which the prospecting activity is proposed and is likely to occur was assessed according to the Mpumalanga Biodiversity Sector plan (MBSP; MTPA, 2014). The sensitivity is assessed in terms of terrestrial and freshwater assessments. In the MBSP, sensitivity areas are identified in terms of *Critical Biodiversity Areas* (CBAs) and *Ecological Support Areas* (ESAs). CBAs and ESAs are deemed to be

necessary to ensure the protection of biodiversity, environmental sustainability and sustainable living and are to remain unaltered.

Comments with regards to the terms of reference for studies needed:

With reference to the assessment of your Draft Scoping Report the MTPA is concerned about the following issues raised with regards to the terms of reference for specialist studies to be done.

1. The alternative sites, although less sensitive to the preferred site, are still located in sensitive areas.
2. Ground truthing and on-site studying of areas regarded as degraded or sensitive and suitable for potential wind turbines must be done considering that cultivated/vegetated lands might be feeding areas for many Species of Conservation Concern. The Site sensitivity verification report must include the feeding areas for SCC.
3. The avoidance of large areas of critical biodiversity terrestrial and freshwater sensitivity areas and the preliminary project layout overlain area is a large concern especially in the southeastern part of the study area.
4. The threat of this WEF to the Important Bird Area and the status of globally threatened bird species such as the Southern Bald Ibis and Secretary bird is of concern. The onsite avifaunal study must include local knowledge of the distribution of large birds especially the Blue crane that is a local migrant during the wintertime.
5. Included in the MTPA's comments are the following discussion that illustrates the **need and desirability** of this proposal:

Renewable energy applications

- Given the energy needs of the country, significant emphasis is being placed on the need to transition away from coal towards renewable energy. However, the urgency and desire to approve nearly all renewable energy applications needs to be put into perspective considering the incredible investment and proliferation of new renewable energy projects within Mpumalanga.
- The MTPA and DARDLEA are maintaining a database of renewable energy projects, which include those in the pre-application phase. We can confirm that 61 renewable energy projects have now been submitted within Mpumalanga. Just over 50% of these have been approved to date. 18 of these are for Wind Energy Farms, which together make up for over 233 000 ha, and this amount is growing as the province is being inundated with renewable energy applications.
- The explosion of renewable energy applications does require careful consideration as to the likely impacts. There is no shortage of renewable energy projects within the Province and the Province has room to apply its mind and navigate this space carefully. The province has now over 300 000 ha of renewable energy applications, and the many more than are still to be submitted.

Mpumalanga Biodiversity Sector Plan (MBSP), Intact Grassland Patches and Important Bird Areas (IBAs)

- The project **footprint overlaps with a significant amount of Critical Biodiversity Areas** (CBA). 1 488.9 ha (over 28%) of the footprint area is identified as a CBA. Wind farms are not appropriate land uses within CBA areas. Two proposed wind turbines are placed in CBA Irreplaceable areas.
- The MBSP Terrestrial assessment indicates that the project footprint is within CBA: Irreplaceable, CBA: Optimal, ESA: Local Corridor, ESA: Landscape Corridor, ESA: Species Specific, Other Natural Areas, Moderately Modified, and Heavily Modified Areas.
- The MBSP Freshwater Assessment indicates that the project footprint is within ESA: Strategic Water Source Areas, and has CBA: Aquatic River, ESA: Wetland Clusters, ESA: Wetlands, ESA: Important Sub-catchments, Other Natural and Heavily Modified Areas.
- ESA: Strategic Water Source Area (SWSAs) maintain ecological integrity across the entire sub-catchment, paying particular attention to maintaining water quality, water quantity, and habitat integrity. They represent 10% of the surface area producing approximately 50% of Mpumalanga's water. The proposed WEF activity in the area might compromise the quality and quantity of the surface water resources through siltation.
- The whole of the proposed Sheepmoor wind farm falls within an Important Bird Area (IBA), which underscores the need to consider its implications on metapopulation dynamics and the need to avoid wind farms in "source" areas.
- The project area mainly falls within the Mesic Eastern Highveld Grassland (Endangered). A high proportion of this vegetation type is threatened and is generally poorly protected. Hence, it should be carefully managed for the persistence of biodiversity; large areas of natural habitat are needed for many bird species, plants, and numerous wetlands that the Mesic Highveld Grassland supports.
- The proposed project area has a portion of Wakkerstroom Montane Grassland (Least Concern). A variety of land-uses are supported by this area and the conservation and good management of this area depends on the continued land-uses practices that have been able to support this biodiversity. The importance of sustainable development is crucial to the long-term maintenance of the biodiversity and ecosystem services in this area.
- 2 143.6 ha (36 %) of the proposed wind farm is comprised of intact grassland patches. With only 51% of the grasslands remaining in a natural state, very little intact natural grasslands still occur in Mpumalanga. Three proposed wind turbines are placed in intact grassland patches.
- Intact grassland patches are areas larger than 100ha, with little or no gaps or edge effects. They were then prioritised according to their connectivity importance. These intact grasslands are "source" areas for avifaunal species where birth rates are expected to exceed death rates, and no wind farms should be placed anywhere near these intact grassland patches.
- The identification of actual avifaunal source areas may be difficult, but as these intact grassland patches occur within an Important Bird Area (IBA) where there are several nesting and roosting avifaunal species of conservation concern, it highlights their significance and our confidence in confirming these as "source" areas. The presence of these intact grassland patches, CBAs, and the IBAs, is probably the biggest concern that the MTPA may have about the proposed wind farm.

- 84 % of the proposed study area is Important Bird Area and 9.3% of the proposed study area is a Key Biodiversity Area.
- Wind farms are not to be placed in IBAs or intact grassland areas as these are important areas where avifauna should be allowed to thrive and then disperse to other areas.
- Approval of the project in such a location could have far-reaching consequences for threatened bird species, potentially disrupting vital source areas critical for population sustainability.
- The south of the project area falls within the National Protected Areas Expansion Strategy (NPAES) Focus Area (Moist Escarpment Grasslands). The Chrissiesmeer Protected Environment overlaps the north of the project area and Jericho Dam Nature Reserve overlaps the eastern part of the project area.
- It is imperative to adopt a precautionary approach and prioritize the conservation of these essential habitats.

Avifaunal concerns

- **Thirteen out of the 23 proposed wind turbines are placed within the 5 km buffer of a Martial Eagles' recommended buffer these should be removed.**
- 26% of the proposed wind turbines are not covered by vantage points.
- The presence of priority bird species for wind energy developments were recorded within the footprint area.
- Two Southern Bald Ibis colonies (Vulnerable) occur within footprint area.
- A Secretary bird nest (Endangered) was found within this area.
- Birds are very mobile and with the proposed turbine height and blade lengths, the current proposed buffers seem inadequate.
- This raises particular concern as these birds may continuously collide with the blades of the wind turbines and the continuous loss of several of these long-lived birds every year may have a significant impact on population status.
- The artificial water bodies within the footprint area may be important for flamingos and other water-dependent birds.

Site Sensitivity Verification

- The results of the Site Sensitivity Verification confirmed that:
    - The sensitivity for the Terrestrial biodiversity impact assessment as Very High in grassland and wetland habitat.
    - Aquatic Biodiversity Impact Assessment as Very High Sensitivity
    - Plant Species Assessment as Medium Sensitivity
    - Animal Species Assessment as High Sensitivity
    - Bat Assessment Very High/High Sensitivity
    - Avifaunal Assessment as Very High/High Sensitivity.

Additional concerns

- Not all the infrastructure has been included on the map or addressed in terms of likely impact, in this case, roads.

Recommendations:

- There should be a thorough Oribi census plan in place, and it should be included in the final EIA report as the project area is home to many Oribi antelope. (Red data species dependant on healthy highveld grasslands).
- Species 23 must be accounted for, and a management plan drawn up for it since the project area is a potential site for its occurrence.
- The EWT's recommended 5 km buffer for the Martial Eagle's nest is non-negotiable and should be adhered to throughout the project lifecycle.
- The current identified Avifaunal Sensitivities map of all 'no-go' areas (Figure (I)) indicates little area for available for the wind farm. With more appropriate buffers, more field work, and all the associated infrastructure (such as roads), we cannot see how it would be possible to establish a wind farm within the footprint area.
- Increase buffer zones for endangered bird nesting sites to reflect their wider flight ranges relative to the height of the turbines.
- Consider alternative locations with less ecological sensitivity, especially considering the numerous renewable energy projects already approved in Mpumalanga.

Conclusion:

The proposed Sheepmoor Wind Energy Facility poses a significant threat to a Critical Biodiversity Areas, intact grassland patches, Important Bird areas, and the habitat of numerous threatened bird species. Relying on the information presented to date, and the desktop assessments, **it is in the MTPA's opinion that this project is fatally flawed.** The anticipated impacts on biodiversity, particularly the avifauna, is too great to support this project. More ecological assessments and exploration of alternative locations are crucial before proceeding with this project.

Please do not hesitate to contact this office if there are any inquiries.

Kind Regards

MS. NOMCEBO KUNENE
EXECUTIVE MANAGER BIODIVERSITY CONSERVATION
DATE: 18 / 09 / 2024

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

OFFICE OF BIODIVERSITY CONSERVATION

Ref: LUA 24/3966
Unit : LUA/SS
Enquiries: F.N. Krige/ Mr. R.L Nkosi
E-mail: frans@mtpa.co.za
Tel: 013 0650286

Ms. S. Gopaul

Environmental Resource Management Southern Africa (Pty) Ltd.
The Great Westerford
240 Main Road
Rondebosch
Cape Town
7700

[redacted]
E-mail: stephanie.gopaul@erm.com

Dear Ms., Gopaul

SUBJECT: MTPA'S COMMENTS REGARDING THE DRAFT SCOPING FOR THE 45 WIND TURBINES EMVELO WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE,) AND AUXILIARY INFRASTRUCTURE (1 ON-SITE SUBSTATION WITH A CAPACITY OF 200MW, AND 1 OVER-HEAD 132 kV POWERLINE OF APPROXIMATELY 30 KM) ON 18 PORTIONS OF FARMS COVERING AN AREA OF 6 964 HA EAST OF ERMELO FOR EMVELO WIND ENERGY FACILITY (PTY) LTD, MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE. DFFE REFERENCE NUMBER TO BE PROVIDED. MPUMALANGA PROVINCE.

Your correspondence with the project ref no. 0684401 of date 28/08/2024.

COMMENTS AND CONCERNS:

The sensitivity of the above farm on which the proposed activity is likely to occur was assessed according to the Mpumalanga Biodiversity Sector Plan (MBSP; MTPA, 2014). This sensitivity is assessed in terms of terrestrial and freshwater assessments. In the MBSP, priority sensitive areas are identified in terms of Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs). CBAs and ESAs are deemed to be necessary to ensure protection of biodiversity, environmental sustainability, and human well-being, and are to remain unaltered.

According to the MBSP terrestrial assessment map (figure 1) the proposed development will occur within CBA Irreplaceable, CBA Optimal, ESA Landscape corridor, ESA Ecological Corridor, Important Bird Areas (IBA), other natural areas, moderately modified- old lands and heavily modified area (Degraded). According to the freshwater assessments map (figure 2), the proposed development will occur within a CBA Aquatic River, CBA wetlands, ESA wetlands, ESA Strategic water source, ESA Important sub-catchments other natural areas and heavily modified area (Degraded).

The MTPA have the following concerns:

The MTPA is concerned with the proposed project area for the Emvelo Wind Energy Facility (WEF) and its associated Auxiliary infrastructure which is within Important Bird Areas (IBA), CBA Irreplaceable, CBA optimal, CBA aquatic rivers, ESA wetland clusters, ESA wetlands and intact grasslands. These areas are of biodiversity importance and the proposed Emvelo WEF and associated infrastructure will compromise the primary biodiversity objectives of these areas.

The MTPA is concerned with a number of turbines that are in no-go areas or highly sensitive areas. There are ten (10) turbines that are located within the intact grasslands which are turbines 1, 2, 3, 4, 5, 6, 7, 9, 13 and 15 (refer to Figure 3), intact grasslands are crucial for supporting threatened avifauna and these turbines will compromise that biodiversity objective. The MBSP specifically incorporated climate change into spatial priorities through the prioritisation of the connectivity of remaining intact grassland patches in the province, as they provide habitat for species to thrive, and allow for their dispersal.

Turbines 12, 14, 16, 17, 29, 32 and 33 are within CBA irreplaceable, which is to be maintained in a natural state with no loss of ecosystems, functionality or species with no flexibility in land-use options. Turbines 8, 18 and 19 are within CBA optimal which is to be maintained in a natural state with no loss of ecosystems, functionality or species with some flexibility in land-use options.

Turbines 1,2,3,5, 9, 11, 13, 15, 18, 19, 22, 24, 26, 31, and 35 are located within Important Bird Area (IBA). The Important Bird Area (IBA) as established by the Birdlife SA are areas that has the richness of conservation important bird species and care should be taken not to lose their breeding and feeding habitats. Wind turbines increase the risk of bird's collision. Surface water (Wetlands, drainage lines and dams) is crucially important for priority Avifauna, wind turbines and powerlines that that are placed near surface water pose a collision risk (as mentioned by the Avifaunal specialist). The most preferred sites are Moderately and Heavily modified areas; other natural areas are also preferred but under certain conditions.

The proposed Emvelo WEF and its associated grid connection is located in an area comprising a high diversity of threatened bird species, including the following confirmed on site: African Marsh Harrier (Regionally Endangered); Martial Eagle (Globally and Regionally Endangered); Denham's Bustard (Globally Near Threatened, Regionally Vulnerable); Secretary bird (Globally Endangered, Regionally Vulnerable); White-bellied Bustard (Regionally Vulnerable), Blue Crane (Globally Vulnerable, Regionally Near Threatened); Grey Crowned Crane (Globally and Regionally Endangered); Lanner Falcon (Regionally Vulnerable); Greater Flamingo (Regionally Near Threatened); Southern Bald Ibis (Regionally and Globally Vulnerable); Cape

Vulture (Globally Vulnerable and Regionally Endangered); and Yellow-breasted Pipit (Regionally and Globally Vulnerable).

Turbines 1, 2, 3, 5, 7, 9, 13 and 15 are within the 5km Martial Eagle Buffer, Birdlife South Africa currently recommends 5-6 km buffer for Martial Eagles, this 5km no-go buffer must be adhered to by the Applicant.

The MTPA would like to recommend the following:

- Key biodiversity areas should be avoided, and Wind turbines removed from such.

- A 100m buffer around wetlands and other waterbodies must be implemented and adhered to throughout the lifecycle of the proposed development.
- 5km radius Martial Eagle Buffer (as recommended by BirdLifeSA) must be implemented and avoided throughout the lifecycle of the proposed development.
- A Thorough Terrestrial Biodiversity assessment which also includes Intact grasslands patches.
- A thorough Avifaunal study must be done with all the best practices to avoid the bird collision risks.
- Proper mitigation strategies of the wind turbines to avoid collisions and mortalities must be included in the EIAr.
- The roads, temporary site camps and all the other associated infrastructure must be included on the site layout of the Emvelo WEF in the EIAr.
- The Applicant must find a more suitable alternative site for this development with less risk to biodiversity.
- The clearance or removal of vegetation must be restricted to the project footprint.
- Moderately modified- old lands and heavily modified areas (Degraded) are the most preferred sites for the Emvelo WEF, other natural areas are also preferred but under certain conditions.
- The applicant must apply duty of care to ensure that there is no significant pollution or degradation of the environment.

The MTPA does not support the Environmental Authorisation of the proposed Emvelo Wind Energy Facility (Pty) Ltd for proposed Wind Energy Facility and Auxiliary infrastructure operation within the application area with up to 45 proposed wind turbines. The sensitive areas cover most of the proposed Emvelo WEF project area, Important Birds Area (IBA) covers 43% of the project area; Key Biodiversity Areas (KBA) Covers 21.4% of the project area; Critical Biodiversity Areas (CBA) covers 1,302.2 ha of the project area; and 2,272.5 ha of intact grassland patches within the project area.

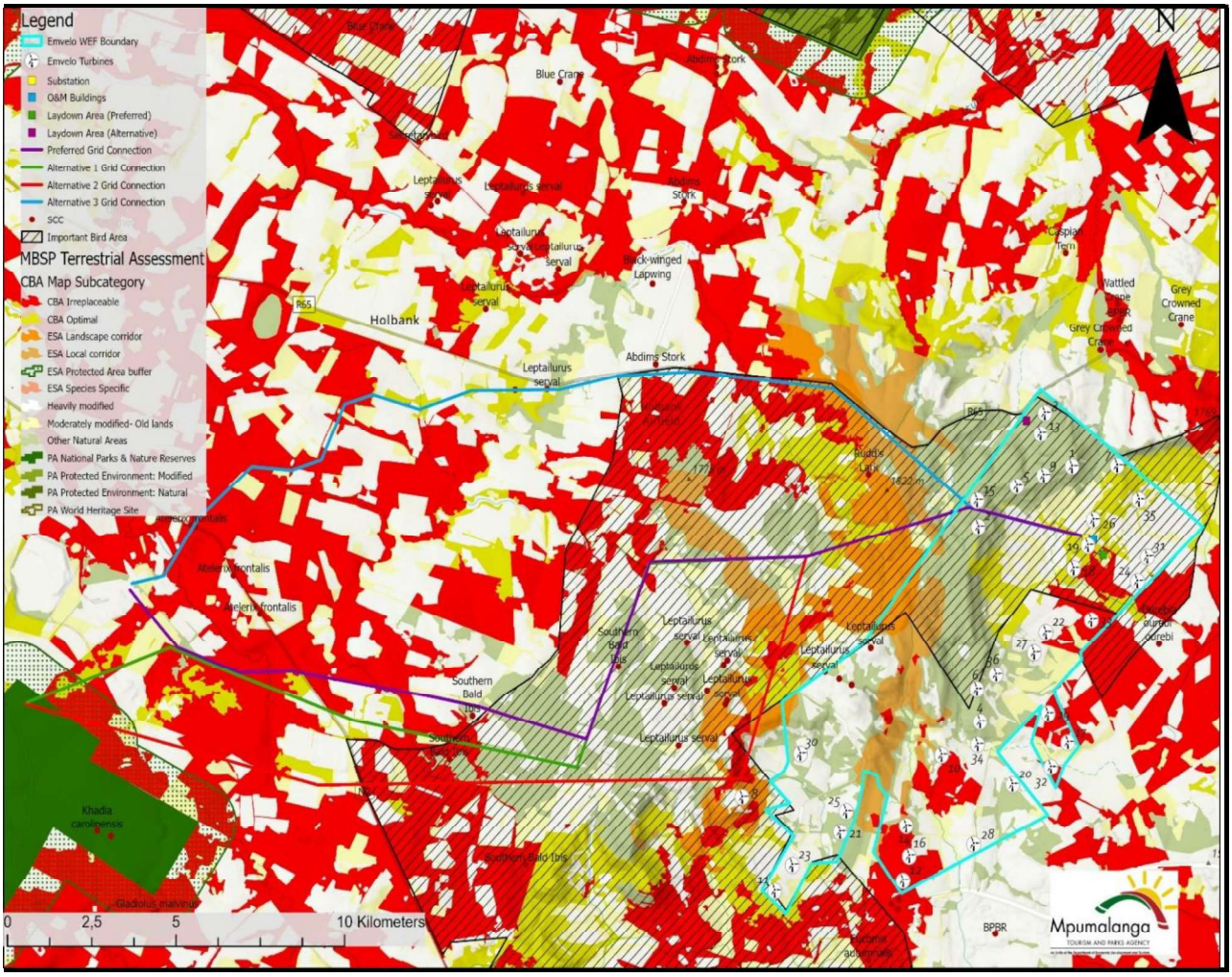


Figure 1. MBSP based terrestrial biodiversity assessment for the Emvelo Wind Energy Facility.

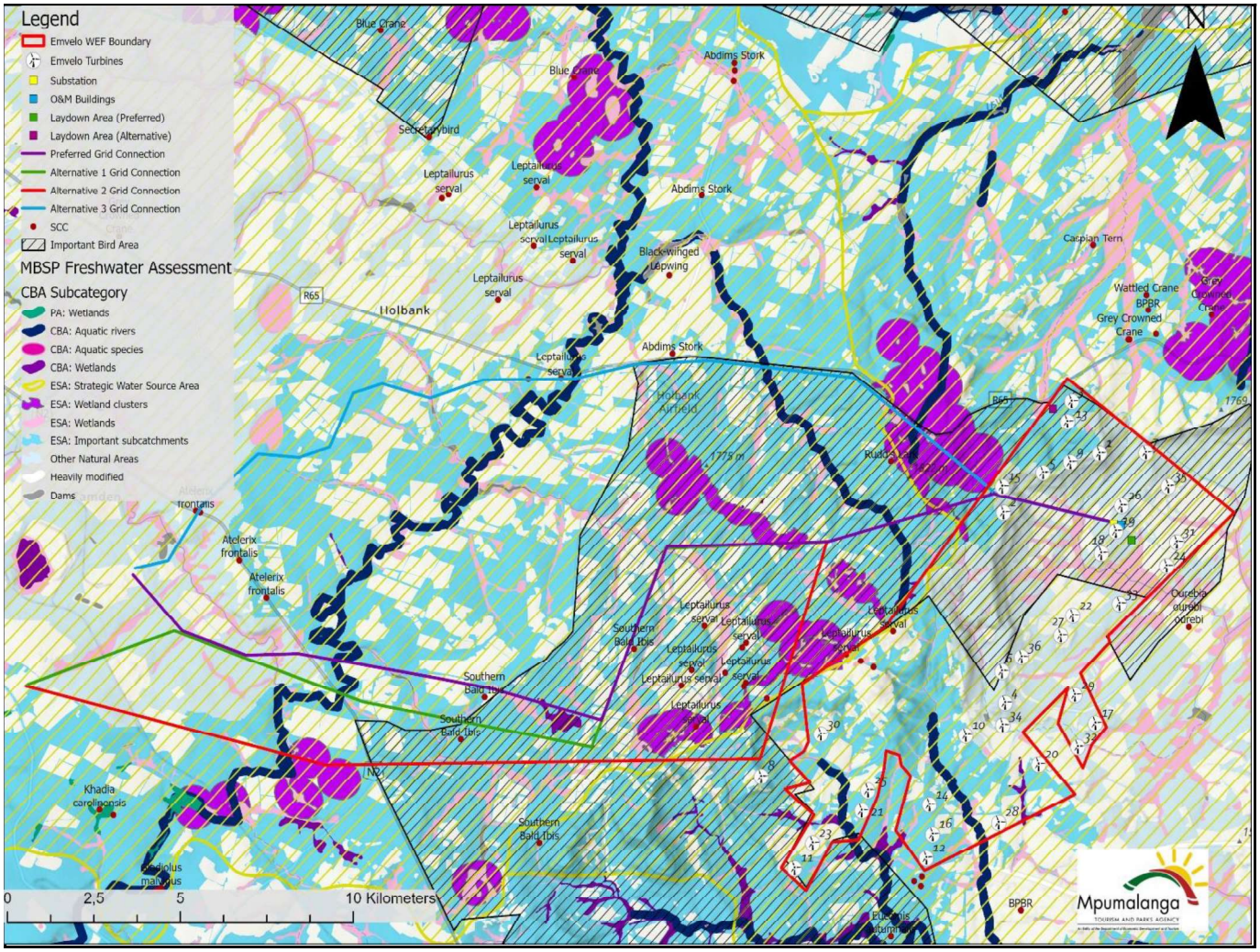


Figure 2. MBSP based Freshwater biodiversity assessment for the Emvelo Wind Energy Facility.

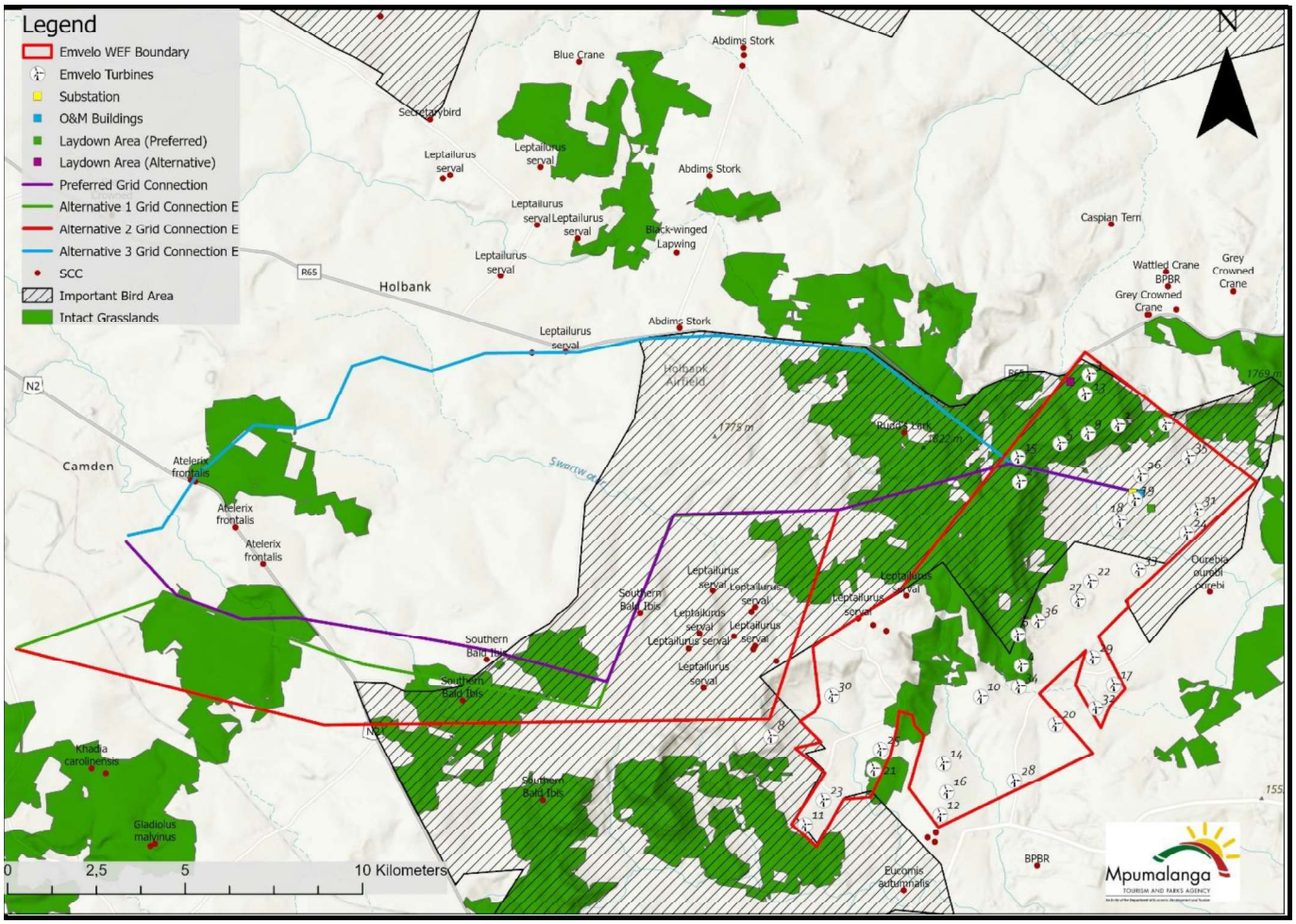


Figure 3. MBSP based Intact Grasslands map for the Emvelo Wind Energy Facility.

Please do not hesitate to contact this office if there are any enquiries.

Kind Regards

MS. NOMCEBO KUNENE
EXECUTIVE MANAGER BIODIVERSITY CONSERVATION
DATE: 20 / 09 / 2024.

From: Celia de Waal
To: ERM Arcus Amsterdam
Cc: Frans Krige
Subject: DRaft Comments LUA 24-3965 Rochdale Wind Energy Facility
Date: Tuesday, 01 October 2024 11:14:57
Attachments: LUA24-3965 Rochdale Wind Energy (DRaft Comments).pdf

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

EXTERNAL MESSAGE

Good day

Kindly receive the draft comments from Mr. Krige of LUA 24-3965. As soon as we have a signed copy, I will forward it to you.

Kind regards

Celia

From: Celia de Waal
Sent: 01 October 2024 10:35
To: Erm.arcusamsterdam@erm.com
Cc: Frans Krige <frans@mtpa.co.za>; Johan Eksteen <johan@mtpa.co.za>
Subject: FW: MTPA's comments LUA 24/3966 - Draft Scoping for 45 wind turbines (Emvelo Wind Energy)

Good day

Kindly receive two of the letters as requested

I will follow up with Frans Krige on LUA 24/3965, Rochdale, as soon as he is done with his meeting.

Regards

Celia

From: Celia de Waal
Sent: 20 September 2024 09:56
To: stephanie.gopaul@erm.com
Cc: Tommie Steyn <Tommie@mtpa.co.za>; Johan Eksteen <johan@mtpa.co.za>; Frans Krige <frans@mtpa.co.za>; Khumbelo Malele <Khumbelo.Malele@mtpa.co.za>; Rockey Nkosi <Rockey.Nkosi@mtpa.co.za>; Thabile Mnisi <Thabile.Mnisi@mtpa.co.za>; Phumla Nkosi <Phumla.Nkosi@mtpa.co.za>; Fortunate Watkins <Fortunate.Watkins@mtpa.co.za>
Subject: MTPA's comments LUA 24/3966 - Draft Scoping for 45 wind turbines (Emvelo Wind

Energy)

Dear Ms. Gopaul

Kindly receive the attached comments from the MTPA regarding a Draft Scoping report for 45 wind turbines for Emvelo Wind Energy Facility & auxiliary infrastructure.

Your project no: **0684401**

Our EIA reference number is **LUA 24/3966**

Kind regards

Celia de Waal

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
[redacted]
e-mail: celia.dewaal@mtpa.co.za

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

OFFICE OF BIODIVERSITY CONSERVATION

Ref : LUA 24/3965
Unit : LUA/SS
Enquiries: F.N. Krige ;M.E Hlatshwayo
E-mail : frans@mtpa.co.za
Tel/Fax: 013 - 0650286

Stephanie Gopaul

Environmental Resource Management Southern Africa (Pty) Ltd
240 Main Road
Great Westerford Building, 1st Floor
Rondebosch
CAPE TOWN
7700

Email: ERM.ArcusAmsterdam@erm.com

Dear Ms., Gopaul

SUBJECT: THE MTPA REVIEW AND COMMENTS ON THE DRAFT SCOPING REPORTIT, ONVERWACHTOSED 240 MW ROCHDALE WIND ENERGY FACILITY (30 TURBINES) ON PORTIONS 1,2 AND 5 OF THE FARM SCHIMMELHOEK 272 IT AND ASSOCIATED 132 Kv GRID INFRASTRUCTURE TRANSVERSING OVER SEVERAL PORTIONS OF THE FARMS SCHIMMELHOEK 272 IT, ONVERWACHT 273, ZWARTWATER 288, WELTERVREDEN 289 AND WITPUNT 267 APPROXIMATELY 31.5 KM BY ROCHDALE WIND ENERGY FACILITY (PTY) LTD NEAR ERMELO, MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE.

With reference to your correspondence reference 0684401 of date 28/08/2024 our comments:

The application has been assessed by using the following tools: Mpumalanga Biodiversity Sector Plan (2014 as updated 2022) land use guidelines, the DFFE web-based sensitivity screening tool, Environmental legislation NEMA and EIA regulations 2014 as amended, Department of Water and Sanitation and Water Research Commission Guidelines on wetlands, the South African Heritage Resources Act and knowledge to assess Development Applications.

The sensitivity of the area, in which the prospecting activity is proposed and is likely to occur was assessed according to the Mpumalanga Biodiversity Sector plan (MBSP; MTPA, 2014). The sensitivity is assessed in terms of terrestrial and freshwater assessments. In the MBSP, sensitivity areas are identified in terms of *Critical Biodiversity Areas* (CBAs) and *Ecological Support Areas* (ESAs). CBAs and ESAs are deemed to be necessary to ensure the protection of biodiversity, environmental sustainability and sustainable living and are to remain unaltered.

With reference to the assessment of your Draft Scoping Report the MTPA is concerned about the following issues raised with regards to the terms of reference for specialist studies.

1. The applicant needs to look for an alternative less sensitive development site to develop the wind energy facility.
2. The avoidance of large areas of critical biodiversity terrestrial and freshwater sensitivity areas and the preliminary project layout overlain area is a large concern especially in the southeastern part of the study area.
3. The threat of this WEF to the Important Bird Area (IBA) and the status of globally Endangered bird species such as the Martial Eagle is of a concern.
4. Road network and its impact must be indicated and must be placed away from the sensitive zones.
5. A 1 km buffer from the CBA Rivers must be applied. Wherever wetland and river crossings are needed, the EIA regulations must be followed.
6. The potential risk and threat of infrastructure-induced fires occurring on grasslands and impacting Species of Conservation Concern (SCC) must be incorporated into the risk assessments.

Proliferation of renewable energy applications

- While South Africa's energy needs highlight the urgency of shifting from coal to renewable energy, it is crucial to consider the scale of investments and the rapid growth of renewable energy projects, especially in Mpumalanga. The drive to approve nearly all renewable applications must be carefully balanced with proper planning and sustainability, ensuring that the transition aligns with environmental, economic, and social factors specific to the region.
- The explosion of renewable energy applications does require careful consideration as to the likely impacts. There is no shortage of renewable energy projects within the Province and the Province has room to apply its mind and navigate this space carefully, especially on areas that are not part of the Renewable Energy Development Zones (REDZs) The province has now over 300 000 ha of renewable energy applications, and the many more than are still to be submitted.

Mpumalanga Biodiversity Sector Plan (MBSP), Intact Grassland Patches and Important Bird Areas (IBAs)

- Majority of the proposed turbines and associated infrastructure such as the laydown structure and grid connections are in environmental sensitives areas(CBA Irreplaceable 1,399.9, CBA Optimal ,Intact grassland areas, Priority Focus Area and Key Biodervisity Areas).The MTPA is also not satisfied with the alternative proposed development sites as they are still placed within the environmental sensitive areas, with the grid connections traversing over the Important Bird Areas(IBA) and the buffer of the Martial Eagle Nest.

- The proposed Rochdale Wind Energy Facility is less than 1 km from an Important Bird Area (IBA), and it is important to note that Birds of SCC were recorded in the broader area, therefore the proposed project might impact these Birds of SCC.

- With the vantage points provided, some of the proposed wind turbines are not visible from the vantage point and, although additional vantage points and transect count monitoring was conducted near the Martial Eagle nest. However, with the possibility of the presence of species 23, and a high diversity of threatened bird species, including the threatened birds confirmed on site: African Marsh Harrier Denham's Bustard, Secretary bird, White-bellied Bustard, Blue Crane, Grey Crowned Crane, Lanner Falcon Greater Flamingo, Southern Bald Ibis, Cape Vulture, and Yellow-breasted Pipit. The MTPA is concerned that the survey effort is not sufficient to adequately find possible breeding and nest sites of species 23 and to assess cumulative impacts and identify appropriate avoidance and mitigation measures for the threatened and vulnerable species. Therefore, the MTPA requests the applicant, to do additional vantage point monitoring not only for the martial eagle, but to ascertain if species 23 is present or not this must be done to satisfy and honour the African-Eurasian Migratory Waterbird Agreement.
- Intact grassland patches are areas larger than 100ha, with little or no gaps or edge effects. They were then prioritised according to their connectivity importance. These intact grasslands are "source" areas for avifaunal species where birth rates are expected to exceed death rates, and no wind farms should be placed anywhere near these intact grassland patches. Proposed Turbine 8 falls within the intact grassland patches,140 Ha is identified as an area with intact grassland. With only 51% of the grasslands remaining in a natural state, very little intact natural grasslands still occur in Mpumalanga. Therefore, the MTPA sees the need to protect the little intact grassland still occurring, therefore turbine 8 should be excluded.
- Majority of proposed project area mainly falls within the Eastern Highveld Grassland (Endangered). A high proportion of this vegetation type is threatened and is generally poorly protected. Hence, it should be carefully managed for the persistence of biodiversity; large areas of natural habitat are needed for many bird species, plants, and numerous wetlands that the Mesic Highveld Grassland supports.
- The proposed project area has a portion of Wakkerstroom Montane Grassland (Least Concern). A variety of land-uses are supported by this area and the conservation and good management of this area depends on the continued land-uses practices that have been able to support this biodiversity. The importance of sustainable development is crucial to the long-term maintenance of the biodiversity and ecosystem services in this area.
- Wind farms should not be placed in intact grassland areas as these are important areas where avifauna should be allowed to thrive and then disperse to other areas.
- Approval of the project in such a location could have far-reaching consequences for threatened bird species, potentially disrupting vital source areas critical for population sustainability.
- It is imperative to adopt a precautionary approach and prioritize the conservation of these essential habitats.

Avifaunal concerns

- The presence of 32 priority bird species for wind energy developments and of the 32,12 priority bird species for wind energy developments were recorded within the footprint area and 19 priority species were also recorded, of which the Southern Bald Ibis were nesting with chicks.

- A Martial Eagle nest (Endangered) occurs within the footprint area. These are South Africa's largest eagles and travel over vast areas. They are also suspectable to collision with turbines and wind farms are of serious concern, therefore according to the Endangered Wildlife Trust a 5km buffer must be applied and adhered to throughout the wind facility life cycle. Four of the proposed turbines (3, 4,13 and 14) are within the buffer of the Martial Eagle therefore these turbines need to be excluded.
- Southern Bald Ibis colonies, Yellow-breasted Pipit, Secretary bird nest occur within footprint area. Therefore, the applicant needs to consider that birds are very mobile and with the proposed turbine height and blade lengths adequate buffers must be assigned.
- This raises particular concern as these birds may continuously collide with the blades of the wind turbines and the continuous loss of several of these long-lived birds every year may have a significant impact on population status.
- The water bodies in the area are important for migrating birds such as flamingos for bathing and drinking, therefore they need to be buffered on either site for the entire during of the project life cycle.

Site Sensitivity Verification

- The results of the Site Sensitivity Verification confirmed that:
    - The sensitivity for the Terrestrial biodiversity impact assessment as Very High/High in grassland and wetland habitat
    - Aquatic Biodiversity Impact Assessment as High Sensitivity
    - Plant Species Assessment as Medium Sensitivity
    - Animal Species Assessment as High Sensitivity
    - Bat Assessment as Very High Sensitivity/High Sensitivity
    - Avifaunal Assessment as Vey High Sensitivity/High Sensitivity

Additional concerns

- Not all the infrastructure has been included on the map or addressed in terms of likely impact. The length of internal roads must be included, and the impact be declared.

Recommendations

- Additional Vantage points must be conducted to establish if species 23(Critically endangered) is present or not to provide more details regarding the potential impacts on the critical species.
- There should be an Oribi management plan in place. The plan should include how this area can be utilized as a sanctuary for the Oribi.
- The EWT's recommended 5 km buffer for the Martial Eagle's nest is non-negotiable and should be adhered to throughout the project lifecycle.
- The location of all but 3 turbines is in avifaunal exclusion zones. However, according to the MBSP proposed turbine 5 is in an CBA Irreplaceable area. Therefore only two proposed turbines ,turbine 15 and 14 are in Heavily Modified or Moderately Modified Areas ,however with some of the SCC

roosting and nesting in trees of alien invasive species ,and cultivated/vegetated lands which might be utilized for feeding areas for many Species of Conservation Concern such as white bellied bustard(Vulnerable)recorded on the broader area, therefore even the Heavily Modified or moderately Modified Areas might not be suitable for the placement of the proposed turbines as they might also be utilized by the birds.

- The current identified Avifaunal Sensitivities map of all 'no-go' areas (Figure (i)) indicates little area for available for the wind farm. With additional monitoring done appropriate buffers must be applied, and all the associated infrastructure such as roads and lay down structures removed from the sensitive areas, the MTPA cannot see how it would be possible to establish a wind farm within the proposed footprint area.
- Increase buffer zones for endangered bird nesting sites to reflect their wider flight ranges relative to the height of the turbines.
- Consider alternative locations with less ecological sensitivity, especially considering the numerous renewable energy projects already approved in Mpumalanga.

Conclusion:

The proposed Rochdale Wind Energy Facility and associated infrastructure poses a significant threat to the Critical Biodiversity Areas, intact grassland patches, Important Bird areas, Key Biodervisity Areas and the habitat of numerous threatened bird species. If we need to rely on the information presented to date, and the desktop assessments, then it is in our opinion that this project is fatally flawed. When considering the cumulative impact of the entire Rochdale Wind Energy Facility the anticipated environmental impacts on biodiversity, particularly on the avifauna, this project becomes a significant concern. The MTPA suggests that the applicant explores alternative locations, that are less environmental sensitive as it crucial before proceeding with this project.



Figure 1. MBSP terrestrial biodiversity map of the proposed wind turbines on portions 1,2 and 5 of the farm Schimmelhoek 272 IT and grid connection on various affected farm portions

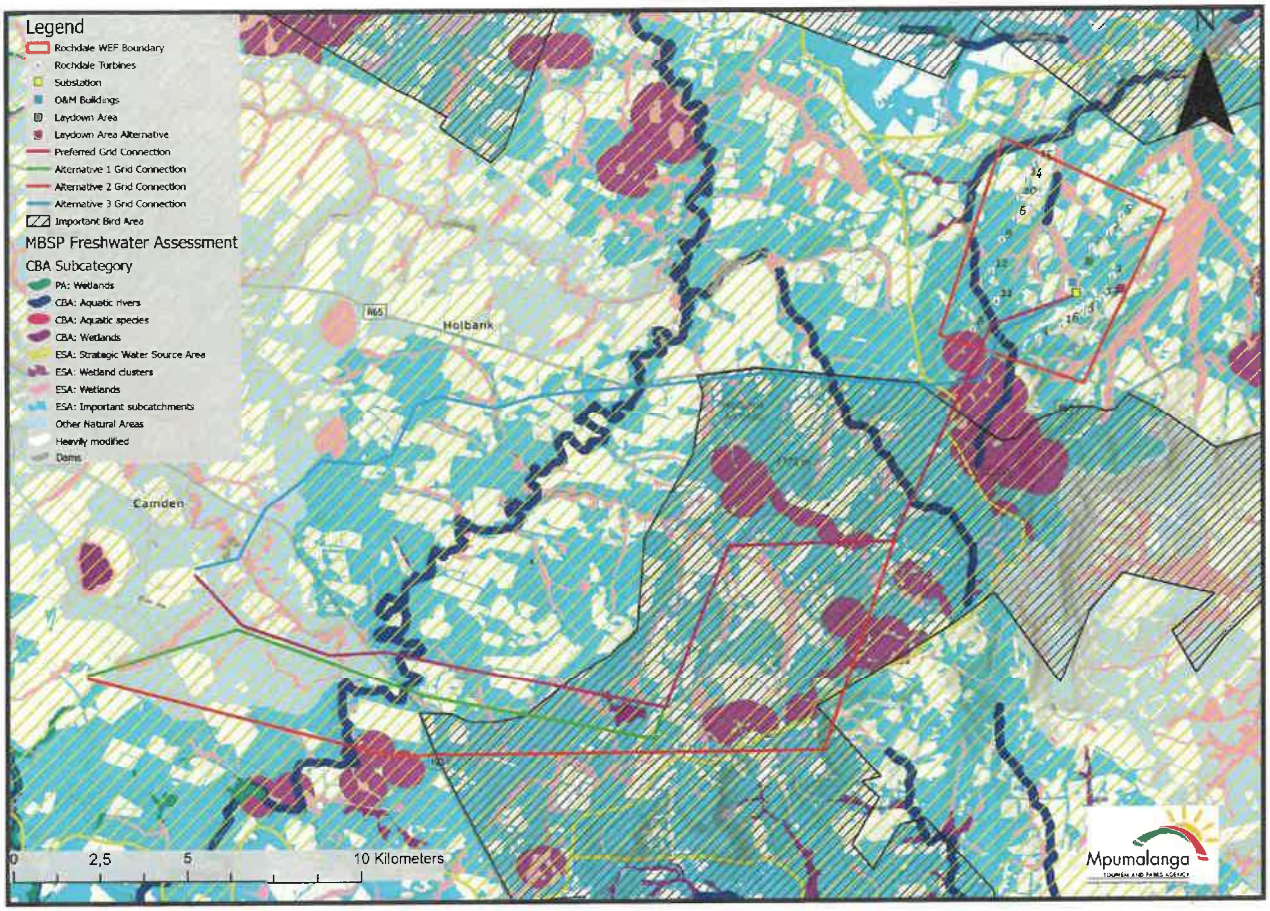


Figure 2: MBSP freshwater biodiversity map of the proposed wind turbines on portions 1,2 and 5 of the farm Schimmelhoek 272 IT and grid connection on various affected farm portions

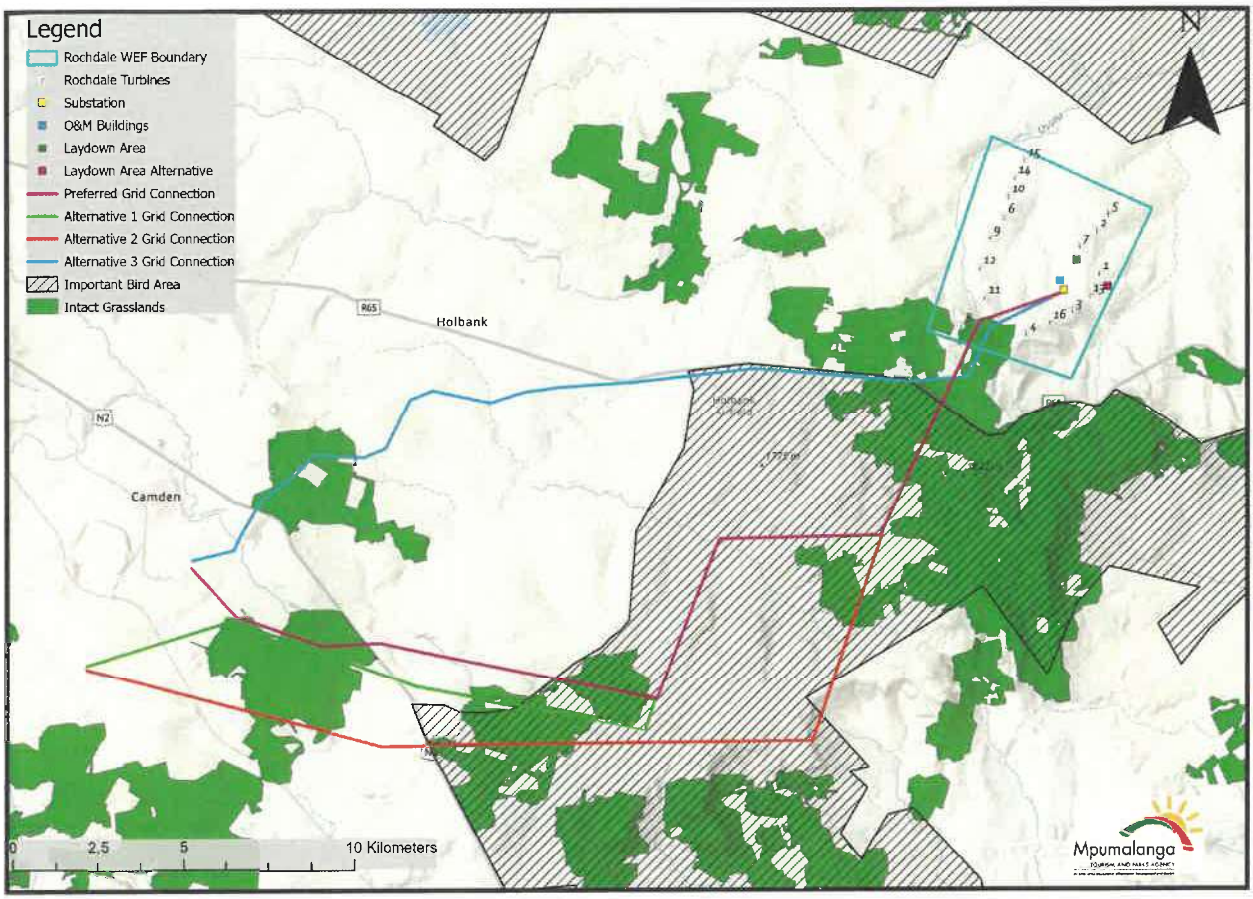


Figure 3: MBSP intact grassland map of the proposed wind turbines portions 1,2 and 5 of the farm Schimmelhoek 272 IT and grid connection on various affected farm portions

Please do not hesitate to contact this office if there are any enquiries.

