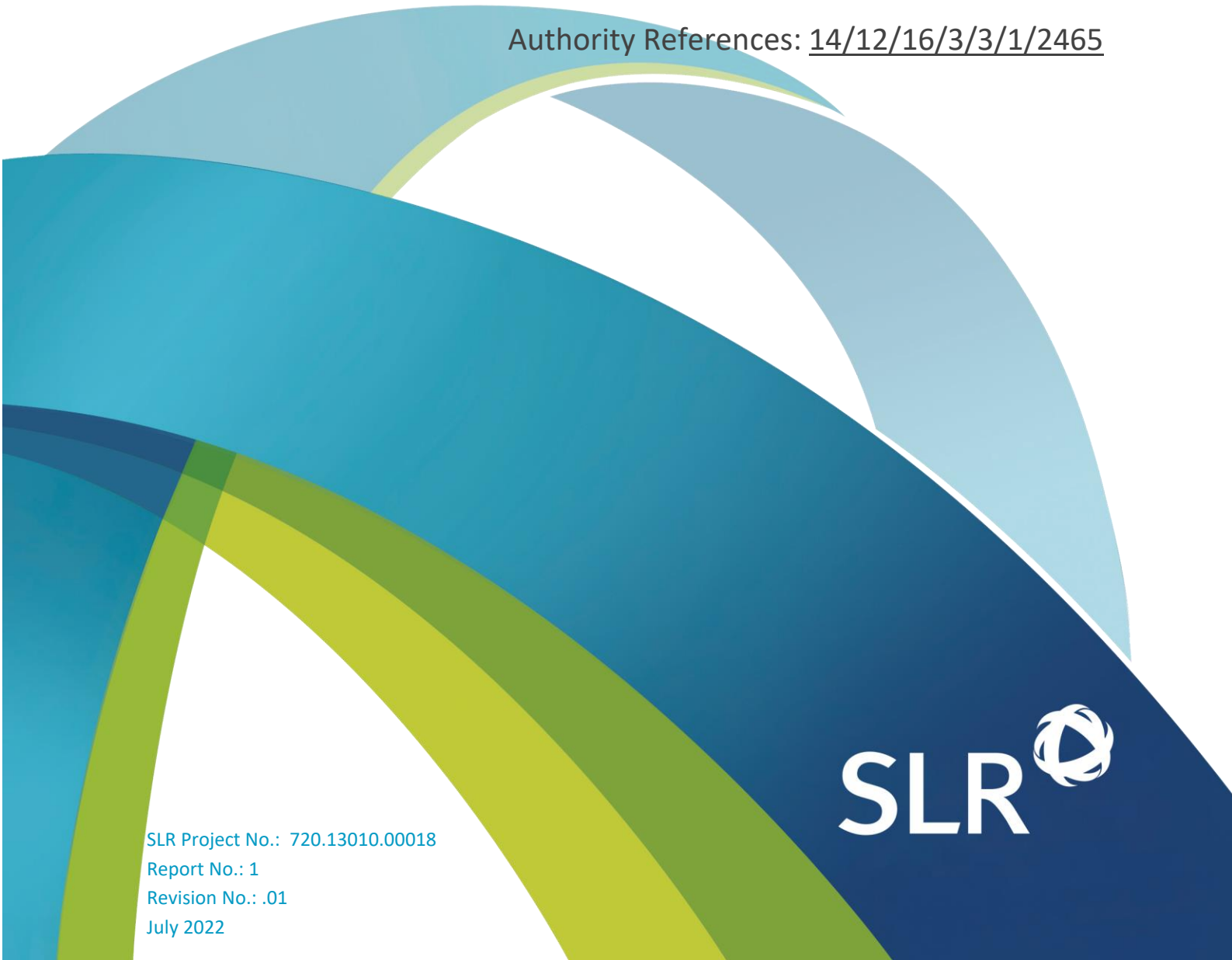
ENVIRONMENTAL AUTHORISATION (EA) AMENDMENT PROCESS FOR THE AUTHORISED ESKOM 132kV SWITCHING SUBSTATION AND ASSOCIATED 132kV POWERLINE, NEAR BEAUFORT WEST IN THE WESTERN CAPE PROVINCE

DRAFT EA AMENDMENT REPORT

Eskom Switching Substation & Powerline Amendment

Prepared for: Beaufort West Wind Farm (Pty) Ltd

Authority References: 14/12/16/3/3/1/2465



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REPORT SIGN OFF AND APPROVALS

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BASIS OF REPORT

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CONTENTS OF AN AMENDMENT REPORT

In terms of Section 32 of Chapter 5 of the Environmental Impact Assessment (EIA) Regulations, promulgated in terms of the National Environmental Management Act (NEMA) (Act no. 107 of 1998, as amended), dated 8 December 2014 and amended on 7 April 2017, an applicant must within 90 days of receipt by the competent authority of the application, submit to the competent authority a report reflecting the information set out in the table below:

Contents of an Amendment Report as per Section 32 of the 2014 NEMA EIA Regulations, as amended on 7 April 2017