Kind Regards

MS. NOMCEBO KUNENE
EXECUTIVE MANAGER BIODIVERSITY CONSERVATION
DATE: _____ / _____ / 2024

From: ERM Arcus Amsterdam
To: Celia de Waal; ERM Arcus Amsterdam
Cc: Frans Krige
Subject: RE: DRaft Comments LUA 24-3965 Rochdale Wind Energy Facility
Date: Tuesday, 01 October 2024 12:46:32
Attachments: image002.png

Thanks Celia!

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: Celia de Waal <celia@mtpa.co.za>
Sent: Tuesday, October 1, 2024 11:15 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Frans Krige <frans@mtpa.co.za>
Subject: DRaft Comments LUA 24-3965 Rochdale Wind Energy Facility

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

EXTERNAL MESSAGE

Good day

Kindly receive the draft comments from Mr. Krige of LUA 24-3965. As soon as we have a signed copy, I will forward it to you.

Kind regards

Celia

From: Celia de Waal
Sent: 01 October 2024 10:35
To: Erm.arcusamsterdam@erm.com
Cc: Frans Krige <frans@mtpa.co.za>; Johan Eksteen <johan@mtpa.co.za>
Subject: FW: MTPA's comments LUA 24/3966 - Draft Scoping for 45 wind turbines (Emvelo Wind Energy)

Good day

Kindly receive two of the letters as requested

I will follow up with Frans Krige on LUA 24/3965, Rochdale, as soon as he is done with his meeting.

Regards

Celia

From: Celia de Waal
Sent: 20 September 2024 09:56
To: stephanie.gopaul@erm.com
Cc: Tommie Steyn <Tommie@mtpa.co.za>; Johan Eksteen <johan@mtpa.co.za>; Frans Krige <frans@mtpa.co.za>; Khumbelo Malele <Khumbelo.Malele@mtpa.co.za>; Rockey Nkosi <Rockey.Nkosi@mtpa.co.za>; Thabile Mnisi <Thabile.Mnisi@mtpa.co.za>; Phumla Nkosi <Phumla.Nkosi@mtpa.co.za>; Fortunate Watkins <Fortunate.Watkins@mtpa.co.za>
Subject: MTPA's comments LUA 24/3966 - Draft Scoping for 45 wind turbines (Emvelo Wind Energy)

Dear Ms. Gopaul

Kindly receive the attached comments from the MTPA regarding a Draft Scoping report for 45 wind turbines for Emvelo Wind Energy Facility & auxiliary infrastructure.

Your project no: **0684401**

Our EIA reference number is **LUA 24/3966**

Kind regards

Celia de Waal

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
[redacted]

From:	Celia de Waal
To:	ERM Arcus Amsterdam
Cc:	Frans Krige; Mixo Hlatshwayo; Khumbelo Malele; Johan Eksteen; Thabile Mnisi; Phumla Nkosi
Subject:	MTPA"s comments: LUA 24/3965 - Draft Scoping report for the Rochdale Wind Energy Facility near ERmelo
Date:	Wednesday, 02 October 2024 11:15:01
Attachments:	LUA 24-3965 OBJ_D.Scoping.Rochdale.WEF_GridInfrastr_Msukaligwa.LM.pdf

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EXTERNAL MESSAGE

Good day

Kindly receive the attached comments from the MTPA regarding a Draft Scoping Report for the 240 MW Rochdale Wind Energy Facility near Ermelo.

Your reference number is**: 0684401**

Our EIA registration/reference number is**: LUA 24/3965**

Kind regards

Celia de Waal

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
[redacted]

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

OFFICE OF BIODIVERSITY CONSERVATION

Ref : LUA 24/3965
Unit : LUA/SS
Enquiries: F.N. Krige ;M.E Hlatshwayo
E-mail : frans@mtpa.co.za
Tel/Fax: 013 - 0650286

Stephanie Gopaul
Environmental Resource Management Southern Africa (Pty) Ltd
240 Main Road
Great Westerford Building, 1st Floor
Rondebosch
CAPE TOWN
7700

E-mail: ERM.ArcusAmsterdam@erm.com

Dear Ms., Gopaul

SUBJECT: THE MTPA COMMENTS ON THE DRAFT SCOPING REPORT, 240 MW ROCHDALE WIND ENERGY FACILITY (30 TURBINES) ON PORTIONS 1,2 AND 5 OF THE FARM SCHIMMELHOEK 272 IT AND ASSOCIATED 132 Kv GRID INFRASTRUCTURE TRANSVERSING OVER SEVERAL PORTIONS OF THE FARMS SCHIMMELHOEK 272 IT, ONVERWACHT 273, ZWARTWATER 288, WELTERVREDEN 289 AND WITPUNT 267 APPROXIMATELY 31.5 KM BY ROCHDALE WIND ENERGY FACILITY (PTY) LTD NEAR ERMELO, MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE.

With reference to your correspondence with reference 0684401 of date 28/08/2024, refer.

Comments
The application was assessed by using the following tools: Mpumalanga Biodiversity Sector Plan (MBSP, 2014 as updated 2022) land use guidelines, DFFE web-based sensitivity screening tool, Environmental legislation NEMA and EIA regulations 2014 as amended, Department of Water and Sanitation and Water Research Commission Guidelines on wetlands, South African Heritage Resources Act and knowledge to assess Development Applications.

The sensitivity of the proposed project area was assessed according to the MBSP. This sensitivity is assessed in terms of terrestrial and freshwater assessments. In the MBSP, sensitivity areas are identified in terms of *Critical Biodiversity Areas* (CBAs) and *Ecological Support Areas* (ESAs). CBAs and ESAs are deemed to be necessary to ensure the protection of biodiversity, environmental sustainability and sustainable living and are to remain unaltered.

With reference to the assessment of your Draft Scoping Report the MTPA is concerned about the following issues raised with regards to the terms of reference for specialist studies.

- The applicant needs consider an alternative, less sensitive development site to develop the wind energy facility.
- The avoidance of large areas of critical biodiversity terrestrial and freshwater sensitivity areas and the preliminary project layout overlain area is a large concern especially in the southeastern part of the study area.
- The threat of this Wind Energy Facility (WEF) to the Important Bird Area (IBA) and the status of globally Endangered bird species such as the Martial Eagle is of a concern.
- The road network and its impact must be indicated on maps and must be placed away from the sensitive zones.
- A 1 km buffer from the CBA Rivers must be applied. Wherever wetland and river crossings are needed, the Environmental Impact Assessment (EIA) regulations must be followed.
- The potential risk and threat of infrastructure-induced fires occurring on grasslands and impacting Species of Conservation Concern (SCC) must be incorporated into the risk assessments.

Proliferation of renewable energy applications

- While South Africa's energy needs highlight the urgency of shifting from coal to renewable energy, it is crucial to consider the scale of investments and the rapid growth of renewable energy projects, especially in Mpumalanga. The drive to approve nearly all renewable applications must be carefully balanced with proper planning and sustainability, ensuring that the transition aligns with environmental, economic, and social factors specific to the region.
- The increase in renewable energy applications does require careful consideration as to the likely impacts. There is no shortage of renewable energy projects within the Province and the Province has room to apply its mind and navigate this space carefully, especially on areas that are not part of the Renewable Energy Development Zones (REDZs) The province has now over 300 000 ha of renewable energy applications, and the many more than are still to be submitted.

Mpumalanga Biodiversity Sector Plan (MBSP), Intact Grassland Patches and Important Bird Areas (IBAs)

- Most of the proposed turbines and associated infrastructure, such as the laydown structure and grid connections, are in environmentally sensitive areas (CBA Irreplaceable 1,399.9, CBA Optimal ,Intact grassland areas, Priority Focus Area and Key Biodiversity Areas).The MTPA is not satisfied with the alternative proposed development sites as they are still placed within the environmental sensitive areas, with the grid connections traversing over the Important Bird Areas(IBA) and the buffer of the Martial Eagle Nest.
- The proposed Rochdale Wind Energy Facility is less than 1 km from an Important Bird Area (IBA), and it is important to note that Birds of SCC were recorded in the broader area, therefore the proposed project might impact these Birds of SCC.
- With the vantage points provided, some of the proposed wind turbines are not visible from the vantage point and, although additional vantage points and transect count monitoring was conducted near the Martial Eagle nest. There is a possibility of the presence of 23 species, and a high diversity

of threatened bird species, including the threatened birds confirmed on site, such as: African Marsh Harrier Denham's Bustard, Secretary bird, White-bellied Bustard, Blue Crane, Grey Crowned Crane, Lanner Falcon Greater Flamingo, Southern Bald Ibis, Cape Vulture, and Yellow-breasted Pipit. The MTPA is concerned that the survey effort is not sufficient to adequately find possible breeding and nest sites of 23 species, and to assess cumulative impacts and identify appropriate avoidance and mitigation measures for the threatened and vulnerable species. Therefore, the MTPA requests the applicant, to do additional vantage point monitoring not only for the martial eagle, but to ascertain if the 23 species are present or not this must be done to satisfy and honour the African-Eurasian Migratory Waterbird Agreement.

- Intact grassland patches are areas larger than 100ha, with little or no gaps or edge effects. It was then prioritised according to their connectivity importance. These intact grasslands are "source" areas for avifaunal species where birth rates are expected to exceed death rates, and no wind farms should be placed anywhere near these intact grassland patches. Proposed Turbine 8 falls within the intact grassland patches,140 Ha is identified as an area with intact grassland. With only 51% of the grasslands remaining in a natural state, very little intact natural grasslands still occur in Mpumalanga. Therefore, the MTPA sees the need to protect the little intact grassland still occurring, therefore turbine 8 should be excluded.
- Majority of proposed project area mainly falls within the Eastern Highveld Grassland (Endangered). A high proportion of this vegetation type is threatened and is generally poorly protected. Hence, it should be carefully managed for the persistence of biodiversity; large areas of natural habitat are needed for many bird species, plants, and numerous wetlands that the Mesic Highveld Grassland supports.
- The proposed project area has a portion of Wakkerstroom Montane Grassland (Least Concern). A variety of land-uses are supported by this area and the conservation and good management of this area depends on the continued land-uses practices that have been able to support this biodiversity. The importance of sustainable development is crucial to the long-term maintenance of the biodiversity and ecosystem services in this area.
- Wind farms should not be placed in intact grassland areas as these are important areas where avifauna should be allowed to thrive and then disperse to other areas.
- Approval of the project in such a location could have far-reaching consequences for threatened bird species, potentially disrupting vital source areas critical for population sustainability.
- It is imperative to adopt a precautionary approach and prioritize the conservation of these essential habitats.

Avifaunal concerns

- The presence of 32 priority bird species for wind energy developments and of the 32,12 priority bird species for wind energy developments were recorded within the footprint area and 19 priority species were also recorded, of which the Southern Bald Ibis were nesting with chicks.
- A Martial Eagle nest (Endangered) occurs within the footprint area. These are South Africa's largest eagles and travel over vast areas. They are also suspectable to collision with turbines and wind farms are of serious concern, therefore according to the Endangered Wildlife Trust a 5km buffer must be applied and adhered to throughout the wind facility life cycle. Four of the proposed turbines (3, 4,13 and 14) are within the buffer of the Martial Eagle therefore these turbines need to be excluded.

- Southern Bald Ibis colonies, Yellow-breasted Pipit, Secretary bird nest occur within footprint area. Therefore, the applicant needs to consider that birds are very mobile and with the proposed turbine height and blade lengths adequate buffers must be assigned.
- This raises particular concern as these birds may continuously collide with the blades of the wind turbines and the continuous loss of several of these long-lived birds every year may have a significant impact on population status.
- The water bodies in the area are important for migrating birds such as flamingos for bathing and drinking, therefore they need to be buffered on either site for the entire during of the project life cycle.

Site Sensitivity Verification

- The results of the Site Sensitivity Verification confirmed that:
    - The sensitivity for the Terrestrial biodiversity impact assessment as Very High/High in grassland and wetland habitat
    - Aquatic Biodiversity Impact Assessment as High Sensitivity
    - Plant Species Assessment as Medium Sensitivity
    - Animal Species Assessment as High Sensitivity
    - Bat Assessment as Very High Sensitivity/High Sensitivity
    - Avifaunal Assessment as Vey High Sensitivity/High Sensitivity

Additional concerns

- Not all the infrastructure has been included on the map or addressed in terms of likely impact. The length of internal roads must be included, and the impact be declared.

Recommendations

- Additional Vantage points must be conducted to establish if 23 species (Critically endangered) are present or not to provide more details regarding the potential impacts on the critical species.
- An Oribi management plan should be in place. The plan should include how this area can be utilized as a sanctuary for the Oribi.
- The Endangered Wildlife Trust's (EWT) recommended 5 km buffer for the Martial Eagle's nest is non-negotiable and should be adhered to throughout the project lifecycle.
- The location of all but 3 turbines is in avifaunal exclusion zones. However, according to the MBSP proposed turbine 5 is in an CBA Irreplaceable area. Therefore only two proposed turbines ,turbine 15 and 14 are in Heavily Modified or Moderately Modified Areas, however with some of the SCC roosting and nesting in trees of alien invasive species ,and cultivated/vegetated lands which might be utilized for feeding areas for many Species of Conservation Concern such as white bellied bustard(Vulnerable)recorded on the broader area, therefore even the Heavily Modified or moderately Modified Areas might not be suitable for the placement of the proposed turbines as they might also be utilized by the birds.
- The current identified Avifaunal Sensitivities map of all 'no-go' areas (Figure (i)) indicates little area for available for the wind farm. With additional monitoring done appropriate buffers must be applied, and all the associated infrastructure such as roads and lay down structures removed from the

sensitive areas, the MTPA cannot see how it would be possible to establish a wind farm within the proposed footprint area.

- Increase buffer zones for endangered bird nesting sites to reflect their wider flight ranges relative to the height of the turbines.
- Consider alternative locations with less ecological sensitivity, especially considering the numerous renewable energy projects already approved in Mpumalanga.



Figure 1. MBSP terrestrial biodiversity map of the proposed wind turbines on portions 1,2 and 5 of the farm Schimmelhoek 272 IT and grid connection on various affected farm portions

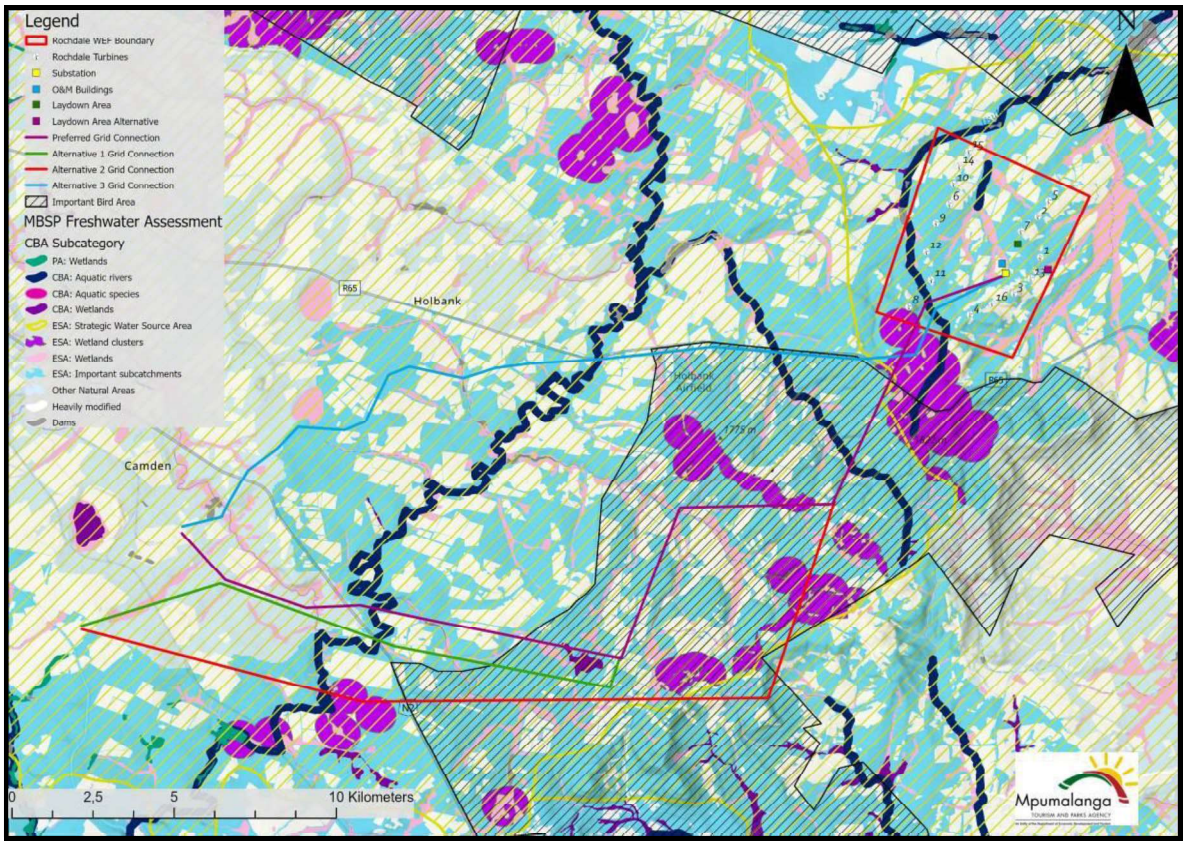


Figure 2: MBSP freshwater biodiversity map of the proposed wind turbines on portions 1,2 and 5 of the farm Schimmelhoek 272 IT and grid connection on various affected farm portions

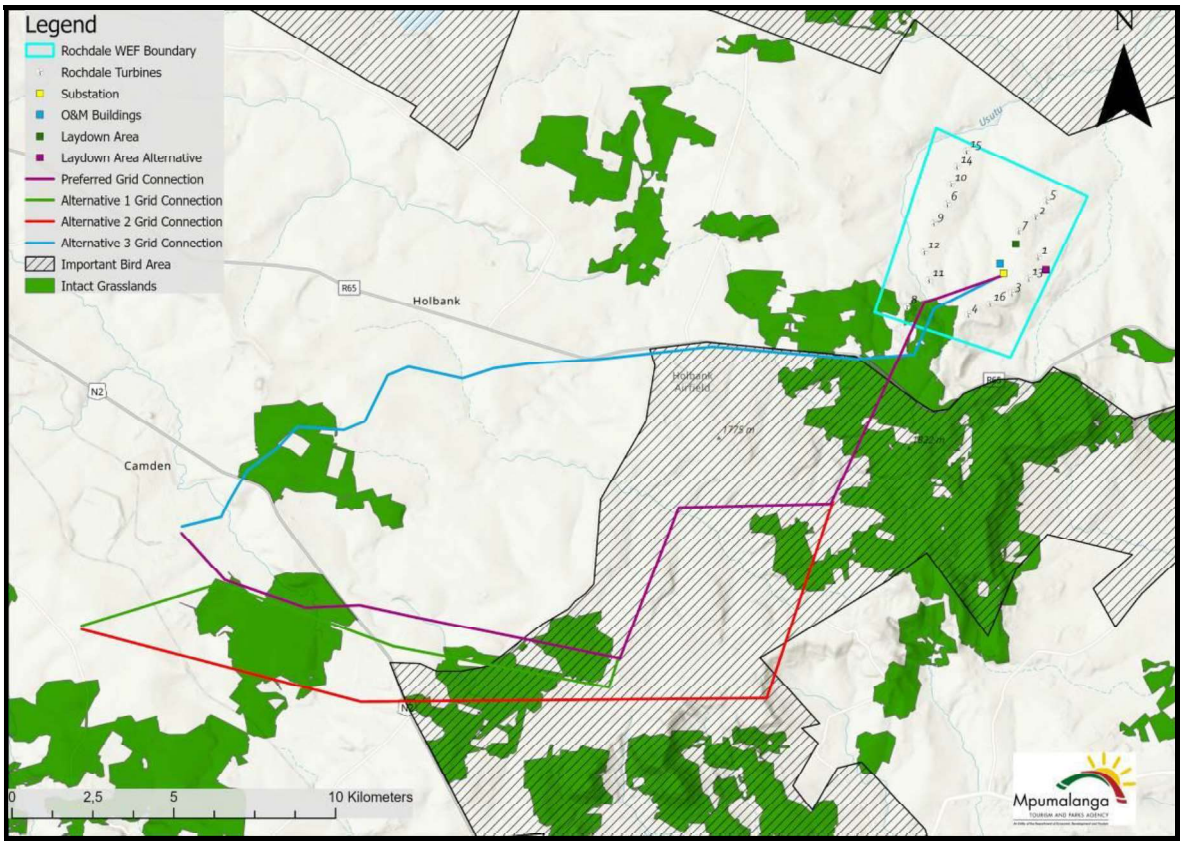


Figure 3: MBSP intact grassland map of the proposed wind turbine portions 1,2 and 5 of Schimmelhoek 272 IT and grid connection on various affected farm portions

Conclusion:

The proposed Rochdale Wind Energy Facility and associated infrastructure pose a significant threat to the Critical Biodiversity Areas, intact grassland patches, Important Bird areas, Key Biodiversity Areas and the habitat of numerous threatened bird species. If we rely on the information presented to date, and desktop assessments, then,in our opinion that this project is fatally flawed. When considering the cumulative impact of the entire Rochdale Wind Energy Facility the anticipated environmental impacts on biodiversity, this project becomes a significant concern, particularly on the avifauna. The MTPA suggests that the applicant explores alternative locations, that are less environmental sensitive as it crucial before proceeding with this project.

Please do not hesitate to contact this office if there are any enquiries.

Kind Regards

MS. NOMCEBO KUNENE
EXECUTIVE MANAGER BIODIVERSITY CONSERVATION
DATE: 02 / 10 / 2024

From: ERM Arcus Amsterdam
To: Postnet Ermelo; ERM Arcus Amsterdam
Cc: meyerjosua55@gmail.com; Stephen Burton
Subject: RE:
Date: Wednesday, 02 October 2024 13:16:36
Attachments: image001.png

Hi Josua,

Thank you for sharing your concerns about the proposed WEF cluster. We appreciate your input. Your comments will be considered during the Environmental Impact Assessment (EIA) phase.

As part of the process, we will assess potential changes to the wind turbine layout and work to avoid sensitive areas to minimize any negative impacts. Your feedback appreciated and we will keep you updated as the EIA progresses.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: Postnet Ermelo <ermelo.postnet@gmail.com>
Sent: Thursday, September 19, 2024 1:21 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: meyerjosua55@gmail.com
Subject:

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EXTERNAL MESSAGE

From: [ERM Arcus Amsterdam]
To: [arcusamsterdam@erm.com; ERM Arcus Amsterdam]
Subject: RE: New Response for "Stakeholder Engagement Form"
Date: Wednesday, 02 October 2024 12:22:57

Good day,

Thank you for your comment. Your comments will be taken into consideration during the EIA phase of the proposed WEF Cluster.

Kind Regards

Lucien Barbeau
Consultant Cape Town
erm.com
+27105963488
-----Original Message-----
From: aidaform@aidaform.com <aidaform@aidaform.com>
Sent: Saturday, September 21, 2024 8:09 PM
To: ERM Arcus Amsterdam <erm.arcusamsterdam@erm.com>
Subject: New Response for "Stakeholder Engagement Form"

[You don't often get email from aidaform@aidaform.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

EXTERNAL MESSAGE

Dear AidaForm user,

Your form "Stakeholder Engagement Form" has a new response.

---

1. What's your name?
Rose Odendaal

2. Who do you represent?
Individual Affected party

[redacted]
Athole farm, Amsterdam, Mpumalanga, 2375, South Africa

7. What is your interest in the projects?
Strongly oppose

8. Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website?
No

9. What are your comments regarding the Rochdale, Envvelo and Shaapmoor WEF Cluster?
Negative impact on the environment and bird life.

10. Protection of Personal Information (POPI) Act, Act 4 of 2013 No (0)

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Stay productive and take care!
Your AidaForm Team

From: [ERM Accra Amsterdam]
To: [Redacted]; [ERM Accra Amsterdam]
Subject: RE: New Response for "Stakeholder Engagement Form"
Date: Wednesday, 02 October 2024 13:32:46

Good day,

Thank you for your comment. Your comments will be taken into consideration during the EIA phase of the proposed WEF Cluster.

Kind Regards

Lucien Barbera
Consultant Cape Town
erm.com
+27105965488

-----Original Message-----
From: aidaform@aidaform.com <aidaform@aidaform.com>
Sent: Saturday, September 21, 2024 7:58 PM
To: ERM Accra Amsterdam <erm.accraamsterdam@erm.com>
Subject: New Response for "Stakeholder Engagement Form"

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EXTERNAL MESSAGE

Dear AidaForm user,

Your form "Stakeholder Engagement Form" has a new response.

---

1. What's your name?
Moya Odendaal

2. Who do you represent?
Private, self, Pty, Ltd Company, etc.
[redacted]

6. Your Address
Stuart Street 90, Amsterdam, Amsterdam, Mpumalanga, 2375, South Africa

7. What is your interest in the projects?
Environment

8. Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website?
Yes

9. What are your comments regarding the Rochdale, Envolo and Sheepmoor WEF Cluster?
It will change the environment forever

10. Protection of Personal Information (POPI) Act, Act 4 of 2013 No (0)

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Stay productive and take care!
Your AidaForm Team

From:	ERM Arcus Amsterdam
To:	Celia de Waal; ERM Arcus Amsterdam
Cc:	Frans Krige; Mixo Hlatshwayo; Khumbelo Malele; Johan Eksteen; Thabile Mnisi; Phumla Nkosi
Subject:	RE: MTPA"s comments: LUA 24/3965 - Draft Scoping report for the Rochdale Wind Energy Facility near ERmelo
Date:	Wednesday, 02 October 2024 13:38:43
Attachments:	image002.png

Hi Celia

Signed copy well received

Kind Regards

ERM

Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: Celia de Waal <celia@mtpa.co.za>
Sent: Wednesday, October 2, 2024 11:14 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Frans Krige <frans@mtpa.co.za>; Mixo Hlatshwayo <mixo@mtpa.co.za>; Khumbelo Malele <Khumbelo.Malele@mtpa.co.za>; Johan Eksteen <johan@mtpa.co.za>; Thabile Mnisi <Thabile.Mnisi@mtpa.co.za>; Phumla Nkosi <Phumla.Nkosi@mtpa.co.za>
Subject: MTPA's comments: LUA 24/3965 - Draft Scoping report for the Rochdale Wind Energy Facility near ERmelo

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

EXTERNAL MESSAGE

Good day

Kindly receive the attached comments from the MTPA regarding a Draft Scoping Report for the 240 MW Rochdale Wind Energy Facility near Ermelo.

Your reference number is**: 0684401**

Our EIA registration/reference number is**: LUA 24/3965**

Kind regards

Celia de Waal

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
[redacted]

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

OFFICE OF BIODIVERSITY CONSERVATION

Ref: LUA 24/3967
Unit: LUA/SS
Inquiries: F.N. Krige & F.N. Lekaka
Email: frans@mtpa.co.za
[redacted]

Ms. Stephanie Gopaul

ERM Southern Africa (Pty) Ltd
240 Main Road
Great Westerford Building, 1st Floor
Rondebosch
CAPE TOWN
7700

Email: ERM.ArcusAmsterdam@erm.com

Dear Ms., Gopaul

SUBJECT: THE MTPA COMMENTS ON THE DRAFT ENVIRONMENTAL SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF THE SHEEPMOOR WIND ENERGY FACILITY (WEF) (23 WIND TURBINES) AND AUXILIARY INFRASTRUCTURE (1 ON-SITE SUBSTATION WITH A CAPACITY OF 132Kv, AND 1 OVER-HEAD POWERLINE OF APPROXIMATELY 22.3 KM) ON SEVERAL PORTIONS OF FARMS COVERING AN AREA OF 5 918 HA EAST OF ERMELO FOR SHEEPMOOR WIND ENERGY FACILITY (PTY) LTD, MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE. DFFE REFERENCE NUMBER TO BE PROVIDED.

With reference to your correspondence reference **Project no: 0684401** of August 2024, herewith the MTPA comments.

The application has been assessed by using the following tools: Mpumalanga Biodiversity Sector Plan (2014 as updated 2022) land use guidelines, the DFFE web-based sensitivity screening tool, Environmental legislation NEMA and EIA regulations 2014 as amended, Department of Water and Sanitation and Water Research Commission Guidelines on wetlands, the South African Heritage Resources Act and knowledge to assess Development Applications.

The sensitivity of the area, in which the prospecting activity is proposed and is likely to occur was assessed according to the Mpumalanga Biodiversity Sector plan (MBSP; MTPA, 2014). The sensitivity is assessed in terms of terrestrial and freshwater assessments. In the MBSP, sensitivity areas are identified in terms of *Critical Biodiversity Areas* (CBAs) and *Ecological Support Areas* (ESAs). CBAs and ESAs are deemed to be

necessary to ensure the protection of biodiversity, environmental sustainability and sustainable living and are to remain unaltered.

Comments with regards to the terms of reference for studies needed:

With reference to the assessment of your Draft Scoping Report the MTPA is concerned about the following issues raised with regards to the terms of reference for specialist studies to be done.

1. The alternative sites, although less sensitive to the preferred site, are still located in sensitive areas.
2. Ground truthing and on-site studying of areas regarded as degraded or sensitive and suitable for potential wind turbines must be done considering that cultivated/vegetated lands might be feeding areas for many Species of Conservation Concern. The Site sensitivity verification report must include the feeding areas for SCC.
3. The avoidance of large areas of critical biodiversity terrestrial and freshwater sensitivity areas and the preliminary project layout overlain area is a large concern especially in the southeastern part of the study area.
4. The threat of this WEF to the Important Bird Area and the status of globally threatened bird species such as the Southern Bald Ibis and Secretary bird is of concern. The onsite avifaunal study must include local knowledge of the distribution of large birds especially the Blue crane that is a local migrant during the wintertime.
5. Included in the MTPA's comments are the following discussion that illustrates the **need and desirability** of this proposal:

Renewable energy applications

- Given the energy needs of the country, significant emphasis is being placed on the need to transition away from coal towards renewable energy. However, the urgency and desire to approve nearly all renewable energy applications needs to be put into perspective considering the incredible investment and proliferation of new renewable energy projects within Mpumalanga.
- The MTPA and DARDLEA are maintaining a database of renewable energy projects, which include those in the pre-application phase. We can confirm that 61 renewable energy projects have now been submitted within Mpumalanga. Just over 50% of these have been approved to date. 18 of these are for Wind Energy Farms, which together make up for over 233 000 ha, and this amount is growing as the province is being inundated with renewable energy applications.
- The explosion of renewable energy applications does require careful consideration as to the likely impacts. There is no shortage of renewable energy projects within the Province and the Province has room to apply its mind and navigate this space carefully. The province has now over 300 000 ha of renewable energy applications, and the many more than are still to be submitted.

Mpumalanga Biodiversity Sector Plan (MBSP), Intact Grassland Patches and Important Bird Areas (IBAs)

- The project **footprint overlaps with a significant amount of Critical Biodiversity Areas** (CBA). 1 488.9 ha (over 28%) of the footprint area is identified as a CBA. Wind farms are not appropriate land uses within CBA areas. Two proposed wind turbines are placed in CBA Irreplaceable areas.
- The MBSP Terrestrial assessment indicates that the project footprint is within CBA: Irreplaceable, CBA: Optimal, ESA: Local Corridor, ESA: Landscape Corridor, ESA: Species Specific, Other Natural Areas, Moderately Modified, and Heavily Modified Areas.
- The MBSP Freshwater Assessment indicates that the project footprint is within ESA: Strategic Water Source Areas, and has CBA: Aquatic River, ESA: Wetland Clusters, ESA: Wetlands, ESA: Important Sub-catchments, Other Natural and Heavily Modified Areas.
- ESA: Strategic Water Source Area (SWSAs) maintain ecological integrity across the entire sub-catchment, paying particular attention to maintaining water quality, water quantity, and habitat integrity. They represent 10% of the surface area producing approximately 50% of Mpumalanga's water. The proposed WEF activity in the area might compromise the quality and quantity of the surface water resources through siltation.
- The whole of the proposed Sheepmoor wind farm falls within an Important Bird Area (IBA), which underscores the need to consider its implications on metapopulation dynamics and the need to avoid wind farms in "source" areas.
- The project area mainly falls within the Mesic Eastern Highveld Grassland (Endangered). A high proportion of this vegetation type is threatened and is generally poorly protected. Hence, it should be carefully managed for the persistence of biodiversity; large areas of natural habitat are needed for many bird species, plants, and numerous wetlands that the Mesic Highveld Grassland supports.
- The proposed project area has a portion of Wakkerstroom Montane Grassland (Least Concern). A variety of land-uses are supported by this area and the conservation and good management of this area depends on the continued land-uses practices that have been able to support this biodiversity. The importance of sustainable development is crucial to the long-term maintenance of the biodiversity and ecosystem services in this area.
- 2 143.6 ha (36 %) of the proposed wind farm is comprised of intact grassland patches. With only 51% of the grasslands remaining in a natural state, very little intact natural grasslands still occur in Mpumalanga. Three proposed wind turbines are placed in intact grassland patches.
- Intact grassland patches are areas larger than 100ha, with little or no gaps or edge effects. They were then prioritised according to their connectivity importance. These intact grasslands are "source" areas for avifaunal species where birth rates are expected to exceed death rates, and no wind farms should be placed anywhere near these intact grassland patches.
- The identification of actual avifaunal source areas may be difficult, but as these intact grassland patches occur within an Important Bird Area (IBA) where there are several nesting and roosting avifaunal species of conservation concern, it highlights their significance and our confidence in confirming these as "source" areas. The presence of these intact grassland patches, CBAs, and the IBAs, is probably the biggest concern that the MTPA may have about the proposed wind farm.

- 84 % of the proposed study area is Important Bird Area and 9.3% of the proposed study area is a Key Biodiversity Area.
- Wind farms are not to be placed in IBAs or intact grassland areas as these are important areas where avifauna should be allowed to thrive and then disperse to other areas.
- Approval of the project in such a location could have far-reaching consequences for threatened bird species, potentially disrupting vital source areas critical for population sustainability.
- The south of the project area falls within the National Protected Areas Expansion Strategy (NPAES) Focus Area (Moist Escarpment Grasslands). The Chrissiesmeer Protected Environment overlaps the north of the project area and Jericho Dam Nature Reserve overlaps the eastern part of the project area.
- It is imperative to adopt a precautionary approach and prioritize the conservation of these essential habitats.

Avifaunal concerns

- **Thirteen out of the 23 proposed wind turbines are placed within the 5 km buffer of a Martial Eagles' recommended buffer these should be removed.**
- 26% of the proposed wind turbines are not covered by vantage points.
- The presence of priority bird species for wind energy developments were recorded within the footprint area.
- Two Southern Bald Ibis colonies (Vulnerable) occur within footprint area.
- A Secretary bird nest (Endangered) was found within this area.
- Birds are very mobile and with the proposed turbine height and blade lengths, the current proposed buffers seem inadequate.
- This raises particular concern as these birds may continuously collide with the blades of the wind turbines and the continuous loss of several of these long-lived birds every year may have a significant impact on population status.
- The artificial water bodies within the footprint area may be important for flamingos and other water-dependent birds.

Site Sensitivity Verification

- The results of the Site Sensitivity Verification confirmed that:
    - The sensitivity for the Terrestrial biodiversity impact assessment as Very High in grassland and wetland habitat.
    - Aquatic Biodiversity Impact Assessment as Very High Sensitivity
    - Plant Species Assessment as Medium Sensitivity
    - Animal Species Assessment as High Sensitivity
    - Bat Assessment Very High/High Sensitivity
    - Avifaunal Assessment as Very High/High Sensitivity.

Additional concerns

- Not all the infrastructure has been included on the map or addressed in terms of likely impact, in this case, roads.

Recommendations:

- There should be a thorough Oribi census plan in place, and it should be included in the final EIA report as the project area is home to many Oribi antelope. (Red data species dependant on healthy highveld grasslands).
- Species 23 must be accounted for, and a management plan drawn up for it since the project area is a potential site for its occurrence.
- The EWT's recommended 5 km buffer for the Martial Eagle's nest is non-negotiable and should be adhered to throughout the project lifecycle.
- The current identified Avifaunal Sensitivities map of all 'no-go' areas (Figure (I)) indicates little area for available for the wind farm. With more appropriate buffers, more field work, and all the associated infrastructure (such as roads), we cannot see how it would be possible to establish a wind farm within the footprint area.
- Increase buffer zones for endangered bird nesting sites to reflect their wider flight ranges relative to the height of the turbines.
- Consider alternative locations with less ecological sensitivity, especially considering the numerous renewable energy projects already approved in Mpumalanga.

Conclusion:

The proposed Sheepmoor Wind Energy Facility poses a significant threat to a Critical Biodiversity Areas, intact grassland patches, Important Bird areas, and the habitat of numerous threatened bird species. Relying on the information presented to date, and the desktop assessments, **it is in the MTPA's opinion that this project is fatally flawed.** The anticipated impacts on biodiversity, particularly the avifauna, is too great to support this project. More ecological assessments and exploration of alternative locations are crucial before proceeding with this project.

Please do not hesitate to contact this office if there are any inquiries.

Kind Regards

MS. NOMCEBO KUNENE
EXECUTIVE MANAGER BIODIVERSITY CONSERVATION
DATE: 18 / 09 / 2024

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

OFFICE OF BIODIVERSITY CONSERVATION

Ref : LUA 24/3965
Unit : LUA/SS
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Stephanie Gopaul

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Email: ERM.ArcusAmsterdam@erm.com

Dear Ms., Gopaul

SUBJECT: THE MTPA REVIEW AND COMMENTS ON THE DRAFT SCOPING REPORTIT, ONVERWACHTOSED 240 MW ROCHDALE WIND ENERGY FACILITY (30 TURBINES) ON PORTIONS 1,2 AND 5 OF THE FARM SCHIMMELHOEK 272 IT AND ASSOCIATED 132 Kv GRID INFRASTRUCTURE TRANSVERSING OVER SEVERAL PORTIONS OF THE FARMS SCHIMMELHOEK 272 IT, ONVERWACHT 273, ZWARTWATER 288, WELTERVREDEN 289 AND WITPUNT 267 APPROXIMATELY 31.5 KM BY ROCHDALE WIND ENERGY FACILITY (PTY) LTD NEAR ERMELO, MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE.

With reference to your correspondence reference 0684401 of date 28/08/2024 our comments:

The application has been assessed by using the following tools: Mpumalanga Biodiversity Sector Plan (2014 as updated 2022) land use guidelines, the DFFE web-based sensitivity screening tool, Environmental legislation NEMA and EIA regulations 2014 as amended, Department of Water and Sanitation and Water Research Commission Guidelines on wetlands, the South African Heritage Resources Act and knowledge to assess Development Applications.

The sensitivity of the area, in which the prospecting activity is proposed and is likely to occur was assessed according to the Mpumalanga Biodiversity Sector plan (MBSP; MTPA, 2014). The sensitivity is assessed in terms of terrestrial and freshwater assessments. In the MBSP, sensitivity areas are identified in terms of *Critical Biodiversity Areas* (CBAs) and *Ecological Support Areas* (ESAs). CBAs and ESAs are deemed to be necessary to ensure the protection of biodiversity, environmental sustainability and sustainable living and are to remain unaltered.

With reference to the assessment of your Draft Scoping Report the MTPA is concerned about the following issues raised with regards to the terms of reference for specialist studies.

1. The applicant needs to look for an alternative less sensitive development site to develop the wind energy facility.
2. The avoidance of large areas of critical biodiversity terrestrial and freshwater sensitivity areas and the preliminary project layout overlain area is a large concern especially in the southeastern part of the study area.
3. The threat of this WEF to the Important Bird Area (IBA) and the status of globally Endangered bird species such as the Martial Eagle is of a concern.
4. Road network and its impact must be indicated and must be placed away from the sensitive zones.
5. A 1 km buffer from the CBA Rivers must be applied. Wherever wetland and river crossings are needed, the EIA regulations must be followed.
6. The potential risk and threat of infrastructure-induced fires occurring on grasslands and impacting Species of Conservation Concern (SCC) must be incorporated into the risk assessments.

Proliferation of renewable energy applications

- While South Africa's energy needs highlight the urgency of shifting from coal to renewable energy, it is crucial to consider the scale of investments and the rapid growth of renewable energy projects, especially in Mpumalanga. The drive to approve nearly all renewable applications must be carefully balanced with proper planning and sustainability, ensuring that the transition aligns with environmental, economic, and social factors specific to the region.
- The explosion of renewable energy applications does require careful consideration as to the likely impacts. There is no shortage of renewable energy projects within the Province and the Province has room to apply its mind and navigate this space carefully, especially on areas that are not part of the Renewable Energy Development Zones (REDZs) The province has now over 300 000 ha of renewable energy applications, and the many more than are still to be submitted.

Mpumalanga Biodiversity Sector Plan (MBSP), Intact Grassland Patches and Important Bird Areas (IBAs)

- Majority of the proposed turbines and associated infrastructure such as the laydown structure and grid connections are in environmental sensitives areas(CBA Irreplaceable 1,399.9, CBA Optimal ,Intact grassland areas, Priority Focus Area and Key Biodervisity Areas).The MTPA is also not satisfied with the alternative proposed development sites as they are still placed within the environmental sensitive areas, with the grid connections traversing over the Important Bird Areas(IBA) and the buffer of the Martial Eagle Nest.

- The proposed Rochdale Wind Energy Facility is less than 1 km from an Important Bird Area (IBA), and it is important to note that Birds of SCC were recorded in the broader area, therefore the proposed project might impact these Birds of SCC.

- With the vantage points provided, some of the proposed wind turbines are not visible from the vantage point and, although additional vantage points and transect count monitoring was conducted near the Martial Eagle nest. However, with the possibility of the presence of species 23, and a high diversity of threatened bird species, including the threatened birds confirmed on site: African Marsh Harrier Denham's Bustard, Secretary bird, White-bellied Bustard, Blue Crane, Grey Crowned Crane, Lanner Falcon Greater Flamingo, Southern Bald Ibis, Cape Vulture, and Yellow-breasted Pipit. The MTPA is concerned that the survey effort is not sufficient to adequately find possible breeding and nest sites of species 23 and to assess cumulative impacts and identify appropriate avoidance and mitigation measures for the threatened and vulnerable species. Therefore, the MTPA requests the applicant, to do additional vantage point monitoring not only for the martial eagle, but to ascertain if species 23 is present or not this must be done to satisfy and honour the African-Eurasian Migratory Waterbird Agreement.
- Intact grassland patches are areas larger than 100ha, with little or no gaps or edge effects. They were then prioritised according to their connectivity importance. These intact grasslands are "source" areas for avifaunal species where birth rates are expected to exceed death rates, and no wind farms should be placed anywhere near these intact grassland patches. Proposed Turbine 8 falls within the intact grassland patches,140 Ha is identified as an area with intact grassland. With only 51% of the grasslands remaining in a natural state, very little intact natural grasslands still occur in Mpumalanga. Therefore, the MTPA sees the need to protect the little intact grassland still occurring, therefore turbine 8 should be excluded.
- Majority of proposed project area mainly falls within the Eastern Highveld Grassland (Endangered). A high proportion of this vegetation type is threatened and is generally poorly protected. Hence, it should be carefully managed for the persistence of biodiversity; large areas of natural habitat are needed for many bird species, plants, and numerous wetlands that the Mesic Highveld Grassland supports.
- The proposed project area has a portion of Wakkerstroom Montane Grassland (Least Concern). A variety of land-uses are supported by this area and the conservation and good management of this area depends on the continued land-uses practices that have been able to support this biodiversity. The importance of sustainable development is crucial to the long-term maintenance of the biodiversity and ecosystem services in this area.
- Wind farms should not be placed in intact grassland areas as these are important areas where avifauna should be allowed to thrive and then disperse to other areas.
- Approval of the project in such a location could have far-reaching consequences for threatened bird species, potentially disrupting vital source areas critical for population sustainability.
- It is imperative to adopt a precautionary approach and prioritize the conservation of these essential habitats.

Avifaunal concerns

- The presence of 32 priority bird species for wind energy developments and of the 32,12 priority bird species for wind energy developments were recorded within the footprint area and 19 priority species were also recorded, of which the Southern Bald Ibis were nesting with chicks.

- A Martial Eagle nest (Endangered) occurs within the footprint area. These are South Africa's largest eagles and travel over vast areas. They are also suspectable to collision with turbines and wind farms are of serious concern, therefore according to the Endangered Wildlife Trust a 5km buffer must be applied and adhered to throughout the wind facility life cycle. Four of the proposed turbines (3, 4,13 and 14) are within the buffer of the Martial Eagle therefore these turbines need to be excluded.
- Southern Bald Ibis colonies, Yellow-breasted Pipit, Secretary bird nest occur within footprint area. Therefore, the applicant needs to consider that birds are very mobile and with the proposed turbine height and blade lengths adequate buffers must be assigned.
- This raises particular concern as these birds may continuously collide with the blades of the wind turbines and the continuous loss of several of these long-lived birds every year may have a significant impact on population status.
- The water bodies in the area are important for migrating birds such as flamingos for bathing and drinking, therefore they need to be buffered on either site for the entire during of the project life cycle.