NEMA requirements for Amendment Report		
Section 32	**Content as required by NEMA**	**Section**
32 (1)	The applicant must within 90 days of receipt by the competent authority of the application made in terms of regulation 31, submit to the competent authority—	
(a)	a report, reflecting-	
	(i) an assessment of all impacts related to the proposed change;	Section 3
	(ii) advantages and disadvantages associated with the proposed change; and	Section 4
	(iii) measures to ensure avoidance, management and mitigation of impacts associated with such proposed change; and	**N/A** – measures to ensure avoidance, management and mitigation of impacts provided by specialist as part of BA process remain unchanged (i.e., still applicable)
	(iv) any changes to the EMPr;	**N/A** – no changes to EMPrs submitted as part of Final BA Report as amendments do not result in changes to EMPrs
	Which report-	
	(aa) had been subjected to a public participation process, which had been agreed to by the competent authority, and which was appropriate to bring the proposed change to the attention of potential and registered interested and affected parties, including organs of state, which have jurisdiction in respect of any aspect of the relevant activity, and the competent authority, and	Section 5
	(bb) reflects the incorporation of comments received, including any comments of the competent authority; or	Section 5 – any comments received following the review of the draft report will be incorporated into the final report, and the necessary proofs will be provided.

NEMA requirements for Amendment Report		
Section 32	**Content as required by NEMA**	**Section**
(b)	a notification in writing that the report will be submitted within 140 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 report, which changes or information was not contained in the report consulted on during the initial public participation process contemplated in subregulation (1)(a) and that the revised report will be subjected to another public participation process of at least 30 days.	**N/A -** Final Amendment Report will be submitted to DFFE within 90 days of receipt of the application.
(2)	In the event where subregulation (1)(b) applies, the report, which reflects the incorporation of comments received, including any comments of the competent authority, must be submitted to the competent authority within 140 days of receipt of the application by the competent authority.	**N/A** – Final Amendment Report will be submitted to DFFE within 90 days of receipt of the application.

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ACRONYMS AND ABBREVIATIONS

Acronym / Abbreviation	Definition
BA	- Basic Assessment
BAR	- Basic Assessment Report
BESS	- Battery Energy Storage System
CBA	- Critical Biodiversity Area
CKDM	- Central Karoo District Municipality
DBAR	- Draft Basic Assessment Report
DFFE	- Department of Forestry, Fisheries and the Environment
DM	- District Municipality
DoE	- Department of Energy
EA	- Environmental Authorisation
EAP	- Environmental Assessment Practitioner
EIA	- Environmental Impact Assessment
EMPr	- Environmental Management Programme
ESA	- Ecological Support Area
FBAR	- Final Basic Assessment Report
Ha	- Hectares
HIA	- Heritage Impact Assessment
I&AP(s)	- Interested and/or Affected Party/Party(ies)
IPP(s)	- Independent Power Producer(s)
kV	- Kilo Volt
LM	- Local Municipality
MW	- Megawatt
NEMA	- National Environmental Management Act (Act No. 107 of 1998) as amended
O&M	- Operations and Maintenance
OoS	- Organs of State
PPA	- Power Purchase Agreement
PPP	- Public Participation Process
PP Plan	- Public Participation Plan
REDZ	- Renewable Energy Development Zone
REIPPP	-Renewable Energy Independent Power Producer Procurement Programme
RE	- Renewable Energy
SA	- South Africa
STP	- Screening Tool Report
TASCS	- Terrestrial Animal Species Compliance Statement
VIA	- Visual Impact Assessment
VU	- Vulnerable

Acronym / Abbreviation	Definition
WC	- Western Cape

Environmental Authorisation (EA) Amendment Process for the authorised Eskom 132kv Switching Substation and associated 132kv Powerline, near Beaufort West in the Western Cape Province (14/12/16/3/3/1/2465) - Draft EA Amendment Report

1. INTRODUCTION

SLR Consulting (South Africa) (Pty) Ltd ('SLR') was appointed by Beaufort West Wind Farm (Pty) Ltd[1] ('Beaufort West Wind Farm') to submit the application for Environmental Authorisation (EA) and undertake the required Basic Assessment (BA) process, in terms of the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), for the proposed construction of one (1) 132 kilovolt (kV) onsite Switching Substation[2] and one (1) 132kV powerline**,** which will be added to the authorised Beaufort West Cluster of wind developments, near the town of Beaufort West in the Western Cape Province (hereafter referred to as the 'project').

The Beaufort West Cluster of wind developments consists of the following authorised projects (i.e., the following projects are collectively referred to as "*the Beaufort West Cluster*"):

- Beaufort West Wind Energy Facility (12/12/20/1784/1/AM3);
- Trakas Wind Energy Facility (12/12/20/1784/2/AM3);
- Beaufort West 132KV-400KV Linking Station, 132KV Power Line and onsite 132KV Substation (14/12/16/3/3/2/925/1); and
- Trakas 132KV-400KV Linking Station, 132KV Power Line and onsite 132KV Substation (14/12/16/3/3/2/925/2).

The final application form and final BA report for the above-mentioned new switching substation powerline project was submitted to the Department of Forestry, Fisheries and the Environment (DFFE) for decision-making on 18 March 2022, and the project subsequently received EA in May 2022, by way of DFFE reference number: 14/12/16/3/3/1/2465. It should be noted that the EA for the new switching substation and 132kV powerline project does not replace any of the above-mentioned authorisations related to the Beaufort West Cluster of wind developments.

The proposed development area is located approximately 60km south of the town of Beaufort West in the Prince Albert Local Municipality, within the Central Karoo District Municipality of the Western Cape Province (**Figure 1-1**).

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[1] Beaufort West Wind Farm (Pty) Ltd is a Special Purpose Vehicle (SPV), a subsidiary created by the parent company South Africa Mainstream Renewable Power Developments (Pty) Ltd, which was created specifically to own and operate the authorised Beaufort West Wind Farm (12/12/20/1784/1/AM2).

[2] Onsite substation will be a shared substation consisting of a 33/132kV yard which will be owned and operated by the Independent Power Producer (IPP) Beaufort West Wind Farm (Pty) Ltd, as well a 132kV switching station yard which will be owned and operated by Eskom. The 33/132kV IPP yard of the shared substation thus required a separate EA and was subject to a separate application for EA and BA process, which also included other associated infrastructure such as a Battery Energy Storage System (BESS), laydown area and Operations & Maintenance (O&M) building (authorised under EA with reference: **14/12/16/3/3/1/2464**). A separate application for EA was lodged for the 132kV Eskom switching station yard of the shared onsite substation and associated 132kV powerline, which also included a separate BA process (authorised under EA with reference: **14/12/16/3/3/1/2465**).

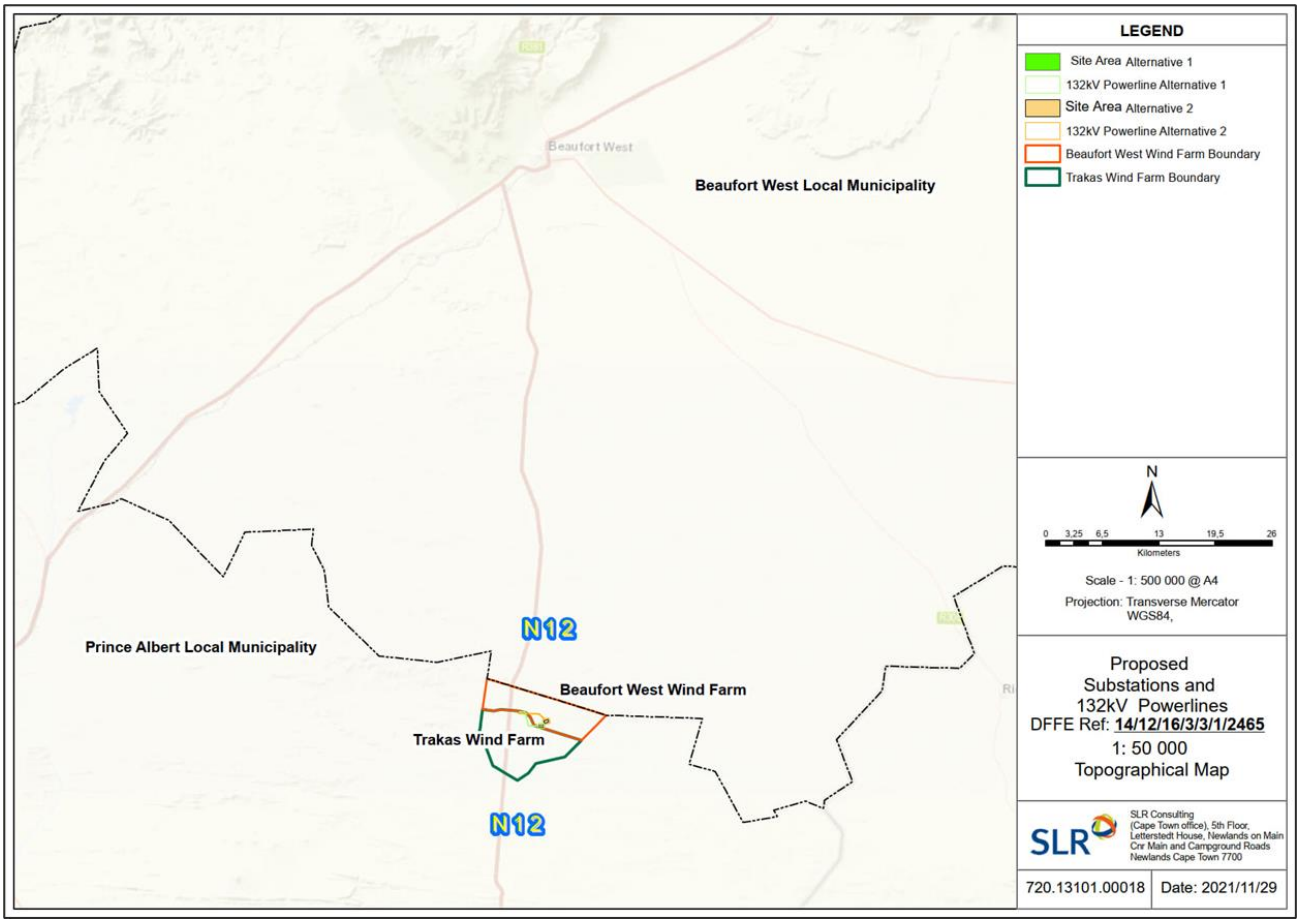

Figure 1-1: Regional Context Map for the Proposed Substation, Switching Substation, Powerline and associated infrastructure

A comprehensive design process was undertaken to inform the layout alternatives for the proposed project. As part of the BA process, two (2) site area alternatives (20-hectare area for placement of onsite switching substation) (namely **Site Area Alternative 1** & **Site Area Alternative 2**) as well as two (2) powerline corridor alternatives (100m powerline corridor buffers, 50m on either side of centre line, for routing of powerline[3]) (namely **Powerline Corridor Alternative 1** & **Powerline Corridor Alternative 2**) were presented and assessed. All project alternatives considered and assessed as part of the BA process were reasonable and/or feasible from a technical perspective, and thus they were considered by SLR and the specialists at the onset of the BA process, as well as found suitable from an environmental perspective.