Site Sensitivity Verification

- The results of the Site Sensitivity Verification confirmed that:
    - The sensitivity for the Terrestrial biodiversity impact assessment as Very High/High in grassland and wetland habitat
    - Aquatic Biodiversity Impact Assessment as High Sensitivity
    - Plant Species Assessment as Medium Sensitivity
    - Animal Species Assessment as High Sensitivity
    - Bat Assessment as Very High Sensitivity/High Sensitivity
    - Avifaunal Assessment as Vey High Sensitivity/High Sensitivity

Additional concerns

- Not all the infrastructure has been included on the map or addressed in terms of likely impact. The length of internal roads must be included, and the impact be declared.

Recommendations

- Additional Vantage points must be conducted to establish if species 23(Critically endangered) is present or not to provide more details regarding the potential impacts on the critical species.
- There should be an Oribi management plan in place. The plan should include how this area can be utilized as a sanctuary for the Oribi.
- The EWT's recommended 5 km buffer for the Martial Eagle's nest is non-negotiable and should be adhered to throughout the project lifecycle.
- The location of all but 3 turbines is in avifaunal exclusion zones. However, according to the MBSP proposed turbine 5 is in an CBA Irreplaceable area. Therefore only two proposed turbines ,turbine 15 and 14 are in Heavily Modified or Moderately Modified Areas ,however with some of the SCC

roosting and nesting in trees of alien invasive species ,and cultivated/vegetated lands which might be utilized for feeding areas for many Species of Conservation Concern such as white bellied bustard(Vulnerable)recorded on the broader area, therefore even the Heavily Modified or moderately Modified Areas might not be suitable for the placement of the proposed turbines as they might also be utilized by the birds.

- The current identified Avifaunal Sensitivities map of all 'no-go' areas (Figure (i)) indicates little area for available for the wind farm. With additional monitoring done appropriate buffers must be applied, and all the associated infrastructure such as roads and lay down structures removed from the sensitive areas, the MTPA cannot see how it would be possible to establish a wind farm within the proposed footprint area.
- Increase buffer zones for endangered bird nesting sites to reflect their wider flight ranges relative to the height of the turbines.
- Consider alternative locations with less ecological sensitivity, especially considering the numerous renewable energy projects already approved in Mpumalanga.

Conclusion:

The proposed Rochdale Wind Energy Facility and associated infrastructure poses a significant threat to the Critical Biodiversity Areas, intact grassland patches, Important Bird areas, Key Biodervisity Areas and the habitat of numerous threatened bird species. If we need to rely on the information presented to date, and the desktop assessments, then it is in our opinion that this project is fatally flawed. When considering the cumulative impact of the entire Rochdale Wind Energy Facility the anticipated environmental impacts on biodiversity, particularly on the avifauna, this project becomes a significant concern. The MTPA suggests that the applicant explores alternative locations, that are less environmental sensitive as it crucial before proceeding with this project.



Figure 1. MBSP terrestrial biodiversity map of the proposed wind turbines on portions 1,2 and 5 of the farm Schimmelhoek 272 IT and grid connection on various affected farm portions

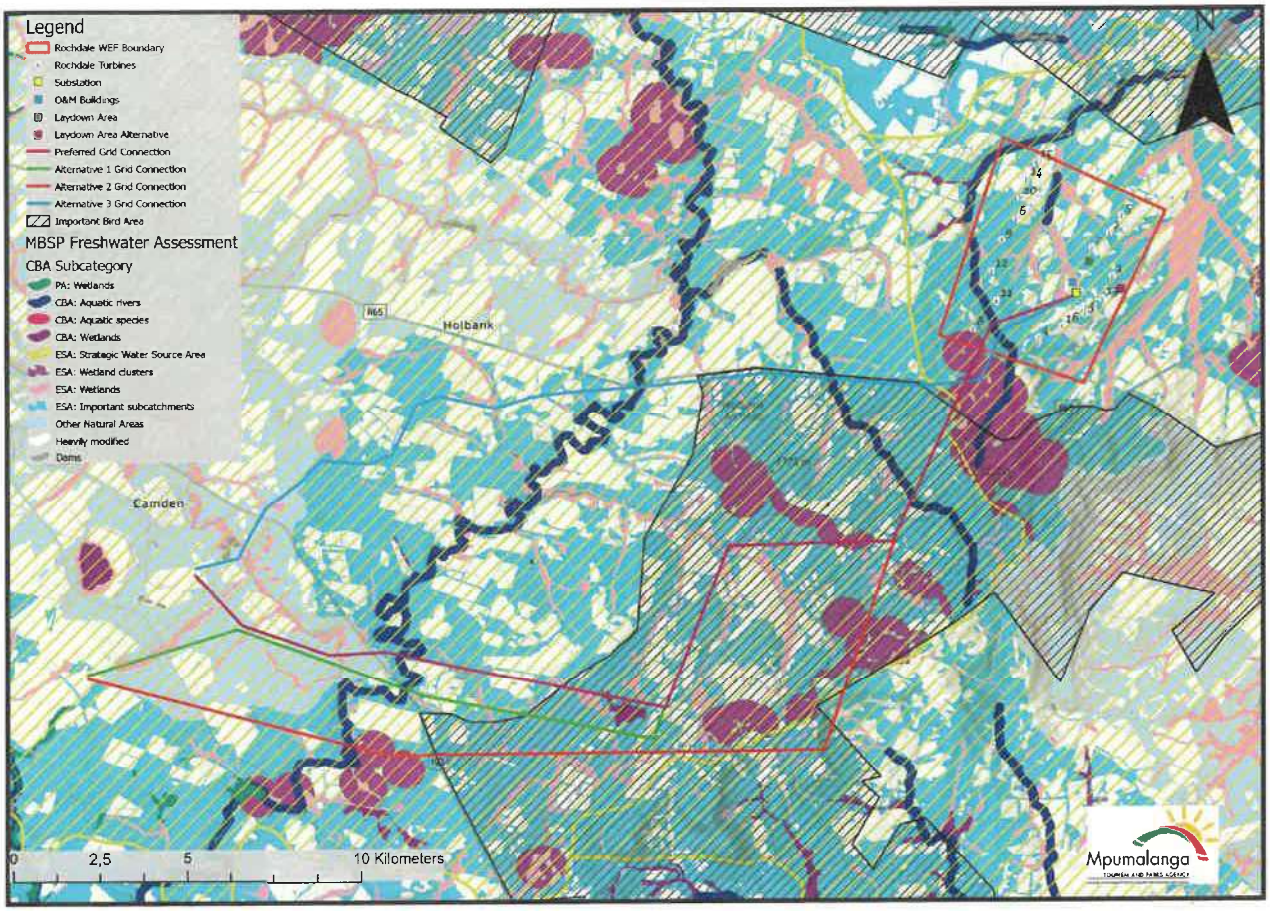


Figure 2: MBSP freshwater biodiversity map of the proposed wind turbines on portions 1,2 and 5 of the farm Schimmelhoek 272 IT and grid connection on various affected farm portions

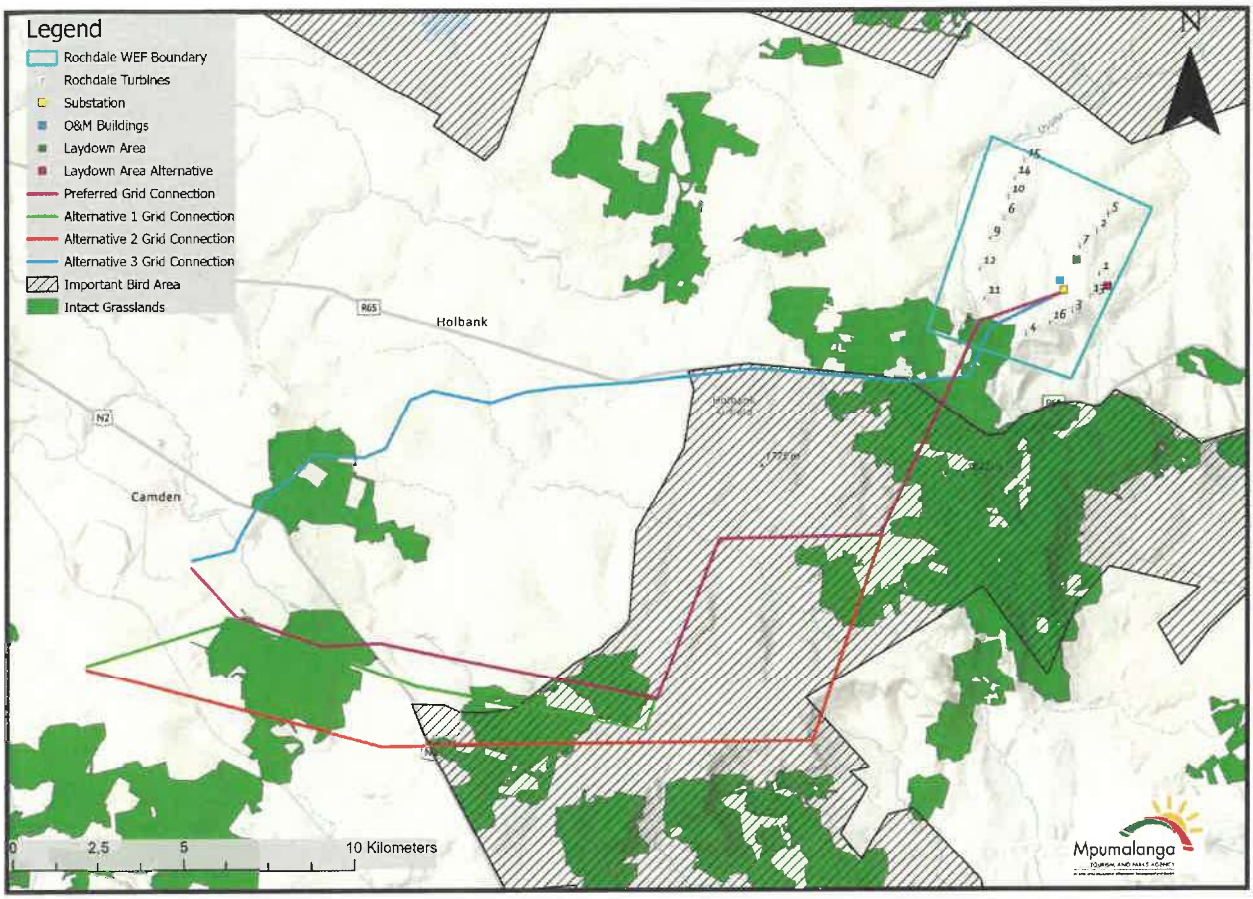


Figure 3: MBSP intact grassland map of the proposed wind turbines portions 1,2 and 5 of the farm Schimmelhoek 272 IT and grid connection on various affected farm portions

Please do not hesitate to contact this office if there are any enquiries.

Kind Regards

MS. NOMCEBO KUNENE
EXECUTIVE MANAGER BIODIVERSITY CONSERVATION
DATE: _____ / _____ / 2024

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

OFFICE OF BIODIVERSITY CONSERVATION

Ref: LUA 24/3966
Unit : LUA/SS
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Ms. S. Gopaul

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Cape Town
7700

[redacted]erm.com

Dear Ms., Gopaul

SUBJECT: MTPA'S COMMENTS REGARDING THE DRAFT SCOPING FOR THE 45 WIND TURBINES EMVELO WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE,) AND AUXILIARY INFRASTRUCTURE (1 ON-SITE SUBSTATION WITH A CAPACITY OF 200MW, AND 1 OVER-HEAD 132 kV POWERLINE OF APPROXIMATELY 30 KM) ON 18 PORTIONS OF FARMS COVERING AN AREA OF 6 964 HA EAST OF ERMELO FOR EMVELO WIND ENERGY FACILITY (PTY) LTD, MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE. DFFE REFERENCE NUMBER TO BE PROVIDED. MPUMALANGA PROVINCE.

Your correspondence with the project ref no. 0684401 of date 28/08/2024.

COMMENTS AND CONCERNS:

The sensitivity of the above farm on which the proposed activity is likely to occur was assessed according to the Mpumalanga Biodiversity Sector Plan (MBSP; MTPA, 2014). This sensitivity is assessed in terms of terrestrial and freshwater assessments. In the MBSP, priority sensitive areas are identified in terms of Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs). CBAs and ESAs are deemed to be necessary to ensure protection of biodiversity, environmental sustainability, and human well-being, and are to remain unaltered.

According to the MBSP terrestrial assessment map (figure 1) the proposed development will occur within CBA Irreplaceable, CBA Optimal, ESA Landscape corridor, ESA Ecological Corridor, Important Bird Areas (IBA), other natural areas, moderately modified- old lands and heavily modified area (Degraded). According to the freshwater assessments map (figure 2), the proposed development will occur within a CBA Aquatic River, CBA wetlands, ESA wetlands, ESA Strategic water source, ESA Important sub-catchments other natural areas and heavily modified area (Degraded).

The MTPA have the following concerns:

The MTPA is concerned with the proposed project area for the Emvelo Wind Energy Facility (WEF) and its associated Auxiliary infrastructure which is within Important Bird Areas (IBA), CBA Irreplaceable, CBA optimal, CBA aquatic rivers, ESA wetland clusters, ESA wetlands and intact grasslands. These areas are of biodiversity importance and the proposed Emvelo WEF and associated infrastructure will compromise the primary biodiversity objectives of these areas.

The MTPA is concerned with a number of turbines that are in no-go areas or highly sensitive areas. There are ten (10) turbines that are located within the intact grasslands which are turbines 1, 2, 3, 4, 5, 6, 7, 9, 13 and 15 (refer to Figure 3), intact grasslands are crucial for supporting threatened avifauna and these turbines will compromise that biodiversity objective. The MBSP specifically incorporated climate change into spatial priorities through the prioritisation of the connectivity of remaining intact grassland patches in the province, as they provide habitat for species to thrive, and allow for their dispersal.

Turbines 12, 14, 16, 17, 29, 32 and 33 are within CBA irreplaceable, which is to be maintained in a natural state with no loss of ecosystems, functionality or species with no flexibility in land-use options. Turbines 8, 18 and 19 are within CBA optimal which is to be maintained in a natural state with no loss of ecosystems, functionality or species with some flexibility in land-use options.

Turbines 1,2,3,5, 9, 11, 13, 15, 18, 19, 22, 24, 26, 31, and 35 are located within Important Bird Area (IBA). The Important Bird Area (IBA) as established by the Birdlife SA are areas that has the richness of conservation important bird species and care should be taken not to lose their breeding and feeding habitats. Wind turbines increase the risk of bird's collision. Surface water (Wetlands, drainage lines and dams) is crucially important for priority Avifauna, wind turbines and powerlines that that are placed near surface water pose a collision risk (as mentioned by the Avifaunal specialist). The most preferred sites are Moderately and Heavily modified areas; other natural areas are also preferred but under certain conditions.

The proposed Emvelo WEF and its associated grid connection is located in an area comprising a high diversity of threatened bird species, including the following confirmed on site: African Marsh Harrier (Regionally Endangered); Martial Eagle (Globally and Regionally Endangered); Denham's Bustard (Globally Near Threatened, Regionally Vulnerable); Secretary bird (Globally Endangered, Regionally Vulnerable); White-bellied Bustard (Regionally Vulnerable), Blue Crane (Globally Vulnerable, Regionally Near Threatened); Grey Crowned Crane (Globally and Regionally Endangered); Lanner Falcon (Regionally Vulnerable); Greater Flamingo (Regionally Near Threatened); Southern Bald Ibis (Regionally and Globally Vulnerable); Cape

Vulture (Globally Vulnerable and Regionally Endangered); and Yellow-breasted Pipit (Regionally and Globally Vulnerable).

Turbines 1, 2, 3, 5, 7, 9, 13 and 15 are within the 5km Martial Eagle Buffer, Birdlife South Africa currently recommends 5-6 km buffer for Martial Eagles, this 5km no-go buffer must be adhered to by the Applicant.

The MTPA would like to recommend the following:

- Key biodiversity areas should be avoided, and Wind turbines removed from such.

- A 100m buffer around wetlands and other waterbodies must be implemented and adhered to throughout the lifecycle of the proposed development.
- 5km radius Martial Eagle Buffer (as recommended by BirdLifeSA) must be implemented and avoided throughout the lifecycle of the proposed development.
- A Thorough Terrestrial Biodiversity assessment which also includes Intact grasslands patches.
- A thorough Avifaunal study must be done with all the best practices to avoid the bird collision risks.
- Proper mitigation strategies of the wind turbines to avoid collisions and mortalities must be included in the EIAr.
- The roads, temporary site camps and all the other associated infrastructure must be included on the site layout of the Emvelo WEF in the EIAr.
- The Applicant must find a more suitable alternative site for this development with less risk to biodiversity.
- The clearance or removal of vegetation must be restricted to the project footprint.
- Moderately modified- old lands and heavily modified areas (Degraded) are the most preferred sites for the Emvelo WEF, other natural areas are also preferred but under certain conditions.
- The applicant must apply duty of care to ensure that there is no significant pollution or degradation of the environment.

The MTPA does not support the Environmental Authorisation of the proposed Emvelo Wind Energy Facility (Pty) Ltd for proposed Wind Energy Facility and Auxiliary infrastructure operation within the application area with up to 45 proposed wind turbines. The sensitive areas cover most of the proposed Emvelo WEF project area, Important Birds Area (IBA) covers 43% of the project area; Key Biodiversity Areas (KBA) Covers 21.4% of the project area; Critical Biodiversity Areas (CBA) covers 1,302.2 ha of the project area; and 2,272.5 ha of intact grassland patches within the project area.

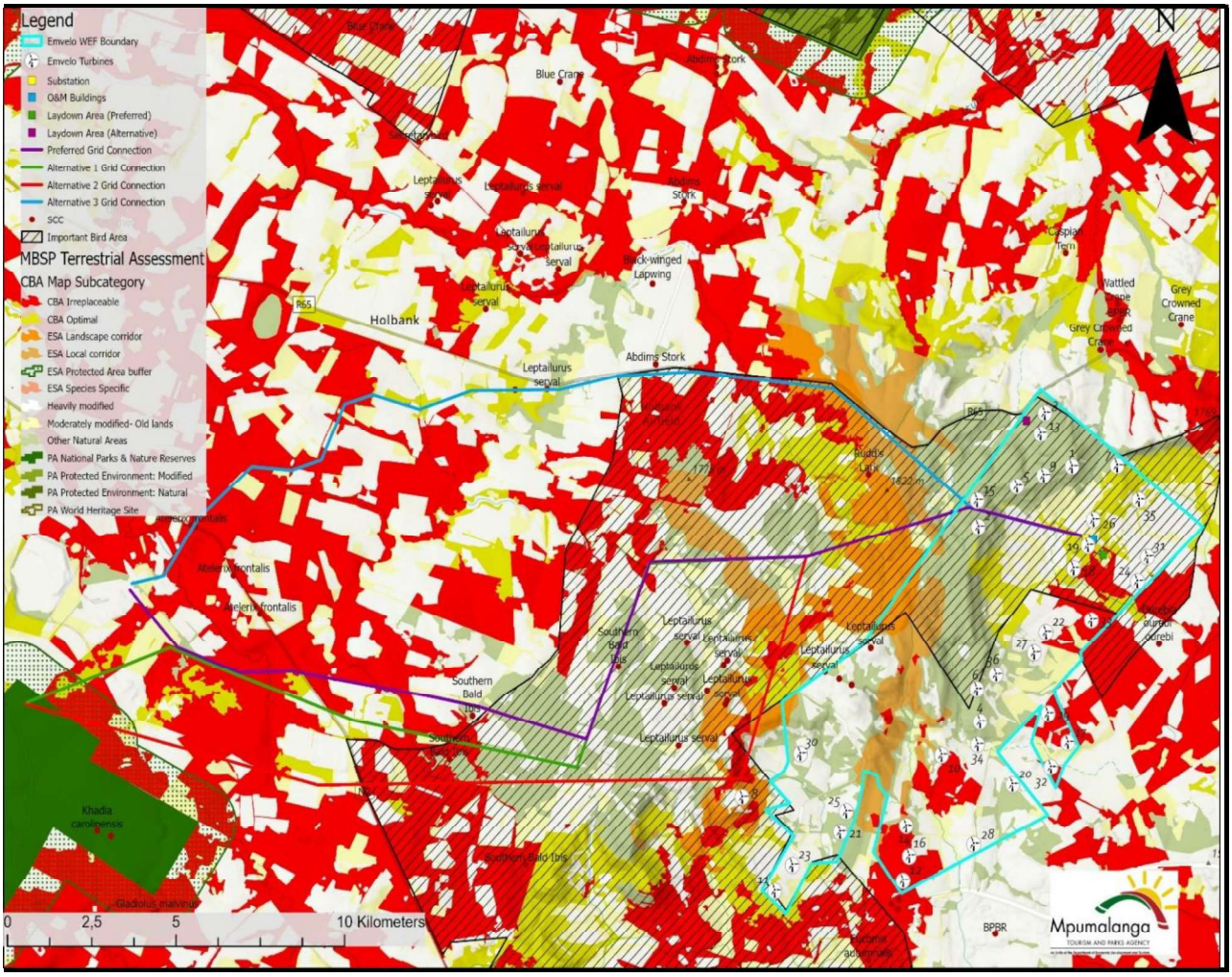


Figure 1. MBSP based terrestrial biodiversity assessment for the Emvelo Wind Energy Facility.

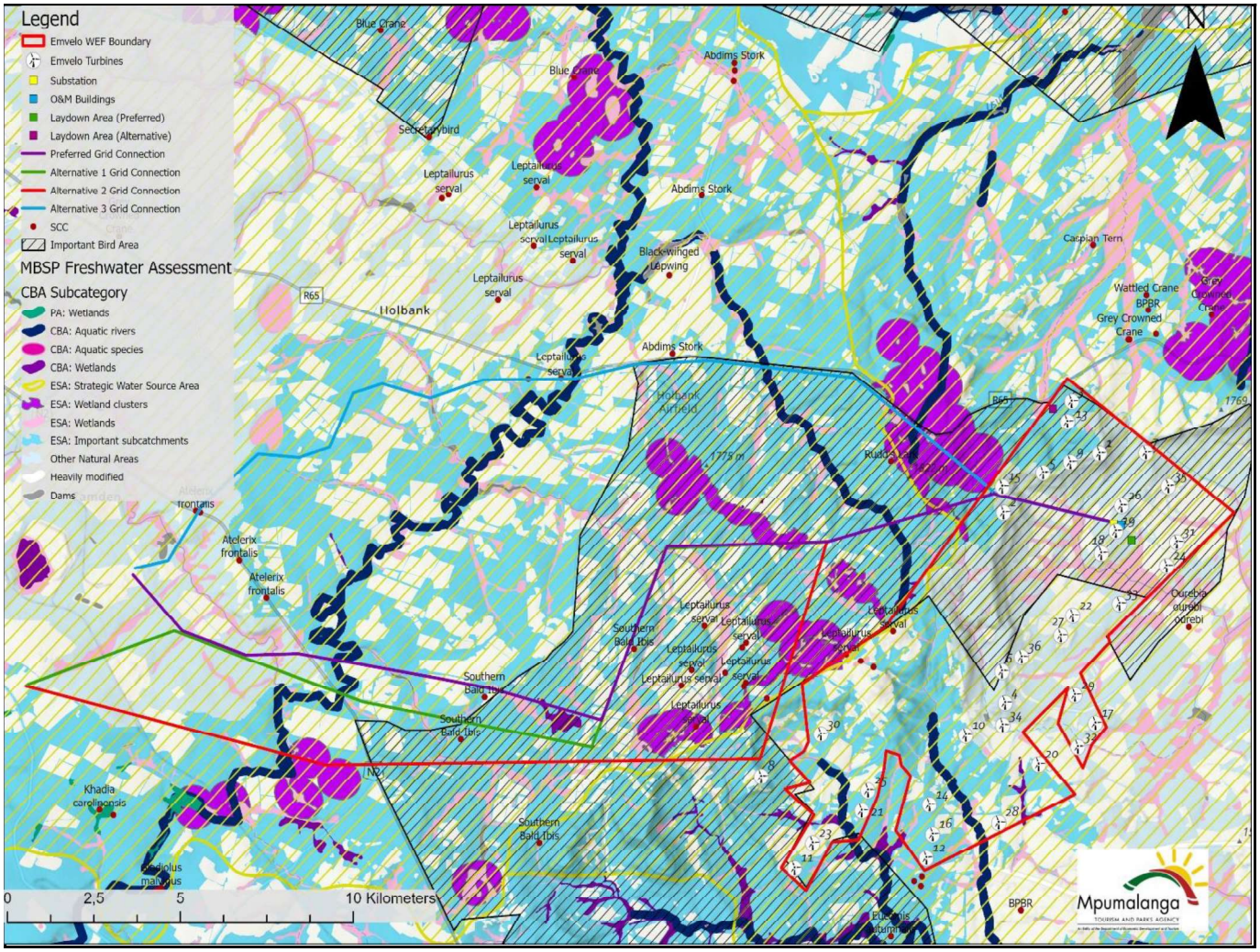


Figure 2. MBSP based Freshwater biodiversity assessment for the Emvelo Wind Energy Facility.

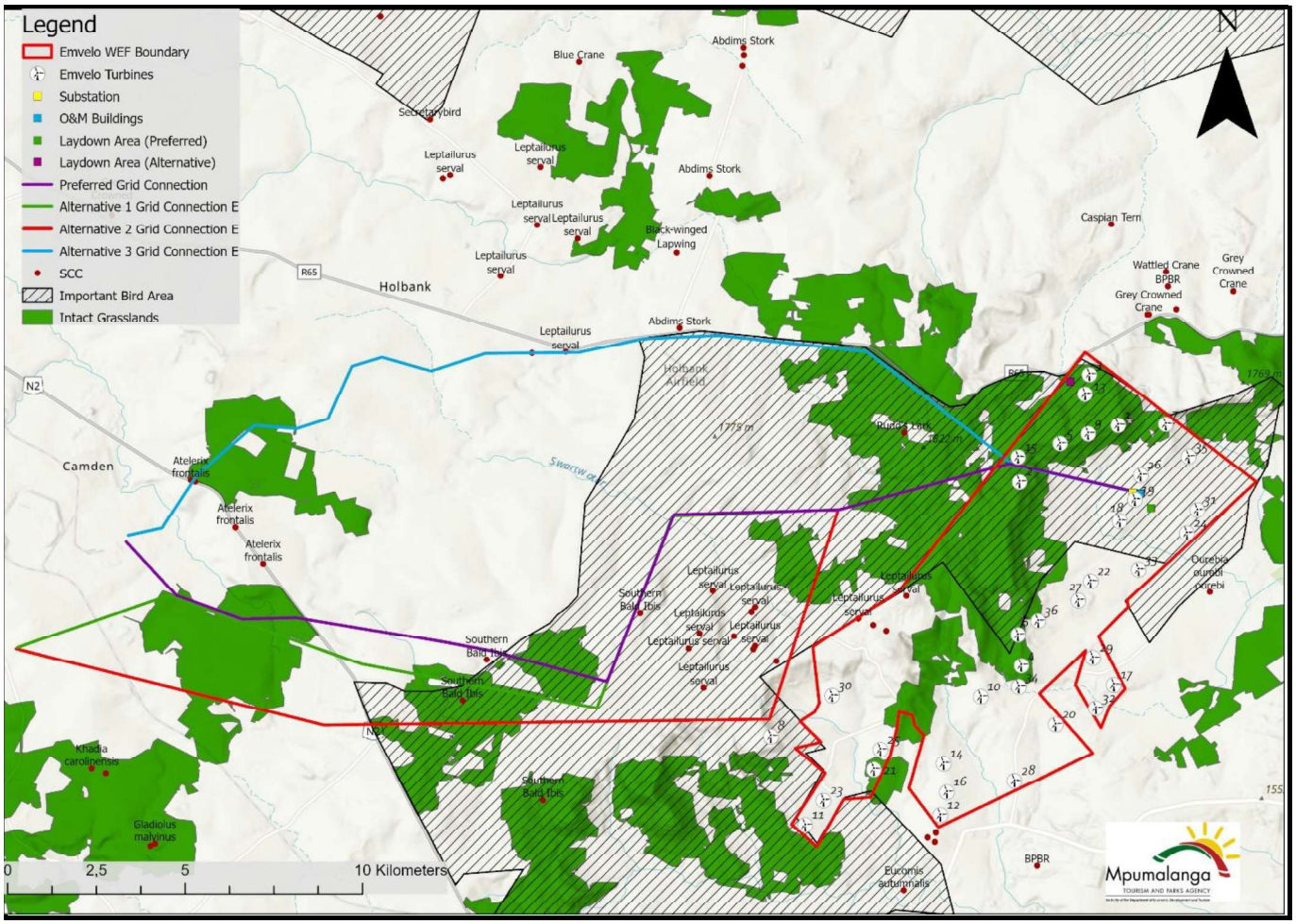


Figure 3. MBSP based Intact Grasslands map for the Emvelo Wind Energy Facility.

Please do not hesitate to contact this office if there are any enquiries.

Kind Regards

MS. NOMCEBO KUNENE
EXECUTIVE MANAGER BIODIVERSITY CONSERVATION
DATE: 20 / 09 / 2024.

forestry, fisheries & the environment
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Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

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DFFE Reference: 14/12/16/3/3/2/2611
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Telephone Number : 010 596 3502
Cellphone Number : 065 666 0066
Email Address : stephanie.gopaul@erm.com / erm.arcusamsterdam@erm.com

PER E-MAIL

Dear Ms Gopaul

ACCEPTANCE OF THE SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF THE EMVELO WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE

The final Scoping Report (SR) and the Plan of Study for Environmental Impact Assessment (PoSEIA) dated October 2024 and received by the Department on 07 October 2024, refers.

The Department has evaluated the submitted final SR and the Plan of Study for Environmental Impact Assessment dated July 2024 and is satisfied that the documents comply with the minimum requirements of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended. The FSR is hereby accepted by the Department in terms of Regulation 22(a) of the EIA Regulations, 2014, as amended.

You may proceed with the environmental impact assessment process in accordance with the tasks contemplated in the PoSEIA as required in terms of the EIA Regulations, 2014, as amended. The Environmental Impact Assessment Report (EIAr) must comply with the requirements of Appendix 3 of the EIA Regulations, 2014, as amended.

In addition, the following amendments and additional information are required for the EIAr:

The processing of personal information by the Department of Forestry, Fisheries and the Environment is done lawfully and not excessive to the purpose of processing in compliance with the POPI Act, any codes of conduct issued by the Information Regulator in terms of the POPI Act and / or relevant legislation providing appropriate security safeguards for the processing of personal information of others.

MEM

General Comments

1. The meeting minutes in Appendix F of the Public Participation Report refers. The discussions during the meeting with the Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs (DARDLEA) and the Mpumalanga Tourism & Parks Agency (MTPA) on 11 September 2024 are noted.
2. The table of coordinates on page *x* of the SR is noted. The EIAr must include:
   a. The corner coordinates for the Battery Energy Storage System.
   b. Bend point coordinates for the 132kV powerline alternatives; and the main access roads.
3. The EIAr must include the approximate length of each grid connection alternative route, and these grid connection routes must be discussed in the "*Alternatives*" section of the EIAr.
4. You are requested to provide the estimated operational lifespan of the proposed Emvelo WEF and details of future plans for the site and infrastructure after decommissioning, as well as the possibility of upgrading the proposed infrastructure to more advanced technologies.
5. The EIAr must confirm the availability of services identified on pages 124 to 126 of the final SR.
6. If the EIAr contains listed activities and/or other information that differs from the application form, the application form must be amended accordingly and submitted to the Department with the EIAr.

Battery Energy Storage System (BESS)

7. Applicable BESS technologies must be included under the Technology Alternatives section of the EIAr.
8. A risk assessment study is not required for the Battery Energy Storage System (BESS), however, impacts associated with the risks must be identified, considered, and assessed as part of the EIAr.

Public Participation

9. Comments on the draft EIAR must be obtained from this Department's Biodiversity Conservation Directorate at BCAdmin@dffe.gov.za and Protected Areas section (regarding the NPAES) at Tnethononda@dffe.gov.za. Further to that, these comments must be addressed and incorporated in the final EIAr.
10. Proof of correspondence with the various stakeholders must be included in the EIAr. This must indicate that this draft EIAr has been subjected to 30 days public participation process, stating the start and end date of the PPP.
11. Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAr.
12. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. Please provide proof of written notice for the availability of the draft EIAr for comment.
13. All issues raised and comments received must be incorporated into the Comments and Response Report (CRR).
14. Comments from I&APs must not be split and arranged into categories. Comments from each submission must be responded to individually.
15. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as "noted" is not regarded as an adequate response to an I&AP's comments.
16. The CRR addresses comments on the draft SR, which have been received from organs of state, however, copies of these comments are not included in the report. Copies of original comments

received from I&APs and organs of state, which have jurisdiction in respect of the proposed activity must be submitted to the Department with the EIAr.

17. If applicable, the attendance registers and minutes of any meetings held by the Environmental Assessment Practitioner (EAP) with Interested and Affected Parties (I&APs) and other role players must be included in the EIAr.
18. The newspaper advert proof in Appendix C of the Public Participation Report refers. Please submit a full page of the newspaper(s) containing the advertisement, ensuring that the name of the newspaper and date are visible.

Specialist assessments

19. Interim and final comments from the South African Heritage Resources Agency (SAHRA) must be addressed and incorporated in the EIAr.
20. Specialist assessments must be conducted in accordance with the Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species).
21. The following specialist studies will form part of the EIAr as indicated in Section 12.6 of the FSR:
    a. Soil and Agriculture Potential Impact Assessment;
    b. Freshwater and Wetlands (Aquatics) Impact Assessment;
    c. Terrestrial Biodiversity (Flora and Fauna) Impact Assessment;
    d. Avifauna Impact Assessment;
    e. Bat Impact Assessment;
    f. Visual / Landscape and Flicker Impact Assessment;
    g. Heritage, Archaeology and Palaeontology Impact Assessment;
    h. Noise Impact Assessment;
    i. Socio-economic Impact Assessment; and
    j. Traffic and Transportation Impact Assessment.
22. 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.
23. Should the specialist definition of 'no-go' area differ from the Departments definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable.
24. Should the specialist studies provide more detail regarding any of the project activity thresholds, please ensure that the project activity descriptions are amended accordingly in the application form and EIAr.
25. All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA.
26. Should a specialist recommend specific mitigation measures, these must be clearly indicated.
27. Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defendable reasons; and were necessary, include further expertise advice.
28. Where applicable, each specialist study must provide a preferred grid connection alternative.

Layout & Sensitivity Maps

29. Please provide a layout map which indicates the following:
    a. Wind turbine positions (numbered) and its associated infrastructure;
    b. Permanent laydown area footprint;

c. Internal roads indicating width (construction period width and operation period width) and with numbered sections between the other site elements which they serve (to make commenting on sections possible);
d. Wetlands, drainage lines, rivers, stream and water crossing of roads and cables indicating the type of bridging structures that will be used;
e. The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure;
f. Substation(s) and/or transformer(s) sites including their entire footprint;
g. All existing infrastructure on the site, especially roads;
h. Buildings proposed within the substation footprint;
i. Buffer areas; and
j. All "no-go" areas.

Cumulative Assessments

30. Regarding the identified similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must indicate the following:
    a. Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land.
    b. Identified cumulative impacts associated with the proposed development must be rated with the significance rating methodology used in the process.
    c. Detailed process flow and proof must be provided, 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.
    d. The cumulative impacts significance rating must also inform the need and desirability of the proposed development.
    e. A cumulative impact environmental statement on whether the proposed development must proceed.

WEF Environmental Management Programme (EMPr)

31. A construction and operational phase EMPr for the WEF, which includes mitigation and monitoring measures must be submitted with the EIAr.
32. The EMPr must be developed in terms of Appendix 4 of the EIA Regulations, 2014 as amended and must include (but not limited to) the following plans and measures:
    a. A Re-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;
    b. A Weed and invader plant 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;
    c. 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 and be implemented prior to commencement of the construction phase;

d. An Open space management plan, to be implemented during the construction and operation of the facility;
e. A Traffic management plan for the site access 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 e.g. limiting construction vehicles travelling on public roadways during the morning and late afternoon commute time and avoid using roads through densely populated built-up areas so as not to disturb existing retail and commercial operations;
f. A Transportation plan for the transport of components, main assembly cranes and other large pieces of equipment;
g. A Stormwater 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;
h. A Fire management plan to be implemented during the construction and operation of the facility;
i. 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;
j. 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;
k. Measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments, and other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants;
l. Dust management measures;
m. Waste management measures;
n. Emergency response; and,
o. All recommendations and mitigation measures recorded in the EIAr and the specialist studies conducted. This includes the management and monitoring plans and procedures appended in the specialist studies.

33. The decommissioning chapter of the EMPr for the facility must contain information relating to the handling, repurposing or disposal of dysfunctional, severely damaged batteries, module and containers.
34. The EMPr must distinguish between impact management actions and impact management outcomes.
35. The EMPr must not contain any ambiguity. Where applicable, statements containing the word "should" or "may" are to be amended to "must".

Generic Environmental Management Programme (EMPr)

36. The proposed development triggers Activity 11 of Listing Notice 1 (as amended). The relevant generic EMPr(s) must be included in the EIAr, over and above the EMPr for the WEF.
37. Part B: Section 2 of the generic EMPr(s) must be completed, and a copy of the signed EMPr(s) must be submitted with the EIAr. Please note that Point 7.1.1 in Part B: Section 2 needs to match the

details of the applicant as contained in the application form. The generic EMPr(s) must be signed by the applicant and submitted with the EIAr. An unsigned Generic EMPr is regarded as incomplete.

38. If any specific environmental sensitivities/attributes are present on the site which require more specific impact management outcomes and impact management actions, not included in the pre-approved generic EMPr template, to manage impacts, those impact management outcomes and actions must be included in Part C of the generic EMPr.

General

The EAP must provide detailed motivation if any of the above requirements are not required by the proposed development and will not be included in the EMPr.

The applicant is hereby reminded to comply with the requirements of Regulation 45 of GN R982 of 04 December 2014, as amendment, with regard to the time period allowed for complying with the requirements of the Regulations.

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



Dr Sabelo Malaza
Chief Director: Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment
Signed by: Ms Masina Morudu
Designation: Control Environmental Officer: National Integrated Authorisation Projects
Date: 19/11/2024.

cc:	Mr Andrew Pearson	Emvelo Wind Energy Facility (Pty) Ltd	Email: Andrew@mulilo.com
	Mr G.O Xaba	Mpumalanga DARDLEA	Email: goxaba@mpg.gov.za / rluyt@mpg.gov.za / mbuyanesb@mpg.gov.za
	Mr Mervyn Lotter	MTPA	Email: mervyn.lotter@gmail.com
	Ms Mapulane Nkosi	Msukaligwa Local Municipality	Email: complaints@msukaligwa.gov.za

forestry, fisheries & the environment
Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 399 9000, Fax: +27 86 625 1042

DFFE Reference: 14/12/16/3/3/2/2612
Enquiries: Ms Bathandwa Ncube
[redacted]**E-mail:** BNcube@dffe.gov.za

Ms Stephanie Gopaul
Environmental Resource Management Southern Africa (Pty) Ltd
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UMHLANGA RIDGE
Durban
4320

Telephone Number : [redacted]
Cellphone Number : [redacted]
Email Address : stephanie.gopaul@erm.com / erm.arcusamsterdam@erm.com

PER E-MAIL

Dear Ms Gopaul

ACCEPTANCE OF THE SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF THE ROCHDALE WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE

The final Scoping Report (SR) and the Plan of Study for Environmental Impact Assessment (PoSEIA) dated October 2024 and received by the Department on 07 October 2024, refers.

The Department has evaluated the submitted final SR and the Plan of Study for Environmental Impact Assessment dated July 2024 and is satisfied that the documents comply with the minimum requirements of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended. The FSR is hereby accepted by the Department in terms of Regulation 22(a) of the EIA Regulations, 2014, as amended.

You may proceed with the environmental impact assessment process in accordance with the tasks contemplated in the PoSEIA as required in terms of the EIA Regulations, 2014, as amended. The Environmental Impact Assessment Report (EIAr) must comply with the requirements of Appendix 3 of the EIA Regulations, 2014, as amended.

In addition, the following amendments and additional information are required for the EIAr:

The processing of personal information by the Department of Forestry, Fisheries and the Environment is done lawfully and not excessive to the purpose of processing in compliance with the POPI Act, any codes of conduct issued by the Information Regulator in terms of the POPI Act and / or relevant legislation providing appropriate security safeguards for the processing of personal information of others.

General Comments

1. The meeting minutes in Appendix F of the Public Participation Report refers. The discussions during the meeting with the Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs (DARDLEA) and the Mpumalanga Tourism & Parks Agency (MTPA) on 11 September 2024 are noted.
2. The table of coordinates on page *x* of the SR is noted. The EIAr must include:
   a. The corner coordinates for the Battery Energy Storage System.
   b. Bend point coordinates for the 132kV powerline alternatives; and the main access roads.
3. The EIAr must include the approximate length of each grid connection alternative route, and these grid connection routes must be discussed in the "*Alternatives*" section of the EIAr.
4. You are requested to provide the estimated operational lifespan of the proposed Rochdale WEF and details of future plans for the site and infrastructure after decommissioning, as well as the possibility of upgrading the proposed infrastructure to more advanced technologies.
5. The EIAr must confirm the availability of services identified on pages 95 to 97 of the final SR.
6. If the EIAr contains listed activities and/or other information that differs from the application form, the application form must be amended accordingly and submitted to the Department with the EIAr.

Battery Energy Storage System (BESS)

7. Applicable BESS technologies must be included under the Technology Alternatives section of the EIAr.
8. A risk assessment study is not required for the Battery Energy Storage System (BESS), however, impacts associated with the risks must be identified, considered, and assessed as part of the EIAr.

Public Participation

9. Comments on the draft EIAR must be obtained from this Department's Biodiversity Conservation Directorate at BCAdmin@dffe.gov.za and Protected Areas section (regarding the NPAES) at Tnethononda@dffe.gov.za. Further to that, these comments must be addressed and incorporated in the final EIAr.
10. Proof of correspondence with the various stakeholders must be included in the EIAr. This must indicate that this draft EIAr has been subjected to 30 days public participation process, stating the start and end date of the PPP.
11. Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAr.
12. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. Please provide proof of written notice for the availability of the draft EIAr for comment.
13. All issues raised and comments received must be incorporated into the Comments and Response Report (CRR).
14. Comments from I&APs must not be split and arranged into categories. Comments from each submission must be responded to individually.
15. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as "noted" is not regarded as an adequate response to an I&AP's comments.
16. The CRR addresses comments on the draft SR, which have been received from organs of state, however, copies of these comments are not included in the report. Copies of original comments

received from I&APs and organs of state, which have jurisdiction in respect of the proposed activity must be submitted to the Department with the EIAr.

17. If applicable, the attendance registers and minutes of any meetings held by the Environmental Assessment Practitioner (EAP) with Interested and Affected Parties (I&APs) and other role players must be included in the EIAr.
18. The newspaper advert proof in Appendix C of the Public Participation Report refers. Please submit a full page of the newspaper(s) containing the advertisement, ensuring that the name of the newspaper and date are visible.

Specialist assessments

19. Interim and final comments from the South African Heritage Resources Agency (SAHRA) must be addressed and incorporated in the EIAr.
20. Specialist assessments must be conducted in accordance with the Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species).
21. The following specialist studies will form part of the EIAr as indicated in Section 12.6 of the FSR:
    a. Soil and Agriculture Potential Impact Assessment;
    b. Noise Impact Assessment;
    c. Freshwater and Wetlands (Aquatics) Impact Assessment;
    d. Terrestrial Biodiversity (Flora and Fauna) Impact Assessment;
    e. Avifauna Impact Assessment;
    f. Bat Impact Assessment;
    g. Socio-economic Impact Assessment;
    h. Heritage, Archaeology and Palaeontology Impact Assessment;
    i. Visual / Landscape and Flicker Impact Assessment; and
    j. Traffic and Transportation Impact Assessment.
22. 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.
23. Should the specialist definition of 'no-go' area differ from the Departments definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable.
24. Should the specialist studies provide more detail regarding any of the project activity thresholds, please ensure that the project activity descriptions are amended accordingly in the application form and EIAr.
25. All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA.
26. Should a specialist recommend specific mitigation measures, these must be clearly indicated.
27. Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defendable reasons; and were necessary, include further expertise advice.
28. Where applicable, each specialist study must provide a preferred grid connection alternative.

Layout & Sensitivity Maps

29. Please provide a layout map which indicates the following:
    a. Wind turbine positions (numbered) and its associated infrastructure;

b. Permanent laydown area footprint;
c. Internal roads indicating width (construction period width and operation period width) and with numbered sections between the other site elements which they serve (to make commenting on sections possible);
d. Wetlands, drainage lines, rivers, stream and water crossing of roads and cables indicating the type of bridging structures that will be used;
e. The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure;
f. Substation(s) and/or transformer(s) sites including their entire footprint;
g. All existing infrastructure on the site, especially roads;
h. Buildings proposed within the substation footprint;
i. Buffer areas; and
j. All "no-go" areas.

Cumulative Assessments

30. Regarding the identified similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must indicate the following:
    a. Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land.
    b. Identified cumulative impacts associated with the proposed development must be rated with the significance rating methodology used in the process.
    c. Detailed process flow and proof must be provided, 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.
    d. The cumulative impacts significance rating must also inform the need and desirability of the proposed development.
    e. A cumulative impact environmental statement on whether the proposed development must proceed.

WEF Environmental Management Programme (EMPr)

31. A construction and operational phase EMPr for the WEF, which includes mitigation and monitoring measures must be submitted with the EIAr.
32. The EMPr must be developed in terms of Appendix 4 of the EIA Regulations, 2014 as amended and must include (but not limited to) the following plans and measures:
    a. A Re-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;
    b. A Weed and invader plant 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;
    c. 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 and be implemented prior to commencement of the construction phase;

d. An Open space management plan, to be implemented during the construction and operation of the facility;
e. A Traffic management plan for the site access 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 e.g. limiting construction vehicles travelling on public roadways during the morning and late afternoon commute time and avoid using roads through densely populated built-up areas so as not to disturb existing retail and commercial operations;
f. A Transportation plan for the transport of components, main assembly cranes and other large pieces of equipment;
g. A Stormwater 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;
h. A Fire management plan to be implemented during the construction and operation of the facility;
i. 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;
j. 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;
k. Measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments, and other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants;
l. Dust management measures;
m. Waste management measures;
n. Emergency response; and,
o. All recommendations and mitigation measures recorded in the EIAr and the specialist studies conducted. This includes the management and monitoring plans and procedures appended in the specialist studies.