The most notable sensitivities affecting the site area and powerline corridor alternatives relate to Archaeology, Terrestrial Ecology and Aquatic Ecology. In terms of Archaeology, archaeology sites (005 & 006) are found within Powerline Corridor Alternative 2 (**Figure 1-2**). From a Terrestrial Ecology perspective, a section of Powerline Corridor Alternative 1 traverses a portion of a Critical Biodiversity Area (CBA) 1 and high sensitivity wash area, while medium sensitivity Ridges and Washes are found within Site Area Alternative 2 (**Figure 1-2**). In terms of Aquatic Ecology, both powerline corridor alternatives traverse

[3] Powerline corridor allows flexibility when routing the powerline within the authorised corridor.

portions of an Aquatic CBA (**Figure 1-2**). Please refer to Section 3 for details regarding sensitivities, as well as impacts related to proposed changes.

The BA Report identified and assessed the potential biophysical and social impacts associated with the proposed project alternatives. Despite the presence of the above-mentioned sensitivities, it was confirmed by the specialists during the BA process that there are no fatal flaws associated with either of the project alternatives and that the associated impacts could be mitigated to acceptable levels. It was thus concluded that there were no concerns and/or impacts which would prevent authorisation of either of the site area and powerline corridor alternatives presented in the BA process.

Site Area Alternative 1 and Powerline Corridor Alternative 1 however emerged as the most feasible alternative from a technical perspective, as indicated by the design Engineers, and were prepared for Financial Close. With no identified environmental fatal flaws, Site Area and Powerline Corridor Alternative 1 were chosen by the Applicant as the preferred alternatives, as they were the most technically feasible for construction as well as being acceptable from an environmental perspective.

As mentioned, the final application form and final BA report was submitted to the DFFE for decision-making by SLR on 18 March 2022, and the project subsequently received EA in May 2022 by way of DFFE reference number: 14/12/16/3/3/1/2465. As part of the final application form and BA report, which considered all material specialist input and the technical feasibly of the project, it was indicated that **Site Area Alternative 1** (**Figure 1-2**) was the Applicant's preferred alternative for the placement of the 132kV onsite switching substation, while **Powerline Corridor Alternative 1** (**Figure 1-2**) was the Applicant's preferred alternative for the routing of the 132kV powerline. However, Site Area Alternative 2 and Powerline Corridor Alternative 2 were authorised by the DFFE as part of the EA instead.

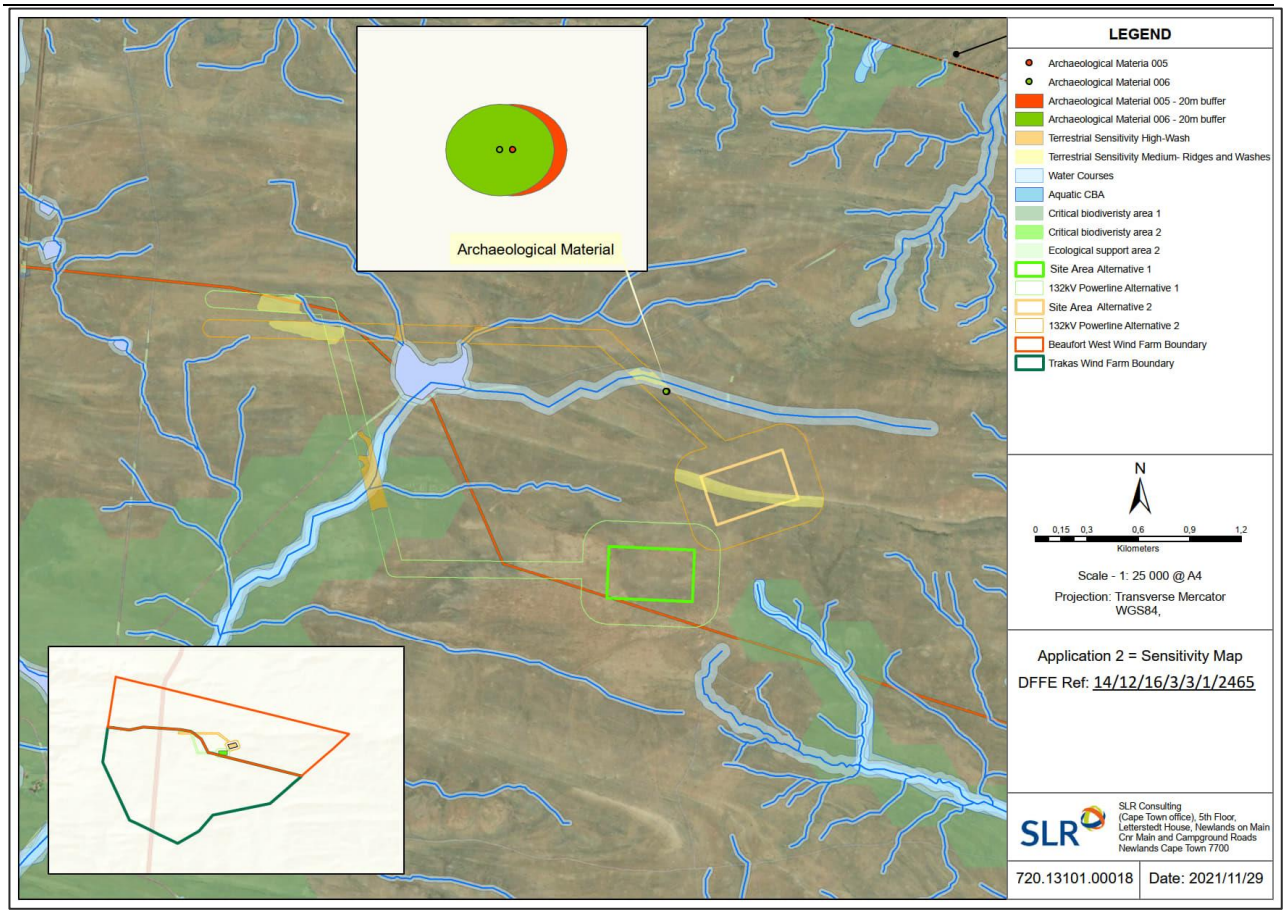

Figure 1-2: Site Sensitivity Map (including alternatives) based on Specialist findings

As Site Area Alternative 1 and Powerline Corridor Alternative 1 (the Applicant's preferred project alternatives) are not fatally flawed and acceptable from an environmental perspective, the Applicant would like these project alternatives authorised as part of the respective EAs, as they are the most technically feasible alternatives. The Applicant is therefore undertaking a Part 2 Amendment process, according to Regulation 31 of the EIA Regulations, 2014 (as amended), to change the project alternatives approved as part of the EA (amongst other amendments – see below as well as Section 2).

The amendments being proposed are largely administrative in nature and involve the following (refer to Section 2 for more details):

1. Correction to the Surveyor General (SG) 21-digit code provided in the EA;
2. Amending the Holder of the EA:
   - The Holder of the EA needs to be amended **from "*South Africa Mainstream Renewable Power Developments (Pty) Ltd*" to** "***Beaufort West Wind Farm (Pty) Ltd***".
3. Removing duplication with regards to Water Demand and Waste Generation in the table with technical details in the EA; and
4. Replacement of Site Area and Powerline Corridor Alternative 2 (including relevant coordinates) with Site Area and Powerline Corridor Alternative 1 (including relevant coordinates) as the authorised project alternatives in the EA.

The proposed amendments in themselves are not listed activities according to Government Notice (GN) R326, R327, R325 and R324 of the EIA Regulations, 2014 (as amended), and do not trigger any listed activity. In addition, the amendments will not result in an increased level of impacts previously assessed (as all alternatives and their associated impacts were assessed in the BA process) or result in a change in nature of impacts previously assessed. However, it has been indicated by the DFFE that there is nevertheless **a change to the scope of the valid EA where the change in nature of impact was not taken into consideration in the initial EA decision (i.e., preferred project alternatives, namely Site Area Alternative 1 and Powerline Corridor Alternative 1, were not authorised, however, were assessed).**

The amendments are thus being submitted in terms of Regulation 31 of the EIA Regulations, 2014 (as amended), to correct errors and remove duplication in the EA; change the Holder of the EA and change the project alternatives approved as part of the EA. Accordingly, Beaufort West Wind Farm has appointed SLR to undertake the necessary Part 2 EA Amendment process as required in terms of Regulation 32 of GN R326 of the EIA Regulations, 2014 (as amended).

Considering the above, this EA Amendment Report has been compiled in accordance with the provisions of Regulation 32(1) of the EIA Regulations 2014, (as amended), and includes the following (where required/applicable):

- an assessment of all impacts related to the proposed change (Section 3);
- an evaluation of the advantages and disadvantages associated with the proposed change (Section 4);
- measures to ensure avoidance, management and mitigation of any impacts associated with the proposed change (Not Applicable – see Section 3); and
- identification of any changes required to the EMPr (Not Applicable).

Due to the need for Part 2 Amendment processes to amend the EA (including the change of approved project alternatives), and as part of the requirement process therein, the specialists who provided input as part of the BA process (and subsequent walkdowns for micro-siting, where applicable) have provided comment on whether Site Area and Powerline Corridor Alternative 1 are acceptable for development over Site Area and Powerline Corridor Alternative 2. The results of this are presented in Section 3 and Section 4.

In addition, the required Public Participation Process, according to Chapter 6 of the EIA Regulations, 2014 (as amended), is being undertaken as part of the amendment process. This includes notifying relevant Interested and/or Affected Parties (I&APs), Key Stakeholders (such as Organs of State / Government Departments / Parastatals) and landowners (affected and adjacent) of the proposed amendments, as well as providing them with an opportunity to provide comments (amongst others) (see Section 5 for more details).

In light of the above, the EA Amendment Report will be made available for public review and comment for a period of 30 days (namely **28 July 2022 – 29 August 2022**, excluding public holidays), in line with legislation. Comments received will be addressed and incorporated into the final report for submission to

the DFFE for decision-making. Refer to Section 5 for more details regarding the Public Participation Process, while all proof related to the Public Participation Process are provided in **Appendix D**[4].