33. The decommissioning chapter of the EMPr for the facility must contain information relating to the handling, repurposing or disposal of dysfunctional, severely damaged batteries, module and containers.
34. The EMPr must distinguish between impact management actions and impact management outcomes.
35. The EMPr must not contain any ambiguity. Where applicable, statements containing the word “should” or “may” are to be amended to “must”.

Generic Environmental Management Programme (EMPr)

36. The proposed development triggers Activity 11 of Listing Notice 1 (as amended). The relevant generic EMPr(s) must be included in the EIAr, over and above the EMPr for the WEF.

37. Part B: Section 2 of the generic EMPr(s) must be completed, and a copy of the signed EMPr(s) must be submitted with the EIAr. Please note that Point 7.1.1 in Part B: Section 2 needs to match the details of the applicant as contained in the application form. The generic EMPr(s) must be signed by the applicant and submitted with the EIAr. An unsigned Generic EMPr is regarded as incomplete.
38. If any specific environmental sensitivities/attributes are present on the site which require more specific impact management outcomes and impact management actions, not included in the pre-approved generic EMPr template, to manage impacts, those impact management outcomes and actions must be included in Part C of the generic EMPr.

General

The EAP must provide detailed motivation if any of the above requirements are not required by the proposed development and will not be included in the EMPr.

The applicant is hereby reminded to comply with the requirements of Regulation 45 of GN R982 of 04 December 2014, as amendment, with regard to the time period allowed for complying with the requirements of the Regulations.

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

Dr Sabelo Malaza
Chief Director: Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment
Signed by: Ms Masina Morudu
Designation: Control Environmental Officer: National Integrated Authorisation Projects
Date: 19/11/2024.

cc:	Mr Andrew Pearson	Rochdale Wind Energy Facility (Pty) Ltd	Email: Andrew@mulilo.com
	Mr G.O Xaba	Mpumalanga DARDLEA	Email: goxaba@mpg.gov.za / rluyt@mpg.gov.za / mbuyanesb@mpg.gov.za
	Mr Mervyn Lotter	MTPA	Email: mervyn.lotter@gmail.com
	Ms Mapulane Nkosi	Msukaligwa Local Municipality	Email: complaints@msukaligwa.gov.za

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Forestry, Fisheries and the Environment
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Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 399 9000, Fax: +27 86 625 1042

DFFE Reference: 14/12/16/3/3/2/2613
Enquiries: Ms Bathandwa Ncube
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Ms Stephanie Gopaul
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UMHLANGA RIDGE
Durban
4320

[redacted]
Email Address : stephanie.gopaul@erm.com / erm.arcusamsterdam@erm.com

PER E-MAIL

Dear Ms Gopaul

ACCEPTANCE OF THE SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF THE SHEEPMOOR WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, MPUMALANGA PROVINCE

The final Scoping Report (SR) and the Plan of Study for Environmental Impact Assessment (PoSEIA) dated October 2024 and received by the Department on 07 October 2024, refers.

The Department has evaluated the submitted final SR and the Plan of Study for Environmental Impact Assessment dated July 2024 and is satisfied that the documents comply with the minimum requirements of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended. The FSR is hereby accepted by the Department in terms of Regulation 22(a) of the EIA Regulations, 2014, as amended.

You may proceed with the environmental impact assessment process in accordance with the tasks contemplated in the PoSEIA as required in terms of the EIA Regulations, 2014, as amended. The Environmental Impact Assessment Report (EIAr) must comply with the requirements of Appendix 3 of the EIA Regulations, 2014, as amended.

In addition, the following amendments and additional information are required for the EIAr:

The processing of personal information by the Department of Forestry, Fisheries and the Environment is done lawfully and not excessive to the purpose of processing in compliance with the POPI Act, any codes of conduct issued by the Information Regulator in terms of the POPI Act and / or relevant legislation providing appropriate security safeguards for the processing of personal information of others.

MEM

General Comments

1. The meeting minutes in Appendix F of the Public Participation Report refers. The discussions during the meeting with the Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs (DARDLEA) and the Mpumalanga Tourism & Parks Agency (MTPA) on 11 September 2024 are noted.
2. The table of coordinates on page *x* of the SR is noted. The EIAr must include:
   a. The corner coordinates for the Battery Energy Storage System.
   b. Bend point coordinates for the 132kV powerline alternatives; and the main access roads.
3. The EIAr must include the approximate length of each grid connection alternative route, and these grid connection routes must be discussed in the "*Alternatives*" section of the EIAr.
4. You are requested to provide the estimated operational lifespan of the proposed Sheepmoor WEF and details of future plans for the site and infrastructure after decommissioning, as well as the possibility of upgrading the proposed infrastructure to more advanced technologies.
5. The EIAr must confirm the availability of services identified on pages 104 to 106 of the final SR.
6. If the EIAr contains listed activities and/or other information that differs from the application form, the application form must be amended accordingly and submitted to the Department with the EIAr.

Battery Energy Storage System (BESS)

7. Applicable BESS technologies must be included under the Technology Alternatives section of the EIAr.
8. A risk assessment study is not required for the Battery Energy Storage System (BESS), however, impacts associated with the risks must be identified, considered, and assessed as part of the EIAr.

Public Participation

9. Comments on the draft EIAR must be obtained from this Department's Biodiversity Conservation Directorate at BCAdmin@dffe.gov.za and Protected Areas section (regarding the NPAES) at Tnethononda@dffe.gov.za. Further to that, these comments must be addressed and incorporated in the final EIAr.
10. Proof of correspondence with the various stakeholders must be included in the EIAr. This must indicate that this draft EIAr has been subjected to 30 days public participation process, stating the start and end date of the PPP.
11. Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAr.
12. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. Please provide proof of written notice for the availability of the draft EIAr for comment.
13. All issues raised and comments received must be incorporated into the Comments and Response Report (CRR).
14. Comments from I&APs must not be split and arranged into categories. Comments from each submission must be responded to individually.
15. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as "noted" is not regarded as an adequate response to an I&AP's comments.
16. The CRR addresses comments on the draft SR, which have been received from organs of state, however, copies of these comments are not included in the report. Copies of original comments

received from I&APs and organs of state, which have jurisdiction in respect of the proposed activity must be submitted to the Department with the EIAr.

17. If applicable, the attendance registers and minutes of any meetings held by the Environmental Assessment Practitioner (EAP) with Interested and Affected Parties (I&APs) and other role players must be included in the EIAr.
18. The newspaper advert proof in Appendix C of the Public Participation Report refers. Please submit a full page of the newspaper(s) containing the advertisement, ensuring that the name of the newspaper and date are visible.

Specialist assessments

19. Interim and final comments from the South African Heritage Resources Agency (SAHRA) must be addressed and incorporated in the EIAr.
20. Specialist assessments must be conducted in accordance with the Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species).
21. The following specialist studies will form part of the EIAr as indicated in Section 12.6 of the FSR:
    a. Soil and Agriculture Potential Impact Assessment;
    b. Aquatic Impact Assessment;
    c. Terrestrial Biodiversity (Flora and Fauna) Impact Assessment;
    d. Avifauna Impact Assessment;
    e. Bat Impact Assessment;
    f. Visual / Landscape and Flicker Impact Assessment;
    g. Heritage, Archaeology and Palaeontology Impact Assessment;
    h. Noise Impact Assessment;
    i. Socio-economic Impact Assessment; and
    j. Traffic and Transportation Impact Assessment.
22. 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.
23. Should the specialist definition of 'no-go' area differ from the Departments definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable.
24. Should the specialist studies provide more detail regarding any of the project activity thresholds, please ensure that the project activity descriptions are amended accordingly in the application form and EIAr.
25. All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA.
26. Should a specialist recommend specific mitigation measures, these must be clearly indicated.
27. Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defendable reasons; and were necessary, include further expertise advice.
28. Where applicable, each specialist study must provide a preferred grid connection alternative.

Layout & Sensitivity Maps

29. Please provide a layout map which indicates the following:
    a. Wind turbine positions (numbered) and its associated infrastructure;

b. Permanent laydown area footprint;
c. Internal roads indicating width (construction period width and operation period width) and with numbered sections between the other site elements which they serve (to make commenting on sections possible);
d. Wetlands, drainage lines, rivers, stream and water crossing of roads and cables indicating the type of bridging structures that will be used;
e. The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure;
f. Substation(s) and/or transformer(s) sites including their entire footprint;
g. All existing infrastructure on the site, especially roads;
h. Buildings proposed within the substation footprint;
i. Buffer areas; and
j. All "no-go" areas.

Cumulative Assessments

30. Regarding the identified similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must indicate the following:
    a. Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land.
    b. Identified cumulative impacts associated with the proposed development must be rated with the significance rating methodology used in the process.
    c. Detailed process flow and proof must be provided, 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.
    d. The cumulative impacts significance rating must also inform the need and desirability of the proposed development.
    e. A cumulative impact environmental statement on whether the proposed development must proceed.

WEF Environmental Management Programme (EMPr)

31. A construction and operational phase EMPr for the WEF, which includes mitigation and monitoring measures must be submitted with the EIAr.
32. The EMPr must be developed in terms of Appendix 4 of the EIA Regulations, 2014 as amended and must include (but not limited to) the following plans and measures:
    a. A Re-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;
    b. A Weed and invader plant 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;
    c. 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 and be implemented prior to commencement of the construction phase;

d. An Open space management plan, to be implemented during the construction and operation of the facility;
e. A Traffic management plan for the site access 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 e.g. limiting construction vehicles travelling on public roadways during the morning and late afternoon commute time and avoid using roads through densely populated built-up areas so as not to disturb existing retail and commercial operations;
f. A Transportation plan for the transport of components, main assembly cranes and other large pieces of equipment;
g. A Stormwater 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;
h. A Fire management plan to be implemented during the construction and operation of the facility;
i. 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;
j. 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;
k. Measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments, and other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants;
l. Dust management measures;
m. Waste management measures;
n. Emergency response; and,
o. All recommendations and mitigation measures recorded in the EIAr and the specialist studies conducted. This includes the management and monitoring plans and procedures appended in the specialist studies.

33. The decommissioning chapter of the EMPr for the facility must contain information relating to the handling, repurposing or disposal of dysfunctional, severely damaged batteries, module and containers.
34. The EMPr must distinguish between impact management actions and impact management outcomes.
35. The EMPr must not contain any ambiguity. Where applicable, statements containing the word “should” or “may” are to be amended to “must”.

Generic Environmental Management Programme (EMPr)

36. The proposed development triggers Activity 11 of Listing Notice 1 (as amended). The relevant generic EMPr(s) must be included in the EIAr, over and above the EMPr for the WEF.

37. Part B: Section 2 of the generic EMPr(s) must be completed, and a copy of the signed EMPr(s) must be submitted with the EIAr. Please note that Point 7.1.1 in Part B: Section 2 needs to match the details of the applicant as contained in the application form. The generic EMPr(s) must be signed by the applicant and submitted with the EIAr. An unsigned Generic EMPr is regarded as incomplete.
38. If any specific environmental sensitivities/attributes are present on the site which require more specific impact management outcomes and impact management actions, not included in the pre-approved generic EMPr template, to manage impacts, those impact management outcomes and actions must be included in Part C of the generic EMPr.

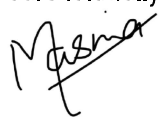
General

The EAP must provide detailed motivation if any of the above requirements are not required by the proposed development and will not be included in the EMPr.

The applicant is hereby reminded to comply with the requirements of Regulation 45 of GN R982 of 04 December 2014, as amendment, with regard to the time period allowed for complying with the requirements of the Regulations.

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



Dr Sabelo Malaza
Chief Director: Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment
Signed by: Ms Masina Morudu
Designation: Control Environmental Officer: National Integrated Authorisation
Date: 19/11/2024.

cc:	Mr Andrew Pearson	Sheepmoor Wind Energy Facility (Pty) Ltd	Email: Andrew@mulilo.com
	Mr G.O Xaba	Mpumalanga DARDLEA	Email: goxaba@mpg.gov.za / rluyt@mpg.gov.za / mbuyanesb@mpg.gov.za
	Mr Mervyn Lotter	MTPA	Email: mervyn.lotter@gmail.com
	Ms Mapulane Nkosi	Msukaligwa Local Municipality	Email: complaints@msukaligwa.gov.za

From: aidaform@aidaform.com
To: [redacted]
Subject: New Response for "Stakeholder Engagement Form"
Date: Saturday, 21 September 2024 20:10:26
Attachments: [redacted]

[You don't often get email from aidaform@aidaform.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

EXTERNAL MESSAGE

Dear AidaForm user,

Your form "Stakeholder Engagement Form" has a new response.

---

1. What's your name?
Rona Odendaal

2. Who do you represent?
Individual, a Private party

[redacted]

3. Your Address?
Athole farm, Amsterdam, Mpumalanga, 2375, South Africa

7. What is your interest in the projects?
Strongly oppose

8. Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website?
No

9. What are your comments regarding the Rochdale, Envolo and Shaepmoor WEF Cluster?
Negative impact on the environment and bird life.

10. Protection of Personal Information (POPI) Act, Act 4 of 2013
No (0)

You can turn off or manage notifications for this form at:
https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fmy.aidaform.com%2Fform%2Fmmg56gvmb8%2Fsettings%2Femail&data=05%7C02%7Cerm.arcsaamsterdam%40erm.com%7C1b8f8fc7cbc8456d8f6430fdcda6880d%7C2f1e6bd39c4a485baa69c1f822de8815%7C0%7C0%7C638625390384030816%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=MopEXdPZ%2BYG%2BtFLa2IK152ssPbyFKdp9kTcoNY9aE%3D&reserved=0

Stay productive and take care!
Your AidaForm Team

From:	Salome Mambane
To:	ERM Arcus Amsterdam
Cc:	EIAadmin; Bathandwa Ncube; Andrew Pearson; Stephanie Gopaul; Gail@mulilo.com; Dieter Rodewald; reth@mulilo.com; Lloyd Barnes; Masina Morudu
Subject:	14/12/16/3/3/2/2611
Date:	Monday, 17 February 2025 11:16:33

You don't often get email from smambane@dffe.gov.za. Learn why this is important

EXTERNAL MESSAGE

Dear Sir/Madam

ACKNOWLEDGEMENT OF RECEIPT OF THE REQUEST FOR AN EXTENSION IN TERMS OF REGULATION 3(7) OF THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014, AS AMENDED FOR THE PROPOSED DEVELOPMENT OF THE EMVELO WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, AND GERT SIBANDE DISTRICT MUNICIPALITY, MPUMALANGA PROVINCE.

The Department confirms having received the request for extension in terms of Regulation 3(7) of Environmental Impact Assessment (EIA) Regulations, 2014, as amended, for the abovementioned project on 13 February 2025.

Please note that the outcome of your request will be communicated in due course.

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

Kind Regards,
Salome Mambane
Integrated Environmental Authorisations:
Priority Infrastructure Developments
[redacted]

From:	Lydia Kutu
To:	ERM Arcus Amsterdam
Cc:	Bathandwa Ncube; EIAadmin; Salome Mambane; Stephen Burton; Stephanie Gopaul; Lloyd Barnes; Andrew Pearson
Subject:	14/12/16/3/3/2/2611
Date:	Wednesday, 09 October 2024 09:11:05

EXTERNAL MESSAGE

Dear Sir/Madam

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

The Department confirms having received the Final Scoping Report and Amended Application Form for the abovementioned project on 07 October 2024. You have submitted these documents to comply with the National Environmental Management Act, 1998 (Act No. 107 of 1998) and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended.

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

Kind Regards,
Lydia Kutu
Integrated Environmental Authorisations:
Priority Infrastructure Developments
[redacted]

To God be the Glory!!!

From:	Bathandwa Ncube
To:	Stephanie Gopaul; ERM Arcus Amsterdam
Cc:	Andrew Pearson; goxaba@mpg.gov.za; R Luyt; SB. Mbuyane; mervyn.lotter@gmail.com; complaints@msukaligwa.gov.za; EIAadmin; Lydia Kutu; Ephron Maradwa; Salome Mambane
Subject:	14/12/16/3/3/2/2611; 14/12/16/3/3/2/2612; 14/12/16/3/3/2/2613
Date:	Tuesday, 24 September 2024 18:07:46
Attachments:	14-12-16-3-3-2-2611.pdf 14-12-16-3-3-2-2612.pdf 14-12-16-3-3-2-2613.pdf

EXTERNAL MESSAGE

Goodday

Please find attached, DSR comments for the proposed Emvelo, Rochdale and Sheepmoor WEF developments.

Kind regards

Ms Bathandwa Ncube (EAPASA)
Department of Forestry, Fisheries and the Environment (DFFE)
Integrated Environmental Authorisations
[redacted]

From:	Masina Morudu
To:	Stephanie Gopaul
Cc:	ERM Arcus Amsterdam; Andrew Pearson; goxaba@mpg.gov.za; mervyn.lotter@gmail.com; complaints@msukaligwa.gov.za; R Luyt; SB. Mbuyane; celia@mtpa.co.za; Bathandwa Ncube; Lydia Kutu; EIAadmin
Subject:	14/12/16/3/3/2/2611; 2612; 2613: FSR Acceptance for the proposed Emvelo, Rochdale and Sheepmoor WEFs, MP
Date:	Tuesday, 19 November 2024 21:59:46
Attachments:	image001.png 01 Acceptance of SR_Emvelo_2611.pdf 01 Acceptance of SR_Rochdale_2612.pdf 01 Acceptance of SR_Sheepmoor_2613.pdf

EXTERNAL MESSAGE

Dear Staphanie,

Attached please find the FSR acceptance letters for your attention.

Regards,

MASINA MORUDU

Integrated Environmental Authorisations
EAPASA Registration: 2019/1805
[redacted]
[redacted]
E-mail: MEMorudu@dffe.gov.za

"We all have few failures in life, it's what makes us ready for the success".

forestry, fisheries & the environment
Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

From:	Lydia Kutu
To:	ERM Arcus Amsterdam
Cc:	Bathandwa Ncube; EIAadmin; Salome Mambane; Stephen Burton; Stephanie Gopaul; Lloyd Barnes; Andrew Pearson
Subject:	14/12/16/3/3/2/2612
Date:	Wednesday, 09 October 2024 09:13:18

EXTERNAL MESSAGE

Dear Sir/Madam

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

The Department confirms having received the Final Scoping Report and Amended Application Form for the abovementioned project on 07 October 2024. You have submitted these documents to comply with the National Environmental Management Act, 1998 (Act No. 107 of 1998) and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended.

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

Kind Regards,
Lydia Kutu
Integrated Environmental Authorisations:
Priority Infrastructure Developments
[redacted]

To God be the Glory!!!

From:	Salome Mambane
To:	ERM Arcus Amsterdam
Cc:	EIAadmin; Andrew Pearson; Stephanie Gopaul; Gail@mulilo.com; Dieter Rodewald; Lloyd Barnes; Masina Morudu; Bathandwa Ncube
Subject:	14/12/16/3/3/2/2612
Date:	Monday, 17 February 2025 11:20:51

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EXTERNAL MESSAGE

Dear Sir/Madam

ACKNOWLEDGEMENT OF RECEIPT OF THE REQUEST FOR AN EXTENSION IN TERMS OF REGULATION 3(7) OF THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014, AS AMENDED FOR THE PROPOSED DEVELOPMENT OF THE ROCHDALE WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, INCLUDING A GRID CONNECTION, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, AND GERT SIBANDE DISTRICT MUNICIPALITY ,MPUMALANGA ROVINCE.

The Department confirms having received the request for extension in terms of Regulation 3(7) of Environmental Impact Assessment (EIA) Regulations, 2014, as amended, for the abovementioned project on 13 February 2025.

Please note that the outcome of your request will be communicated in due course.

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

Kind Regards,
Salome Mambane
Integrated Environmental Authorisations:
Priority Infrastructure Developments
[redacted]

From:	Lydia Kutu
To:	ERM Arcus Amsterdam
Cc:	Bathandwa Ncube; EIAadmin; Salome Mambane; Stephen Burton; Stephanie Gopaul; Lloyd Barnes; Andrew Pearson
Subject:	14/12/16/3/3/2/2613
Date:	Wednesday, 09 October 2024 09:15:34

EXTERNAL MESSAGE

Dear Sir/Madam

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

The Department confirms having received the Final Scoping Report and Amended Application Form for the abovementioned project on 07 October 2024. You have submitted these documents to comply with the National Environmental Management Act, 1998 (Act No. 107 of 1998) and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended.

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

Kind Regards,
Lydia Kutu
Integrated Environmental Authorisations:
[redacted]

To God be the Glory!!!

From:	Salome Mambane
To:	ERM Arcus Amsterdam
Cc:	EIAadmin; Andrew Pearson; Stephanie Gopaul; gail@mulilo.com; Dieter Rodewald; Lloyd Barnes; Masina Morudu; Bathandwa Ncube
Subject:	14/12/16/3/3/2/2613
Date:	Monday, 17 February 2025 11:29:57

EXTERNAL MESSAGE

Dear Sir/Madam

ACKNOWLEDGEMENT OF RECEIPT OF THE REQUEST FOR AN EXTENSION IN TERMS OF REGULATION 3(7) OF THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014, AS AMENDED FOR THE PROPOSED DEVELOPMENT OF THE SHEEPMOOR WIND ENERGY FACILITY AND AUXILIARY INFRASTRUCTURE, NEAR ERMELO, WITHIN THE MSUKALIGWA LOCAL MUNICIPALITY, AND GERT SIBANDE DISTRICT MUNICIPALITY, MPUMALANGA PROVINCE.

The Department confirms having received the request for extension in terms of Regulation 3(7) of Environmental Impact Assessment (EIA) Regulations, 2014, as amended, for the abovementioned project on 13 February 2025.

Please note that the outcome of your request will be communicated in due course.

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

Kind Regards,
Salome Mambane
Integrated Environmental Authorisations:
[redacted]

Stakeholder Engagement Form

https://mulilowef.aidaform.com/public-participation-form

Monday, January 20, 2025 06:12 UTC

What's your name?

First Name
Du Toit

Last Name
Malherbe

Who do you represent?

Organisation
ABO Energy

Designation
Project Manager

Your Email

dutoit.malherbe@aboenergy.com

Your Phone Number

[redacted]

Alternative Phone Number

[redacted]

Your Address

Street Address
[redacted]

City
Cape Town

State/Province
Western Cape

Zip Code
7441

Country
South Africa

What is your interest in the projects?

ABO is developing other renewable energy projects in the area

Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website?

Yes

What are your comments regarding the Rochdale, Emvelo and Sheepmoor WEF Cluster?

ABO Energy is developing other renewable energy projects in the area

Protection of Personal Information (POPI) Act, Act 4 of 2013

No (0)

From:	Du Toit Malherbe
To:	ERM Arcus Amsterdam
Cc:	Lihle Khumalo
Subject:	0684401 Amsterdam Cluster WEF - Register as I&AP
Date:	Wednesday, 23 October 2024 23:04:55
Attachments:	image001.png image003.png image004.png

You don't often get email from dutoit.malherbe@aboenergy.com. Learn why this is important

EXTERNAL MESSAGE

Hi Liandra,

I hope you're doing well.

Could you kindly register me as an I&AP for the Project Reference: 0684401 'Amsterdam Cluster WEF', including the proposed Rochdale , Emvelo and Sheepmoor WEFs including their associated infrastructure, since we're developing other renewable energy projects in the area.

Thank you in advance.

Kind regards,

Du Toit Malherbe
Project Manager

ABO Energy South Africa (Pty) Ltd.
Unit 2A, Quantico House, Loerie Park
Paul Kruger Street
Durbanville, Western Cape, 7550, South Africa

Visitor address:
6th Floor, Sunclare Building
21 Dreyer Street
Cape Town, Claremont, 7708, South Africa

[redacted]
dutoit.malherbe@aboenergy.com
www.aboenergy.co.za

ABO ENERGY | Renewables are our DNA

ABO Wind is now ABO Energy. Find out more: www.aboenergy.com/newname

Company registration number 2018/062901/07 | Tax registration number 4370284061
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From: David Nunez Blundell
To: Stephanie Gopaul; ERM Arcus Amsterdam
Subject: Amsterdam Wind Cluster
Date: Friday, 08 November 2024 08:22:33

Algunos contactos que recibieron este mensaje no suelen recibir correos electrónicos de david.nunez@siriuspower.co.za. Por qué es esto importante

EXTERNAL MESSAGE

Dear Stephanie,

I filled in the online form - kindly confirm I am registered as an I&AP and will receive further info as the EIA process evolves.

Please note:

- There is a disconnect between the declared MW size and the number of turbines:
  - Rochdale: 240MW vs. 16 WTGs @ 8MW = 128MW
  - Emvelo: 200MW vs. 36 WTGs @ 8MW = 288MW
  - Sheepmoor: 360MW vs. 22 WTGs @ 8MW = 176W
- WTG8 of Emvelo falls outside of the declared development area

Can you kindly clarify?

Thanks and regards,

DAVID NUNEZ
executive director
[redacted]
website www.siriuspower.co.za

SIRIUS POWER SOUTH AFRICA

From: Thea Liebenberg
To: ERM Arcus Amsterdam
Subject: Automatic reply: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date: Thursday, 10 October 2024 13:53:31

You don't often get email from thea@agrisa.org.za. Learn why this is important

EXTERNAL MESSAGE

Thank you for your email. Please expect a delayed response as I am currently attending AgriSA's Green Horizon Congress in Cape Town. Please WhatsApp me on [redacted]

For inquiries, you can also contact the AgriSA office on [redacted]

From:	Lizell Stroh
To:	ERM Arcus Amsterdam
Subject:	Automatic reply: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date:	Thursday, 10 October 2024 13:52:53

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

EXTERNAL MESSAGE

Kindly note that im not availble,

Kindly direct all general obstacle related queries to: obstacles@caa.co.za.

Kindly forward all EIA notices to environment@caa.co.za.

Kind regards

Lizell Stroh

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If you are not the intended recipient of this email, kindly notify the SACAA and delete the email as soon as possible. For mor on how the SACAA process your personal information, please click below to access its Privacy Policy.

https://www.caa.co.za/paia-and-privacy/

Stakeholder Engagement Form

https://mulilowef.aidaform.com/public-participation-form

Friday, November 08, 2024 05:51 UTC

What's your name?

First Name
David

Last Name
Nunez

Who do you represent?

Organisation
Sirius Power

Designation
Director

Your Email

[redacted]

Your Phone Number

[redacted]

Alternative Phone Number

[redacted]

Your Address

Street Address
[redacted]

City
Cape Town

State/Province
Western Cape

Zip Code
7708

Country
South Africa

What is your interest in the projects?

Collecting information about energy projects

Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website?

Yes

What are your comments regarding the Rochdale, Emvelo and Sheepmoor WEF Cluster?

Protection of Personal Information (POPI) Act, Act 4 of 2013

No (0)

From:	postmaster@sec-mGP-ag04.imcf.co.za
To:	ERM Arcus Amsterdam
Subject:	Delivery Status Notification (Failure)
Date:	Thursday, 10 October 2024 13:53:12
Attachments:	Notification of Submission of Final Scoping Report for the Proposed Sheepmoor Rochdale and Emvelo WEF Cluster Mpumalanga Province.msg

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[You don't often get email from postmaster@sec-mgp-ag04.imcf.co.za. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

EXTERNAL MESSAGE

From: Celia de Waal
To: ERM Arcus Amsterdam
Cc: Frans Krige
Subject: DRaft Comments LUA 24-3965 Rochdale Wind Energy Facility
Date: Tuesday, 01 October 2024 11:14:57
Attachments: LUA24-3965 Rochdale Wind Energy (DRaft Comments).pdf

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

EXTERNAL MESSAGE

Good day

Kindly receive the draft comments from Mr. Krige of LUA 24-3965. As soon as we have a signed copy, I will forward it to you.

Kind regards

Celia

From: Celia de Waal
Sent: 01 October 2024 10:35
To: Erm.arcusamsterdam@erm.com
Cc: Frans Krige <frans@mtpa.co.za>; Johan Eksteen <johan@mtpa.co.za>
Subject: FW: MTPA's comments LUA 24/3966 - Draft Scoping for 45 wind turbines (Emvelo Wind Energy)

Good day

Kindly receive two of the letters as requested

I will follow up with Frans Krige on LUA 24/3965, Rochdale, as soon as he is done with his meeting.

Regards

Celia

From: Celia de Waal
Sent: 20 September 2024 09:56
To: stephanie.gopaul@erm.com
Cc: Tommie Steyn <Tommie@mtpa.co.za>; Johan Eksteen <johan@mtpa.co.za>; Frans Krige <frans@mtpa.co.za>; Khumbelo Malele <Khumbelo.Malele@mtpa.co.za>; Rockey Nkosi <Rockey.Nkosi@mtpa.co.za>; Thabile Mnisi <Thabile.Mnisi@mtpa.co.za>; Phumla Nkosi <Phumla.Nkosi@mtpa.co.za>; Fortunate Watkins <Fortunate.Watkins@mtpa.co.za>
Subject: MTPA's comments LUA 24/3966 - Draft Scoping for 45 wind turbines (Emvelo Wind

Energy)

Dear Ms. Gopaul

Kindly receive the attached comments from the MTPA regarding a Draft Scoping report for 45 wind turbines for Emvelo Wind Energy Facility & auxiliary infrastructure.

Your project no: **0684401**

Our EIA reference number is **LUA 24/3966**

Kind regards

Celia de Waal

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
[redacted]
[redacted]
e-mail: celia.dewaal@mtpa.co.za

From:	Celia de Waal
To:	ERM Arcus Amsterdam
Cc:	Frans Krige; Johan Eksteen
Subject:	FW: MTPA"s comments LUA 24/3966 - Draft Scoping for 45 wind turbines (Emvelo Wind Energy)
Date:	Tuesday, 01 October 2024 10:35:09
Attachments:	LUA24-3966 obj. Emvelo WEF infrastructure Draft SR ERM.pdf LUA 24-3967 MTPA objection DSR SHEEPMOOR WEF ERM.pdf

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

EXTERNAL MESSAGE

Good day

Kindly receive two of the letters as requested

I will follow up with Frans Krige on LUA 24/3965, Rochdale, as soon as he is done with his meeting.

Regards

Celia

From: Celia de Waal
Sent: 20 September 2024 09:56
To: stephanie.gopaul@erm.com
Cc: Tommie Steyn <Tommie@mtpa.co.za>; Johan Eksteen <johan@mtpa.co.za>; Frans Krige <frans@mtpa.co.za>; Khumbelo Malele <Khumbelo.Malele@mtpa.co.za>; Rockey Nkosi <Rockey.Nkosi@mtpa.co.za>; Thabile Mnisi <Thabile.Mnisi@mtpa.co.za>; Phumla Nkosi <Phumla.Nkosi@mtpa.co.za>; Fortunate Watkins <Fortunate.Watkins@mtpa.co.za>
Subject: MTPA's comments LUA 24/3966 - Draft Scoping for 45 wind turbines (Emvelo Wind Energy)

Dear Ms. Gopaul

Kindly receive the attached comments from the MTPA regarding a Draft Scoping report for 45 wind turbines for Emvelo Wind Energy Facility & auxiliary infrastructure.

Your project no: **0684401**

Our EIA reference number is **LUA 24/3966**

Kind regards

Celia de Waal

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

Cecilia de Waal

Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
[redacted]
[redacted]
e-mail: celia.dewaal@mtpa.co.za

From:	Celia de Waal
To:	ERM Arcus Amsterdam
Cc:	Frans Krige; Johan Eksteen
Subject:	FW: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date:	Friday, 11 October 2024 07:55:59
Attachments:	image001.png

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

EXTERNAL MESSAGE

Good morning

Kindly send us, the MTPA a hard copy of the Final Scoping Report, for our scientists to comment on, to the following physical address:

To: Cecilia de Waal (MTPA EIA Data Capturer)
MTPA Office Building (Lydenburg)
End of Morgan street
Lydenburg 1120

My contact details are: 013 065 0062 or 082 841 7163

Kind regards

Celia de Waal

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
[redacted]
e-mail: celia.dewaal@mtpa.co.za

From: Celia de Waal <celia@mtpa.co.za>

Sent: Thursday, 10 October 2024 14:29
To: Frans Krige <frans@mtpa.co.za>
Subject: FW: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province

Middag Frans

Moet ek vir die harde kopiee van die Final Draft aanvra

Groete

Celia

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: 10 October 2024 13:52
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province

Dear Registered Interested and Affected Party,

NOTIFICATION OF SUBMISSION OF THE FINAL SCOPING REPORT(S) FOR APPROVAL TO PROCEED TO ENVIRONMENTAL IMPACT ASSESSMENT PHASE FOR THE PROPOSED SHEEPMOOR, ROCHDALE AND EMVELO WIND ENERGY FACILITIES, MPUMALANGA PROVINCE

DFFE Reference: 14/12/16/3/3/2/2611, 14/12/16/3/3/2/2612 and 14/12/16/3/3/2/2613

This email serves to inform you about the submission of the Final Scoping Reports for the proposed Sheepmoor, Rochdale and Emvelo WEFs , in the Mpumalanga Province.

The Draft Scoping Report for the Proposed Development(s) was subjected to the required 30-day comment and review period, from the 22 August 2024 to the 21 September 2024 (both days inclusive), taking into consideration Chapter 2 Regulation 3 (1); (2) and (3) of the NEMA, 1998 (Act No. 107 of 1998). Comments received from the public were incorporated, addressed and responded to in the Final Scoping Report.

Following the 30-day public comment and review period, the Final Scoping Reports has been submitted to the Department of Forestry, Fisheries and the Environment (competent authority) for decision and is available for the public to view and download via the ERM website.

With reference to the above, please send any queries to the below address. Please also indicate the contact details of any other potential I&APs that should be contacted and registered.

Email: mailto:ERM.ArcusAmsterdam@erm.com

Website: **https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/**

Thank you for the interest in the project.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**



From: Josua Meyer
To: ERM Arcus Amsterdam
Subject: In sake : SHEEPMOOR, EMVELO en ROCKDALE WINDPLAAS PROJEK
Date: Tuesday, 17 December 2024 11:05:20

EXTERNAL MESSAGE

Vir aandag : Mnr Lucien Barbeau

Dagse

Die volgende het onder my aandag gekom en plaas dit net op rekord
- die drie windplase is gewysig na slegs twee
- die windturbines se plasing is wesenlik gewysig
- as I&AP is geen kennis daarvan ontvang nie
- geleentheid om kommentaar op wysiging te lewer is sodoende my ontneem
- verskeie spesialiste het intussen weer area besoek om verdere verslae op te stel. afgesien van die voelkundiges het die ander twee, waarvan ek weet, my nie gekontak nie. my kontak detail is blykbaar van hul weerhou.

EAP is ook verskeie kere al versoek vir kaart wat turbines, plaas grense en distrik paaie duidelik toon. wag nou nog.

Bogemelde prosedure is totaal gebrekkig en regsadvies word in die verband ingewin.

Josua Meyer
[redacted]

From:	Mail Delivery System
To:	ERM Arcus Amsterdam
Subject:	Mail delivery failed: returning message to sender
Date:	Thursday, 10 October 2024 13:53:24
Attachments:	Notification of Submission of Final Scoping Report for the Proposed Sheepmoor Rochdale and Emvelo WEF Cluster Mpumalanga Province.msg

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EXTERNAL MESSAGE

From: Postnet Ermelo
To: ERM Arcus Amsterdam
Cc: meyerjosua55@gmail.com
Date: Friday, 20 September 2024 11:18:42
Attachments: SKM_C250i24092004520.pdf

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EXTERNAL MESSAGE

From: ERM Arcus Amsterdam
To: ERM Arcus Amsterdam
Subject: Mpumalanga Tourism and National Parks Comments
Date: Wednesday, 02 October 2024 15:34:45
Attachments: image001.png
LUA24-3966 obj. Emvelo WEF infrastructure Draft SR ERM.pdf
LUA 24-3967 MTPA objection DSR SHEEPMOOR WEF ERM.pdf
LUA24-3965 Rochdale Wind Energy (DRaft Comments).pdf

Good day,

Kindly see attached comments from MTPA. This is in relation to the Mulilo Amsterdam WEF cluster. Kindly read through all comments and respond to the comments directed at your speciality.

If responses could please be provided by the end of this week, it will be appreciated.

Thank you,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**



From:	Celia de Waal
To:	ERM Arcus Amsterdam
Cc:	Frans Krige; Mixo Hlatshwayo; Khumbelo Malele; Johan Eksteen; Thabile Mnisi; Phumla Nkosi
Subject:	MTPA"s comments: LUA 24/3965 - Draft Scoping report for the Rochdale Wind Energy Facility near ERmelo
Date:	Wednesday, 02 October 2024 11:15:01
Attachments:	LUA 24-3965 OBJ_D.Scoping.Rochdale.WEF_GridInfrastr_Msukaligwa.LM.pdf

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

EXTERNAL MESSAGE

Good day

Kindly receive the attached comments from the MTPA regarding a Draft Scoping Report for the 240 MW Rochdale Wind Energy Facility near Ermelo.

Your reference number is**: 0684401**

Our EIA registration/reference number is**: LUA 24/3965**

Kind regards

Celia de Waal

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
[redacted]
e-mail: celia.dewaal@mtpa.co.za

From: aidaform@aidaform.com
To: ERM Alert Mailboxes
Subject: New Response for "Stakeholder Engagement Form"
Date: Saturday, 21 September 2024 19:59:22
Attachments: Inbox Mail - Aida.eml, Mail Details.pdf

[You don't often get email from aidaform@aidaform.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

EXTERNAL MESSAGE

Dear AidaForm user,

Your form "Stakeholder Engagement Form" has a new response.

---

1. What's your name?
Moya Odendaal

2. Who do you represent?
[redacted]

[redacted] Number

[redacted]
Stuart Street 90, Amsterdam, Amsterdam, Mpumalanga, 2375, South Africa

7. What is your interest in the projects?
Environment

8. Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website?
Yes

9. What are your comments regarding the Rochdale, Envirolo and Shaepmoor WEF Cluster?
It will change the environment forever

10. Protection of Personal Information (POPI) Act, Act 4 of 2013
No (0)

You can turn off or manage notifications for this form at:
https://eur01.safelinks.protection.outlook.com/?
url=https%3A%2F%2Fmy.aidaform.com%2Fforms%2Fsettings%2Femail&data=05%7C02%7Cerm.arcsaamsterdam%40erm.com%7C8060f0bbd46a0846e228c508da6a67008f%7C1f2fe6bd39c4a485baa69c1f820a8313 0%7C0%7C0%7C638625383413151760%7CUnknown%7CTWFpbGZsb3dzb29jZWlsdHJ1ZSIsIlYiOiIwLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=QRCEO8DyUk4bwtkQTbW4mwb4f7qW4hOyJa5Zzuhk8C%2BU%3D&reserved=0

Stay productive and take care!
Your AidaForm Team

From:	ERM Arcus Amsterdam
To:	ERM Arcus Amsterdam
Subject:	Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date:	Thursday, 10 October 2024 13:52:23
Attachments:	image001.png

Dear Registered Interested and Affected Party,

NOTIFICATION OF SUBMISSION OF THE FINAL SCOPING REPORT(S) FOR APPROVAL TO PROCEED TO ENVIRONMENTAL IMPACT ASSESSMENT PHASE FOR THE PROPOSED SHEEPMOOR, ROCHDALE AND EMVELO WIND ENERGY FACILITIES, MPUMALANGA PROVINCE

DFFE Reference: 14/12/16/3/3/2/2611, 14/12/16/3/3/2/2612 and 14/12/16/3/3/2/2613

This email serves to inform you about the submission of the Final Scoping Reports for the proposed Sheepmoor, Rochdale and Emvelo WEFs , in the Mpumalanga Province.

The Draft Scoping Report for the Proposed Development(s) was subjected to the required 30-day comment and review period, from the 22 August 2024 to the 21 September 2024 (both days inclusive), taking into consideration Chapter 2 Regulation 3 (1); (2) and (3) of the NEMA, 1998 (Act No. 107 of 1998). Comments received from the public were incorporated, addressed and responded to in the Final Scoping Report.

Following the 30-day public comment and review period, the Final Scoping Reports has been submitted to the Department of Forestry, Fisheries and the Environment (competent authority) for decision and is available for the public to view and download via the ERM website.

With reference to the above, please send any queries to the below address. Please also indicate the contact details of any other potential I&APs that should be contacted and registered.

Email: mailto:ERM.ArcusAmsterdam@erm.com

Website: **https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/**

Thank you for the interest in the project.

Kind Regards

Lucien Barbeau
Consultant

Cape Town **erm.com**

ERM

Sustainability is our business



From: Kirsten Jones
To: ERM Arcus Amsterdam
Subject: Out of office Re: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date: Thursday, 10 October 2024 13:52:34

EXTERNAL MESSAGE

Thank you for your email. I am out of office and will respond to your email on my return. If urgent please contact Francois on francois@red-cap.co.za.

From: ERM Arcus Amsterdam
To: Postnet Ermelo; ERM Arcus Amsterdam
Cc: meyerjosua55@gmail.com; Stephen Burton
Subject: RE:
Date: Wednesday, 02 October 2024 13:16:36
Attachments: image001.png

Hi Josua,

Thank you for sharing your concerns about the proposed WEF cluster. We appreciate your input. Your comments will be considered during the Environmental Impact Assessment (EIA) phase.

As part of the process, we will assess potential changes to the wind turbine layout and work to avoid sensitive areas to minimize any negative impacts. Your feedback appreciated and we will keep you updated as the EIA progresses.

Kind regards,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: Postnet Ermelo <ermelo.postnet@gmail.com>
Sent: Thursday, September 19, 2024 1:21 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: meyerjosua55@gmail.com
Subject:

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EXTERNAL MESSAGE

From:	Stephanie Gopaul
To:	Masina Morudu
Cc:	ERM Arcus Amsterdam
Subject:	RE: 14/12/16/3/3/2/2611; 2612; 2613: FSR Acceptance for the proposed Emvelo, Rochdale and Sheepmoor WEFs, MP
Date:	Wednesday, 20 November 2024 09:27:43
Attachments:	image002.png image003.png

Thanks you Masina. Received.

ERM
Sustainability is our business

Stephanie Gopaul
Partner
She/Her/Hers

Durban [redacted] **erm.com**

From: Masina Morudu <memorudu@dffe.gov.za>
Sent: Tuesday, November 19, 2024 9:59 PM
To: Stephanie Gopaul <stephanie.gopaul@erm.com>
Cc: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Andrew Pearson <andrew@mulilo.com>; goxaba@mpg.gov.za; mervyn.lotter@gmail.com; complaints@msukaligwa.gov.za; R Luyt <rluyt@mpg.gov.za>; SB. Mbuyane <MbuyaneSB@mpg.gov.za>; celia@mtpa.co.za; Bathandwa Ncube <BNcube@dffe.gov.za>; Lydia Kutu <LKutu@dffe.gov.za>; EIAadmin <EIAadmin@dffe.gov.za>
Subject: 14/12/16/3/3/2/2611; 2612; 2613: FSR Acceptance for the proposed Emvelo, Rochdale and Sheepmoor WEFs, MP

EXTERNAL MESSAGE

Dear Staphanie,

Attached please find the FSR acceptance letters for your attention.

Regards,

MASINA MORUDU

Integrated Environmental Authorisations
EAPASA Registration: 2019/1805
T [redacted]
[redacted]
E-mail: MEMorudu@dffe.gov.za

"We all have few failures in life, it's what makes us ready for the success".



forestry, fisheries
& the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

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From: Du Toit Malherbe
To: ERM Arcus Amsterdam
Cc: Lihle Khumalo
Subject: RE: 0684401 Amsterdam Cluster WEF - Register as I&AP
Date: Monday, 20 January 2025 11:37:47
Attachments: image002.png
image003.png
image005.png
image001.png

You don't often get email from dutoit.malherbe@aboenergy.com. Learn why this is important

EXTERNAL MESSAGE

Hi Lucien,

Thank you for the feedback!

Kind regards,

Du Toit Malherbe | ABO Energy South Africa (Pty) Ltd.
Mobile: +27 (0) 60 383 8058 | Phone: +27 (0) 21 276 3620 | Email: dutoit.malherbe@aboenergy.com

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Monday, January 20, 2025 09:53
To: Du Toit Malherbe <dutoit.malherbe@aboenergy.com>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lihle Khumalo <lihle.khumalo@aboenergy.com>
Subject: RE: 0684401 Amsterdam Cluster WEF - Register as I&AP

Hi Du Toit,

Kindly note that you have been added as an I&AP to this projects database. New Public documentation will be available in February 2025 when PPP commences.

Kind Regards



Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Du Toit Malherbe <dutoit.malherbe@aboenergy.com>
Sent: Monday, January 20, 2025 8:13 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lihle Khumalo <lihle.khumalo@aboenergy.com>
Subject: RE: 0684401 Amsterdam Cluster WEF - Register as I&AP

You don't often get email from dutoit.malherbe@aboenergy.com. Learn why this is important

EXTERNAL MESSAGE

Good day,

I'd like to follow-up on my request form October 2024 to be registered as an I&AP for the Project Reference: 0684401 Amsterdam Cluster WEF, since we're developing other renewable energy projects in the area. Please confirm if I'm registered and kindly share all publicly available documents.

Kind regards,

Du Toit Malherbe | ABO Energy South Africa (Pty) Ltd.
[redacted] mail: dutoit.malherbe@aboenergy.com

From: Du Toit Malherbe
Sent: Wednesday, October 23, 2024 23:05
To: ERM.ArcusAmsterdam@erm.com
Cc: Lihle Khumalo <lihle.khumalo@aboenergy.com>
Subject: 0684401 Amsterdam Cluster WEF - Register as I&AP

Hi Liandra,

I hope you're doing well.

Could you kindly register me as an I&AP for the Project Reference: 0684401 'Amsterdam Cluster WEF', including the proposed Rochdale , Emvelo and Sheepmoor WEFs including their associated infrastructure, since we're developing other renewable energy projects in the area.

Thank you in advance.

Kind regards,

Du Toit Malherbe
Project Manager

ABO Energy South Africa (Pty) Ltd.
Unit 2A, Quantico House, Loerie Park
Paul Kruger Street
Durbanville, Western Cape, 7550, South Africa

Visitor address:
6th Floor, Sunclare Building
21 Dreyer Street
Cape Town, Claremont, 7708, South Africa

[redacted]
dutoit.malherbe@aboenergy.com
www.aboenergy.co.za

ABO ENERGY | Renewables are our DNA

ABO Wind is now ABO Energy. Find out more: www.aboenergy.com/newname

Company registration number 2018/062901/07 | Tax registration number 4370284061
The information contained in this message is confidential or protected by law. If you are not the intended recipient, please contact the sender and delete this message. Any unauthorised copying of this message or unauthorised distribution of the information contained herein is prohibited.