2. PROPOSED AMENDMENTS

2.1 REQUESTED AMENDMENTS TO THE EA

As mentioned, the amendments to the EA being applied for are largely administrative in nature and are required to ensure correctness of the EA for Financial Close. These include the following:

1. Correction to the SG 21-digit code provided in the EA;
2. Amending the Holder of the EA:
   - The Holder of the EA needs to be amended from "***South Africa Mainstream Renewable Power Developments (Pty) Ltd***" to "***Beaufort West Wind Farm (Pty) Ltd"***.
3. Removing duplication with regards to Water Demand and Waste Generation in the table with technical details in the EA; and
4. Replacement of Site Area and Powerline Corridor Alternative 2 (including relevant coordinates) with Site Area and Powerline Corridor Alternative 1 (including relevant coordinates) as the authorised project alternatives in the EA.

1. <u>Correction to the SG 21-digit Code:</u>

After a review of the EA, it was noted that the SG 21-digit code provided on page 6 of the EA dated 17 May 2022 does not align with the code provided in the final application form and Final BA Report. This might have been due to an accidental copy and paste error. The correct SG 21-digit code needs to be provided to ensure the accuracy of the EA for Financial Close (scheduled for 30 September 2022), and thus the SG 21-digit code provided in the EA needs to be corrected, as detailed below:

From	To	Page of EA
SG 21 Code – **C06100000000001500010**	SG 21 Code – **C06100000000015000010**	**6**

2. <u>Amending the Holder of the EA</u>

The current Holder of the EA is South Africa Mainstream Renewable Power Developments (Pty) Ltd ('Mainstream'), however, this needs to be amended to be in the name of the Special Purpose vehicle (SPV), a fully owned subsidiary of Mainstream, namely "***Beaufort West Wind Farm (Pty) Ltd***". The amendment is required to cede ownership of the EA to the SPV Beaufort West Wind Farm (Pty) Ltd, as the EA needs to be in the SPV name for construction.

A signed letter confirming that South Africa Mainstream Renewable Power Developments (Pty) Ltd transfers the rights to the EA to Beaufort West Wind Farm (Pty) Ltd is provided in **Appendix E**.

3. <u>Removal of duplication related to Water Demand and Waste Generation:</u>

The component and description for Water Demand and Waste Generation has been duplicated in the table with technical details on page 8 and 9 of the EA dated 17 May 2022. This duplication needs to be removed

[4] All proofs related to the Public Participation Process will be provided as part of final report, where available.

(i.e., component and description for Water Demand and Waste Generation only included once) to ensure the correctness of the EA.

4. Replacement of On-site Substation / Site Area and Powerline Corridor Alternative 2 with On-site Substation / Site Area and Powerline Corridor Alternative 1 (Figure 1-2):

As part of the final application form and Final BA Report that was submitted for decision-making, it was requested that the DFFE authorise On-site Substation / Site Area and Powerline Corridor **Alternative 1** (along with their relevant set of coordinates) as the preferred project alternatives. However, the Department authorised On-site Substation / Site Area and Powerline Corridor **Alternative 2** (along with their relevant set of coordinates).

It should be noted that all alternatives considered and assessed as part of the BA process were reasonable from a technical perspective (and thus they were considered at the onset of the BA process), as well as suitable from an environmental perspective (see **Appendix C** for the original specialist studies from the BA process). It was confirmed by the specialists during the BA process that there are no fatal flaws which would prevent authorisation of any of the project alternatives. With no identified environmental fatal flaws, this grid connection layout (site area for onsite switching substation and powerline corridor) makes more sense from a technical perspective, largely due to contours / topography. Site Area Alternative 1 and Powerline Corridor Alternative 1 however emerged as the most feasible alternative from a technical perspective, as indicated by the design Engineers, and is being prepared for Financial Close.

Refer to **Figure 1-2** for a visual representation of the project alternatives presented and assessed as part of the BA process (14/12/16/3/3/1/2465), including identified environmental sensitivities.

Since On-site Substation / Site Area and Powerline Corridor Alternative 1 are preferred from a technical perspective by the Applicant and are acceptable from an environmental perspective (i.e., no fatal flaws identified which would prevent authorisation – see Section 3 & Section 4), the Holder of the EA requires the DFFE to **replace On-site Substation / Site Area and Powerline Corridor Alternative 2 with On-site Substation / Site Area and Powerline Corridor Alternative 1** (including all relevant information and coordinates, as well as changes to the scope of authorisation under "*Conditions of this Environmental Authorisation*") to ensure the correctness of the EA for Financial Close (which is scheduled for 30 September 2022), using the following information:

Replacing corner point coordinates for On-site Substation / Site Area Alternative 2 with coordinates for On-site Substation / Site Area Alternative 1		
From	**To**	**Page of EA**
A - 32°56'8.42"S; 22°35'17.17"E	A - 32°56'22.12"S; 22°34'56.76"E	6
B - 32°56'3.15"S; 22°35'35.37"E	B - 32°56'22.46"S; 22°35'16.00"E	6
C - 32°56'17.63"S; 22°35'20.90"E	C - 32°56'31.78"S; 22°34'56.47"E	6
D - 32°56'12.37"S; 22°35'39.11"E	D - 32°56'32.18"S; 22°35'15.71"E	6

Replacing centre point coordinates for On-site Substation / Site Area Alternative 2 with coordinates for On-site Substation / Site Area Alternative 1		
From	**To**	**Page of EA**

A - 32°56'10.40"S; 22°35'27.70"E	A - 32°56'26.99"S; 22°35'6.25"E	6

Replacing start and end point coordinates for Powerline Corridor Alternative 2 with coordinates for Powerline Corridor Alternative 1		
From	**To**	**Page of EA**
Start - 32°56'6.25"S; 22°35'24.56"E **End** - 32°55'41.73"S; 22°33'24.90"E	**Start** - 32°56'26.76"S; 22°34'56.59"E **End** - 32°55'36.06"S; 22°33'25.31"E	6

Amendment of Condition 1 in Scope of authorisation under "*Conditions of this Environmental Authorisation*"		
From	**To**	**Page of EA**
1. Site Area Alternative 2 and Power line corridor Alternative 2 for the proposed construction and operation of the Beaufort West Wind Farm 33kV/132kV substation and associated infrastructure, near Beaufort West within Ward 2 of Prince Albert Local Municipality of the Central Karoo District Municipality in the Western Cape Province is approved as per the geographic coordinates cited in the table above	1. Site Area Alternative 1 and Power line corridor Alternative 1 for the proposed construction and operation of the Beaufort West Wind Farm 33kV/132kV substation and associated infrastructure, near Beaufort West within Ward 2 of Prince Albert Local Municipality of the Central Karoo District Municipality in the Western Cape Province is approved as per the geographic coordinates cited in the table above	11
Since the Holder of the EA is requesting that the DFFE replace On-site Substation / Site Area Alternative 2 and Powerline Corridor Alternative 2 (which are authorised in the EA dated 17 May 2022) with On-site Substation / Site Area Alternative 1 and Powerline Corridor Alternative 1, the wording of Condition 1 on page 11 of the EA needs to be amended to read "*Site Area Alternative 1 and Powerline Corridor alternative 1*" to ensure correctness of the EA.		

As part of the Financial Close process, it is important that all project information and documentation is correct, which includes the EA. The proposed amendments above are thus required to ensure the correctness of the EA for Financial Close, which is underway. It is important that the correct SG 21-digit Code is authorised as part of the EA, while also ensuring the correct Holder of the EA is included, and any unnecessary duplication is removed which might cause confusion. It is also important that the correct On-site Substation / Site Area and Powerline Corridor alternatives are authorised, to ensure that the most reasonable layout from a technical and environmental perspective can be taken forward to construction.

2.2 MOTIVATION FOR AMENDMENTS TO THE EA

The proposed amendments are largely administrative in nature and are required to ensure the correctness of the EA for Financial Close, which is scheduled for 30 September 2022. As mentioned, it is important that all project information and documentation is correct as part of the Financial Close process, which includes the EA. It is thus important that the correct Holder of the EA is included, the correct SG 21-digit Code is authorised as part of the EA, and any unnecessary duplication is removed, to ensure the correctness of the EA and to avoid confusion.

2.2.1 Amendment to SG 21-digit Code, Holder of EA & Removal of Duplication

The SG 21-digit code provided on page 6 of the EA dated 17 May 2022 does not align with the code provided in the final application form and Final BA Report, which might have been due to an accidental copy and

paste error. In addition, the change to the Holder of the EA is required to cede ownership of the EA to the SPV Beaufort West Wind Farm (Pty) Ltd, as the EA needs to be in the SPV name for construction.

Since the change to the SG 21-digit code and Holder of the EA, as well as the removal of duplication, is purely administrative and required to ensure correctness, this does not affect the findings / results of the BA process. In addition, the correction to the SG 21-digit code will not result in additional properties being authorised (i.e., there will be no change in the authorised property).

2.2.2 Change in Site Area and Powerline Corridor Alternatives

It is also important that the correct Site Area and Powerline Corridor alternatives are authorised as part of the EA, to ensure that the most reasonable layout from a technical and environmental perspective can be prepared for Financial Close and can ultimately be constructed.

Site Area Alternative 1 and Powerline Corridor Alternative 1 are the most feasible alternatives from a technical perspective and as such, with no fatal flaws identified, as well as due to better topographical features, the preferred alternatives were prepared for Financial Close and taken forward to the design phase. It should however be noted that all alternatives considered and assessed as part of the BA process were reasonable from a technical perspective, and thus they were considered at the onset of the BA process. All project alternatives were also found to be suitable from an environmental perspective.

As mentioned, all impacts associated with the project alternatives were identified, assessed and presented as part of the BA process. All specialists confirmed that there are no fatal flaws associated with either alternative, as well as that the impacts associated with all alternatives can be mitigated to acceptable levels. However, Site Area Alternative 1 and Powerline Corridor Alternative 1 are preferred from a technical perspective and have thus been chosen as part of the preferred layout which is being prepared for Financial Close. With no identified environmental fatal flaws, this grid connection layout (site area and powerline corridor) makes more sense from a technical perspective, largely due to contours / topography.

The most notable sensitivities affecting the site area and powerline corridor alternatives related to Archaeology (archaeology sites found within Powerline Corridor Alternative 2), Terrestrial Ecology (section of Powerline Corridor Alternative 1 traverses a portion of CBA 1 and high sensitivity wash area, while medium sensitivity Ridges and Washes are found within Site Area Alternative 2) and Aquatic Ecology (powerline corridor alternatives traverse portions of Aquatic CBA).

Archaeology:

No archaeology sites were identified within Site Area Alternative 1 or Powerline Corridor Alternative 1. Sites 005 & 006 were however identified within Powerline Corridor Alternative 2 (**Figure 1-2**), with appropriate buffer areas (as recommended by Heritage specialist) applied. It was confirmed by Heritage Western Cape (HWC) during the BA process that Site Area Alternative 2 and Powerline Corridor Alternative 2 have a potentially slightly higher degree of impact on archaeology, due to the fact that archaeology sites 005 and 006 can be found within the powerline corridor[5].