From: ERM Arcus Amsterdam
To: Du Toit Malherbe; ERM Arcus Amsterdam
Cc: Lihle Khumalo
Subject: RE: 0684401 Amsterdam Cluster WEF - Register as I&AP
Date: Monday, 20 January 2025 09:53:03
Attachments: image002.png
image005.png
image007.png
image001.png

Hi Du Toit,

Kindly note that you have been added as an I&AP to this projects database. New Public documentation will be available in February 2025 when PPP commences.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Senior Consultant

Cape Town [redacted] **erm.com**

From: Du Toit Malherbe <dutoit.malherbe@aboenergy.com>
Sent: Monday, January 20, 2025 8:13 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Lihle Khumalo <lihle.khumalo@aboenergy.com>
Subject: RE: 0684401 Amsterdam Cluster WEF - Register as I&AP

You don't often get email from dutoit.malherbe@aboenergy.com. Learn why this is important

EXTERNAL MESSAGE

Good day,

I'd like to follow-up on my request form October 2024 to be registered as an I&AP for the Project Reference: 0684401 Amsterdam Cluster WEF, since we're developing other renewable energy projects in the area. Please confirm if I'm registered and kindly share all publicly available documents.

Kind regards,

[redacted]

From: Du Toit Malherbe
Sent: Wednesday, October 23, 2024 23:05
To: ERM.ArcusAmsterdam@erm.com
Cc: Lihle Khumalo <lihle.khumalo@aboenergy.com>
Subject: 0684401 Amsterdam Cluster WEF - Register as I&AP

Hi Liandra,

I hope you're doing well.

Could you kindly register me as an I&AP for the Project Reference: 0684401 'Amsterdam Cluster WEF', including the proposed Rochdale , Emvelo and Sheepmoor WEFs including their associated infrastructure, since we're developing other renewable energy projects in the area.

Thank you in advance.

Kind regards,

Du Toit Malherbe
Project Manager

ABO Energy South Africa (Pty) Ltd.
Unit 2A, Quantico House, Loerie Park
Paul Kruger Street
Durbanville, Western Cape, 7550, South Africa

Visitor address:
6th Floor, Sunclare Building
21 Dreyer Street
Cape Town, Claremont, 7708, South Africa

[redacted]
www.aboenergy.co.za



ABO Wind is now ABO Energy. Find out more: www.aboenergy.com/newname

Company registration number 2018/062901/07 | Tax registration number 4370284061
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From:	Du Toit Malherbe
To:	ERM Arcus Amsterdam
Cc:	Lihle Khumalo
Subject:	RE: 0684401 Amsterdam Cluster WEF - Register as I&AP
Date:	Monday, 20 January 2025 08:13:20
Attachments:	image001.png image003.png image004.png

You don't often get email from dutoit.malherbe@aboenergy.com. Learn why this is important

EXTERNAL MESSAGE

Good day,

I'd like to follow-up on my request form October 2024 to be registered as an I&AP for the Project Reference: 0684401 Amsterdam Cluster WEF, since we're developing other renewable energy projects in the area. Please confirm if I'm registered and kindly share all publicly available documents.

Kind regards,

Du Toit Malherbe | ABO Energy South Africa (Pty) Ltd.
[redacted]

From: Du Toit Malherbe
Sent: Wednesday, October 23, 2024 23:05
To: ERM.ArcusAmsterdam@erm.com
Cc: Lihle Khumalo <lihle.khumalo@aboenergy.com>
Subject: 0684401 Amsterdam Cluster WEF - Register as I&AP

Hi Liandra,

I hope you're doing well.

Could you kindly register me as an I&AP for the Project Reference: 0684401 'Amsterdam Cluster WEF', including the proposed Rochdale , Emvelo and Sheepmoor WEFs including their associated infrastructure, since we're developing other renewable energy projects in the area.

Thank you in advance.

Kind regards,

Du Toit Malherbe
Project Manager

ABO Energy South Africa (Pty) Ltd.
Unit 2A, Quantico House, Loerie Park
Paul Kruger Street
Durbanville, Western Cape, 7550, South Africa

Visitor address:
6th Floor, Sunclare Building
21 Dreyer Street
Cape Town, Claremont, 7708, South Africa

[redacted]
www.aboenergy.co.za



ABO Wind is now ABO Energy. Find out more: www.aboenergy.com/newname

Company registration number 2018/062901/07 | Tax registration number 4370284061
The information contained in this message is confidential or protected by law. If you are not the intended recipient, please contact the sender and delete this message. Any unauthorised copying of this message or unauthorised distribution of the information contained herein is prohibited.

From: David Nunez Blundell
To: ERM Arcus Amsterdam
Cc: Stephanie Gopaul
Subject: Re: Amsterdam Wind Cluster
Date: Tuesday, 12 November 2024 12:09:10

EXTERNAL MESSAGE

Dear Lucien,

This is extremely helpful, thanks a lot

I am already registered as an I&AP for the Amsterdam cluster and for Khoe/Hugo. Can you kindly register me for Boshoek 1-3 and Koup1-2?

Thanks and regards,

DAVID NUNEZ
executive director
[redacted]za
website www.siriuspower.co.za

SIRIUS POWER SOUTH AFRICA

El 12 nov 2024, a las 8:26, ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> escribió:

Hi David,

I have drawn up a list of ERM onshore Wind and Solar Renewable projects below:

https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/

https://www.erm.com/public-information-sites/genesis-koup-wind-energy-facility-1-beaufort-west-province/

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https://www.erm.com/public-information-sites/proposed-boshoek-solar-energy-facility-3-north-west-province/

https://www.erm.com/hugoandkhoe/

Kind Regards

<image001.png>

Lucien Barbeau
Consultant

Cape Town
+27105963488

erm.com

From: David Nunez Blundell <david.nunez@siriuspower.co.za>
Sent: Friday, November 8, 2024 9:57 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Subject: Re: Amsterdam Wind Cluster

Algunos contactos que recibieron este mensaje no suelen recibir correos electrónicos de david.nunez@siriuspower.co.za. Por qué es esto importante
EXTERNAL MESSAGE

Thanks for your prompt response!

On a different note that is unrelated to the PPP for the Amsterdam cluster:

I have put together a database of renewable energy projects at different stages of development in South Africa based entirely on public information obtained from PPP of EIA applications. I lost track of EIA applications from your portfolio when ERM acquired Arcus and the public participation section on Arcus' website was removed, and there isn't a similar section on ERM's website (the closest I found is this site, but it is empty).

Is there a section of your website that I'm missing where I can find a list of "active" projects similar to this one? If not, is there any way I can automatically get registered as I&AP on existing and future energy projects?

Many thanks for your help

Best regards,

DAVID NUNEZ
executive director
[redacted]
website www.siriuspower.co.za

SIRIUS POWER SOUTH AFRICA

El 8 nov 2024, a las 9:45, ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> escribió:

Hi David,

Thank you for the interest in the project. You have now been added and an I&AP database and will be notified as the EIA process continues. The project status: Transitioning from Final scoping to Draft EIA phase.

Your notes below have been acknowledged. Please do me on the look out for updated Technical information and layout changes within the EIA Phase.

Kind Regards,

<image001.png>

Lucien Barbeau
Consultant

Cape Town
+27105963488

erm.com

From: David Nunez Blundell <david.nunez@siriuspower.co.za>
Sent: Friday, November 8, 2024 8:21 AM
To: Stephanie Gopaul <stephanie.gopaul@erm.com>; ERM Arcus Amsterdam <erm.arcusamsterdam@erm.com>
Subject: Amsterdam Wind Cluster

Algunos contactos que recibieron este mensaje no suelen recibir correos electrónicos de david.nunez@siriuspower.co.za. Por qué es esto importante
EXTERNAL MESSAGE

Dear Stephanie,

I filled in the online form - kindly confirm I am registered as an I&AP and will receive further info as the EIA process evolves.

Please note:

- There is a disconnect between the declared MW size and the number of turbines:
  - Rochdale: 240MW vs. 16 WTGs @ 8MW = 128MW
  - Emvelo: 200MW vs. 36 WTGs @ 8MW = 288MW
  - Sheepmoor: 360MW vs. 22 WTGs @ 8MW = 176W
- WTG8 of Emvelo falls outside of the declared development area

Can you kindly clarify?

Thanks and regards,

DAVID NUNEZ
executive director
[redacted]

[redacted] SOUTH AFRICA

From: David Nunez Blundell
To: ERM Arcus Amsterdam
Cc: Stephanie Gopaul
Subject: Re: Amsterdam Wind Cluster
Date: Friday, 08 November 2024 09:57:05

Algunos contactos que recibieron este mensaje no suelen recibir correos electrónicos de david.nunez@siriuspower.co.za. Por qué es esto importante
EXTERNAL MESSAGE

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[redacted]
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<image001.png>

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Consultant
Cape Town
+27105963488
erm.com

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Subject: Amsterdam Wind Cluster

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- WTG8 of Emvelo falls outside of the declared development area

Can you kindly clarify?

Thanks and regards,

DAVID NUNEZ
executive director
[redacted]
website www.siriuspower.co.za
SIRIUS POWER SOUTH AFRICA

From: ERM Arcus Amsterdam
To: David Nunez Blundell; ERM Arcus Amsterdam
Cc: Stephanie Gopaul
Subject: RE: Amsterdam Wind Cluster
Date: Wednesday, 13 November 2024 13:11:35
Attachments: image001.png

Hi David,

A pleasure, sure I will place you on the database.

Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: David Nunez Blundell <david.nunez@siriuspower.co.za>
Sent: Tuesday, November 12, 2024 12:09 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Subject: Re: Amsterdam Wind Cluster

EXTERNAL MESSAGE

Dear Lucien,

This is extremely helpful, thanks a lot

I am already registered as an I&AP for the Amsterdam cluster and for Khoe/Hugo. Can you kindly register me for Boshoek 1-3 and Koup1-2?

Thanks and regards,

DAVID NUNEZ
executive director
[redacted]
website www.siriuspower.co.za

SIRIUS POWER SOUTH AFRICA

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>
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>
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https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/

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https://www.erm.com/public-information-sites/genesis-koup-wind-energy-facility-2-beaufort-west-province/

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https://www.erm.com/hugoandkhoe/

Kind Regards

<image001.png>

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: David Nunez Blundell <david.nunez@siriuspower.co.za>
Sent: Friday, November 8, 2024 9:57 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Subject: Re: Amsterdam Wind Cluster

Algunos contactos que recibieron este mensaje no suelen recibir correos electrónicos de david.nunez@siriuspower.co.za. Por qué es esto importante
EXTERNAL MESSAGE

Thanks for your prompt response!

On a different note that is unrelated to the PPP for the Amsterdam cluster:

I have put together a database of renewable energy projects at different stages of development in South Africa based entirely on public information obtained from PPP of EIA applications. I lost track of EIA applications from your portfolio when ERM acquired Arcus and the public participation section on Arcus' website was removed, and there isn't a similar section on ERM's website (the closest I found is this site, but it is empty).

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Many thanks for your help

Best regards,

DAVID NUNEZ
executive director
[redacted]
website www.siriuspower.co.za

SIRIUS POWER SOUTH AFRICA

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Hi David,

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Your notes below have been acknowledged. Please do me on the look out for updated Technical information and layout changes within the EIA Phase.

Kind Regards,

<image001.png>

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: David Nunez Blundell <david.nunez@siriuspower.co.za>
Sent: Friday, November 8, 2024 8:21 AM
To: Stephanie Gopaul <stephanie.gopaul@erm.com>; ERM Arcus Amsterdam <erm.arcusamsterdam@erm.com>

Subject: Amsterdam Wind Cluster

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EXTERNAL MESSAGE

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Please note:

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- WTG8 of Emvelo falls outside of the declared development area

Can you kindly clarify?

Thanks and regards,

DAVID NUNEZ
executive director
[redacted]
website www.siriuspower.co.za

SIRIUS POWER SOUTH AFRICA

From:	ERM Arcus Amsterdam
To:	David Nunez Blundell; ERM Arcus Amsterdam
Cc:	Stephanie Gopaul
Subject:	RE: Amsterdam Wind Cluster
Date:	Tuesday, 12 November 2024 08:26:30
Attachments:	image001.png

Hi David,

I have drawn up a list of ERM onshore Wind and Solar Renewable projects below:

https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/

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Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted]

erm.com

From: David Nunez Blundell <david.nunez@siriuspower.co.za>

Sent: Friday, November 8, 2024 9:57 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Stephanie Gopaul <Stephanie.Gopaul@erm.com>
Subject: Re: Amsterdam Wind Cluster

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EXTERNAL MESSAGE

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DAVID NUNEZ
executive director
[redacted]
website www.siriuspower.co.za

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Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: David Nunez Blundell <david.nunez@siriuspower.co.za>
Sent: Friday, November 8, 2024 8:21 AM
To: Stephanie Gopaul <stephanie.gopaul@erm.com>; ERM Arcus Amsterdam <erm.arcusamsterdam@erm.com>
Subject: Amsterdam Wind Cluster

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Can you kindly clarify?

Thanks and regards,

DAVID NUNEZ
executive director

[redacted]
website www.siriuspower.co.za

SIRIUS POWER SOUTH AFRICA

From: ERM Arcus Amsterdam
To: David Nunez Blundell; Stephanie Gopaul; ERM Arcus Amsterdam
Subject: RE: Amsterdam Wind Cluster
Date: Friday, 08 November 2024 09:45:15
Attachments: image001.png

Hi David,

Thank you for the interest in the project. You have now been added and an I&AP database and will be notified as the EIA process continues. The project status: Transitioning from Final scoping to Draft EIA phase.

Your notes below have been acknowledged. Please do me on the look out for updated Technical information and layout changes within the EIA Phase.

Kind Regards,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: David Nunez Blundell <david.nunez@siriuspower.co.za>
Sent: Friday, November 8, 2024 8:21 AM
To: Stephanie Gopaul <stephanie.gopaul@erm.com>; ERM Arcus Amsterdam <erm.arcusamsterdam@erm.com>
Subject: Amsterdam Wind Cluster

Algunos contactos que recibieron este mensaje no suelen recibir correos electrónicos de david.nunez@siriuspower.co.za. Por qué es esto importante

EXTERNAL MESSAGE

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Can you kindly clarify?

Thanks and regards,

DAVID NUNEZ
executive director
[redacted]
website www.siriuspower.co.za

SIRIUS POWER SOUTH AFRICA

From: jonathan@camissaconsulting.com
To: ERM Arcus Amsterdam
Cc: Lloyd Barnes; Stephen Burton
Subject: RE: Bat Specialist - Mulilo Amsterdam CA Commenting Responses required
Date: Monday, 30 September 2024 17:57:33
Attachments: image001.png
image002.png
image003.png

You don't often get email from jonathan@camissaconsulting.com. Learn why this is important

EXTERNAL MESSAGE

Hi Lucien

Do you have any updates on the next steps needed for me – are my comments below sufficient?

All the best

Jonathan Aronson
Camissa Sustainability Consulting

[redacted]
A 1053 BA Amsterdam, Netherlands

From: jonathan@camissaconsulting.com <jonathan@camissaconsulting.com>
Sent: Wednesday, 18 September 2024 12:02
To: 'ERM Arcus Amsterdam' <ERM.ArcusAmsterdam@erm.com>
Cc: 'Lloyd Barnes' <lloyd@mulilo.com>; 'Stephen Burton' <Stephen.Burton@erm.com>
Subject: RE: Bat Specialist - Mulilo Amsterdam CA Commenting Responses required

Hi Lucien

Thanks for sharing these comments.
I agree with the board on points regarding the CBA. I have used that in my structuring of risk as per the text and table below:

To align with regional conservation and integrated development planning, the Mpumalanga Biodiversity Sector Plan Handbook (MTPA 2014) was consulted to further define spatial risk in the AoI. The intention here was to align biodiversity conservation policy objectives with renewable energy policy objectives, attempting to minimise trade-offs between conflicting goals (Jackson 2011, Gasparatos et al. 2017). The handbook includes a map of terrestrial areas that are important for conserving biodiversity and ecological processes – Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs) respectively. CBA Irreplaceable Areas were categorised as High Risk (Table 6) because the conservation goals for these areas are to maintain them in a natural state with no loss of ecosystems, functionality or species, and with no flexibility in land-use options (MTPA 2014). The remaining areas were assigned low or medium risk where all infrastructure development should be prioritized. These included modified land, ESA, CBA optimal, and other Natural Areas (Table 6). Although the primary objective of the CBA optimal areas is to

maintain these spaces in a natural state with no loss of ecosystems, functionality or species, some flexibility in land-use options is permitted (MTPA 2014). Similarly, in ecological supports areas (ESAs), the objective is to maintain habitats in a natural, or near-natural, state with limited loss of ecosystems or functionality. Hence, these areas were classified as medium risk, permitting the siting of turbines in these spaces. All turbines will be subjected to a post-construction bat fatality monitoring program which will monitor residual impacts at turbines located in CBA optimal and ecological support areas, as well as turbines in low-risk areas. The results of this monitoring will inform management actions where needed to ensure alignment with the MTPA objectives to limit impacts to biodiversity.

Table 6: Features used to assign spatial risk categories in the AoI for bats (Chiroptera)

Risk Level			
Low	**Medium**	**High**	**No-Go**
Heavily modified land	CBA Optimal	CBA Irreplaceable Areas	Farm Dams (200 m buffer)
Moderately modified land	ESA Landscape corridor		Wetlands (200 m buffer)
	ESA Local corridor		Houses (200 m buffer)
	Other Natural Areas		Buildings (200 m buffer)
			Rivers (200 m buffer)
			Wetlands (200 m buffer)
			Rocky Outcrops (200 m buffer)

Based on the comments, it can be argued that the CBA Irreplaceable Areas would need to be elevated to No-Go as well which I would support.

Regarding comments 8.3, 9.3 and 10.3; these assessments would be addressed in the final EIA report.

I am unable to attend the meeting on Monday. Please advise what the next steps are.

All the best

Jonathan Aronson
Camissa Sustainability Consulting

CAMISSA
SUSTAINABILITY CONSULTING

[redacted]
A 1053 BA Amsterdam, Netherlands

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Wednesday, 18 September 2024 10:44
To: jonathan@camissaconsulting.com
Cc: Lloyd Barnes <lloyd@mulilo.com>; Stephen Burton <Stephen.Burton@erm.com>
Subject: Bat Specialist - Mulilo Amsterdam CA Commenting Responses required

Hi Jonathan,

Kindly see attached comments from DARDLEA/MTPA pertaining to the Mulilo Amster WEF Cluster (Sheepmoor, Rochdale and Emvelo).

Please could you read through all the comments for each development. However please focus your responses on the following points per development:

Bats	Rochdale	Sheepmoor	Emvelo
Point	1, 4, 6 and 9.3	1, 6, 7, 8 and 10.3	1, 4, 5, 6 and 8.3

Ideally, we would like these comments responded to by Monday the 23rd September, please let us know if this will be an issue.

A meeting invite for today at 14h00 will be sent out shortly to discuss the above. Kindly indicate your availability to attend.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town
[redacted]

erm.com



From: Ephron Maradwa
To: ERM Arcus Amsterdam
Subject: RE: Confirmation of Project Final EIAr Submission
Date: Tuesday, 26 November 2024 10:02:04
Attachments: image003.png
image004.png

You don't often get email from emaradwa@dffe.gov.za. Learn why this is important

EXTERNAL MESSAGE

Yes correct , Friday, 28 March 2025

Regards
Mr. Ephron Maradwa
Administrative Officer: Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment
473 Steve Biko Road
PRETORIA
[redacted]
E-mail: EMaradwa@dffe.gov.za

forestry, fisheries and the environment
Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

[redacted] ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Monday, 25 November 2024 12:48
To: Ephron Maradwa <EMaradwa@dffe.gov.za>
Subject: Confirmation of Project Final EIAr Submission

Good day Ephron,

I trust that you are well. We have received acceptance of Final Scoping from the Department on the 19th of November 2024 for Project Mulilo Amsterdam WEF Cluster within the Msukaligwa Local Municipality, Mpumalanga Province. References: 14/12/16/3/3/2/2611, 14/12/16/3/3/2/2612 and 14/12/16/3/3/2/2613.

I would like to confirm this projects Final EIA Report submission of the 28th March 2025 as telephonically discussed.

Awaiting your response,

Many Thanks

Lucien Barbeau
Consultant

Cape Town [redacted]

erm.com



From: ERM Arcus Amsterdam
To: Celia de Waal; ERM Arcus Amsterdam
Cc: Frans Krige
Subject: RE: DRaft Comments LUA 24-3965 Rochdale Wind Energy Facility
Date: Tuesday, 01 October 2024 12:46:32
Attachments: image002.png

Thanks Celia!

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town **erm.com**
+[redacted]

From: Celia de Waal <celia@mtpa.co.za>
Sent: Tuesday, October 1, 2024 11:15 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Frans Krige <frans@mtpa.co.za>
Subject: DRaft Comments LUA 24-3965 Rochdale Wind Energy Facility

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

EXTERNAL MESSAGE

Good day

Kindly receive the draft comments from Mr. Krige of LUA 24-3965. As soon as we have a signed copy, I will forward it to you.

Kind regards

Celia

From: Celia de Waal
Sent: 01 October 2024 10:35
To: Erm.arcusamsterdam@erm.com
Cc: Frans Krige <frans@mtpa.co.za>; Johan Eksteen <johan@mtpa.co.za>
Subject: FW: MTPA's comments LUA 24/3966 - Draft Scoping for 45 wind turbines (Emvelo Wind Energy)

Good day

Kindly receive two of the letters as requested

I will follow up with Frans Krige on LUA 24/3965, Rochdale, as soon as he is done with his meeting.

Regards

Celia

From: Celia de Waal
Sent: 20 September 2024 09:56
To: stephanie.gopaul@erm.com
Cc: Tommie Steyn <Tommie@mtpa.co.za>; Johan Eksteen <johan@mtpa.co.za>; Frans Krige <frans@mtpa.co.za>; Khumbelo Malele <Khumbelo.Malele@mtpa.co.za>; Rockey Nkosi <Rockey.Nkosi@mtpa.co.za>; Thabile Mnisi <Thabile.Mnisi@mtpa.co.za>; Phumla Nkosi <Phumla.Nkosi@mtpa.co.za>; Fortunate Watkins <Fortunate.Watkins@mtpa.co.za>
Subject: MTPA's comments LUA 24/3966 - Draft Scoping for 45 wind turbines (Emvelo Wind Energy)

Dear Ms. Gopaul

Kindly receive the attached comments from the MTPA regarding a Draft Scoping report for 45 wind turbines for Emvelo Wind Energy Facility & auxiliary infrastructure.

Your project no: **0684401**

Our EIA reference number is **LUA 24/3966**

Kind regards

Celia de Waal

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
[redacted]
e-mail: celia.dewaal@mtpa.co.za

From:	ERM Arcus Amsterdam
To:	ERM Arcus Amsterdam; Celia de Waal
Cc:	Tommie Steyn; Frans Krige; Tommie Steyn; Stephen Burton
Subject:	RE: MTPA"s comments LUA 24/3967 - Draft EIA Scoping Report for the proposed development of the Sheepmoor Wind Energy facility.
Date:	Monday, 30 September 2024 11:49:03
Attachments:	image001.png

Good day Celia,

Trusting you are well. Do you have any update for me on comments for Emvelo and Rochdale proposed Developments.

Kind Regards,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, September 19, 2024 11:15 AM
To: Celia de Waal <celia@mtpa.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Tommie Steyn <Tommie@mtpa.co.za>; Frans Krige <frans@mtpa.co.za>; Tommie Steyn <tommiesteyn63@gmail.com>
Subject: RE: MTPA's comments LUA 24/3967 - Draft EIA Scoping Report for the proposed development of the Sheepmoor Wind Energy facility.

Hi Celia,

Thank you for the update,

Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: Celia de Waal <celia@mtpa.co.za>
Sent: Thursday, September 19, 2024 11:07 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>

Cc: Tommie Steyn <Tommie@mtpa.co.za>; Frans Krige <frans@mtpa.co.za>; Tommie Steyn <tommiesteyn63@gmail.com>
Subject: RE: MTPA's comments LUA 24/3967 - Draft EIA Scoping Report for the proposed development of the Sheepmoor Wind Energy facility.

You don't often get email from celia@mtpa.co.za. Learn why this is important

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

EXTERNAL MESSAGE

Good morning

Regarding your enquiry below, the following:

- The comments for the Emvelo project (our ref: LUA 24/3966) is currently at the Acting Manager: Scientific Service for review). The signed copy might be released today, which will be send to you as soon as I receive it.

- The commenting scientist is currently still busy commenting on the Rochdale project (LUA 24/3965).

Kind regards

Celia

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, 19 September 2024 09:54
To: Celia de Waal <celia@mtpa.co.za>; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Tommie Steyn <Tommie@mtpa.co.za>; jjexteen@gmail.com; Johan Eksteen <johan@mtpa.co.za>; Frans Krige <frans@mtpa.co.za>; Khumbelo Malele <Khumbelo.Malele@mtpa.co.za>; Thabile Mnisi <Thabile.Mnisi@mtpa.co.za>; Phumla Nkosi <Phumla.Nkosi@mtpa.co.za>; Fortunate Watkins <Fortunate.Watkins@mtpa.co.za>; Mervyn Lotter <Mervyn.Lotter@mtpa.co.za>
Subject: RE: MTPA's comments LUA 24/3967 - Draft EIA Scoping Report for the proposed development of the Sheepmoor Wind Energy facility.

Hi Celia,

Thank you for providing comment on the Sheepmoor WEF facility. Are you able to please indicate when we can expect comment on the remaining 2 facilities, namely Rochdale and Emvelo.

Kind regards
Lucien

ERM

Sustainability is our business

From: Celia de Waal <celia@mtpa.co.za>
Sent: Wednesday, September 18, 2024 2:36 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Tommie Steyn <Tommie@mtpa.co.za>; jjexteen@gmail.com; Johan Eksteen <johan@mtpa.co.za>; Frans Krige <frans@mtpa.co.za>; Khumbelo Malele <Khumbelo.Malele@mtpa.co.za>; Thabile Mnisi <Thabile.Mnisi@mtpa.co.za>; Phumla Nkosi <Phumla.Nkosi@mtpa.co.za>; Fortunate Watkins <Fortunate.Watkins@mtpa.co.za>; Mervyn Lotter <Mervyn.Lotter@mtpa.co.za>
Subject: MTPA's comments LUA 24/3967 - Draft EIA Scoping Report for the proposed development of the Sheepmoor Wind Energy facility.

You don't often get email from celia@mtpa.co.za. Learn why this is important

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

EXTERNAL MESSAGE

Dear Ms. Gopaul

Kindly receive the attached comments from the MTPA regarding a Draft EIA Report for the proposed development of the Sheepmoore Wind Energy facility (WEF) with 23 wind turbines and Auxiliary infrastructure.

Your reference number: **Project 0684401** (DFFE: 14/12/16/3/3/2/2593)

Our EIA registration/reference number is **LUA 24/3967** (kindly use this number in any further correspondence to us regarding this project)

Kind regards

Celia de Waal

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
[redacted]
[redacted]
e-mail: celia.dewaal@mtpa.co.za

From:	ERM Arcus Amsterdam
To:	Celia de Waal; ERM Arcus Amsterdam
Cc:	Frans Krige; Mixo Hlatshwayo; Khumbelo Malele; Johan Eksteen; Thabile Mnisi; Phumla Nkosi
Subject:	RE: MTPA"s comments: LUA 24/3965 - Draft Scoping report for the Rochdale Wind Energy Facility near ERmelo
Date:	Wednesday, 02 October 2024 13:38:43
Attachments:	image002.png

Hi Celia

Signed copy well received

Kind Regards

ERM

Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: Celia de Waal <celia@mtpa.co.za>
Sent: Wednesday, October 2, 2024 11:14 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Frans Krige <frans@mtpa.co.za>; Mixo Hlatshwayo <mixo@mtpa.co.za>; Khumbelo Malele <Khumbelo.Malele@mtpa.co.za>; Johan Eksteen <johan@mtpa.co.za>; Thabile Mnisi <Thabile.Mnisi@mtpa.co.za>; Phumla Nkosi <Phumla.Nkosi@mtpa.co.za>
Subject: MTPA's comments: LUA 24/3965 - Draft Scoping report for the Rochdale Wind Energy Facility near ERmelo

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

EXTERNAL MESSAGE

Good day

Kindly receive the attached comments from the MTPA regarding a Draft Scoping Report for the 240 MW Rochdale Wind Energy Facility near Ermelo.

Your reference number is**: 0684401**

Our EIA registration/reference number is**: LUA 24/3965**

Kind regards

Celia de Waal

Mpumalanga
TOURISM AND PARKS AGENCY
An Entity of the Department of Economic Development and Tourism

Cecilia de Waal
Environmental Impact Assessment (EIA) Data Capturer
Land Use Advisory (LUA)
Biodiversity Conservation: Scientific Services
[redacted]
[redacted]
e-mail: celia.dewaal@mtpa.co.za

From:	Jonathan Colville
To:	ERM Arcus Amsterdam; Birding Africa (Callan Cohen)
Subject:	Re: Mulilo Amsterdam WEF Cluster - DFFE Specialist Declaration Form and SACNASP registration request Final Scoping
Date:	Thursday, 10 October 2024 14:26:46
Attachments:	image001.png eia.specialistdeclaration2023aug_Jonathan_Colville_Oct2024_p2.pdf eia.specialistdeclaration2023aug_Jonathan_Colville_Oct2024_p3.pdf eia.specialistdeclaration2023aug_Jonathan_Colville_Oct2024_p1.pdf 134759JFColville_SACNASP_Certficate_2024.pdf

EXTERNAL MESSAGE

Hi Lucien

Please find attached the requested documents.

Regards
Jonathan

On Thu, 3 Oct 2024 at 10:14, ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Good day,
>
> I kindly request the following documentation for Final Scoping submission to DFFE:
>
> - DFFE Specialist Declaration form (see latest form attached); and
> - E-copy of SACNASP registration (if applicable).
>
> Kindly do forward these documents to me as soon as you can.
>
> Thank you

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Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**


SUSTAINABILITY REPORT 2024
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From: ERM Arcus Amsterdam
To: Graham Young; ERM Arcus Amsterdam; Menno Klapwijk
Subject: RE: Mulilo Amsterdam WEF Cluster (Sheepmoor, Rochdale and Emvelo)
Date: Monday, 30 September 2024 14:46:31
Attachments: image001.png

Hi Graham,

Kindly send invoices for projects attached in previous email.

Your response to comments are noted.

Thank you,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: Graham Young <grahamyounglandarch@gmail.com>
Sent: Monday, September 23, 2024 12:29 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Menno Klapwijk <menno@bcksa.co.za>
Subject: Re: Mulilo Amsterdam WEF Cluster (Sheepmoor, Rochdale and Emvelo)

You don't often get email from grahamyounglandarch@gmail.com. Learn why this is important

EXTERNAL MESSAGE

Dear Lucien,
Upon review of the CA's comments, we've found no specific issues that relate directly to the visual assessment. We therefore have not commented.
However, their comment about cumulative impact is noted and will be addressed in the assessment phase, should the project proceed to that phase.

I have also attached our Statement for work done to date. Please note that we have not been paid for our Scoping Reports. The invoice was issued in November 2023.
G

On Wed, 18 Sept 2024 at 11:07, ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Hi there.
>
> I hope this email finds you well. Please see attached comments from the CA (DARDLEA/MTPA) pertaining to the Mulilo Amsterdam WEF cluster. Please read through all comments and respond to the comments directed at your speciality.
>
> If responses could please be provided by Monday the 23rd September that would be appreciated.
>
> Thank you,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**



From: ERM Arcus Amsterdam
To: Gavin Anderson; ERM Arcus Amsterdam
Subject: RE: Mulilo Amsterdam WEF Cluster (Sheepmoor, Rochdale and Emvelo)
Date: Tuesday, 01 October 2024 15:23:52
Attachments: image001.png

Hi Gavin,

Hoping you are well. Noted on your availability to attend to these comments, however please do let me know if you are able to provide any comment before this coming Friday, it will be appreciated. Apologies for the delays in the VO – I am following up with finance.

Additionally, I just wanted to find out if you have uploaded the Heritage survey to the SAHRA via SAHRIS?

Kindest Regards,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: Gavin Anderson <umlando@gmail.com>
Sent: Wednesday, September 18, 2024 6:40 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Re: Mulilo Amsterdam WEF Cluster (Sheepmoor, Rochdale and Emvelo)

EXTERNAL MESSAGE

Hi Lucien
Highly unlikely that I can get comments by then. It is too short notice. If they require more than a sentence and if there are many it will take longer. I have been in the field for 3 weeks and have 3 weeks to go. Will see what I can do.
We still have not been paid that VO. Can you please look into it.
Regards
Gavin

On Wed, 18 Sept 2024 at 11:07, ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Hi there.
>
> I hope this email finds you well. Please see attached comments from the CA (DARDLEA/MTPA) pertaining to the Mulilo Amsterdam WEF cluster. Please read

through all comments and respond to the comments directed at your speciality.

If responses could please be provided by Monday the 23rd September that would be appreciated.

Thank you,

ERM
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Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**



--
==========
20 years of Heritage Impact Assessments
==========
UMLANDO: Archaeological Surveys & Heritage Management
PO Box 10153, Meerensee, KwaZulu-Natal 3901
phone (035)7531785
[redacted]
Facebook: Umlando SouthAfrica
Email:umlando@gmail.com

From: ERM Arcus Amsterdam
To: Graham Young; ERM Arcus Amsterdam; Menno Klapwijk
Subject: RE: Mulilo Amsterdam WEF Cluster (Sheepmoor, Rochdale and Emvelo)
Date: Monday, 30 September 2024 14:46:31
Attachments: image001.png

Hi Graham,

Kindly send invoices for projects attached in previous email.

Your response to comments are noted.

Thank you,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: Graham Young <grahamyounglandarch@gmail.com>
Sent: Monday, September 23, 2024 12:29 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Menno Klapwijk <menno@bcksa.co.za>
Subject: Re: Mulilo Amsterdam WEF Cluster (Sheepmoor, Rochdale and Emvelo)

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EXTERNAL MESSAGE

Dear Lucien,
Upon review of the CA's comments, we've found no specific issues that relate directly to the visual assessment. We therefore have not commented.
However, their comment about cumulative impact is noted and will be addressed in the assessment phase, should the project proceed to that phase.

I have also attached our Statement for work done to date. Please note that we have not been paid for our Scoping Reports. The invoice was issued in November 2023.
G

On Wed, 18 Sept 2024 at 11:07, ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Hi there.
>
> I hope this email finds you well. Please see attached comments from the CA (DARDLEA/MTPA) pertaining to the Mulilo Amsterdam WEF cluster. Please read through all comments and respond to the comments directed at your speciality.
>
> If responses could please be provided by Monday the 23rd September that would be appreciated.
>
> Thank you,

ERM
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Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**



From:	Liesal Muller
To:	Stephen Burton
Cc:	ERM Arcus Amsterdam
Subject:	RE: Mulilo Amsterdam WEF Cluster (Sheepmoor, Rochdale and Emvelo)
Date:	Tuesday, 01 October 2024 11:06:34
Attachments:	image002.png

Hi Stephen

When you have a moment, kindly check if you are able to view and approve invoice 160 that I've routered to you. I'm holding thumbs it works this time around.

Liesal Muller
IT Coordinator
She/Her/Hers

Great Westerford, 240 Main Road,
Rondebosch, 7700, Cape Town
+27 21 681 5400
+[redacted]

erm.com

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Tuesday, October 1, 2024 10:06 AM
To: Liesal Muller <Liesal.Muller@erm.com>
Cc: Stephen Burton <Stephen.Burton@erm.com>
Subject: FW: Mulilo Amsterdam WEF Cluster (Sheepmoor, Rochdale and Emvelo)

Hi Liesal

Please see the invoice as requested.

Thank you!

Lucien Barbeau
Consultant

Cape Town
+[redacted]

erm.com

From: Graham Young <grahamyounglandarch@gmail.com>
Sent: Tuesday, October 1, 2024 9:55 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Menno Klapwijk <menno@bcksa.co.za>
Subject: Re: Mulilo Amsterdam WEF Cluster (Sheepmoor, Rochdale and Emvelo)

EXTERNAL MESSAGE

Dear Lucien
Attached the invoice as requested.
Kind regards
G

African Journal of Landscape Architecture: https://www.ajlajournal.org/ifla-africa
African Landscape Network: https://bit.ly/ALNstorymap

On Mon, 30 Sept 2024 at 14:46, ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Hi Graham,
>
> Kindly send invoices for projects attached in previous email.
>
> Your response to comments are noted.
>
> Thank you,
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Consultant
>
> Cape Town [redacted] **erm.com**
>
> **From:** Graham Young <grahamyounglandarch@gmail.com>
> **Sent:** Monday, September 23, 2024 12:29 PM
> **To:** ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>; Menno Klapwijk <menno@bcksa.co.za>
> **Subject:** Re: Mulilo Amsterdam WEF Cluster (Sheepmoor, Rochdale and Emvelo)
>
> You don't often get email from grahamyounglandarch@gmail.com. Learn why this is important
> **EXTERNAL MESSAGE**
>
> Dear Lucien,
> Upon review of the CA's comments, we've found no specific issues that relate directly to the visual assessment. We therefore have not commented.
> However, their comment about cumulative impact is noted and will be addressed in the assessment phase, should the project proceed to that phase.
>
> I have also attached our Statement for work done to date. Please note that we have not been paid for our Scoping Reports. The invoice was issued in November 2023.
> G

African Journal of Landscape Architecture: https://www.ajlajournal.org/ifla-africa
African Landscape Network: https://bit.ly/ALNstorymap

On Wed, 18 Sept 2024 at 11:07, ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Hi there.
>
> I hope this email finds you well. Please see attached comments from the CA (DARDLEA/MTPA) pertaining to the Mulilo Amsterdam WEF cluster. Please read through all comments and respond to the comments directed at your speciality.
>
> If responses could please be provided by Monday the 23rd September that would be appreciated.
>
> Thank you,

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted]

erm.com



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email communication or its attachments. To find out how the ERM Group manages personal data please review our Privacy Policy

From: Graham Young
To: ERM Arcus Amsterdam; Menno Klapwijk
Subject: Re: Mulilo Amsterdam WEF Cluster (Sheepmoor, Rochdale and Emvelo)
Date: Monday, 23 September 2024 12:30:20
Attachments: image001.png
ERM Statement_2024709.pdf

You don't often get email from grahamyounglandarch@gmail.com. Learn why this is important

EXTERNAL MESSAGE

Dear Lucien,
Upon review of the CA's comments, we've found no specific issues that relate directly to the visual assessment. We therefore have not commented.
However, their comment about cumulative impact is noted and will be addressed in the assessment phase, should the project proceed to that phase.

I have also attached our Statement for work done to date. Please note that we have not been paid for our Scoping Reports. The invoice was issued in November 2023.
G

African Journal of Landscape Architecture: https://www.ajlajournal.org/ifla-africa
African Landscape Network: https://bit.ly/ALNstorymap

On Wed, 18 Sept 2024 at 11:07, ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Hi there.
>
> I hope this email finds you well. Please see attached comments from the CA (DARDLEA/MTPA) pertaining to the Mulilo Amsterdam WEF cluster. Please read through all comments and respond to the comments directed at your speciality.
>
> If responses could please be provided by Monday the 23rd September that would be appreciated.
>
> Thank you,
>
> ERM
> Sustainability is our business
>
> **Lucien Barbeau**
> Consultant
>
> Cape Town
> +[redacted]
> **erm.com**


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From: Brian EnviroSci
To: ERM Arcus Amsterdam
Subject: Re: Mulilo Amsterdam WEF Cluster (Sheepmoor, Rochdale and Emvelo)
Date: Monday, 23 September 2024 10:02:42

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

EXTERNAL MESSAGE

Morning

From my side no comments directly on the aquatic / wetland environment as any comments related to this field were related to the avifaunal i.e. waterbirds or buffers associated.

They have noted that some of the infrastructure is within some of the aquatic features / buffers as indicated in my reports and must be resolved in the design phase for the EIA

Thanks and regards

Brian

Dr Brian Colloty
Ecologist (Pr Sci Nat 400268/07)

EnviroSci (Pty) Ltd

[redacted]

> On 18 Sep 2024, at 11:07, ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:
>
> Hi there.
>
> I hope this email finds you well. Please see attached comments from the CA (DARDLEA/MTPA) pertaining to the Mulilo Amsterdam WEF cluster. Please read through all comments and respond to the comments directed at your speciality.
>
> If responses could please be provided by Monday the 23rd September that would be appreciated.
>
> Thank you,
>
> <image001.png>
>
> **Lucien Barbeau**
> Consultant
>
> Cape Town [redacted] erm.com



<Comments SR_Emvelo WEF_5G-30 (002).pdf><Comments SR_Rochdale WEF 5G-29.pdf><Comments SR_Sheepmoor WEF 5G-28.pdf>

From: EIM Accra Amsterdam
To: "aliadam@outlook.co.za" EIM Accra Amsterdam
Subject: RE: New Response for "Stakeholder Engagement Form"
Date: Wednesday, 02 October 2024 13:22:46

Good day,

Thank you for your comment. Your comments will be taken into consideration during the EIA phase of the proposed WEF Cluster.

Kind Regards

Lucien Barbera
Consultant Cape Town
erm.com
+27105965488
-----Original Message-----
From: aidaform@aidaform.com <aidaform@aidaform.com>
Sent: Saturday, September 21, 2024 7:58 PM
To: ERM Accra Amsterdam <erm.accraamsterdam@erm.com>
Subject: New Response for "Stakeholder Engagement Form"

[You don't often get email from aidaform@aidaform.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

EXTERNAL MESSAGE

Dear AidaForm user,

Your form "Stakeholder Engagement Form" has a new response.

---

1. What's your name?
Moya Odendaal

2. Who do you represent?
Hoya Lidri Pty Ltd Odendaal

3. Your Email
[redacted]

4. Your Phone Number
[redacted]

[redacted]

6. Your Address
[redacted]

7. What is your interest in the projects?
Environment

8. Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website?
Yes

9. What are your comments regarding the Rochdale, Envolo and Sheepmoor WEF Cluster?
It will change the environment forever

10. Protection of Personal Information (POPI) Act, Act 4 of 2013 No (0)

You can turn off or manage notifications for this form at:
https://outlook.office.com/mail/deeplink?ispopout=1&path=%2Fmail%2Faction%2Fcompose&to=aidaform%40aidaform.com&subject=New%20Response%20for%20%22Stakeholder%20Engagement%20Form%22&body=%0D%0A%0D%0A---%0D%0AYou%20can%20turn%20off%20or%20manage%20notifications%20for%20this%20form%20at%3A%0D%0Ahttps%3A%2F%2Fwww.aidaform.com%2FForm%2Fsettings%2FForm&id=AAMkADIzNjE0ZmFjLTk0ZjctNDQ0Ni1hNjQ0LTQ0NjQ0NjQ0NjQ0NgBGAAAAAAAiQ8W967B7TKBjgx9qqVEigcAiQ8W967B7TKBjgx9qqVEigcAAAAAAENAACiQ8W967B7TKBjgx9qqVEigcAAAAAAEOAAA%3D&version=2021-04-01&exvsurl=1&viewmodel=ReadMessageItem
Stay productive and take care!
Your AidaForm Team

From: IRM Arcus Amsterdam
To: stakeholder.engagement@erm.com; IRM Arcus Amsterdam
Subject: RE: New Response for "Stakeholder Engagement Form"
Date: Friday, 06 December 2024 08:35:00

Good day,

Thank you for your interest in the project. You have now been added to the I&AP Database and will receive updated information as the project moves forward.

Kind Regards

Lucien Barbeau
Senior Consultant Cape Town
erm.com
+27105902400
-----Original Message-----
From: Aidaform <do_not_reply@aidaform.com> <aidaform@aidaform.com>
Sent: Thursday, December 5, 2024 1:30 PM
To: IRM Arcus Amsterdam <erm.arcusamsterdam@erm.com>
Subject: New Response for "Stakeholder Engagement Form"

EXTERNAL MESSAGE

Dear AidaForm user,

Your form "Stakeholder Engagement Form" has a new response.

---

1. What's your name?
Makondelele "Kondi" Makoya

2. Who do you represent?
[redacted]

15 Chaplin, Cnr Oxford and Chaplin Roads, Illovo, 2196, Johannesburg, Gauteng , 2194, South Africa

3. What is your interest in the projects?
Environmental Authorization progress

8. Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website?
Yes

9. What are your comments regarding the Rochdale, Envrole and Sheapmoor WEF Cluster?
No comments related to the projects but would like to be updated on the status of the environmental authorization progress.

10. Protection of Personal Information (POPI) Act, Act 4 of 2013 No (0)

You can turn off or manage notifications for this form at:
https://eu01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fmy.aidaform.com%2Fforms%2Fsetting%2Femail&data=05%7C02%7CIRM.ArcusAmsterdam%40erm.com%7C5b93adb3a46243.1cc4f656fdd15c0198f%7C2f2e6ef49e4e405baa69c1482ba8013f%7C0%7C0%7C638696636998803954%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIjAuMDAwMCIsIkFuIjoiV2luMzIiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=Ihn6N0lVU24f4voQEJRlyVJTfIIn2yYpLhH1UE1O4UGuzDA%3D&reserved=0

Stay productive and take care!
Your AidaForm Team

From: ERM Arcus Amsterdam
To: patrowellsecondhandmail.com; ERM Arcus Amsterdam
Subject: RE: New Response for "Stakeholder Engagement Form"
Date: Wednesday, 02 October 2024 12:22:57

Good day,

Thank you for your comment. Your comments will be taken into consideration during the EIA phase of the proposed WEF Cluster.

Kind Regards

Lucien Barbeau
Consultant Cape Town
erm.com
+27105963488
-----Original Message-----
From: aidaform@aidaform.com <aidaform@aidaform.com>
Sent: Saturday, September 21, 2024 8:09 PM
To: ERM Arcus Amsterdam <erm.arcusamsterdam@erm.com>
Subject: New Response for "Stakeholder Engagement Form"

[You don't often get email from aidaform@aidaform.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

EXTERNAL MESSAGE

Dear AidaForm user,

Your form "Stakeholder Engagement Form" has a new response.

---

1. What's your name?
Rose Odendaal

2. Who do you represent?
Individual Affected party

3. Your Email
patrowellsecondhandmail@gmail.com

[redacted]
Athole farm, Amsterdam, Mpumalanga, 2375, South Africa

7. What is your interest in the projects?
Strongly oppose

8. Please visit the ERM website (link below) for more info and access to the reports. Are you able to access the website?
No

9. What are your comments regarding the Rochdale, Envvelo and Shaqmoor WEF Cluster?
Negative impact on the environment and bird life.

10. Protection of Personal Information (POPI) Act, Act 4 of 2013 No (0)

You can turn off or manage notifications for this form at:
https://eur01.safelinks.protection.outlook.com/?
url=https%3A%2F%2Fmy.aidaform.com%2Fform%2Fmmg56gvmb8%2Fsettings%2Femail&data=05%7C02%7CERM.ArcusAmsterdam%40erm.com%7C43c63ecbfffdf4999f3b304dca2d5f508%7C2fe6bd39c4a4858aae89e1882ba88130%7C0%7C0%7C638634655764230243%7CUnknown%7CTWFpbGZsb3dpeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=Fbkexsomqlk7RfRL7P6%2F1dcvO9ULNc6o0q4cAMb%2Bno3k8%3D&reserved=0

Stay productive and take care!
Your AidaForm Team

From:	BC Admin
To:	ERM Arcus Amsterdam
Cc:	Portia Makitla; Nompumeleo Lekalakala; Lindiwe Victoria Dlamini
Subject:	RE: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date:	Wednesday, 16 October 2024 13:11:09
Attachments:	image001.png image003.png

You don't often get email from bcadmin@dffe.gov.za. Learn why this is important

EXTERNAL MESSAGE

Dear Sir/Madam

DFFE Directorate: Biodiversity Conservation hereby acknowledge receipt of the invitation to review and comment on the project mentioned on the subject line. Kindly note that the project has been allocated to Mrs P Makitla and Ms Nompumelelo Lekalakala (Copied on this email). In addition, kindly share the shapefiles of the development footprints/application site with the Case Officers.

Please note: All Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries must be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@dffe.gov.za for attention of Mr Seoka Lekota

Kind regards,

Lindiwe Victoria Dlamini

Directorate: Biodiversity Mainstreaming and EIA
Branch: Biodiversity and Conservation
473 Steve Biko Road|Private Bag X477|Pretoria|0001
[redacted]
Website:www.environment.gov.za

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, 10 October 2024 13:52
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province

Dear Registered Interested and Affected Party,

NOTIFICATION OF SUBMISSION OF THE FINAL SCOPING REPORT(S) FOR APPROVAL TO PROCEED TO ENVIRONMENTAL IMPACT ASSESSMENT PHASE FOR THE PROPOSED SHEEPMOOR, ROCHDALE AND EMVELO WIND ENERGY FACILITIES, MPUMALANGA PROVINCE

DFFE Reference: 14/12/16/3/3/2/2611, 14/12/16/3/3/2/2612 and 14/12/16/3/3/2/2613

This email serves to inform you about the submission of the Final Scoping Reports for the proposed Sheepmoor, Rochdale and Emvelo WEFs , in the Mpumalanga Province.

The Draft Scoping Report for the Proposed Development(s) was subjected to the required 30-day comment and review period, from the 22 August 2024 to the 21 September 2024 (both days inclusive), taking into consideration Chapter 2 Regulation 3 (1); (2) and (3) of the NEMA, 1998 (Act No. 107 of 1998). Comments received from the public were incorporated, addressed and responded to in the Final Scoping Report.

Following the 30-day public comment and review period, the Final Scoping Reports has been submitted to the Department of Forestry, Fisheries and the Environment (competent authority) for decision and is available for the public to view and download via the ERM website.

With reference to the above, please send any queries to the below address. Please also indicate the contact details of any other potential I&APs that should be contacted and registered.

Email: mailto:ERM.ArcusAmsterdam@erm.com

Website: **https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/**

Thank you for the interest in the project.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**



From:	ERM Arcus Amsterdam
To:	BC Admin; ERM Arcus Amsterdam
Cc:	Portia Makitla; Nompumeleo Lekalakala; Lindiwe Victoria Dlamini
Subject:	RE: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date:	Wednesday, 16 October 2024 15:40:56
Attachments:	image001.png image003.png Amsterdam (2023-08-16).kmz

Good day,

Kindly see shapefiles as requested.

Thank you

ERM

Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: BC Admin <bcadmin@dffe.gov.za>
Sent: Wednesday, October 16, 2024 1:11 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: Portia Makitla <PMakitla@dffe.gov.za>; Nompumeleo Lekalakala <NLekalakala@dffe.gov.za>; Lindiwe Victoria Dlamini <LVDlamini@dffe.gov.za>
Subject: RE: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province

You don't often get email from bcadmin@dffe.gov.za. Learn why this is important

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Please note: All Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries must be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@dffe.gov.za for attention of Mr Seoka Lekota

Kind regards,

Lindiwe Victoria Dlamini

Directorate: Biodiversity Mainstreaming and EIA
Branch: Biodiversity and Conservation
473 Steve Biko Road|Private Bag X477|Pretoria|001
[redacted]
Website:www.environment.gov.za

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, 10 October 2024 13:52
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province

Dear Registered Interested and Affected Party,

NOTIFICATION OF SUBMISSION OF THE FINAL SCOPING REPORT(S) FOR APPROVAL TO PROCEED TO ENVIRONMENTAL IMPACT ASSESSMENT PHASE FOR THE PROPOSED SHEEPMOOR, ROCHDALE AND EMVELO WIND ENERGY FACILITIES, MPUMALANGA PROVINCE

DFFE Reference: 14/12/16/3/3/2/2611, 14/12/16/3/3/2/2612 and 14/12/16/3/3/2/2613

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With reference to the above, please send any queries to the below address. Please also indicate the contact details of any other potential I&APs that should be contacted and registered.

Email: mailto:ERM.ArcusAmsterdam@erm.com

Website: **https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/**

Thank you for the interest in the project.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted]

erm.com



From:	Thea Liebenberg
To:	ERM Arcus Amsterdam
Subject:	RE: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date:	Monday, 14 October 2024 11:43:14
Attachments:	image001.png RSImage-1550512.png RSImage-1550510.png

You don't often get email from thea@agrisa.org.za. Learn why this is important

EXTERNAL MESSAGE

Good day
Please send notifications of this nature to janse@agrisa.org.za

Kind regards

Thea Liebenberg
Communications | Kommunikasie

[redacted]
E: Thea@agrisa.org.za

[redacted]
Pretoria Head Office: Block D, Inkwazi Office Park,
1249 Embankment Road, Zwartkop X7, South Africa



Attention: This message is intended for the exclusive use of the named addressees hereof and may contain privileged or confidential information or otherwise restricted from disclosure wider than the named addressees. If you are not the named addressee, you are not authorised to read, use, transmit, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify me immediately by email, discard any paper copies and delete all electronic files of the message.

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, October 10, 2024 1:52 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province

Some people who received this message don't often get email from erm.arcusamsterdam@erm.com. Learn why this is important

Dear Registered Interested and Affected Party,

NOTIFICATION OF SUBMISSION OF THE FINAL SCOPING REPORT(S) FOR APPROVAL TO PROCEED TO ENVIRONMENTAL IMPACT ASSESSMENT PHASE FOR THE PROPOSED SHEEPMOOR, ROCHDALE AND EMVELO WIND ENERGY FACILITIES, MPUMALANGA PROVINCE

DFFE Reference: 14/12/16/3/3/2/2611, 14/12/16/3/3/2/2612 and 14/12/16/3/3/2/2613

This email serves to inform you about the submission of the Final Scoping Reports for the proposed Sheepmoor, Rochdale and Emvelo WEFs , in the Mpumalanga Province.

The Draft Scoping Report for the Proposed Development(s) was subjected to the required 30-day comment and review period, from the 22 August 2024 to the 21 September 2024 (both days inclusive), taking into consideration Chapter 2 Regulation 3 (1); (2) and (3) of the NEMA, 1998 (Act No. 107 of 1998). Comments received from the public were incorporated, addressed and responded to in the Final Scoping Report.

Following the 30-day public comment and review period, the Final Scoping Reports has been submitted to the Department of Forestry, Fisheries and the Environment (competent authority) for decision and is available for the public to view and download via the ERM website.

With reference to the above, please send any queries to the below address. Please also indicate the contact details of any other potential I&APs that should be contacted and registered.

Email: mailto:ERM.ArcusAmsterdam@erm.com

Website: **https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/**

Thank you for the interest in the project.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town **erm.com**
[redacted]



From:	Josua Meyer
To:	ERM Arcus Amsterdam
Subject:	Re: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date:	Thursday, 21 November 2024 10:02:11
Attachments:	image001.png

EXTERNAL MESSAGE

Good day

What is the next step in the EIA phase for the above proposed three windfarms?

Where can the public comments, the address and response to that been seen?

Has the health risk and distance from occupied dwellings according to international standards and law been investigated and addressed?

Are there still public meetings to follow?

Can you please forward the procedure that is still to come?

Regards

On Thu, Oct 10, 2024 at 1:52 PM ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Dear Registered Interested and Affected Party,
>
> **NOTIFICATION OF SUBMISSION OF THE FINAL SCOPING REPORT(S) FOR APPROVAL TO PROCEED TO ENVIRONMENTAL IMPACT ASSESSMENT PHASE FOR THE PROPOSED SHEEPMOOR, ROCHDALE AND EMVELO WIND ENERGY FACILITIES, MPUMALANGA PROVINCE**
>
> DFFE Reference: 14/12/16/3/3/2/2611, 14/12/16/3/3/2/2612 and 14/12/16/3/3/2/2613
>
> This email serves to inform you about the submission of the Final Scoping Reports for the proposed Sheepmoor, Rochdale and Emvelo WEFs , in the Mpumalanga Province.
>
> The Draft Scoping Report for the Proposed Development(s) was subjected to the required 30-day comment and review period, from the 22 August 2024 to the 21 September 2024 (both days inclusive), taking into consideration Chapter 2 Regulation 3 (1); (2) and (3) of the NEMA, 1998 (Act No. 107 of 1998). Comments received from the public were incorporated, addressed and responded to in the Final Scoping Report.

Following the 30-day public comment and review period, the Final Scoping Reports has been submitted to the Department of Forestry, Fisheries and the Environment (competent authority) for decision and is available for the public to view and download via the ERM website.

With reference to the above, please send any queries to the below address. Please also indicate the contact details of any other potential I&APs that should be contacted and registered.

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Website: **https://www.erm.com/public-information-sites/proposed-amsterdam-wind-energy-facility-and-auxiliary-infrastructure-cluster-mpumalanga/**

Thank you for the interest in the project.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town
[redacted]
erm.com



From: ERM Arcus Amsterdam
To: kirsten@red-cap.co.za; ERM Arcus Amsterdam
Cc: "Francois le Roex"
Subject: RE: Sheepmoor, Rochdale and Emvelo WEFs - Registration as I&AP
Date: Monday, 30 September 2024 12:43:53
Attachments: image001.png
image002.png

Hi Kristen,

That is correct.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: kirsten@red-cap.co.za <kirsten@red-cap.co.za>
Sent: Friday, September 20, 2024 9:56 AM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: 'Francois le Roex' <francois@red-cap.co.za>
Subject: RE: Sheepmoor, Rochdale and Emvelo WEFs - Registration as I&AP

You don't often get email from kirsten@red-cap.co.za. Learn why this is important

EXTERNAL MESSAGE

Thanks Lucien,

Will you be uploading the FSR onto the website (and notifying I&APs) once it has been submitted to DFFE?

Kind regards
Kirsten

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, 19 September 2024 20:13
To: kirsten@red-cap.co.za; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: 'Francois le Roex' <francois@red-cap.co.za>
Subject: RE: Sheepmoor, Rochdale and Emvelo WEFs - Registration as I&AP

Good day,

Thank you for your email, you will now be added as an I&AP to the proposed Sheepmoor,

Rochdale and Emvelo WEFs.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: kirsten@red-cap.co.za <kirsten@red-cap.co.za>
Sent: Thursday, September 19, 2024 4:17 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: 'Francois le Roex' <francois@red-cap.co.za>
Subject: Sheepmoor, Rochdale and Emvelo WEFs - Registration as I&AP

You don't often get email from kirsten@red-cap.co.za. Learn why this is important
EXTERNAL MESSAGE

Hi there,

Please could you register myself and colleague Francois le Roex (copied) as I&APs on these projects,

Kind regards

redcap

KIRSTEN JONES | SENIOR PROJECT MANAGER
[redacted]

From: kirsten@red-cap.co.za
To: ERM Arcus Amsterdam
Cc: "Francois le Roex"
Subject: RE: Sheepmoor, Rochdale and Emvelo WEFs - Registration as I&AP
Date: Friday, 20 September 2024 09:55:56
Attachments: image001.png
image002.png

You don't often get email from kirsten@red-cap.co.za. Learn why this is important

EXTERNAL MESSAGE

Thanks Lucien,

Will you be uploading the FSR onto the website (and notifying I&APs) once it has been submitted to DFFE?

Kind regards
Kirsten

From: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Sent: Thursday, 19 September 2024 20:13
To: kirsten@red-cap.co.za; ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: 'Francois le Roex' <francois@red-cap.co.za>
Subject: RE: Sheepmoor, Rochdale and Emvelo WEFs - Registration as I&AP

Good day,

Thank you for your email, you will now be added as an I&AP to the proposed Sheepmoor, Rochdale and Emvelo WEFs.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: kirsten@red-cap.co.za <kirsten@red-cap.co.za>
Sent: Thursday, September 19, 2024 4:17 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: 'Francois le Roex' <francois@red-cap.co.za>
Subject: Sheepmoor, Rochdale and Emvelo WEFs - Registration as I&AP

You don't often get email from kirsten@red-cap.co.za. Learn why this is important

EXTERNAL MESSAGE

Hi there,

Please could you register myself and colleague Francois le Roex (copied) as I&APs on these projects,

Kind regards



KIRSTEN JONES | SENIOR PROJECT MANAGER
[redacted]

From:	ERM Arcus Amsterdam
To:	kirsten@red-cap.co.za; ERM Arcus Amsterdam
Cc:	"Francois le Roex"
Subject:	RE: Sheepmoor, Rochdale and Emvelo WEFs - Registration as I&AP
Date:	Thursday, 19 September 2024 20:12:47
Attachments:	image002.png image003.png

Good day,

Thank you for your email, you will now be added as an I&AP to the proposed Sheepmoor, Rochdale and Emvelo WEFs.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted] **erm.com**

From: kirsten@red-cap.co.za <kirsten@red-cap.co.za>
Sent: Thursday, September 19, 2024 4:17 PM
To: ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com>
Cc: 'Francois le Roex' <francois@red-cap.co.za>
Subject: Sheepmoor, Rochdale and Emvelo WEFs - Registration as I&AP

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EXTERNAL MESSAGE

Hi there,

Please could you register myself and colleague Francois le Roex (copied) as I&APs on these projects,

Kind regards

redcap

KIRSTEN JONES | SENIOR PROJECT MANAGER
[redacted]

From: Jonathan Colville
To: ERM Arcus Amsterdam
Cc: jamiepote@live.co.za; callanafrica@gmail.com; Lloyd Barnes; Stephen Burton
Subject: Re: Terrestrial Biodiversity + Faunal Specialist - Mulilo Amsterdam CA Commenting Responses required
Date: Thursday, 26 September 2024 08:18:52
Attachments: image001.png

EXTERNAL MESSAGE

Hi Lucien

Sorry we could not attend the meeting - we've been busy with field work and Callan is still away in Australia.

I had a quick look at the comments - most seem related to the avifaunal theme and there appear to be no direct comments related to the faunal theme and animal SCC we assessed.

The general comment about the importance of intact grassland patches and CBAs: In this regard, we had considered intact grassland habitat and CBAs to classify our constraints map in terms of faunal sensitivity.

Once turbine placement and associated roads and other infrastructure are finalized, then one can better assess the site sensitivity of these specific areas and if any ecological processes may be impacted in relation to the animal theme and flagged animal SCC.

Best regards
Jonathan (and Callan)

On Wed, 18 Sept 2024 at 10:44, ERM Arcus Amsterdam <ERM.ArcusAmsterdam@erm.com> wrote:

> Hi Jamie, Jonathan and Callan,
>
> Kindly see attached comments from DARDLEA/MTPA pertaining to the Mulilo Amster WEF Cluster (Sheepmoor, Rochdale and Emvelo).
>
> Please could you read through all the comments for each development. However please focus your responses on the following points per development:
>
> | Terrestrial Biodiversity | Rochdale | Sheepmoor | Emvelo |
> |---|---|---|---|
> | Point | 1, 4, 5, 6 and 9.1 | 1, 4, 5, 7, 8 and 10.2 | 1, 3, 4, 5, 6 and 8.1 |
>
> We would like these comments responded to by Monday the 23rd September, please let us know if this will be an issue.

A meeting invite for today at 14h00 will be sent out shortly to discuss the above. Kindly indicate your availability to attend.

Kind Regards

ERM
Sustainability is our business

Lucien Barbeau
Consultant

Cape Town [redacted]

erm.com



From: Microsoft Outlook
To: mduduzi.shabane@drdlr.gov.za
Subject: Undeliverable: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date: Thursday, 10 October 2024 13:52:24
Attachments: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor Rochdale and Emvelo WEF Cluster Mpumalanga Province.msg

---

Delivery has failed to these recipients or groups:
mduduzi.shabane@drdlr.gov.za <mailto:mduduzi.shabane@drdlr.gov.za>
Your message couldn't be delivered. The Domain Name System (DNS) reported that the recipient's domain does not exist.
Contact the recipient by some other means (by phone, for example) and ask them to tell their email admin that it appears that their domain isn't properly registered at their domain registrar. Give them the error details shown below. It's likely that the recipient's email admin is the only one who can fix this problem.
For more information and tips to fix this issue see this article: https://go.microsoft.com/fwlink/?LinkId=389361.

Diagnostic information for administrators:
Generating server: DU2PR04MB8725.eurprd04.prod.outlook.com

mduduzi.shabane@drdlr.gov.za
Remote server returned '550 5.4.310 DNS domain drdlr.gov.za does not exist [Message=InfoDomainNonexistent] [LastAttemptedServerName=drdlr.gov.za] [DB1PEPF00052759.eurprd05.prod.outlook.com 2024-10-10T11:52:22.864Z 08DCE19CAAEFE6B]'

Original message headers:
ARC-Seal: i=1; a=rsa-sha256; c=arc/sector10001; d=microsoft.com; s=msarc-
b=qachvBrT2Y/hPnPr1mauGvQLPkZP4ou2fDMHbH9ddaKWO8bPbYDYIMF9EEarcT+jjuFqMYtWUCAHvhaOsmWnrWHpmG9TaMcVZWFABZiNUCEkgCxiSXNSg+/E9mu3C/Agv+M9pBgwMDcbQ1s7zdhcF+pRIYJ8hVL26A7ixtLzHbGVJD39kf5PW7yY5Rw2pGIoaECEIyWBjXUdEzZA9CEMMdMLG0OG36kcfIcWcOpkrIBckdPIcsY6ywbhEaVjUbY16ay1cocuW caxBnKOwOseYBfCV/wjBAHnnvvxxYEqVtKIUgVIye1t496xdsMyuexhEO4OtUQvwOLDg==
ARC-Message-Signature: i=1; a=rsa-sha256; c=relaxed/relaxed; d=microsoft.com;
s=arcselector10001;
h=From:Date:Subject:Message-ID:Content-Type:MIME-Version:X-MS-Exchange-AntiSpam-MessageData-ChunkCount:X-MS-Exchange-AntiSpam-MessageData-0:X-MS-Exchange-AntiSpam-MessageData-1;
bh=DeckpYaY8ZvLzIo64Jy7r4fyhenxkopn42a278cDtcSdE=;
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ARC-Authentication-Results: i=1; mx.microsoft.com 1; spf=pass
smtp.mailfrom=erm.com; dmarc=pass action=none header.from=erm.com; dkim=pass
header.d=erm.com; arc=none
DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed; d=erm.com; s=selector1;
h=From:Date:Subject:Message-ID:Content-Type:MIME-Version:X-MS-Exchange-SenderADCheck;
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Received: from DB9PR04MB10065.eurprd04.prod.outlook.com (2603:10a6:10:4c4::10)
by DU2PR04MB8725.eurprd04.prod.outlook.com (2603:10a6:10:2dc::18) with
Microsoft SMTP Server (version=TLS1_2,
cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) id 15.20.8048.18; Thu, 10 Oct
2024 11:52:28 +0000
Received: from DB9PR04MB10065.eurprd04.prod.outlook.com
([fa80::87b5:80bb:8d:3148]) by DB9PR04MB10065.eurprd04.prod.outlook.com
([fa80::87b5:80bb:8d:3148%2]) with mapi id 15.20.8026.020; Thu, 10 Oct 2024
11:52:19 +0000
From: "ERM_Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com>
To: "ERM_Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission of Final Scoping Report for the Proposed
Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Thread-Topic: Notification of Submission of Final Scoping Report for the
Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Thread-Index: AdsXSXcvRcfxhiRvRcCL7pnpRLqjBQ==
Date: Thu, 10 Oct 2024 11:52:19 +0000
Message-ID: <DB9PR04MB10065AEDFC1894A088F9230B0988782@DB9PR04MB10065.eurprd04.prod.outlook.com>
Accept-Language: en-ZA, en-US
Content-Language: en-US
X-MS-Has-Attach: yes
X-MS-TNEF-Correlator:
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- Anyone
(unrestricted);MSIP_Label_afc8dfa6-a4b9-4802-9a97-56875960857 7_SetDate=2024-10-10T11:52:14Z;MSIP_Label_afc8dfa6-a4b9-4802-9a97-56875960857 7_SiteId=f2fa6bd3-9c4a-485b-ae69-e1882f8a8130;
x-processedbytempally: true
x-templafy:emailsignatureversion 9.16.0.0
authentication-results: dkim=none (message not signed)
header.d=none;dmarc=none action=none header.from=erm.com;
x-ms-exchange-messagesentrepresentingtype: 1
x-ms-publictraffictype: Email
x-ms-traffictypediagnostic: DB9PR04MB10065:EE_|DU2PR04MB8725:EE_
x-ms-office365-filtering-correlation-id: f96c446c-96d5-41aa-8ba6-88dcc021fdb5
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x-ms-exchange-antispam-relay: 0
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<?us-ascii?Q?Ty+Ue+Ue+Ue

From:	postmaster@transnet.net
To:	ERM Arcus Amsterdam
Subject:	Undeliverable: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date:	Thursday, 10 October 2024 13:53:20
Attachments:	Undeliverable Notification of Submission of Final Scoping Report for the Proposed Sheepmoor Rochdale and Emvelo WEF Cluster Mpumalanga Province.msg

---

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

EXTERNAL MESSAGE

From:	postmaster@DMRE.GOV.ZA
To:	ERM Arcus Amsterdam
Subject:	Undeliverable: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date:	Thursday, 10 October 2024 13:55:19
Attachments:	Undeliverable Notification of Submission of Final Scoping Report for the Proposed Sheepmoor Rochdale and Emvelo WEF Cluster Mpumalanga Province.msg

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

EXTERNAL MESSAGE

From:	postmaster@DMRE.GOV.ZA
To:	ERM Arcus Amsterdam
Subject:	Undeliverable: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date:	Friday, 11 October 2024 13:58:25
Attachments:	Undeliverable Notification of Submission of Final Scoping Report for the Proposed Sheepmoor Rochdale and Emvelo WEF Cluster Mpumalanga Province.msg

EXTERNAL MESSAGE

From:	postmaster@transnet.net
To:	ERM Arcus Amsterdam
Subject:	Undeliverable: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date:	Thursday, 10 October 2024 13:53:06
Attachments:	Undeliverable Notification of Submission of Final Scoping Report for the Proposed Sheepmoor Rochdale and Emvelo WEF Cluster Mpumalanga Province.msg

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

EXTERNAL MESSAGE

From:	postmaster@transnet.net
To:	ERM Arcus Amsterdam
Subject:	Undeliverable: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date:	Thursday, 10 October 2024 13:53:01
Attachments:	Undeliverable Notification of Submission of Final Scoping Report for the Proposed Sheepmoor Rochdale and Emvelo WEF Cluster Mpumalanga Province.msg

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

EXTERNAL MESSAGE

From:	postmaster@cellc.co.za
To:	ERM Arcus Amsterdam
Subject:	Undeliverable: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date:	Thursday, 10 October 2024 13:55:12
Attachments:	Undeliverable Notification of Submission of Final Scoping Report for the Proposed Sheepmoor Rochdale and Emvelo WEF Cluster Mpumalanga Province.msg

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[You don't often get email from postmaster@cellc.co.za. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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

EXTERNAL MESSAGE

From: Microsoft Outlook
To: tanialtenning@emtshaded.co.za
Subject: Undeliverable: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date: Thursday, 10 October 2024 11:52:27
Attachments: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor Rochdale and Emvelo WEF Cluster Mpumalanga Province.msg

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<https://products.office.com/en-us/CMSImages/Office365Logo_Orange.png?version=8fcd100e9-0a8b-4e6a-88e1-af488fae6470>
Your message to tanialtenning@emtshaded.co.za couldn't be delivered.

tanialtenning wasn't found at emtshaded.co.za, or the mailbox is unavailable.

ERM.ArcusAmsterdam Office 365 tanialtenning
Action Required Recipient

Unknown To address

How to Fix It
The email address might be misspelled or it might not exist. Try one or more of the following:
* Retype the recipient's address, then resend the message - If you're using Outlook, open this non-delivery report message and click Send Again from the menu or ribbon. In Outlook on the web, select this message, and then click the "To send this message again, click here." link located just above the message preview window. In the To or Cc line, delete and then retype the entire recipient's address (ignore any address suggestions). After typing the complete address, click Send to resend the message. If you're using an email program other than Outlook or Outlook on the web, follow its standard way for resending a message. Just be sure to delete and retype the recipient's entire address before resending it.
* Remove the recipient from the recipient Auto-Complete List, then resend the message - If you're using Outlook or Outlook on the web, follow the steps in the "Remove the recipient from the recipient Auto-Complete List" section of this article: <https://emea01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fsupport.microsoft.com%2Fen-us%2Fhelp%2F2032697%2Fremove-an-entry-from-the-auto-complete-list&data=yg4MTIzMzIzMjM4NzAwMzAwMC4ArcusAmsterdam%40erm.com%7Cc5cdfe01c5d34f132456f6dce9220102%7C2f6e6bd39c4e485ba69fa1802ba8813f%7C0%7C0%7C638641579477232795%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=ygTHZ5ZBDQkRRzCdZnNv3HD5SZI%2Fhodcfxw%2BWRA%3D&reserved=0>. Then resend the message. Be sure to delete and retype the recipient's entire address before clicking Send.
* Contact the recipient by some other means, (by phone, for example) to confirm you're using the right address. Ask them if they've set up an email forwarding rule that could be forwarding your message to an incorrect address.
If the problem continues, forward this message to your email admin. If you're an email admin, refer to the More Info for Email Admins section below.
Was this helpful? Send feedback to Microsoft: <https://emea01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fsupport.microsoft.com%2Fftb%2Ftfa%2Fpf%2FFtLtaRDPJ3D7172f0&data=05%7C02%7CERM.ArcusAmsterdam%40erm.com%7Cc5cdfe01c5d34f132456f6dce9220102%7C2f6e6bd39c4e485ba69fa1802ba8813f%7C0%7C0%7C638641579477232795%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=mjqaw%2FbvRCBDGGshxInCsiMdjCG1fWf0NuPsoq3oc%3D&reserved=0>

Mem Info for Email Admins
Status code: 550 5.1.351
When Office 365 tried to send the message, the external email server returned an error stating that the recipient is unknown or the mailbox is unavailable. This error was reported by an email server outside Office 365.
If you or the sender can't fix the problem, contact the responsible party's email admin - Give them the error code and error message from this non-delivery report (NDR) to help them troubleshoot the issue. To determine who the responsible party might be, check the error for information about where the problem is happening. For example, look for a domain name like contoso.com. A domain name in the error might suggest who is responsible for the error. It could be the recipient's email server, or it could be a third-party service that your organization or the recipient's organization is using to process or filter email messages.
Although the sender might be able to fix the issue by correcting the recipient address, it's likely that only the recipient's email admin can fix the problem. Unfortunately, it's unlikely Office 365 Support will be able to help with these kinds of externally reported errors.

Original Message Details
Created Date: 2024/10/10 11:52:19
Sender Address: ERM.ArcusAmsterdam@erm.com
Recipient Address: tanialtenning@emtshaded.co.za
Subject: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Error Details
Error: 550 5.1.351 Remote server returned unknown recipient or mailbox unavailable -> 550 rejected because recipient verify failed -- user not found
Message rejected by: securemail-pl-mx7.outsg.com
Notification Details
Sent by: DU2PR04MB8725.eurprd04.prod.outlook.com
Hop Count: 2
HOP TIME (UTC) FROM TO WITH RELAY TIME
1 2024/10/10
11:52:19 DB9PR04MB10065.eurprd04.prod.outlook.com DB9PR04MB10065.eurprd04.prod.outlook.com mapi *
2 2024/10/10
11:52:20 DB9PR04MB10065.eurprd04.prod.outlook.com DU2PR04MB8725.eurprd04.prod.outlook.com Microsoft SMTP Server (version=TLS1_2, cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) 1 sec
Original Message Headers
ARC-Seal: i=1; a=rsa-sha256; s=arcselector10001; d=microsoft.com; cv=none;
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ARC-Message-Signature: i=1; a=rsa-sha256; s=arcselector10001; d=microsoft.com;
cv=none;h=From:Date:Subject:Message-ID:Content-Type:MIME-Version:X-MS-Exchange-AntiSpam-MessageData-ChunkCount:X-MS-Exchange-AntiSpam-MessageData-0:X-MS-Exchange-AntiSpam-MessageData-1;
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Received: from DB9PR04MB10065.eurprd04.prod.outlook.com (2603:10a6:10:4c4::10)
by DU2PR04MB8725.eurprd04.prod.outlook.com (2603:10a6:10:2dc::18) with
Microsoft SMTP Server (version=TLS1_2,
cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) id 15.20.8048.18; Thu, 10 Oct
2024 11:52:20 +0000
Received: from DB9PR04MB10065.eurprd04.prod.outlook.com
([fe80::87b3:88b:8d31:4401]) by DB9PR04MB10065.eurprd04.prod.outlook.com
([fe80::87b3:88b:8d31:4401%2]) with mapi id 15.20.8026.020; Thu, 10 Oct 2024
11:52:19 +0000
From: "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com>
To: "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission of Final Scoping Report for the Proposed
Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Thread-Topic: Notification of Submission of Final Scoping Report for the
Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Thread-Index: AdeX53UrdIJ6oRrCT2ypzRLq1HQ==
Date: Thu, 10 Oct 2024 11:52:19 +0000
Message-ID: <DB9PR04MB10065AED8C1894A089F9230B8983E2@DB9PR04MB10065.eurprd04.prod.outlook.com>
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Content-Language: en-US
X-MS-Has-Attach: yes
X-MS-TNEF-Correlator:
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- Anyone
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x-scmpolicy:enabledigestsver.online: 9.16.0.0
authentication-results: dkim=none (message not signed)
header.d=none;dmarc=none action=none header.from=erm.com;
x-ms-exchange-messagesentrepresentingtype: 1
x-ms-publictraffictype: Email
x-ms-traffictypediagnostic: DB9PR04MB10065:EE_|DU2PR04MB8725:EE
x-ms-office365-filtering-correlation-id: f96c44fc-56d5-402a-8ba6-0bdce9216b5
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x-ms-exchange-antispam-messagedata-chunkcount: 1
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Content-Type: multipart/related;
boundary="_005_DB9PR04MB10065AED8C1894A089F9230B8983E2DB9PR04MB10065na_";
type="multipart/alternative"
MIME-Version: 1.0
X-OriginatorOrg: erm.com
X-MS-Exchange-CrossTenant-AuthAs: Internal
X-MS-Exchange-CrossTenant-AuthSource: DB9PR04MB10065.eurprd04.prod.outlook.com
X-MS-Exchange-CrossTenant-Network-Message-Id: f96c44fc-56d5-402a-8ba6-0bdce9216b5
X-MS-Exchange-CrossTenant-originalarrivaltime: 10 Oct 2024 11:52:19.5869
(UTC)
X-MS-Exchange-CrossTenant-fromentityheader: Hosted
X-MS-Exchange-CrossTenant-id: f2fe6bd3-9c4a-487b-ae69-c1882ba88130
X-MS-Exchange-CrossTenant-mailboxtype: HOSTED
X-MS-Exchange-CrossTenant-userprincipalname: EYmuAWtlOOVD7IXLogZwGSCESbmu8I1ia03RDBhv47XcXeSQpqALYDjWHVjgRzfHWL+YHQqJsUwIkA==
X-MS-Exchange-Transport-CrossTenantHeadersStamped: DU2PR04MB8725

From: Microsoft Outlook
To: alwyn@sasa.org
Subject: Undeliverable: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Enveolo WEF Cluster, Mpumalanga Province
Date: Thursday, 10 October 2024 13:52:26
Attachments: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor Rochdale and Enveolo WEF Cluster Mpumalanga Province.msg

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<https://products.office.com/en-us/ICMSImages/Office365Logo_Orange.png?version=8dd100ab-8a8b-4e6a-88e1-e4988fa6a947f0>
Your message to alwyn@sasa.org couldn't be delivered.

alwyn wasn't found at sasa.org, or the mailbox is unavailable.

ERM.AccraAmsterdam Office 365 alwyn
Action Required Recipient

Unknown To address

How to Fix It
The email address might be misspelled or it might not exist. Try one or more of the following:
* Retype the recipient's address, then resend the message - If you're using Outlook, open this non-delivery report message and click Send Again from the menu or ribbon. In Outlook on the web, select this message, and then click the "To send this message again, click here." link located just above the message preview window. In the To or Cc line, delete and then retype the entire recipient's address (ignore any address suggestions). After typing the complete address, click Send to resend the message. If you're using a program other than Outlook or Outlook on the web, follow its standard way for resending a message. Just be sure to delete and retype the recipient's entire address before resending it.
* Remove the recipient from the recipient Auto-Complete List, then resend the message - If you're using Outlook or Outlook on the web, follow the steps in the "Remove the recipient from the recipient Auto-Complete List" section of this article.<https://emea01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2F%3FLinkId%3D532972&data=05%7C02%7CERM.AccraAmsterdam%40erm.com%7C06f95fa0fb3f2444c778408da5922f1405%7C2fc6fbd39c4a485ba6fe1f82ba801305%7C0%7C0%7C638641579456103595%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=3mXHK0EIjnM1oyygSZgfRXxBFYJeOuojrnXcZ%2B6eA%3D&reserved=0> . Then resend the message. Be sure to delete and retype the recipient's entire address before clicking Send.
* Contact the recipient by some other means, (by phone, for example) to confirm you're using the right address. Ask them if they've set up an email forwarding rule that could be forwarding your message to an incorrect address.
If the problem continues, forward this message to your email admin. If you're an email admin, refer to the More Info for Email Admins section below.
Was this helpful? Send feedback to Microsoft: <https://emea01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fforms.office.com%2Fr%2FpCtsHUaiBP%3Fhostclienttype%3Doutlook%26msgid%3D%3C%3C%3C%3CERM.AccraAmsterdam%40erm.com%7C06f95fa0fb3f2444c778408da5922f1405%7C2fc6fbd39c4a485ba6fe1f82ba801305%7C0%7C0%7C638641579456103209%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=1NcmTp/TGoAO5yGKXDCcgy8KJCw659dB2ZD4%2Fucik%3D&reserved=0> .

More Info for Email Admins
Status code: 550 5.1.351
When Office 365 tried to send the message, the external email server returned an error stating that the recipient is unknown or the mailbox is unavailable. This error was reported by an email server outside Office 365.
If you or the sender can't fix the problem, contact the responsible party's email admin - Give them the error code and error message from this non-delivery report (NDR) to help them troubleshoot the issue. To determine who the responsible party might be, check the error for information about where the problem is happening. For example, look for a domain name like contoso.com. A domain name in the error might suggest who is responsible for the error. It could be the recipient's email server, or it could be a third-party service that your organization or the recipient's organization is using to process or filter email messages.
Although the sender might be able to fix the issue by correcting the recipient address, it's likely that only the recipient's email admin can fix the problem. Unfortunately, it's unlikely Office 365 Support will be able to help with these kinds of externally reported errors.

Original Message Details
Created Date: 2024/10/10 11:52:19
Sender Address: ERM.AccraAmsterdam@erm.com
Recipient Address: alwyn@sasa.org
Subject: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Enveolo WEF Cluster, Mpumalanga Province
Error Details
Error: 550 5.1.351 Remote server returned unknown recipient e-mailbox unavailable -> 550 No Such User Here
Message rejected by: tia6031.hankbest.com
Notification Details
Sent by: DU2PR04M0B725.eurprd04.prod.outlook.com
Message Hops
HOP TIME (UTC) FROM TO WITH RELAY TIME
1 2024/10/10
11:52:19 DB9PR04MB10065.eurprd04.prod.outlook.com DB9PR04MB10065.eurprd04.prod.outlook.com mapi *
2 2024/10/10
11:52:19 DB9PR04MB10065.eurprd04.prod.outlook.com DU2PR04M0B725.eurprd04.prod.outlook.com Microsoft SMTP Server (version=TLS1_2, cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) 1 sec
Original Message Headers
ARC-Seal: i=1; a=rsa-sha256; s=arcselector10001; d=microsoft.com; cv=none;
b=qaclbr8fS7YSPmJFUmaqCsQLFVZP4wZDfMBH9AdaKWO8bFbTFDdPHEEaxcT+jjiuFqMVt9VUCAIlvhaOsoz0ka/WHJpnGFfAMcVZWFAAIRZNUCBqCxXNSSg+/E9SmUCAg=/M9qBqwMfO8bQ1u7ulRcF+pRJTJ8bVL20A73zIxLzHGVJUF8kfSPW37y5RwzQgGloaECIIty WBjXUaEzZA9CEMt6MMLG6OGBkkz5cWcOpkr1BnkHPkc6Yyeyhhk5aVUL bYHday1cocaWcudlmHOeOoUQvwcOLDg==
ARC-Message-Signature: i=1; a=rsa-sha256; c=relaxed/relaxed; d=microsoft.com;
s=arcselector10001;
h=From:Date:Subject:Message-ID:Content-Type:MIME-Version:X-MS-Exchange-AntiSpam-MessageData-ChunkCount:X-MS-Exchange-AntiSpam-MessageData-0:X-MS-Exchange-AntiSpam-MessageData-1;
bh=fhoJuqYpYHZvLeA4Q1YrQanxnkqwLu27bt2bs5ol8=;
b=dXQgEHRkJyTQAZ5zGkJanqiSNP3FYIhCv7vFDH5xHWuiTuMKvtydkoj8cWqJkdZ2g65XmQ/ju5pqALXZT+xkCqUCSWuJIDEf3eQWLuZMHYSLOvvTX+54KqwSBdQE9WwdVf2dYUy

From:	postmaster@cellc.co.za
To:	ERM Arcus Amsterdam
Subject:	Undeliverable: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date:	Thursday, 10 October 2024 13:54:33
Attachments:	Undeliverable Notification of Submission of Final Scoping Report for the Proposed Sheepmoor Rochdale and Emvelo WEF Cluster Mpumalanga Province.msg

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[You don't often get email from postmaster@cellc.co.za. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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

EXTERNAL MESSAGE

From:	postmaster@DMRE.GOV.ZA
To:	ERM Arcus Amsterdam
Subject:	Undeliverable: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date:	Thursday, 10 October 2024 13:54:04
Attachments:	Undeliverable Notification of Submission of Final Scoping Report for the Proposed Sheepmoor Rochdale and Emvelo WEF Cluster Mpumalanga Province.msg

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

EXTERNAL MESSAGE

From: Microsoft Outlook
To: DGOffice@ddrlfr.gov.za; karen.vanschalkwyk@ddrlfr.gov.za; Malaho.halo@ddrlfr.gov.za; Ramalebo.saila@ddrlfr.gov.za; zongezile.hango@ddrlfr.gov.za; katshaba.gaofhiwe@ddrlfr.gov.za; ryan.oliver@ddrlfr.gov.za
Subject: Undeliverable: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date: Friday, 11 October 2024 13:56:49
Attachments: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor Rochdale and Emvelo WEF Cluster Mpumalanga Province.msg

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Delivery has failed to these recipients or groups:
DGOffice@ddrlfr.gov.za <mailto:DGOffice@ddrlfr.gov.za>
Your message couldn't be delivered. Despite repeated attempts to deliver your message, querying the Domain Name System (DNS) for the recipient's domain location information failed. For more information and tips to fix this issue see this article: https://go.microsoft.com/fwlink/?LinkId=389361.

karen.vanschalkwyk@ddrlfr.gov.za <mailto:karen.vanschalkwyk@ddrlfr.gov.za>
Your message couldn't be delivered. Despite repeated attempts to deliver your message, querying the Domain Name System (DNS) for the recipient's domain location information failed. For more information and tips to fix this issue see this article: https://go.microsoft.com/fwlink/?LinkId=389361.

Malaho.halo@ddrlfr.gov.za <mailto:Malaho.halo@ddrlfr.gov.za>
Your message couldn't be delivered. Despite repeated attempts to deliver your message, querying the Domain Name System (DNS) for the recipient's domain location information failed. For more information and tips to fix this issue see this article: https://go.microsoft.com/fwlink/?LinkId=389361.

Ramalebo.saila@ddrlfr.gov.za <mailto:Ramalebo.saila@ddrlfr.gov.za>
Your message couldn't be delivered. Despite repeated attempts to deliver your message, querying the Domain Name System (DNS) for the recipient's domain location information failed. For more information and tips to fix this issue see this article: https://go.microsoft.com/fwlink/?LinkId=389361.

zongezile.hango@ddrlfr.gov.za <mailto:zongezile.hango@ddrlfr.gov.za>
Your message couldn't be delivered. Despite repeated attempts to deliver your message, querying the Domain Name System (DNS) for the recipient's domain location information failed. For more information and tips to fix this issue see this article: https://go.microsoft.com/fwlink/?LinkId=389361.

katshaba.gaofhiwe@ddrlfr.gov.za <mailto:katshaba.gaofhiwe@ddrlfr.gov.za>
Your message couldn't be delivered. Despite repeated attempts to deliver your message, querying the Domain Name System (DNS) for the recipient's domain location information failed. For more information and tips to fix this issue see this article: https://go.microsoft.com/fwlink/?LinkId=389361.

ryan.oliver@ddrlfr.gov.za <mailto:ryan.oliver@ddrlfr.gov.za>
Your message couldn't be delivered. Despite repeated attempts to deliver your message, querying the Domain Name System (DNS) for the recipient's domain location information failed. For more information and tips to fix this issue see this article: https://go.microsoft.com/fwlink/?LinkId=389361.

Diagnostic information for administrators:
Generating server: VI1PR04MB9788.eurprd04.prod.outlook.com
Receiving server: VI1PR04MB9788.eurprd04.prod.outlook.com

DGOffice@ddrlfr.gov.za
10/11/2024 11:56:46 AM - Server at VI1PR04MB9788.eurprd04.prod.outlook.com returned '550 5.4.312 Message expired, DNS query failed[InfoNoRecords]'
10/11/2024 11:50:35 AM - Server at ddrlfr.gov.za (0.0.0.0) returned '450 4.4.312 DNS query failed [Message=InfoNoRecords] [LastAttemptatIfaceServerName=ddrlfr.gov.za] [AM6EUR05FT046.eop-eur05.prod.protection.outlook.com 2024-10-11T11:50:35.466Z 08DCE962B6E31866]([InfoNoRecords]/
karen.vanschalkwyk@ddrlfr.gov.za
10/11/2024 11:56:46 AM - Server at VI1PR04MB9788.eurprd04.prod.outlook.com returned '550 5.4.312 Message expired, DNS query failed[InfoNoRecords]'
10/11/2024 11:50:35 AM - Server at ddrlfr.gov.za (0.0.0.0) returned '450 4.4.312 DNS query failed [Message=InfoNoRecords] [LastAttemptatIfaceServerName=ddrlfr.gov.za] [AM6EUR05FT046.eop-eur05.prod.protection.outlook.com 2024-10-11T11:50:35.466Z 08DCE962B6E31866]([InfoNoRecords]/
Malaho.halo@ddrlfr.gov.za
10/11/2024 11:56:46 AM - Server at VI1PR04MB9788.eurprd04.prod.outlook.com returned '550 5.4.312 Message expired, DNS query failed[InfoNoRecords]'
10/11/2024 11:50:35 AM - Server at ddrlfr.gov.za (0.0.0.0) returned '450 4.4.312 DNS query failed [Message=InfoNoRecords] [LastAttemptatIfaceServerName=ddrlfr.gov.za] [AM6EUR05FT046.eop-eur05.prod.protection.outlook.com 2024-10-11T11:50:35.466Z 08DCE962B6E31866]([InfoNoRecords]/
Ramalebo.saila@ddrlfr.gov.za
10/11/2024 11:56:46 AM - Server at VI1PR04MB9788.eurprd04.prod.outlook.com returned '550 5.4.312 Message expired, DNS query failed[InfoNoRecords]'
10/11/2024 11:50:35 AM - Server at ddrlfr.gov.za (0.0.0.0) returned '450 4.4.312 DNS query failed [Message=InfoNoRecords] [LastAttemptatIfaceServerName=ddrlfr.gov.za] [AM6EUR05FT046.eop-eur05.prod.protection.outlook.com 2024-10-11T11:50:35.466Z 08DCE962B6E31866]([InfoNoRecords]/
zongezile.hango@ddrlfr.gov.za
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10/11/2024 11:56:46 AM - Server at VI1PR04MB9788.eurprd04.prod.outlook.com returned '550 5.4.312 Message expired, DNS query failed[InfoNoRecords]'
10/11/2024 11:50:35 AM - Server at ddrlfr.gov.za (0.0.0.0) returned '450 4.4.312 DNS query failed [Message=InfoNoRecords] [LastAttemptatIfaceServerName=ddrlfr.gov.za] [AM6EUR05FT046.eop-eur05.prod.protection.outlook.com 2024-10-11T11:50:35.466Z 08DCE962B6E31866]([InfoNoRecords]/
ryan.oliver@ddrlfr.gov.za
10/11/2024 11:56:46 AM - Server at VI1PR04MB9788.eurprd04.prod.outlook.com returned '550 5.4.312 Message expired, DNS query failed[InfoNoRecords]'
10/11/2024 11:50:35 AM - Server at ddrlfr.gov.za (0.0.0.0) returned '450 4.4.312 DNS query failed [Message=InfoNoRecords] [LastAttemptatIfaceServerName=ddrlfr.gov.za] [AM6EUR05FT046.eop-eur05.prod.protection.outlook.com 2024-10-11T11:50:35.466Z 08DCE962B6E31866]([InfoNoRecords]/
Original message headers:
Received: from PAWP80MB10053.eurprd04.prod.outlook.com (2603:10a6:102:387::9)
 by VI1PR04MB9788.eurprd04.prod.outlook.com (2603:10a6:800:1e4::6) with
 Microsoft SMTP Server (version=TLS1_2,
 cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) id 15.20.8048.18; Fri, 11 Oct
 2024 10:06:31 +0000
Received: from DU2PR04MB8725.eurprd04.prod.outlook.com (2603:10a6:10:2dc::18)
 by PAWP80MB10053.eurprd04.prod.outlook.com (2603:10a6:102:387::9) with
 Microsoft SMTP Server (version=TLS1_2,
 cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) id 15.20.8026.22; Thu, 10 Oct
 2024 22:58:13 +0000
ARC-Seal: i=1; a=rsa-sha256; c=aes/aes:test10001; d=microsoft.com; cv=none;
 b=pacbvBvS7/JvPmPv1mnaCvQLPLZF4mZ0D9BBd9AdoKW08bPBYDYDMF9EEuxcT+jjiuFqMYtWUCAIb/toOom9ieWHIpmt39TaMcVZWFABZiN/UCDkgCxiSXN5g/+E9InC/Agc+M9pBgwMOiSbQ1e7odhcF+pRIYJHbVL20A7IzrfzLcHdGVUI39kfSPW7y5Rw2pGIlooECfLYyWBjXUuEzZA9CEM6MMLG0OGJ6kxfXcWcOpkr1hEwkoMyuehfiUO4OUQvwOLDg==
ARC-Message-Signature: i=1; a=rsa-sha256; c=relaxed/relaxed; d=microsoft.com;
 s=arcselector10001;
 h=From:Date:Subject:Message-ID:Content-Type:MIME-Version:X-MS-Exchange-AntiSpam-MessageData-ChunkCount:X-MS-Exchange-AntiSpam-MessageData-0:X-MS-Exchange-AntiSpam-MessageData-1;
 bh=DedpuYyYH2yLeh4Ij1UYdQnxuokopu6Ga7Ihc2hoS6E=;
 b=dOQqEHRkzTQAZ5zGh3inqi6NP5FYZhCv17vFDH5vHWnTxcMKvoykuKbWvfqBd22g65XmQ/ac5pgALXZT+/sKCqcJCSWiaIZDE3zQ9UcZMBYSL9vvTX+14KpeS0fdgU9Wwdv5Y12q9UySM3qXDhaEStW/2M0x0slv9XF4yaFuL6otqqqRHSjNogFxCXpInMnj6vcCy2/17fZuLZ2p/gxbAE517+Ldp3ZkVIhcHRrcvFVKX0N6va86daeNcGbr9UZZrjHSkk1rVFdNP6PfSyp2V74eGjidaLjJ0wGRNIX00a+5VEUgpbvuOE448+/8IHzhcYwpfq3033Q==
ARC-Authentication-Results: i=1; mx.microsoft.com 1; spf=pass
 smtp.mailfrom=srm.com; dmarc=pass action=none header.from=srm.com; dkim=pass
 header.d=srm.com; arc=none
DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed; d=srm.com; s=selector1;
 h=From:Date:Subject:Message-ID:Content-Type:MIME-Version:X-MS-Exchange-SenderADCheck;
 bh=DedpuYyYH2yLeh4Ij1UYdQnxuokopu6Ga7Ihc2hoS6E=;
 b=uvYGMVMcSadgEBf3SPdVpkWKvRPEa/BJIdxDfWkG7eSFvfjSgzmOsIK+InFSeXjxbWGh4pPYDfMF9EEuxcT+jiuFqMYtWUCAIb/toOom9ieWHIpmt39TaMcVZWFABZiN/UCDkgCxiSXN5g/+E9InC/Agc+M9pBgwMOiSbQ1e7odhcF+pRIYJHbVL20A7IzrfzLcHdGVUI39kfSPW7y5Rw2pGIlooECfLYyWBjXUuEzZA9CEM6MMLG0OGJ6kxfXcWcOpkr1hEwkoMyuehfiUO4OUQvwOLDg==
Received: from DB9PR04MB10065.eurprd04.prod.outlook.com (2603:10a6:10:4c4::10)
 by DU2PR04MB8725.eurprd04.prod.outlook.com (2603:10a6:10:2dc::18) with
 Microsoft SMTP Server (version=TLS1_2,
 cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) id 15.20.8048.18; Thu, 10 Oct
 2024 11:52:20 +0000
Received: from DB9PR04MB10065.eurprd04.prod.outlook.com
 ([fe80::87b5:8f6b:8cf:3148]) by DB9PR04MB10065.eurprd04.prod.outlook.com
 ([fe80::87b5:8f6b:8cf:3148%2]) with mapi id 15.20.8026.020; Thu, 10 Oct 2024
 11:52:19 +0000
From: "ERM_Accss Amsterdam" <ERM.AccssAmsterdam@erm.com>
To: "ERM_Accss Amsterdam" <ERM.AccssAmsterdam@erm.com>
Subject: Notification of Submission of Final Scoping Report for the Proposed
 Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Thread-Topic: Notification of Submission of Final Scoping Report for the
 Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Thread-Index: AdrbXXSrcIkfcbfeRCi3ypgLqBQ==
Date: Thu, 10 Oct 2024 11:52:19 +0000
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From:	postmaster@justice.gov.za
To:	ERM Arcus Amsterdam
Subject:	Undeliverable: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date:	Thursday, 10 October 2024 13:52:47
Attachments:	Undeliverable Notification of Submission of Final Scoping Report for the Proposed Sheepmoor Rochdale and Emvelo WEF Cluster Mpumalanga Province.msg

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[You don't often get email from postmaster@justice.gov.za. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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

EXTERNAL MESSAGE

From: Microsoft Outlook
To: jscherter@webmail.co.za
Subject: Undeliverable: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date: Thursday, 10 October 2024 13:52:25
Attachments: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor Rochdale and Emvelo WEF Cluster Mpumalanga Province.msg

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<https://products.office.com/en-us/CMSImages/Office365Logo_Orange.png?version=b8d180a9-8a8b-4e6a-88e1-e9880cd9470>
Your message to jscherter@webmail.co.za couldn't be delivered.

jscherter wasn't found at webmail.co.za.

ERM.AreasAmsterdam Office 365 jscherter
Action Required Recipient

Unknown To address

How to Fix It
The address may be misspelled or may not exist. Try one or more of the following:
* Send the message again following these steps: In Outlook, open this non-delivery report (NDR) and choose Send Again from the Report ribbon. In Outlook on the web, select this NDR, then select the link "To send this message again, click here." Then delete and retype the entire recipient address. If prompted with an Auto-Complete List suggestion don't select it. After typing the complete address, click Send.
* Contact the recipient (by phone, for example) to check that the address exists and is correct.
* The recipient may have set up email forwarding to an incorrect address. Ask them to check that any forwarding they've set up is working correctly.
* Clear the recipient Auto-Complete List in Outlook or Outlook on the web by following the steps in this article: Fix email delivery issues for error code 5.1.1 in Office 365 <https://emea01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2F%3FLinkId%3D559268&data=05%7C02%7CERM.AreasAmsterdam%40erm.com%7C3c4544b84532384fbf1260bdced2200c%7C1f2e6bd39c4a485bae6c1682ba8b1305%7C0%7C0%7C638641579490474379%7CUnknown%7CTWFpbGZsb3dpdzIjb2lqMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=pLHIEM01JDpoFo4X89Wjqfd2Dxjfq1iCWECqs808U2%3D&reserved=0>
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If the problem continues, forward this message to your email admin. If you're an email admin, refer to the More Info for Email Admins section below.
Was this helpful? Send feedback to Microsoft <https://emea01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2F%3FLinkId%3D559268&data=05%7C02%7CERM.AreasAmsterdam%40erm.com%7C3c4544b84532384fbf1260bdced2200c%7C1f2e6bd39c4a485bae6c1682ba8b1305%7C0%7C0%7C638641579490474379%7CUnknown%7CTWFpbGZsb3dpdzIjb2lqMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=R1uZk5gbVV%2BOKnxerF9 5smv%2BBIagw9F4vJpns7uf0v%3D&reserved=0>
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More Info for Email Admins
Status code: 550 5.1.1
This error occurs because the sender sent a message to an email address outside of Office 365, but the address is incorrect or doesn't exist at the destination domain. The error is reported by the recipient domain's email server, but most often it must be fixed by the person who sent the message. If the steps in the How to Fix It section above don't fix the problem, and you're the email admin for the recipient, try one or more of the following:
The email address exists and is correct - Confirm that the recipient address exists, is correct, and is accepting messages.
Synchronize your directories - If you have a hybrid environment and are using directory synchronization make sure the recipient's email address is synced correctly in both Office 365 and in your on-premises directory.
Errant forwarding rule - Check for forwarding rules that aren't behaving as expected. Forwarding can be set up by an admin via mail flow rules or mailbox forwarding address settings, or by the recipient via the Inbox Rules feature.
Mail flow settings and MX records are not correct - Misconfigured mail flow or MX record settings can cause this error. Check your Office 365 mail flow settings to make sure your domain and any mail flow connectors are set up correctly. Also, work with your domain registrar to make sure the MX records for your domain are configured correctly.
For more information and additional tips to fix this issue, see Fix email delivery issues for error code 550 5.1.1 in Office 365 <https://emea01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2F%3FLinkId%3D559268&data=05%7C02%7CERM.AreasAmsterdam%40erm.com%7C3c4544b84532384fbf1260bdced2200c%7C1f2e6bd39c4a485bae6c1682ba8b1305%7C0%7C0%7C638641579490474379%7CUnknown%7CTWFpbGZsb3dpdzIjb2lqMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=6EgwVdZSNScC1hEkXnnbmIxKvpwcN91r%2FrGZOSIBc%3D&reserved=0>
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Original Message Details
Created Date: 2024/10/10 11:52:19
Sender Address: ERM.AreasAmsterdam@erm.com
Recipient Address: jscherter@webmail.co.za
Subject: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Error Details
Error: 550 5.1.1 <jscherter@webmail.co.za>: Recipient address rejected: User unknown in relay recipient table
Message rejected by: MX.DKA.mailcore.net
Notification Details
Sent by: DU2PR04MB8725.eurprd04.prod.outlook.com
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by DU2PR04MB8725.eurprd04.prod.outlook.com (2603:10eb:10:2dc::10) with
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cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) id 15.20.8048.18; Thu, 10 Oct
2024 11:52:20 +0000
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11:52:19 +0000
From: "ERM.AreasAmsterdam" <ERM.AreasAmsterdam@erm.com>
To: "ERM .Areas Amsterdam" <ERM.AreasAmsterdam@erm.com>
Subject: Notification of Submission of Final Scoping Report for the Proposed
Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Thread-Topic: Notification of Submission of Final Scoping Report for the
Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Thread-Index: AdeXC0XrcHdfo0RzC1ypnRLqJRQ==
Date: Thu, 10 Oct 2024 11:52:19 +0000
Message-ID: <DB9PR04MB10065AE2EFC1894A080F923HB09B782@DB9PR04MB10065.eurprd04.prod.outlook.com>
Accept-Language: en-ZA, en-US
Content-Language: en-US
X-MS-Has-Attach: yes
X-MS-TNEF-Correlator:
msip_labels: MSIP_Label_a6c0d8a6-a4b9-4802-9a97-56875960857 7_ActionId=0:1907115-da05-473a-8b9d-eb13cbc529f0;MSIP_Label_a6c0d8a6-a4b9-4802-9a97-56875960857 7_ContentBits=0;MSIP_Label_a6c0d8a6-a4b9-4802-9a97-56875960857 7_Enabled=true;MSIP_Label_a6c0d8a6-a4b9-4802-9a97-56875960857 7_Method=Privileged;MSIP_Label_a6c0d8a6-a4b9-4802-9a97-56875960857 7_Name=General
- Anyone
;MSIP_Label_a6c0d8a6-a4b9-4802-9a97-56875960857 7_SetDate=2024-10-10T11:52:14Z;MSIP_Label_a6c0d8a6-a4b9-4802-9a97-56875960857 7_SiteId=f2fe6bd3-9c4a-485b-aa99-e1882b8f8130;
x-ms-exchange-organization-messagedirectionality: Incoming
x-ms-publictraffictype: Email
x-ms-traffictypediagnostic: DB9PR04MB10065:EE_|DU2PR04MB8725:EE_
x-ms-office365-filtering-correlation-id: f96c44fc-56df-4faa-8ba9-08dce9216fb5
x-ms-exchange-senderadcheck: 1
x-ms-exchange-antispam-relay: 0
x-microsoft-antispam: BCL:0;ARA:13230040|376014|366016|7416014|1800799024|3807070008|4;
x-microsoft-antispam-message-info: =?us-ascii?Q?L3dMmSkSVdiTKdJRs10GvcaVdzJgOHCIQkEU0mtSVvgwThMmVcmG57oMc5=
=?us-ascii?Q?WoPNxIsF+bHQwMvMAJKqZpx9FHkVVJgnxTqEHZ3PvEQAwBqc9wZy2E7=
=?us-ascii?Q?/Q+49L8KvTbPYxDn1opvNuhqPUpVDmkLzEbNXQaqJ8vBOWXCdLEtuGfQ=
=?us-ascii?Q?Ue+Ue+Ue+

From: Microsoft Outlook
To: complaints@mnakaligwa.gov.za
Subject: Undeliverable: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date: Thursday, 10 October 2024 11:52:42
Attachments: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor Rochdale and Emvelo WEF Cluster Mpumalanga Province.msg

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<https://products.office.com/en-us/CMSImages/Office365Logo_Orange.png?version=b6d108a9-0a8b-8e6a-88e1-e49f8fae0470>
Your message to complaints@mnakaligwa.gov.za couldn't be delivered.

complaints wasn't found at mnakaligwa.gov.za.

ERM.AreasAmsterdam Office 365 complaints
Action Required Recipient

Unknown To address

How to Fix It
The address might be misspelled or might not exist. Try one or more of the following:
* Retype the recipient's address, then resend the message - If you're using Outlook, open this non-delivery report message and click Send Again from the menu or ribbon. In Outlook on the web, select this message, and then click the "To send this message again, click here." link located just above the message preview window. In the To or Cc line, delete and then retype the entire recipient's address (ignore any address suggestions). After typing the complete address, click Send to resend the message. If the recipient's address is still incorrect, contact the recipient by another method to confirm the correct address.
* Remove the recipient from the recipient Auto-Complete List, then resend the message - If you're using Outlook or Outlook on the web, edit the recipient's address from the Auto-Complete List* section of this article: <https://emea01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2F%3FLinkId%3D532972&data=05%7C02%7CERM.AreasAmsterdam%40erm.com%7Ca4f6e2fc7db04912377f8dce922bdb8%7C2fdeb8d39c4e4485ba69c1882ba88138%7C0%7C0%7C638661759015173%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C%7C%7C&sdata=a7YdkJQhdf5ueXQWv1o9tNYQEiCQo5UEkIL%2FSjocY1w0%3D&reserved=0>
url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2F%3FLinkId%3D532972&data=05%7C02%7CERM.AreasAmsterdam%40erm.com%7Ca4f6e2fc7db04912377f8dce922bdb8%7C2fdeb8d39c4e4485ba69c1882ba88138%7C0%7C0%7C638661759015173%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C%7C%7C&sdata=P2uuMUvvsBAtJUcRr3IF7tgEELfdL7mohqbVcY%3D&reserved=0>. Then resend the message. Be sure to delete and retype the recipient's entire address before clicking Send.
* Contact the recipient by some other means, (by phone, for example) to confirm you're using the right address. Ask them if they've set up an email forwarding rule that could be forwarding your message to an incorrect address.
If the problem continues, ask the recipient to tell their email admin about the problem, and give them the error (and the name of the server that reported it) shown below. It's likely that only the recipient's email admin can fix this problem.
Was this helpful? Send feedback to Microsoft <https://emea01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2F%3FLinkId%3D532974&data=05%7C02%7CERM.AreasAmsterdam%40erm.com%7Ca4f6e2fc7db04912377f8dce922bdb8%7C2fdeb8d39c4e4485ba69c1882ba88138%7C0%7C0%7C638661759015173%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C%7C%7C&sdata=P2uuMUvvsBAtJUcRr3IF7tgEELfdL7mohqbVcY%3D&reserved=0>.

More Info for Email Admins
Status code: 550 5.4.1
This error occurred because a message was sent to an email address hosted by Office 365, but the address doesn't exist in the receiving organization's Office 365 directory. Directory Based Edge Blocking (DBEB) is enabled for mnakaligwa.gov.za, and DBEB rejects messages addressed to recipients who don't exist in the receiving organization's Office 365 directory. This error is reported by the recipient domain's email server, but most often it can be fixed by the person who sent the message. If the steps you take to resolve the issue don't work, contact your email admin.
Check that the email address exists and is correct - Confirm that the recipient address exists in your Office 365 directory, is correct, and is accepting messages.
Synchronize your directories - Make sure directory synchronization is working correctly, and that the recipient's email address exists in both Office 365 and in your on-premises directory.
Check for extant forwarding rules - Check for forwarding rules for the original recipient that might be trying to forward the message to an invalid address. Forwarding can be set up by an admin via mail flow rules or mailbox forwarding address settings, or by the recipient via the Forwarding or Inbox Rules features.
Make sure the recipient has a valid license - Make sure the recipient has an Office 365 license assigned to them. The recipient's email admin can use the Office 365 admin center to assign a license to them (Users > Active Users > Select the recipient > Assigned License > Edit).
Make sure that mail flow settings and MX records are correct - Misconfigured mail flow or MX record settings can cause this error. Check your Office 365 mail flow settings to make sure your domain and any mail flow connectors are set up correctly. Also, work with your domain registrar to make sure the MX records for your domain are set up correctly.
For more information and additional tips to fix this issue, see this article <https://emea01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2F%3FLinkId%3D532974&data=05%7C02%7CERM.AreasAmsterdam%40erm.com%7Ca4f6e2fc7db04912377f8dce922bdb8%7C2fdeb8d39c4e4485ba69c1882ba88138%7C0%7C0%7C638661759015173%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C%7C%7C&sdata=%2FBtvRfGEeCwurf9FL%2BMJKTDZvmiQjGfo3ujc9FYdfjOBPY%3D&reserved=0>.

Original Message Details
Created Date: 2024/10/10 11:52:19
Sender Address: ERM.AreasAmsterdam@erm.com
Recipient Address: complaints@mnakaligwa.gov.za
Subject: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Error Details
Error: 550 5.4.1 Recipient address rejected: Access denied. [CP1EPF0000071E.EAFF275.PROD.OUTLOOK.COM 2024-10-10T11:52:38.379Z 08DCE1E404E0E240]
Message rejected by: CP1EPF0000071E.mail.protection.outlook.com
Notification Details
Sent by: DU2PR04MB8725.eurprd04.prod.outlook.com
Message Hops
HOP TIME (UTC) FROM TO WITH RELAY TIME
1 2024/10/10 11:52:19 DB9PR04MB10065.eurprd04.prod.outlook.com DB9PR04MB10065.eurprd04.prod.outlook.com mapi *
2 2024/10/10 11:52:20 DB9PR04MB10065.eurprd04.prod.outlook.com DU2PR04MB8725.eurprd04.prod.outlook.com Microsoft SMTP Server (version=TLS1_2, cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) 1 sec
ARC Details
ARC-Seal: i=1; a=rsa-sha256; s=arcselector10001; d=microsoft.com; cv=none;
b=qacbo89i52Tc/bPmIb1maqCoQLPXZF4uZiDHBH56duhkWO08hPlYDDFiMJ9IEEaxcTijiiFqbIYWUCAIbAuOaeBhaWHDgmG9TaMcYZWFABZNUCDkgCxiSXNSg=iEHmXCAgv+MPpBgwMIOthQ1e5udIcFyRIYJBWL20A73mJdLz8HGV3Rk7PW7yY5RwZpGIoxECIEyWlk/XUaEzZA8CEMd8MLG8OGJ6kzf3cWeQ1mpKcEtLyWlk/Uc

From: Microsoft Outlook
To: Phila.Mayisela@westerncape.gov.za
Subject: Undeliverable: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date: Thursday, 10 October 2024 13:52:33
Attachments: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor Rochdale and Emvelo WEF Cluster Mpumalanga Province.msg

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<https://products.office.com/en-us/CMSImages/Office365Logo_Orange.png?version=b8d180a8-fa3b-8a6a-88e1-a4988ae6470>
Your message to Phila.Mayisela@westerncape.gov.za couldn't be delivered.

Phila.Mayisela wasn't found at westerncape.gov.za.

ERM.AcrossAmsterdam Office 365 Phila.Mayisela
Action Required Recipient

Unknown To address

How to Fix It
The address might be misspelled or might not exist. Try one or more of the following:
* Retype the recipient's address, then resend the message - If you're using Outlook, open this non-delivery report message and click Send Again from the menu or ribbon. In Outlook on the web, select this message, and then click the "To send this message again, click here." link located just above the message preview window. In the To or Cc line, delete and then retype the entire recipient's address (ignore any address suggestions). After typing the complete address, click Send to resend the message. If the recipient's entire address is misspelled, you'll receive another non-delivery report.
* Remove the recipient from the recipient Auto-Complete List, then resend the message - If you're using Outlook or Outlook on the web, follow the steps in the "Remove a recipient's address from the Auto-Complete List" section of this article: <https://emea01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2F%3FLinkId%3D53972&data=05%7C02%7CERM.AcrossAmsterdam%40erm.com%7Cd27ada8e2e4494497308da9220532%7C2fe6bd39c4e485bae69c1882ba881389%7C0%7C0%7C638461575527526582%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=KobOIJeuzgVqPFqQETBAp4lcvNDIcBYyf6O3v3Ka9iA%3D&reserved=0>.
Then resend the message. Be sure to delete and retype the recipient's entire address before clicking Send.
* Contact the recipient by some other means, (by phone, for example) to confirm you're using the right address. Ask them if they've set up an email forwarding rule that could be forwarding your message to an incorrect address.
If the problem continues, ask the recipient to tell their email admin about the problem, and give them the error (and the name of the server that reported it) shown below. It's likely that only the recipient's email admin can fix this problem.
Was this helpful? Send feedback to Microsoft: <https://emea01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2Fp%2F%3FLinkID%3D717197&data=05%7C02%7CERM.AcrossAmsterdam%40erm.com%7Cd27ada8e2e4494497308da9220532%7C2fe6bd39c4e485bae69c1882ba881389%7C0%7C0%7C638461575527526582%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=uCC2cjtjpt8WSAIxYT4Kqeio9HNwaNCfIdCY2f8vA9w%3D&reserved=0>
.

More Info for Email Admins
Status code: 550 5.4.1
Exchange received a message was sent to an email address hosted by Office 365, but the address doesn't exist in the receiving organization's Office 365 directory. Directory Based Edge Blocking (DBEB) is enabled for westerncape.gov.za, and DBEB rejects messages addressed to recipients who don't exist in the receiving organization's Office 365 directory. This error is reported by the recipient domain's email server, but most often it can be fixed by the person who sent the message. If the steps in the How to Fix It section above don't fix the problem, send you're the email admin for the recipient, try one or more of the following:
Check that the email address exists and is correct - Confirm that the recipient address exists in your Office 365 directory, is correct, and is accepting messages.
Synchronize your directories - Make sure directory synchronization is working correctly, and that the recipient's email address exists in both Office 365 and in your on-premises directory.
Check for errant forwarding rules - Check for forwarding rules for the original recipient that might be trying to forward the message to an invalid address. Forwarding can be set up by an admin via mail flow rules or mailbox forwarding address settings, or by the recipient via the Forwarding or Inbox Rules features.
Make sure the recipient has a valid license - Make sure the recipient has an Office 365 license assigned to them. The recipient's email admin can see the Office 365 admin center to assign a license to them (Users > Active Users > Select the recipient > Assigned License > Edit).
Make sure that mail flow settings and MX records are correct - Misconfigured mail flow or MX record settings can cause this error. Check your Office 365 mail flow settings to make sure your domain and any mail flow connectors are set up correctly. Also, work with your domain registrar to make sure the MX records for your domain are set up correctly.
For more information and additional tips to fix this issue, see this article <https://emea01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2F%3FLinkId%3D53972&data=05%7C02%7CERM.AcrossAmsterdam%40erm.com%7Cd27ada8e2e4494497308da9220532%7C2fe6bd39c4e485bae69c1882ba881389%7C0%7C0%7C638461575527526582%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=GuCYT/W6KjzDQ57ZFs/hgfdLB5XCrU%2FnHuv%2BE1FKc0%3D&reserved=0>

Original Message Details
Created Date: 2024-10-10 11:52:19
Sender Address: ERM.AcrossAmsterdam@erm.com
Recipient Address: Phila.Mayisela@westerncape.gov.za
Subject: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Error Details
Error: 550 5.4.1 Recipient address rejected: Access denied. [AM2PEPF0001C70E.eurprd05.prod.outlook.com 2024-10-10T11:52:24.368Z 08DCD1739EAASFD0]
Message rejected by AM2PEPF0001C70E.mail.protection.outlook.com
Notification Details
Sent by: DU2PR04M8B725.eurprd04.prod.outlook.com
Message Hops
HOP TIME (UTC) FROM TO WITH RELAY TIME
1 2024/10/10
11:52:19 DB9PR04MB10065.eurprd04.prod.outlook.com DB9PR04MB10065.eurprd04.prod.outlook.com mapi *
2 2024/10/10
11:52:19 DB9PR04MB10065.eurprd04.prod.outlook.com DU2PR04M8B725.eurprd04.prod.outlook.com Microsoft SMTP Server (version=TLS1_2, cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) 1 sec
Original Message Headers
ARC-Seal: i=1; a=rsa-sha256; s=arcselector10001; d=microsoft.com; cv=none;
b=qaxJnbfb527L9iPnbFUmaqCvQLFXZO4ucZ0PBBbF8AdaKWO8hPBYFDIrMFHEEaeT+jjiuFqMYWUCAIhvhaOnoRheWHDpmGOFTuMcVZWFABZJNUCDkgCuiSXNSg+fE9ttaCAg==;MQbBgNwMJOMQ1v7cdBcF+pRIY2B6VL20A7InSzLzHtGVJE9ktSPW7yY5Rw2pGIeaFCIEyWBjXUuIZzZA9CIM6MMLGkOGJHkxTkcWeQnkrIBckIPIeoFYqwhKaVJUbYI4qvIoccaWaaBnlOOeoYIBCVwjUH9EuhMyuerhIO4OUQvwOLDg==
ARC-Message-Signature: i=1; a=rsa-sha256; s=arcselector10001;
d=microsoft.com;
cv=none;
b=FcmTate/Subject/Message-ID/Content-Type/MIME-Version/X-MS-Exchange-AntiSpam-MessageData-ChunkCount/X-MS-Exchange-AntiSpam-MessageData-0/X-MS-Exchange-AntiSpam-MessageData-1;
bh=DeduYpY0YtZyLdv4IjU7vfQuvtaxqwGuU7bt2hx/S4E=;
h=dXQgEHRkYQtZkGtUmjzHSNPSFYIhCvi7vFDHSxHWxuTuCMCxyzRcqBvWqBd22qbXumQw5pqALXZT=/ukCqcJCS/WiaIDEJnQ0UcZMBYS1JVvTX+I4KpcSHdqHDhaES8W/2Mb0xdv9/8Pf4yaFuL6mqqqHHSjNogFcCKjdmMnjtfevCy2/17IZuLZ2jrjgdvdE517+IJtpZLKTmBHRtrxFVKXOiNtvaBzdaNoGhv9UZZrjHJ0vGK1v9YvpfqSH3Q==
ARC-Authentication-Results: i=1; mx.microsoft.com 1; spf=pass
smtp.mailfrom=erm.com; dmarc=pass action=none header.from=erm.com; dkim=pass
header.d=erm.com; arc=none
DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed; d=erm.com; s=selector1;
h=From:Date:Subject:Message-ID:Content-Type:MIME-Version:X-MS-Exchange-SenderADCheck;
bh=DeduYpY0YtZyLdv4IjU7vfQuvtaxqwGuU7bt2hx/S4E=;
b=wYGMVMrfxdgIIRfZbPtVQpKWO4bPEa3kBn1HdzDWkTvkTvSFvfSjmnOoSK+0mF8oXQxWGbpuzkPfvULJuFba1x9E+VAvAs4X4jaGeuw4wQp1qgFnrEMKiHTyxDbfBSdPEGHcNp4d+9qIlXp2EtTxdoRYLCuYqUqpV1+XgryfzNPWn5CQ+F4jhumzGPwEIaB7cwNQM5wWyqONRgNuTEmuuxjJVXBHVNcqqIEDYCIBuDxjJERy9vh4uSjbuVwsMuZEU4ADNLuMusBAOkVp7k3HSBlmuuNEbcOcgZBtKHwMbZfaqMT7N2+uGUyJZTfvMe9R79cSiMo1CgA==
Received: from DB9PR04MB10065.eurprd04.prod.outlook.com (2603:10a6:10:2dc::18)
by DU2PR04M8B725.eurprd04.prod.outlook.com (2603:10a6:10:2dc::18) with
Microsoft SMTP Server (version=TLS1_2,
cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) id 15.20.8048.18; Thu, 10 Oct
2024 11:52:20 +0000
Received: from DB9PR04MB10065.eurprd04.prod.outlook.com
([fe80::87b3:8fbb:8d:3146]) by DB9PR04MB10065.eurprd04.prod.outlook.com
([fe80::87b3:8fbb:8d:3146%2]) with mapi id 15.20.8026.020; Thu, 10 Oct 2024
11:52:19 +0000
From: "ERM .Across Amsterdam" <ERM.AcrossAmsterdam@erm.com>
To: "ERM .Across Amsterdam" <ERM.AcrossAmsterdam@erm.com>
Subject: Notification of Submission of Final Scoping Report for the Proposed
Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Thread-Topic: Notification of Submission of Final Scoping Report for the
Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Thread-Index: AdXXXtxiSDi6oRvLT3yopiLqjHQ==
Date: Thu, 10 Oct 2024 11:52:19 +0000
Message-ID: <DB9PR04MB10065AED8C1B94A089F9230B89B7E2@DB9PR04MB10065.eurprd04.prod.outlook.com>
Accept-Language: en-ZA, en-US
Content-Language: en-US
X-MS-Has-Attach: yes
X-MS-TNEF-Correlator:
msip_labels: MSIP_Label_a6cfdfad-a4b9-4802-9a97-56875968857 7_Actionid=01907107-da05-472a-80fd-eb1c3cbc5390;MSIP_Label_a6cfdfad-a4b9-4802-9a97-56875968857 7_ContentBits=0;MSIP_Label_a6cfdfad-a4b9-4802-9a97-56875968857 7_Enabled=true;MSIP_Label_a6cfdfad-a4b9-4802-9a97-56875968857 7_Method=Privileged;MSIP_Label_a6cfdfad-a4b9-4802-9a97-56875968857 7_Name=General
- Anyone
(unrestricted);MSIP_Label_a6cfdfad-a4b9-4802-9a97-56875968857 7_SetDate=2024-10-10T11:52:14Z;MSIP_Label_a6cfdfad-a4b9-4802-9a97-56875968857 7_Siteid=f26dbd3-9c4a-4859-aa69-e1f82ba88130;
x-processedbymmplaffy: true
x-xemplatybymailingconversion: 9.16.0.0
authentication-results: dkim=none (message not signed)
header.d=none;dmarc=none action=none header.from=erm.com;
x-ms-exchange-messagesentrepresentingtype: 1
x-ms-publictraffictype: Email
x-ms-traffictypediagnostic: DB9PR04MB10065:EE_ EU2PR04M8B725:EE_
x-ms-office365-filtering-correlation-id: ff9c446c-56d5-48aa-8ba8-8fda5e521bb5
x-ms-exchange-senderadcheck: 1
x-ms-exchange-antispam-relay: 0
x-microsoft-antispam: BCL:0;ARA:13230040(376014)(7416014)(4076899024)(3807070008)(8;
x-microsoft-antispam-message-info: =?us-ascii?Q?TLkMmfSkSVoBTkKfRfo8FGvca16AfgQ94UBzlUUJ9mzVvgeTDvMmVemG57nhEw=?=
=?us-ascii?Q?V9ieiWyfaB+b4Q2ph6/MAJEKgZnWIBkVVIjmAAMZnFHZ3fvUGJ4aBqe5m2vZrD5=?=
=?us-ascii?Q?OQ4JWLMGTBfVv2nUmpbAtqGuYqkTQmqLiL/0kXAaqB6OBO9+3UdLEtat5TQ/=?=
=?us-ascii?Q?AnHvvcQBnxYyQDtRFAy+TtPMZ83gXlYZz7ZDBBgBbNtBu4e9PwuOkuAhJRT=?=
=?us-ascii?Q?MUDvKGJlSJvIjdOMYZgfYTU2pVFWu8IneEzmmOAw4bMXGCtXjZ0a654kZme/=?=
=?us-ascii?Q?49GnjOtBnWCvvSAAiZuLtZWBQe1l+PgAnaPm+QzPAigGIKJhcdoLCk/=?=
=?us-ascii?Q?w8FlcZoAH2ndqXCpJ8a7kQfJkOeCjLGR4TAkFc6x15fBnS+0?XzwvBjkbz/=?=
=?us-ascii?Q?MMMJDFNhyY4wa9FJZUfpY+uPNU3hcT8H5wwkTDt+ARZbNH57WgRmx+Un/5?=
=?us-ascii?Q?MEGJzFHBIocm/Wty7dpeQcw7498AdrBqLAqJUJdoiAXF9IYIuiTeJm?=
=?us-ascii?Q?Bvj9+4qJqFkTcLQ2qnc4FUaoBtZ9v9cZN+7EuWc1pr0BuLDQc9rYXNz?=
=?us-ascii?Q?AeMMdFMXNdRhuxFjrdpRwQnJqA39SEy8D1xc4wCfcLFyMHn2dCdgcxM?=
=?us-ascii?Q?Ue+Ue+Ue+

From: Microsoft Outlook
To: nonjabo@sdpc.gov.za
Subject: Undeliverable: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date: Thursday, 10 October 2024 13:52:24
Attachments: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor Rochdale and Emvelo WEF Cluster Mpumalanga Province.msg

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Delivery has failed to these recipients or groups:
nonjabo@sdpc.gov.za <mailto:nonjabo@sdpc.gov.za>
Your message couldn't be delivered. The Domain Name System (DNS) reported that the recipient's domain does not exist.
Contact the recipient by some other means (by phone, for example) and ask them to tell their email admin that it appears that their domain isn't properly registered at their domain registrar. Give them the error details shown below. It's likely that the recipient's email admin is the only one who can fix this problem.
For more information and tips to fix this issue see this article: https://go.microsoft.com/fwlink/?LinkId=389361.

Diagnostic information for administrators:
Generating server: DU2PR04MB8725.eurprd04.prod.outlook.com

nonjabo@sdpc.gov.za
Remote server returned '550 5.4.310 DNS domain doc.gov.za does not exist [Message=InfoDomainNonexistent] [LastAttemptedServerName=doc.gov.za] [AM1PEPF0002EAE5.eurprd04.prod.outlook.com 2024-10-10T11:52:22.962Z 08DCE58434754ODD]'

Original message headers:
ARC-Seal: i=1; a=rsa-sha256; s=arcselector10001; d=microsoft.com; cv=none;
b=qachvBcT2U/bPnbPr1mauGvQLPkZP4ou2fZHMHdH9ddaKWO8bPkYDYDJdF9EEarcT+jjuFqMYtWUCAHvhaOsmWnrWHpmG9TaMcVZWFABZiNUCEkgCxiSXNSg+/E9mx3C/Agv+M9pBgwMDcbQ1s7zdhcF+pRIYJ8hVL26A7ixtLzHbGVID39kf5PW7yY5Rw2pGIoaECEIyWBjXUdEzZA9CEMd6MLG0OG86kcfIcWcOpkrIBdEPKeSYqwbhdCaVjUbY16ay1o6vcc/WcaxBnIOwOeYBfCWwjJBAHnnnvxxYEqiViXHUgVIye1t496 edsMyuexhEO4OtUQvwOLDg==
ARC-Message-Signature: i=1; a=rsa-sha256; c=relaxed/relaxed; d=microsoft.com;
s=arcselector10001;
h=From:Date:Subject:Message-ID:Content-Type:MIME-Version:X-MS-Exchange-AntiSpam-MessageData-ChunkCount:X-MS-Exchange-AntiSpam-MessageData-0:X-MS-Exchange-AntiSpam-MessageData-1;
bh=DeckpYdY8ZvLeh4Hj3Y4fQhenxkopGn25a2TbcDxS4E=;
b=dXQgEHRLcTQAz5fcOzJungjkSNP5FY2hCvi7vFDHYuFWmTxcMKvyqhqvlwWqBd22g65XmQ/acfpgALXZT+xkCqcJCSWiaJDE3zqWUcZMEYSL9vvTX+14Kpe50ahqE9Wwdv5Y12qYUySMJnjhDInE58W/2Mt0nIvb/9/8Fy/aFxcL6ntqqqBISjNugFxCQdmMnj6vvcCy2/17fZuLZ2p/gnbvEt517+L0pfZkVBcHRrroFVKXiN6vaJ6daNaGhr9UZZjJlJSkk1vVFdNP9rPSyp2V74tGjdenLjJdwGRNiX08u+5VEUlgp8vuaOE448+/8IHdaIcYbvpfq8O3Q==
ARC-Authentication-Results: i=1; mx.microsoft.com 1; spf=pass
smtp.mailfrom=erm.com; dmarc=pass action=none header.from=erm.com; dkim=pass
header.d=erm.com; arc=none
DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed; d=erm.com; s=selector1;
h=From:Date:Subject:Message-ID:Content-Type:MIME-Version:X-MS-Exchange-SenderADCheck;
bh=DeckpYdY8ZvLeh4Hj3Y4fQhenxkopGn25a2TbcDxS4E=;
b=nuYGhtVMi5u6gIBH2SbPaYyIkWXvBdPEaJkBnJ3HnDN1k67vSFv0jSyzmOsIKr/ImFScXjxbW/dVpnakP3rUL1nFtn3vHE+/VnAic4X4yaGmvpnsQp1sgEu03ANfKHTyuDbJBSdPEGkNp4cl+9gIJQa2lsTuhdtYLCepJ9UupV1vXgbvytloNP9WnSCQ+F4bjhanzGPwEhB7cwNQM5+WyyQMRgNnrTihmxnjJVXBHVNcqgED/DYCHbsIhcjERy9db4n8jNaYwsMuZEU434DNLxMsoBAOkVp7k3HSbImuaNDbcOqZ08kDbwM8tZ6qMTNN2+uOGUyJZTfvMo9879xSMwlCgA==
Received: from DB9PR04MB10065.eurprd04.prod.outlook.com (2603:10a6:10:4c4::10)
by DU2PR04MB8725.eurprd04.prod.outlook.com (2603:10a6:10:2dc::18) with
Microsoft SMTP Server (version=TLS1_2,
cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) id 15.20.8048.18; Thu, 10 Oct
2024 11:52:28 +0000
Received: from DB9PR04MB10065.eurprd04.prod.outlook.com
([fa80::87b5:88bb:8d:3148%2]) with mapi id 15.20.8026.020; Thu, 10 Oct 2024
11:52:19 +0000
From: "ERM_Arcas Amsterdam" <ERM.ArcasAmsterdam@erm.com>
To: "ERM_Arcas Amsterdam" <ERM.ArcasAmsterdam@erm.com>
Subject: Notification of Submission of Final Scoping Report for the Proposed
Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Thread-Topic: Notification of Submission of Final Scoping Report for the
Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Thread-Index: AdsX5XIcvBcfnlvRrCS7pnpRLqjBQ==
Date: Thu, 10 Oct 2024 11:52:19 +0000
Message-ID: <DB9PR04MB10065AEDFC1894A088F9230B0988782@DB9PR04MB10065.eurprd04.prod.outlook.com>
Accept-Language: en-ZA, en-US
Content-Language: en-US
X-MS-Has-Attach: yes
X-MS-TNEF-Correlator:
msip_labels: MSIP_Label_afc8dfa6-a4b9-4802-9a97-56875960857 7_ActionId=0190710f-dad6-470a-8b9d-ab13cbc5298b;MSIP_Label_afc8dfa6-a4b9-4802-9a97-56875960857 7_ContentBits=0;MSIP_Label_afc8dfa6-a4b9-4802-9a97-56875960857 7_Enabled=true;MSIP_Label_afc8dfa6-a4b9-4802-9a97-56875960857 7_Method=Privileged;MSIP_Label_afc8dfa6-a4b9-4802-9a97-56875960857 7_Name=General
- Anyone
(unrestricted);MSIP_Label_afc8dfa6-a4b9-4802-9a97-56875960857 7_SetDate=2024-10-10T11:52:14Z;MSIP_Label_afc8dfa6-a4b9-4802-9a97-56875960857 7_SiteId=f2fa6fa0-9c4a-4835-ae69-e1882f8a8130;
x-processedbytempally: true
x-tmphally:emaskingv4environment 9.16.0.0
authentication-results: dkim=none (message not signed)
header.d=none;dmarc=none action=none header.from=erm.com;
x-ms-exchange-messagesentrepresentingtype: 1
x-ms-publictraffictype: Email
x-ms-traffictypediagnostic: DB9PR04MB10065:EE_|DU2PR04MB8725:EE_
x-ms-office365-filtering-correlation-id: f96c446c-96d5-41aa-8ba6-88dcc021fde5
x-ms-exchange-senderadcheck: 1
x-ms-exchange-antispam-relay: 0
x-microsoft-antispam: BCL:0;ARA:13230040|376014|4766014|7416014|1800799024|3807070008|1;
x-microsoft-antispam-message-info: ~?us-ascii?Q?LkMmfiK5V6lTkK0Lo9OvcvA1GcIpQ04UKdUUFmz5VrgwTDoMmVemG57uMn?=
<?us-ascii?Q?9Ytr09vEsI+b402p4b38AEKqZmV1HbVVfgtnAAMZpFdZZ3vIvEyGwhqBnuZyJ2?=
<?us-ascii?Q?Q49LM/GTSkTJ0Ym+Ap8vYqBcYyKLGTbXAtaqJb0bWcR9+1GdLLuETQ?=
<?us-ascii?Q?ev6wQRxcbVpDxBEAvp+JpTUQXFZcrT22t9BqDdvvBuK9PXmtDhnAbAA?=
<?us-ascii?Q?/Ue+Ue+Ue+

From: Microsoft Outlook
To: bongi@gobiande.gov.za
Subject: Undeliverable: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Envelo WEF Cluster, Mpumalanga Province
Date: Thursday, 10 October 2024 13:52:32
Attachments: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor Rochdale and Envelo WEF Cluster Mpumalanga Province.msg

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<https://products.office.com/en-us/CMSImages/Office365Logo_Orange.png?version=9bf100a9-0a88-8a6a-88e1-e9f88fa6947f>
Your message to bongi@gobiande.gov.za couldn't be delivered.

bongi wasn't found at gobiande.gov.za, or the mailbox is unavailable.

ERM.AccessAmsterdam Office 365 bongi
Action Required Recipient

Unknown To address

How to Fix It
The email address might be misspelled or it might not exist. Try one or more of the following:
* Retype the recipient's address, then resend the message - If you're using Outlook, open this non-delivery report message and click Send Again from the menu or ribbon. In Outlook on the web, select this message, and then click the "To:+cnd this message again, click here." link located just above the message preview window. In the To or Cc line, delete and then retype the entire recipient's address (ignore any address suggestions). After typing the complete address, click Send to resend the message. If you're using a different email program other than Outlook or Outlook on the web, follow its standard way for resending a message. Just be sure to delete and retype the recipient's entire address before resending it.
* Remove the recipient from the recipient Auto-Complete List, then resend the message - If you're using Outlook or Outlook on the web, follow the steps in the "Remove the recipient from the recipient Auto-Complete List" section of this article:<https://emea01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2F%3FLinkId%3D532972&data=05%7C02%7CERM.AccessAmsterdam%40erm.com%7C5cd78a58e9fc4375c008f8dce922034b%7C2f1e6a03fc4a4658aa69e1882ba8013f%7C0%7C0%7C638641579517662697%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=coo4cgaVmP%2FOWDtBjWW%2Bn138c5oeyIUnd%2BaKc6c5%3D&reserved=0>.
Then resend the message. Be sure to delete and retype the recipient's entire address before clicking Send.
* Contact the recipient by some other means, (by phone, for example) to confirm you're using the right address. Ask them if they've set up an email forwarding rule that could be forwarding your message to an incorrect address.
If the problem continues, forward this message to your email admin. If you're an email admin, refer to the More Info for Email Admins section below.
Was this helpful? Send feedback to Microsoft: <https://emea01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2F%3FLinkID%3D517200&data=05%7C02%7CERM.AccessAmsterdam%40erm.com%7C5cd78a58e9fc4375c008f8dce922034b%7C2f1e6a03fc4a4658aa69e1882ba8013f%7C0%7C0%7C638641579517662697%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=561ojMPGmCzvnaf9V2kiTBP%2FDBkwMhJcGMdHuo7OQ8%3D&reserved=0>
.

Mere Info for Email Admins
Status code: 550 5.1.351
When Office 365 tried to send the message, the external email server returned an error stating that the recipient is unknown or the mailbox is unavailable. This error was reported by an email server outside Office 365.
If you or the sender can't fix the problem, contact the responsible party's email admin. • Give them the error code and error message from this non-delivery report (NDR) to help them troubleshoot the issue. To determine who the responsible party might be, check the error for information about where the problem is happening. For example, look for a domain name like contoso.com. A domain name in the error might suggest who is responsible for the error. It could be the recipient's email server, or it could be a third-party service that your organization or the recipient's organization is using to process or filter email messages.
Although the sender might be able to fix the issue by correcting the recipient address, it's likely that only the recipient's email admin can fix the problem. Unfortunately, it's unlikely Office 365 Support will be able to help with those kinds of externally reported errors.

Original Message Details
Created Date: 2024/10/10 11:52:19
Sender Address: ERM.AccessAmsterdam@erm.com
Recipient Address: bongi@gobiande.gov.za
Subject: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Envelo WEF Cluster, Mpumalanga Province
Error Details
Reason: 5.1.351 Remote server returned unknown recipient or mailbox unavailable -> 550 Invalid Recipient - https://community.mimecast.com/docs/DOC-1369#550 [aQ99KB5POPGebipwXfKt7w.au122]
Message rejected by: za-smtp-inbound-1.mimecast.co.za
Notification Details
Sent by: DU2P80404MB8725.eurprd04.prod.outlook.com
Message Hops
HOP TIME (UTC) FROM TO WITH RELAY TIME
1 2024/10/10
11:52:19 DB9P80404MB10065.eurprd04.prod.outlook.com DB9P80404MB10065.eurprd04.prod.outlook.com mapi *
2 2024/10/10
11:52:20 DB9P80404MB10065.eurprd04.prod.outlook.com DU2P80404MB8725.eurprd04.prod.outlook.com Microsoft SMTP Server (version=TLS1_2, cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) 1 sec
Original Message Headers
ARC-Seal: i=1; a=rsa-sha256; s=arcselector10001; d=microsoft.com; cv=none;
b=ycbo8fr8527/kPwPr1ouqCoQLFX2F4ro2DH8H9AtdaK9O8hPkYDFIbMF0EEuxCY/ijioTqMYWUCAIt8uaOcot8kr/WHJpraGFFaMcVZWFABZNUCDkgCxSXNSg=;t=I9tn3CAg=;bh=MHpBgwMOhOj6+5c8cF+pRYJ8NVL20A73zlLtHGVH9tS9WJY/sY5Rw2pGkudECEIyWBjXUaEzGAECEMSMMLG8OG8kkzIkcWvOpkrIBokIPkoSYqwhhKnVjUhYHlayAcoxvWeadhdJOeOaYBECVwjBkHbnwrcnYEqGVfXHUqVlyo1i491eduMyaeHJO4OtUQvwOLDg==
ARC-Message-Signature: i=1; a=rsa-sha256; c=relaxed/relaxed; d=microsoft.com;
s=arcselector10001;
h=From:Date:Subject:Message-ID:Content-Type:MIME-Version:X-MS-Exchange-AntiSpam-MessageData-ChunkCount:X-MS-Exchange-AntiSpam-MessageData-0:X-MS-Exchange-AntiSpam-MessageData-1;
bh=DedneXjrYIEyLLdv6Q1YrQAmtIkvqvEuU7hr2SxiSE=;
b=dXQjEHRkYQAZIuGfcJimjiiSNP3FYIhCx17vOFDH5AHWwiTuMKvrydKqJbWgH2g6XXmQ/acSpyALXZT+/akCqCSWlu3JfQEz3zQWUcZH8YSLSvvTX+1HKqo6h0dgI9WwkdYDzjOCyIMIJqHDIaL5HW2MBnth/88F4vjaFxrL6otqqqHHSjNiqFxCXpInMnjt6vsCy2/1T7dzLZ2pjuhvE517+LHpIZkVHnHIRzvzFVEXJHUkk1rVFsNPWPSygZV746QdaaSjJtwGRMXOBo+5VEUlgphvaOE448+/8HHzhcYvvpfq5f3Q==
ARC-Authentication-Results: i=1; mx.microsoft.com 1; spf=pass
smtp.mailfrom=erm.com; dmarc=pass action=none header.from=erm.com; dkim=pass
header.d=erm.com; arc=none
DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed; d=erm.com; s=selector1;
h=From:Date:Subject:Message-ID:Content-Type:MIME-Version:X-MS-Exchange-SenderADCheck;
bh=DedneXjrYIEyLLdv6Q1YrQAmtIkvqvEuU7hr2SxiSE=;
b=Ie/Ge+Ge+Ge+

From: Microsoft Outlook
To: makhabanepi@vodamail.co.za
Subject: Undeliverable: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date: Thursday, 10 October 2024 13:52:20
Attachments: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor Rochdale and Emvelo WEF Cluster Mpumalanga Province.msg

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<https://products.office.com/en-us/CMSImages/Office365Logo_Orange.png?version=b8d190a9-0a8b-4e6a-88e1-e5988fce0470>
Your message to makhabanepi@vodamail.co.za couldn't be delivered.

makhabanepi wasn't found at vodamail.co.za.

ERM Access Amsterdam Office 365 makhabanepi
Action Required Recipient

Unknown To address

How to Fix It
The address may be misspelled or may not exist. Try one or more of the following:
* Send the message again following these steps: In Outlook, open this non-delivery report (NDR) and choose Send Again from the Report ribbon. In Outlook on the web, select this NDR, then select the link "To send this message again, click here." Then delete and retype the entire recipient address. If prompted with an Auto-Complete List suggestion don't select it. After typing the complete address, click Send.
* Contact the recipient (by phone, for example) to check that the address exists and is correct.
* The recipient may have set up email forwarding to an incorrect address. Ask them to check that any forwarding they've set up is working correctly.
* Clear the recipient Auto-Complete List in Outlook or Outlook on the web by following the steps in this article: Fix email delivery issues for error code 5.1.1 in Office 365 <https://emailfl.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2F%3FLinkId%3D389383&data=05%7C02%7CERM.Access.Amsterdam%40erm.com%7C72f3b409ca8b4894497380&sdata=05%7C02%7CERM.Access.Amsterdam%40erm.com%7C72f3b409ca8b4894497380dcc9228532%7C2f2e0ed3b9c4e4f5baa69c1882ba8b1309%7C0%7C0%7C638641579527694023%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=tXE%2FXC+r81+e9%2FRFtFLo%2Fr1oZnhlC%2FMZo74%3D&reserved=0>
, and then send the message again. Retype the entire recipient address before selecting Send.
If the problem continues, forward this message to your email admin. If you're an email admin, refer to the More Info for Email Admins section below.
Was this helpful? Send feedback to Microsoft: <https://emailfl.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2F%3FLinkId%3D525920&data=05%7C02%7CERM.Access.Amsterdam%40erm.com%7C72f3b409ca8b4894497380dcc9228532%7C2f2e0ed3b9c4e4f5baa69c1882ba8b1309%7C0%7C0%7C638641579527694023%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=qk41ZMXZgIL5MmAc%2F9%2Bl7g%2BIDnqicfENo8gYFZEf8%3D&reserved=0>
.

More Info for Email Admins
Status code: 550 5.1.1
This error occurs because the sender sent a message to an email address outside of Office 365, but the address is incorrect or doesn't exist at the destination domain. The error is reported by the recipient domain's email server, but most often it must be fixed by the person who sent the message. If the steps in the How to Fix It section above don't fix the problem, and you're the email admin for the recipient, try one or more of the following:
The email address exists and is correct - Confirm that the recipient address exists, is correct, and is accepting messages.
Synchronize your directories - If you have a hybrid environment and are using directory synchronization make sure the recipient's email address is synced correctly in both Office 365 and in your on-premises directory.
Extract forwarding rule - Check for forwarding rules that aren't behaving as expected. Forwarding can be set up by an admin via mail flow rules or mailbox forwarding address settings, or by the recipient via the Inbox Rules feature.
Mail flow settings and MX records are not correct - Microsoftgenerated mail flow or MX record settings can cause this error. Check your Office 365 mail flow settings to make sure your domain and any mail flow connectors are set up correctly. Also, work with your domain registrar to make sure the MX records for your domain are configured correctly.
For more information and additional tips to fix this issue, see Fix email delivery issues for error code 550 5.1.1 in Office 365 <https://emailfl.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2F%3FLinkId%3D389383&data=05%7C02%7CERM.Access.Amsterdam%40erm.com%7C72f3b409ca8b4894497380dcc9228532%7C2f2e0ed3b9c4e4f5baa69c1882ba8b1309%7C0%7C0%7C638641579527694023%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=LJqLdoNEcyGBpcVbAp0U3qYRZKg%2BW8xUdfM7RgWpM%3D&reserved=0>
.

Original Message Details
Created Date: 2024/10/10 11:52:19
Sender Address: ERM.Access.Amsterdam@erm.com
Recipient Address: makhabanepi@vodamail.co.za
Subject: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Error Details
Error: 550 5.1.1 <makhabanepi@vodamail.co.za>... User unknown
Message rejected by: mail2025c50.megamailservers.eu
Notification Details
Sent by: DU2P804MB8725.eurprd04.prod.outlook.com
Message Route
1: DU2P804MB8725.EURPRD04.PROD.OUTLOOK.COM; FROM TO WITH RELAY TIME
1: 2024/10/10
11:52:19 DB9P804MB10065.eurprd04.prod.outlook.com DB9P804MB10065.eurprd04.prod.outlook.com mapi *
2: 2024/10/10
11:52:20 DB9P804MB10065.eurprd04.prod.outlook.com DU2P804MB8725.eurprd04.prod.outlook.com Microsoft SMTP Server (version=TLS1_2, cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) 1 sec
Original Message Headers
ARC-Seal: i=1; a=rsa-sha256; s=arcselector10001; d=microsoft.com; cv=none;
b=qcnoHtbT2/WPnzPt1mnqCvQLPXZF4nZ0D9BHPrhAdLWV0BzPkYDFIMF0ETaeY+jiuFqMYtWUCAIb/baOsm0hz/W3IJpnGFTaMcYZRWTRdcNUCIDkgCxiSXNSg+/I0tn3CAg==MPqBgwMIO3Qi1v7cdhcF+pRIYJ86VL20A73mIcLrHGV/EY8cf5PW71/yY5Rn2pGkoaECIEyWIkJXUaEzZACEMi6MdMLG0OGh8xx5x/WcOpkr1BukIPEoBYqwhhKcVFi3hY0IaqAcocxYEqYeYXHUyYyv1i949/zdaNhyuerhEO4OtUQvwOLDg==
ARC-Message-Signature: i=1; a=rsa-sha256; c=relaxed/relaxed; d=microsoft.com;
s=arcselector10001;
h=From:Date:Subject:Message-ID:Content-Type:MIME-Version:X-MS-Exchange-AntiSpam-MessageData-ChunkCount:X-MS-Exchange-AntiSpam-MessageData-0:X-MS-Exchange-AntiSpam-MessageData-1;
bh=Dtdq3wVmEyLeM1JC7rfQmxuIkmpGz2Th2Ds26f0=;
b=bXQgEHRA7QAJEwGh1mqiiSNF9TyBCvv7vBTSdJ9NzaT/nUBCvqBxqIkWgBuEZgt5OzuQ/acNpqALXTT+ukCqcJCSWuIJDEUeQ9UzZMBY5L9vvTX+04Kpe08uQF9FwdaYO2yP6Ub9qHvcCy2+17JZuLZ2rjyuh/uF517+L0p1ZkVIkHBRlzvFVKXH9Ivu3dzkeNcOhr9UZjUH2kk1vVfZvPP8sPSyyZV74rGdmUjhSwGRN8X9bs+5VUUgzbvuoIE448+/8IBIsheYrp6jS03Qw==
ARC-Authentication-Results: i=1; mx.microsoft.com 1; spf=pass
smtp.mailfrom=erm.com; dmarc=pass action=none header.from=erm.com; dkim=pass
header.d=erm.com; arc=none
DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed; d=erm.com; s=selector1;
h=From:Date:Subject:Message-ID:Content-Type:MIME-Version:X-MS-Exchange-SenderADCheck;
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Received: from DB9P804MB10065.eurprd04.prod.outlook.com (2603:10a6:10:2dc::18) with
by DU2P804MB8725.eurprd04.prod.outlook.com (2603:10a6:10:2dc::18) with
Thu, 10 Oct 2024 11:52:20 +0000
cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) id 15.20.8048.18; Thu, 10 Oct
2024 11:52:20 +0000
Received: from DB9P804MB10065.eurprd04.prod.outlook.com
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([fe80::87b3:89bb:8d:3140%2]) with mapi id 15.20.8026.020; Thu, 10 Oct 2024
11:52:19 +0000
From: "ERM Access Amsterdam" <ERM.Access.Amsterdam@erm.com>
To: "ERM Access Amsterdam" <ERM.Access.Amsterdam@erm.com>
Subject: Notification of Submission of Final Scoping Report for the Proposed
Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Thread-Topic: Notification of Submission of Final Scoping Report for the
Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Thread-Index: AdiSXZIzvdI3foRrQCLTpxpHLqHQ==
Date: Thu, 10 Oct 2024 11:52:19 +0000
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X-MS-TNEF-Correlator:
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- Anyone
;MSIP_Label_a6cfd0a6-a49d-4802-9a97-568759608577_SetDate=2024-10-10T11:52:14Z;MSIP_Label_a6cfd0a6-a49d-4802-9a97-568759608577_SiteId=f2fe0ed3-9c4a-493b-ae69-e1882ba88130;
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x-templafyemailsignaturesversion: 9.16.0.0
authentication-results: dkim=none (message not signed)
header.d=none;dmarc=none action=none header.from=erm.com;
x-ms-exchange-messagesentrepresentingtype: 1
x-ms-publictraffictype: Email
x-ms-traffictypediagnostic: DB9P804MB10065:EE_ DU2P804MB8725:EE_
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x-ms-exchange-antispam-relay:
x-microsoft-antispam: BCL:0;ARA:13230040|376014|4766014|7416014|1800799024|3807070001|;
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=?us-ascii?Q?Ra+Ue+Ue+Ue

From:	Microsoft Outlook
To:	Molefe.Morokane@dmr.gov.za.
Subject:	Undeliverable: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date:	Thursday, 10 October 2024 13:52:22
Attachments:	Notification of Submission of Final Scoping Report for the Proposed Sheepmoor Rochdale and Emvelo WEF Cluster Mpumalanga Province.msg

Delivery has failed to these recipients or groups:
Molefe.Morokane@dmr.gov.za. <mailto:Molefe.Morokane@dmr.gov.za.>
The format of the email address isn't correct. A correct address looks like this: someone@example.com. Please check the recipient's email address and try to resend the message.

Diagnostic information for administrators:
Generating server: DB9PR04MB10065.eurprd04.prod.outlook.com

Molefe.Morokane@dmr.gov.za.
Remote server returned '550 5.1.3 STOREDRV.Submit; invalid recipient address'

Original message headers:
Received: from DB9PR04MB10065.eurprd04.prod.outlook.com
([fe80::87b3:8fbb:8d:3148]) by DB9PR04MB10065.eurprd04.prod.outlook.com
([fe80::87b3:8fbb:8d:3148%2]) with mapi id 15.20.8026.020; Thu, 10 Oct 2024
11:52:19 +0000
Content-Type: application/ms-tnef; name="winmail.dat"
Content-Transfer-Encoding: binary
From: "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com>
To: "ERM Arcus Amsterdam" <ERM.ArcusAmsterdam@erm.com>
Subject: Notification of Submission of Final Scoping Report for the Proposed
Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Thread-Topic: Notification of Submission of Final Scoping Report for the
Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Thread-Index: AdsX5XlzxlfchforRcCL7pxp8LqjHQ==
X-MS-Exchange-MessageSentRepresentingType: 1
Date: Thu, 10 Oct 2024 11:52:19 +0000
Message-ID: <DB9PR04MB10065AEDFC1894A089F9230B09B782@DB9PR04MB10065.eurprd04.prod.outlook.com>
Accept-Language: en-ZA, en-US
Content-Language: en-US
X-MS-Has-Attach: yes
X-MS-TNEF-Correlator: <DB9PR04MB10065AEDFC1894A089F9230B09B782@DB9PR04MB10065.eurprd04.prod.outlook.com>
msip_labels: MSIP_Label_a6c0d0a6-a4b9-4802-9a97-568759608577_ActionId=019071f1-da05-47fa-8b9d-eb13cbc5298b;MSIP_Label_a6c0d0a6-a4b9-4802-9a97-568759608577_ContentBits=0;MSIP_Label_a6c0d0a6-a4b9-4802-9a97-568759608577_Enabled=true;MSIP_Label_a6c0d0a6-a4b9-4802-9a97-568759608577_Method=Privileged;MSIP_Label_a6c0d0a6-a4b9-4802-9a97-568759608577_Name=General
- Anyone
(unrestricted);MSIP_Label_a6c0d0a6-a4b9-4802-9a97-568759608577_SetDate=2024-10-10T11:52:14Z;MSIP_Label_a6c0d0a6-a4b9-4802-9a97-568759608577_SiteId=f2fe6bd3-9c4a-485b-ae69-e18820a88130;
x-processedbytemplafy: true
x-templafyemailsigvstoversion: 9.16.0.0
MIME-Version: 1.0
X-MS-PublicTrafficType: Email
X-MS-TrafficTypeDiagnostic: DB9PR04MB10065:EE_

From: Microsoft Outlook
To: Jmarakala@mgp.gov.za
Subject: Undeliverable: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date: Thursday, 10 October 2024 13:52:35
Attachments: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor Rochdale and Emvelo WEF Cluster Mpumalanga Province.msg

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Delivery has failed to these recipients or groups:
Jmarakala@mgp.gov.za <mailto:Jmarakala@mgp.gov.za>
Your message couldn't be delivered. The Domain Name System (DNS) reported that the recipient's domain does not exist.
Contact the recipient by some other means (by phone, for example) and ask them to tell their email admin that it appears that their domain isn't properly registered at their domain registrar. Give them the error details shown below. It's likely that the recipient's email admin is the only one who can fix this problem.
For more information and tips to fix this issue see this article: https://go.microsoft.com/fwlink/?LinkId=389361.

Diagnostic information for administrators:
Generating server: DU2PR04MB8725.eurprd04.prod.outlook.com

Jmarakala@mgp.gov.za
Remote server returned '550 5.4.310 DNS domain mgp.gov.za does not exist [Message=InfoDomainNonexistent] [LastAttemptedServerName=mgp.gov.za] [AM1PEPF0002EAE5.eurprd04.prod.outlook.com 2024-10-10T11:52:22.962Z 08DCE8434754ODB]'

Original message headers:
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s=arcselector10001;
h=From:Date:Subject:Message-ID:Content-Type:MIME-Version:X-MS-Exchange-AntiSpam-MessageData-ChunkCount:X-MS-Exchange-AntiSpam-MessageData-0:X-MS-Exchange-AntiSpam-MessageData-1;
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ARC-Authentication-Results: i=1; mx.microsoft.com 1; spf=pass
smtp.mailfrom=erm.com; dmarc=pass action=none header.from=erm.com; dkim=pass
header.d=erm.com; arc=none
DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed; d=erm.com; s=selector1;
h=From:Date:Subject:Message-ID:Content-Type:MIME-Version:X-MS-Exchange-SenderADCheck;
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Received: from DB9PR04MB10065.eurprd04.prod.outlook.com (2603:10a6:10:4c4::10)
by DU2PR04MB8725.eurprd04.prod.outlook.com (2603:10a6:10:2dc::18) with
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cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) id 15.20.8048.18; Thu, 10 Oct
2024 11:52:28 +0000
Received: from DB9PR04MB10065.eurprd04.prod.outlook.com
([fa80::87b1:8f6b:8d:1146]) by DB9PR04MB10065.eurprd04.prod.outlook.com
([fa80::87b1:8f6b:8d:1146%2]) with mapi id 15.20.8026.020; Thu, 10 Oct 2024
11:52:19 +0000
From: "ERM_Arcas Amsterdam" <ERM.ArcasAmsterdam@erm.com>
To: "ERM_Arcas Amsterdam" <ERM.ArcasAmsterdam@erm.com>
Subject: Notification of Submission of Final Scoping Report for the Proposed
Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Thread-Topic: Notification of Submission of Final Scoping Report for the
Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Thread-Index: AdsXSXcvRcfnhvRvCS7pnpRLqjfBQ==
Date: Thu, 10 Oct 2024 11:52:19 +0000
Message-ID: <DB9PR04MB10065AEDFC1894A088F9230B0985782@DB9PR04MB10065.eurprd04.prod.outlook.com>
Accept-Language: en-ZA, en-US
Content-Language: en-US
X-MS-Has-Attach: yes
X-MS-TNEF-Correlator:
msip_labels: MSIP_Label_afc8dfa6-a4b9-4802-9a97-56875960857 7_ActionId=0190710f-dad6-470a-8b9d-ab13cbc5298b;MSIP_Label_afc8dfa6-a4b9-4802-9a97-56875960857 7_ContentBits=0;MSIP_Label_afc8dfa6-a4b9-4802-9a97-56875960857 7_Enabled=true;MSIP_Label_afc8dfa6-a4b9-4802-9a97-56875960857 7_Method=Privileged;MSIP_Label_afc8dfa6-a4b9-4802-9a97-56875960857 7_Name=General
- Anyone
(unrestricted);MSIP_Label_afc8dfa6-a4b9-4802-9a97-56875960857 7_SetDate=2024-10-10T11:52:14Z;MSIP_Label_afc8dfa6-a4b9-4802-9a97-56875960857 7_SiteId=f2fa6fa0-9c4a-4858-ae69-e1882f8a8130;
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x-tmpally.emailorigin.version: 9.16.0.0
authentication-results: dkim=none (message not signed)
header.d=none;dmarc=none action=none header.from=erm.com;
x-ms-exchange-messagesentrepresentingtype: 1
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x-ms-exchange-antispam-relay: 0
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From:	postmaster@gsibande.gov.za
To:	ERM Arcus Amsterdam
Subject:	Undeliverable: Notification of Submission of Final Scoping Report for the Proposed Sheepmoor, Rochdale and Emvelo WEF Cluster, Mpumalanga Province
Date:	Thursday, 10 October 2024 13:52:42
Attachments:	Undeliverable Notification of Submission of Final Scoping Report for the Proposed Sheepmoor Rochdale and Emvelo WEF Cluster Mpumalanga Province.msg

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[You don't often get email from postmaster@gsibande.gov.za. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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

EXTERNAL MESSAGE

From: postmaster@dffe.gov.za
To: ERM Arcus Amsterdam
Subject: Your message couldn"t be delivered
Date: Thursday, 10 October 2024 13:52:45

You don't often get email from postmaster@dffe.gov.za. Learn why this is important

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

EXTERNAL MESSAGE

Logo

Your message couldn't be delivered

The message you sent to messop@dffe.gov.za couldn't be delivered due to: Recipient email address is possibly incorrect.

Further information
5.4.1 Recipient address rejected: Access denied.
[JN1PEPF00001EDB.ZAFP275.PROD.OUTLOOK.COM 2024-10-10T11:52:32.374Z 08DCE8B46F5EF61A]

If you sent this message to multiple addresses, you'll receive a notification like this for every one that didn't arrive.

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From: Domain postMaster address
To: ERM Arcus Amsterdam
Subject: Your message couldn"t be delivered
Date: Thursday, 10 October 2024 13:52:41

You don't often get email from postmaster@ipp-projects.co.za. Learn why this is important

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

EXTERNAL MESSAGE

Logo

Your message couldn't be delivered

The message you sent to pervelan.govender@ipp-projects.co.za couldn't be delivered due to: Recipient email address is possibly incorrect.

Further information
5.4.1 Recipient address rejected: Access denied.
[DU2PEPF0001E9C4.eurprd03.prod.outlook.com 2024-10-10T11:52:31.113Z 08DCE59A8F64C342]

If you sent this message to multiple addresses, you'll receive a notification like this for every one that didn't arrive.

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From: postmaster@dffe.gov.za
To: ERM Arcus Amsterdam
Subject: Your message couldn"t be delivered
Date: Thursday, 10 October 2024 13:52:40

You don't often get email from postmaster@dffe.gov.za. Learn why this is important

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

EXTERNAL MESSAGE

Logo

Your message couldn't be delivered

The message you sent to emokganedi@dffe.gov.za couldn't be delivered due to: Recipient email address is possibly incorrect.

Further information
5.4.1 Recipient address rejected: Access denied.
[CPT0EPF00000718.ZAFP275.PROD.OUTLOOK.COM 2024-10-10T11:52:32.347Z 08DCE8E40E0E3300]

If you sent this message to multiple addresses, you'll receive a notification like this for every one that didn't arrive.

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APPENDIX 8 MTPA AND DARDLEA MEETING MINUTES

MULILO AMSTERDAMN WEF MEETING AGENDA

LOCATION	The Capital Mbombela, 4 Penny Gum Avenue, 1202 Nelspruit, South Africa
DATE	14 May 2025
TIME	12:00 – 13:30
TOPIC	Engagement on DARDLEA Comments

Item	Topic	Lead
1.	**Welcome and Introductions** • Brief introductions of attendees • Purpose of the meeting	Lloyd Barnes
2.	**Overview of DARDLEA's Comments on the Draft EIA Reports** • Summary of key comments and concerns • Clarification of any specific points	MPG - Robyn Luyt
3.	**Specialist Discussion: Avifaunal Comments** • Detailed discussion of avifaunal issues raised by DARDLEA • Specialist's response and clarification	AfriAvian - Albert Froneman
4.	**Strategic Insight: Importance of Wind Energy and the Just Energy Transition** • Importance of renewable energy for the province • The role of wind energy in supporting the Just Energy Transition	Mulilo: Group Chairman – Jan Oberholzer
5.	**Terrestrial Ecology: Intact Grasslands and Other Considerations** • Discussion of intact grasslands and other sensitive terrestrial features	Lloyd Barnes
6.	**Closing Remarks** • Final thoughts from DARDLEA, MUL, and consultant team • Meeting close	Lloyd Barnes

WELCOME AND OPENING REMARKS

- Lloyd Barnes opened the meeting, thanking attendees and acknowledging the importance of the engagement.
- Clarified that the meeting was initiated by Mulilo to discuss comments received from MTPA and DARDLEA on the draft EIA.

PROJECT OVERVIEW

- Amsterdam Wind Cluster comprises two wind farms: Emvelo (22 turbines) and Sheepmoor (25 turbines), located near Ermelo and Camden Power Station.
- Turbine numbers and blade lengths have been reduced to address environmental sensitivities.
- Grid connection planned via Camden B Main Transmission Substation.
  Project timeline:
  - Final EIA submission: imminent
  - Environmental decision: expected July 2025
  - Financial close: Q2–Q3 2026
  - Operations commencement: late 2028

STRATEGIC CONTEXT AND JUST ENERGY TRANSITION

- Jan Oberholzer (Chairman, Mulilo) emphasized:
  - Mulilo's transformation post-acquisition by Copenhagen Infrastructure Partners.
  - The critical role of renewable energy in South Africa's energy transition.
  - The need for robust transmission infrastructure.
  - Importance of Mpumalanga as a strategic location due to grid availability and aging coal infrastructure.

COMMENTS AND CONCERNS FROM AUTHORITIES

- Mervyn Lotter (MTPA) clarified that the meeting was not requested by MTPA/DARDLEA but welcomed the engagement.
- Reiterated support for renewable energy and the Just Transition, while emphasizing the need for rigorous environmental scrutiny.

CUMULATIVE IMPACT AND VIABILITY DISCUSSION

- Rebecca Thomas presented data on project viability:
  - Only ~5% of renewable energy projects nationally reach commercial operation.
  - Grid availability in Mpumalanga may increase this percentage.
  - Authorities emphasized the need to assess cumulative impacts assuming full build-out of authorized projects, per precautionary principles.

ENVIRONMENTAL SENSITIVITIES AND MITIGATION

- Albert Froneman (Avifaunal Specialist) outlined:
  - Extensive bird monitoring, including Marshall Eagle tracking.
- Multi-tiered mitigation strategy:
  - Avoidance of high-risk areas

- Shutdown-on-demand (day and night)
- Proactive curtailment based on environmental triggers
- Radar systems for nocturnal species
- Commitment to transparency, annual reporting, and open access for research and audits.

TERRESTRIAL AND BIODIVERSITY CONSIDERATIONS

- Lloyd Barnes and team addressed:
  - Reduction of turbines in sensitive areas (e.g., CBA irreplaceable, intact grasslands).
  - Proposal to manage and rehabilitate 326 hectares of vegetation.
  - Acknowledgement of the need for stewardship and biodiversity management plans.

PROCESS AND PROCEDURAL CLARIFICATIONS

- Robyn Luyt (DARDLEA) raised concerns about:
  - Lack of opportunity to review revised layouts and mitigation before final EIA submission.
  - Need for transparency and early engagement on substantive changes.
- Mulilo committed to:
  - Sharing updated layouts and comment-response reports with authorities before final submission.
  - Considering a follow-up engagement if time permits.

CLOSING REMARKS

- Authorities reiterated the importance of:
  - Avoiding development in intact grasslands and sensitive bird habitats.
  - Ensuring mitigation is evidence-based and enforceable.
  - Mulilo acknowledged the feedback and committed to continued collaboration.

ACTION ITEMS

Action	Responsible	Due Date
Share updated layout and comment-response report	Mulilo	Before 27 May 2025
Review and provide feedback on revised documents	MTPA & DARDLEA	As soon as received
Consider follow-up meeting if needed	All parties	TBD

APPENDIX 9 LEGAL MEMO

NICHOLAS SMITH ATTORNEYS
ENVIRONMENTAL LAW SPECIALISTS

MEMORANDUM OF ADVICE:

IN RE: **AMSTERDAM WEF CLUSTER (PROPOSED SHEEPMOOR AND EMVELO WIND ENERGY FACILITIES)**

Prepared for:

Mulilo Renewable Project Developments (Pty) Ltd
Attention: Mr. Lloyd Barnes
By email: Lloyd@mulilo.com

Copy to:

Mr. Andrew Pearson; Ms. Rebecca Thomas; Mr. Stuart MacWilliam; Ms. Ameesha Sanker; Ms. Gail Wheeler; and Ms. Jody Thorburn
By email: Andrew@mulilo.com; Reth@mulilo.com; Stuart@mulilo.com; ameesha@mulilo.com; gail@mulilo.com; joth@mulilo.com

6 MARCH 2025

Nicholas Smith - BA (Hons) LLB ADL LLM (Marine & Environmental Law)

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3. MY ADVICE **8**

1. INTRODUCTION

We act for Mulilo Renewable Project Developments (Pty) Ltd.

Our instructions are that client proposes undertaking the development of two wind energy facilities ("WEFs") where three WEFs were originally envisaged.

The three WEFs originally envisaged were the Sheepmoor WEF; the Emvelo WEF and the Rochdale WEF. The current proposal is to incorporate areas from the Rochdale WEF into the two remaining projects (the Sheepmoor and Emvelo WEFs) following the scoping phase, which excluded most of the turbines originally part of the Rochdale WEF.[1] This is explained in more detail in the two paragraphs directly below.

The Sheepmoor WEF, as approved for the EIA phase after acceptance of the scoping report by the Department of Forestry, Fisheries and the Environment ("DFFE")[2] will now include properties that were assessed as part of the scoping process for the Emvelo WEF and the Sheepmoor WEF.

The Emvelo WEF will, for purposes of the EIA phase for that WEF, now include immovable properties assessed, and accepted by DFFE, pursuant to the Emvelo and Rochdale scoping processes.[3]

The Chief Directorate: Environmental Affairs[4] in the DFFE (i.e. the competent authority) has confirmed in writing that the proposed approach as described above is substantively sound, and that the Sheepmoor and Emvelo WEFs (collectively the Amsterdam Cluster herein) can both proceed to the EIA phase.

DFFE's Chief Directorate: Integrated Environmental Authorisations has confirmed DFFE's opinion in writing, in the following terms:

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[1] Our instructions are that the number of turbines originally envisaged for the Rochdale WEF were scoped out principally because of concerns pertaining to aspects raised by the civil aviation authority; and potential impacts on avifauna.

[2] By letter dated 19 November 2024 and signed by Ms. Masina Morudu. Ms. Morudu is the Designated Control Environmental Officer: National Integrated Authorisation, and at the behest of Dr. Sabelo Malaza the Chief Director: Integrated Environmental Authorisations in DFFE.

[3] The Emvelo and Rochdale scoping reports and respective plans of study for environmental impact assessment (PoSEIA) dated October 2024 and received by the Department on 7 October 2024 were accepted by Ms. Morudu for and on behalf of Dr. Malaza on 19 November 2024.

[4] Represented by Ms. Milicent Solomons of the Chief Directorate: Integrated Environmental Authorisations in the Department of Forestry, Fisheries and Environment ("DFFE"). Ms. Solomons expressed the competent authority's position in an email to our client's Mr. Barnes dated 17 February 2025.

"*The trailing emails below refer. Please note the opinion of the Chief Directorate: Integrated Environmental Authorisations after internal consultation …*

2. *In terms of the EIA Regulations, 2014 (as amended) we do not see any prohibition of the proposed process, incorporating the 20% of the Rochdale site into the Emvelo application. The project scope and the relevant assessments will have to comply with all legislative requirements.*

3. ***However it is important to indicate that we foresee several challenges, should you adopt to follow this process:***

   a. *This is the 2nd application for the same development and as you are aware a few concerns have been raised by stakeholders.*

   b. *The screening reports and approved plan of study does not include this portion of the property (20% of Rochdale) and will very likely be challenged by stakeholders. The current approved plan of study and terms of reference for Emvelo does not include the 20% of Rochdale and this can be challenged based on procedure.*

Based on the potential risks, we suggest that you consider withdrawing the two applications in question, i.e. Rochdale and Emvelo and submit one application as Emvelo (including 20% Rochdale portion). The screening report and the plan of study will include the whole area; all stakeholders will have an opportunity to comment and provide input at scoping phase during the public review process." (My underlining; bold text as in the original.)

As regards the *verbatim* extract above from the emailed correspondence from the DFFE's Chief Directorate: Integrated Environmental Authorisation, in summary, and in my considered view, any procedural challenge would only have reasonable prospects of success if the public/registered interested and affected parties ("I&APs") are excluded from the EIA phase, which is not client's intention nor the practice that will be followed.

All relevant stakeholders will be entitled to participate fully in the EIA process, which will conform to the requirements of regulation 23 of the NEMA EIA Regulations (which governs the submission and consideration of EIA Reports and supporting documents to the competent authority; and Chapter 6[5] in the latter Regulations, which governs pubic participation; and regulation 45[6] of EIA Regulations, which stipulates adherence to the regulatory time-frames.

[5] Chapter 6 is titled "*Public participation*".

[6] Regulation 45 is included in Chapter 7 of the NEMA EIA Regulations, titled "*General matters*".

The public participation processes obliged in the DFFE's letters accepting the respective scoping reports are exactly the same. In other words, even with the proposed inclusion of turbines from the Rochdale WEF in the Emvelo WEF, and turbines from the Emvelo WEF in the Sheepmoor WEF, the same nature and extent of PPP is obliged of the applicant.

What is also clear from our instructions[7] is that our client is not proposing to expand upon the areas already assessed during scoping.[8] As such, there can be no suggestion of procedural or substantive unfairness in the EIAs as authorised by the DFFE and to be undertaken respectively for the Emvelo and Sheepmoor WEFs.

If the areas assessed during the two EIAs were to be increased (either additionally or cumulatively) then there could be an argument that the scoping process should commence afresh. The same principle would apply if additional NEMA-listed activities were to be triggered by the proposed merger of the three WEFs originally envisaged into the two WEFs now proposed for purposes of EIA. On the facts, neither of these scenarios arises, and it follows that the two WEFs now contemplated can lawfully be progressed to the EIA phase, with particular reference to meeting the procedural and substantive requirements laid down in DFFE's acceptance letters dated 19 November 2024.

2. THE APPLICABLE LAW

2.1 The constitutional point of departure in respect of fair process

Section 33 of the Constitution[9] provides that administrative action (in this instance, the DFFE's decision-making procedures that pertain to the grant or refusal of EA after the EIA phase) must be lawful, reasonable and procedurally fair.[10]

---

[7] By email from client's Mr. Barnes.

[8] See the unnumbered second paragraph of our emailed instructions.

[9] Act 108 of 1996 (as amended).

[10] Section 33 of the Constitution (titled "*Just administrative action*") reads as follows in full: "*(1) Everyone has the right to administrative action that is lawful, reasonable and procedurally fair (2) everyone whose rights have been adversely affected by administrative action has the right to be given written reasons (3) National legislation must be enacted to give effect to these rights, and must – (a) provide for the review of administrative action by a court or, where appropriate, an independent and impartial tribunal; (b) impose a duty on the State to give effect to the rights in sub-sections (1) and (2); and (c) promote an efficient administration.*" (We mention for the sake of completeness that the national legislation enacted to give effect to the right to just administrative action is the Promotion of Administrative Justice Act, 3 of 2000).

Procedural fairness will depend on the facts of the particular administrative action in question as well as the prevailing law that applies to a particular procedure.[11]

2.2 **The requirements in NEMA pertaining to procedural fairness**

In this instance, procedural fairness in respect of the two WEF applications to be proceeded with by client to the EIA phase and pursuant to acceptance of the scoping phase is regulated in the main by the NEMA EIA Regulations, and in particular, the requirements incumbent upon an applicant as those are set out in Chapter 6 of the aforesaid Regulations.

Before considering the procedural requirements (or safeguards) articulated in the NEMA EIA Regulations, it is useful to have regard to the provisions of NEMA itself.

Among the relevant principles in NEMA's section 2 are the following:

Section 2(3) of NEMA stipulates that:

> "*Development must be socially, environmentally and economically sustainable.*"

Section 2(4)(b) of NEMA provides that:

> "*Environmental management must be integrated, acknowledging that all elements of the environment are linked and inter-related, and it must take into account the effects of decisions on all aspects of the environment and all people in the environment by pursuing the selection of the best practicable environmental option.*"

Section 2(4)(f) of NEMA obliges the following:

> "*The participation of all interested and affected parties in environmental governance must be promoted, and all people must have the opportunity to develop the understanding, skills and capacity necessary for achieving equitable and effective participation, and participation by vulnerable and disadvantaged persons must be ensured.*"

Section 2(4)(g) of NEMA stipulates that:

> "*Decisions must take into account the interests, needs and values of all interested and affected parties, and this includes recognising all forms of knowledge, including traditional and ordinary knowledge.*"

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[11] See *Director: Mineral Development, Gauteng Region and Another v Save the Vaal Environment and Others* (133/98) [1999] ZASCA 9; [1999] 2 All SA 381 (A) (12 March 1999).

Section 2(4)(k) of NEMA provides that:

> "*Community well-being and empowerment must be promoted through environmental education, the raising of environmental awareness, the sharing of knowledge and experience and other appropriate means.*"

The general objectives of integrated environmental management in section 23 of NEMA include ensuring "*… adequate and appropriate opportunity for public participation in decisions that may affect the environment.*"

It is clear with reference to the Constitution and the primary regulation that gives effect to the environmental assessment process that public participation forms an integral part of any environmental assessment process, whether basic assessment or (as in this instance) scoping and EIA.

On the facts of the present matter DFFE's Chief Director: Integrated Environmental Authorisations[12] has accepted the scoping reports respectively for the Rochdale WEF; the Sheepmoor WEF and the Emvelo WEF. He has also accepted the plan of study for the EIA in each instance, dated October 2024 and received by DFFE on 7 October 2024. In each case, the EAP employed by Environmental Resource Management Southern Africa (Pty) Ltd[13] has been authorised to proceed "*… with the* [EIA] *process in accordance with the tasks contemplated in the* [plan of study for EIA] *as required in terms of the EIA Regulations, 2014, as amended. The EIA report must comply with the requirements of appendix 3 of the EIA Regulations 2014, as amended*".

In each instance the DFFE's Chief Directorate has progressed the scoping phase with particular reference to regulation 22(a) of the NEMA EIA Regulations. That regulation provides that the competent authority must, within 43 days of receipt of a scoping report accept the scoping report, with or without conditions, and advise the applicant to proceed or continue with the tasks contemplated in the plan of study for EIA.

Subsequent to DFFE's acceptance of the scoping report, client's EAP attended a meeting with DFFE, the aim of which was to formally present the proposed way forward post-scoping approval, for the proposed WEFs in this matter. Another principal aspect for discussion was the review and discussion of agreed changes to the project boundaries in the EIA phase. It is clear from the minutes of the meeting that the remaining turbines comprising the Rochdale WEF "*… will be merged with Emvelo*". The scope of the Sheepmoor WEF has been reduced and will include a small portion of the previous Emvelo application. It is clear from the minute of the meeting that the updated Sheepmoor and Emvelo WEFs are contemplated for completion in terms of regulations 31 and 32 of the NEMA EIA Regulations. The provisions of the EIA

[12] Dr. Sabelo Malaza.

[13] Ms. Stephanie Gopaul.

Regulations applicable to the submission and consideration of an EIA report and supporting documents to the competent authority

Regulation 23(1) obliges the applicant for EA, within 106 days of the acceptance of the scoping report to submit an EIA report inclusive of any specialist reports, and an EMPr (in this instance, by no later than Thursday 27 March 2025[14]).

The submission of the EIA report and accompanying EMPr is subject to a peremptory procedural requirement: Both documents "*… must have been subjected to a public participation process of at least 30 days and* [they must reflect] *the incorporation of comments received, including any comments of the competent authority.*"

In the alternative the applicant must submit to the competent authority a notice in writing that the documents contemplated in regulation 23(1)(a) will be submitted within 156 days of acceptance of the scoping report by the competent authority, as significant changes have been made or significant new information has been added to the documents, which changes or information was not contained in the original documents consulted on during the initial public participation process contemplated in sub-regulation 1(a), and that the revised documents contemplated in sub-regulation 1(a) will be subjected to another public participation process of at least 30 days.

In the circumstances there can be no suggestion that the relevant procedural safeguards in relation to an EIA report pertaining to the two proposed WEFs (Emvelo and Sheepmoor) will not occur.

Another of the substantive requirements in regulation 23 that includes a procedural safeguard is to be found in regulation 23(3) which provides as follows:

> "*An* [EIA] *report must contain all information set out in appendix 3 to these Regulations or comply with a protocol or minimum information requirements relevant to the application as identified and gazetted by the Minister in a Government Notice.*"

The EMPr delivered simultaneously with the EIA report must contain all information set out in appendix 4 to the EIA Regulations or must be a generic EMPr relevant to the application as identified and gazetted by the Minister.

Specialist reports must contain all information set out in appendix 6 to the NEMA EIA Regulations.

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[14] The 106-day period must exclude the period from 15 December 2024 to 5 January 2025. In this regard, regulation 3(2) of the NEMA EIA Regulations provides as follows: "*For any action contemplated in terms of these Regulations for which a timeframe is prescribed, the period of 15 December to 5 January must be excluded in the reckoning of days.*"

As regards the scope of assessment and content of EIA reports as regulated by appendix 3 to the EIA Regulations it is important to have regard to paragraph 2 thereunder which provides the following:

> "*The objective of the EIA process is to, through a consultative process –*
>
> *(a) Determine the policy and legislative context within which the activity is located and document how the proposed activity complies with and responds to the policy and legislative context;*
>
> *(b) describe the need and desirability of the proposed activity, including the need and desirability of the activity in the context of the development footprint on the approved site as contemplated in the accepted scoping report.*"

As to the scope of assessment and content of EIA reports appendix 3 contains certain peremptory obligations (i.e. the report "*… must contain the information that is necessary for the competent authority to consider and come to a decision on the application and must include – (h) a full description of the process followed to reach the proposed development footprint within the approved site as contemplated in the accepted scoping report, including: … (iii) a summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them ...; (i) a full description of the process undertaken to identify, assess and rank the impacts the activity and associated structures and infrastructure will impose on the preferred development footprint on the approved site as contemplated in the accepted scoping report through the life of the activity, including – (i) a description of all environmental issues and risks that were identified during the EIA process; and (ii) an assessment of the significance of each issue and risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures.*")

Also required is a reasoned opinion from the EAP as to whether the proposed activity should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be made in respect of that authorisation.[15]

Another important obligation incumbent upon the EAP is set out in paragraph 3(1)(s) which obliges the EAP, under oath or affirmation to confirm the inclusion of comments and inputs from stakeholders and I&APs as well as any information provided by the EAP to I&APs and any responses by the EAP to comments or inputs made by interested or affected parties.

[15] See paragraph 3(1)(q) in appendix 3.

It is clear that the procedure pertaining to EIA after the acceptance of a scoping report includes detailed procedural requirements which act as a bulwark in respect of fair and defensible public participation.

In the circumstances and provided that the EAP ensures full and proper public participation with all I&APs registered during the scoping phase (as accepted by the DFFE) there should be no procedural difficulties with the proposed merger of the originally envisaged three WEFs into two WEFs.

3. **MY ADVICE**

Mulilo needs to ensure that there is a detailed but succinct explanation contained in the EIA reports of the following:

(1) How the scoping phase for each WEF culminated in the DFFE's approval thereof on 19 November 2024, which acceptance letters include reference to PPP in the EIA phase as follows:

- Under the heading "*General Comments*" at paragraph 1 the acceptance of the scoping report reads as follows:

  "*The meeting minutes in Appendix F of the* [PP] *Report refers. The discussions during the meeting with the Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs (DARDLEA) and the Mpumalanga Tourism & Parks Agency (MTPA) on 11 September 2024 are noted.*"

- Under the heading "*Public Participation*" in DFFE's written acceptance of the scoping report the following is recorded:

  "*10. Proof of correspondence with the various stakeholders must be included in the EIAr. This must indicate that this draft EIAr has been subjected to 30 days* [PPP]*, stating the start and end date of the PPP.*

  11. Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAr.

  12. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. Please provide proof of written notice for the availability of the draft EIAr for comment.

  13. All issues raised and comments received must be incorporated into the Comments and Response Report (CRR).

14. *Comments from I&APs must not be split and arranged into categories. Comments from each submission must be responded to individually.*

15. *Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as "noted" is not regarded as an adequate response to an I&AP's comments.*

16. *The CRR addresses comments on the draft SR, which have been received from organs of state, however, copies of these comments are not included in the report. Copies of original comments received from I&APs and organs of state, which have jurisdiction in respect of the proposed activity must be submitted to the Department with the EIAr.*

17. *If applicable, the attendance registers and minutes of any meetings held by the Environmental Assessment Practitioner (EAP) with I&APs and other role players must be included in the EIAr.*

18. *The newspaper advert proof in Appendix C of the* [PP] *Report refers. Please submit a full page of the newspaper(s) containing the advertisement, ensuring that the name of the newspaper and date are visible. (Underlining as in the original.)*

- As regards comments from organs of state paragraph 19 (under the heading "*Specialist assessments*") provides as follows:

  "*Interim and final comments from the South African Heritage Resources Agency (SAHRA) must be addressed and incorporated in the EIAr.*"

(2) Subsequent to the approval of the scoping phase it became clear that only some of the turbines comprising the Rochdale WEF could be erected.

(3) The proposal assessed in the EIA is to merge Rochdale's remaining turbines into the Emvelo WEF, and the registered stakeholders (i.e. I&APs) are entitled to participate fully in the on-going EIA process.

My advice is that there can be no procedural prejudice to the registered I&APs provided that they are fully engaged in the statutory PPP as envisaged in NEMA, the EIA Regulations and the relevant provisions of the letter from DFFE that confirms the Chief Director: Integrated Environmental Authorisation's acceptance of the scoping reports at issue in this matter. There is a substantively good *rationale* for the accepted scoping report for the Sheepmoor WEF now including properties that were assessed (and

accepted by DFFE) as part of the Emvelo and Sheepmoor scoping processes, which will now form part of the Sheepmoor WEF.

The same *rationale* applies to the accepted scoping report for the Emvelo WEF now including properties that were assessed (and accepted by DFFE) as part of the Emvelo and Rochdale scoping processes, which will now form part of the consolidated Emvelo WEF.

In an abundance of caution, the EAP could include DFFE's Chief Directorate's emailed correspondence to client's Mr. Barnes as an annexure to the two EIA reports to be submitted by 27 March 2025.

It would also be useful to append an aerial photograph that shows conclusively that the consolidated and respective Sheepmoor and Emvelo WEFs incorporate properties that were assessed during scoping and accepted as such in DFFE's acceptance letters dated 19 November 2024. As already pointed out, there can be no suggestion that the now-proposed Sheepmoor WEF and Emvelo WEF include any properties that were not the subject of the scoping exercise that culminated in the acceptance of the scoping reports. An aerial photograph as proposed would provide the reader of this memorandum with conclusive evidence in that regard.

We advise accordingly.

PREPARED at CAPE TOWN on this 6th day of MARCH 2025

N.D. SMITH

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