[5] This was not considered to be a fatal flaw since HWC confirmed that this is mitigatable and Alternative 2 is not considered to be a 'no-go' option. Proof of this can be provided upon request.

Terrestrial Ecology:

Sections of Powerline Corridor Alternative 2 traverse high sensitivity wash areas as well as medium sensitivity ridges and washes. Medium sensitivity ridges and washes are also found within Site Area Alternative 2. No sensitivities have been identified within Site Area Alternative 1, however, a section of Powerline Corridor Alternative 1 traverses a portion of a Critical Biodiversity Area (CBA) 1 as well as high sensitivity wash areas and medium sensitivity ridges and washes (**Figure 1-2**).

Despite this, it was confirmed by the Ecologist that the development of the powerline through the CBA 1 would be unlikely to compromise any of the underlying ecological features associated with the CBA and as such, the impact on this area would be considered acceptable, should Powerline Corridor Alternative 1 be used. Additionally, the habitats present on site are not localized or unique and as the footprint within these areas would be low, there would not be an irreplaceable loss of resources as related to the ESAs and CBAs of the affected area. Ultimately, it was confirmed that the impact of the substation and grid connection on CBAs will be minor (namely **Very Low negative with mitigation**) and that no fatal flaws were identified in this regard (see Appendix C for original Terrestrial Ecology specialist study).

Aquatic Ecology:

While sections of both powerline corridor alternatives traverse Aquatic CBAs (**Figure 1-2**), the specialist confirmed that the impacts related to physical loss of ecological connectivity and/or CBA corridors were deemed to be **Insignificant** and **Very Low** respectively, after mitigation. In addition, only small sections of the powerline corridor alternatives traverse parts of the Aquatic CBA. It should also be noted that the powerline can span these areas and no pylons or other infrastructure will be constructed within the Aquatic CBA or its buffer zone(s), as far as practically possible.

While there will be an impact on CBAs for Powerline Corridor Alternative 1, the Terrestrial Ecology specialist confirmed that the impact on this area would be acceptable, should this alternative be used, and the impact of the substation and grid connection on CBAs will be minor (namely **Very Low negative with mitigation**). In addition, no fatal flaws were identified from either of the specialists.

Further to the above, walkdowns and micro-siting of the Applicant's preferred powerline route (namely Powerline Corridor Alternative 1) has been undertaken by all specialists. The findings, specifically from the Aquatic and Terrestrial Ecology perspectives, have confirmed that the CBA is not uniform or contiguous and that proposed pylon positions for proposed Powerline Corridor Alternative 1 can avoid highly sensitive areas by being placed in areas with little or no conservation value. In addition, any minor negative effects can be mitigated during the pre-construction planning and construction.

Based on the information above, as well as the fact that Site Area and Powerline Corridor Alternative 1 are the most feasible alternatives from a technical perspective, Site Area Alternative 1 and Powerline Corridor Alternative 1 were chosen by the applicant as the preferred alternatives for authorisation. With no identified environmental fatal flaws, Site Area Alternative 1 and Powerline Corridor Alternative 1 layout makes more sense from a technical perspective, largely due to contours / topography.

Due to the proposed amendment to the approved project alternatives, the specialists who undertook assessments as part of the BA process were requested to provide confirmation (via comment letter) regarding the acceptability of approving Site Area and Powerline Corridor Alternative 1 (i.e., confirm whether there would be any objections or fatal flaws related to the authorisation of Site Area and Powerline Corridor Alternative 1). Based on specialist input, it was confirmed that there were no objections or fatal flaws associated with the request for approval of Site Area and Powerline Corridor Alternative 1 (see Section 3.1).

Considering the information above, as well as the input from the specialists detailed in Section 3.1, the **change in authorised alternatives will not result in an increased level or change in the nature of impacts previously assessed, and therefore the amendment should be granted**.

2.2.3 Conclusion

If EA is not amended the project will not be able to reach Financial Close, which has been delayed to 30 September 2022 due to Eskom delays in the issuing of Budget Quotes. This would delay or prevent construction and thus prevent the project from supplying urgent power into the already strained national grid and meeting and achieving the identified need of providing a renewable energy source and reducing carbon emissions for South Africa.

The switching substation and associated powerline applied for as part of the EA will service the Beaufort West Wind Farm and Trakas Wind Farm projects (which received Preferred Bidder status as part of the Round 5 REIPPPP and are now Strategic Infrastructure Projects - SIPs i.e., SIPs 8 and 10) by supplying urgent power generated by the wind farms into the national grid. By not amending the EA to include the correct project alternatives, detailed design work would need to be undertaken on a less preferred alternative, which would result in an increase in project costs (thereby reducing feasibility) as well as cause a delay in construction or possibly prevent the realisation of both Wind Farm projects. There would also be an increase in costs and time to build on more complex terrain associated with the current authorised alternatives. This will substantially delay or even prevent construction, as it affects the issuing of Budget Quotes by Eskom, which is critical to Financial Close and the signing of Power Purchase Agreements (PPAs) by Eskom.

This would have negative consequences for the environment in South Africa as a whole, as the country's coal dependency would be alleviated to a lesser degree if construction of the proposed wind farms is delayed, and they cannot feed electricity into the national grid. This in turn is expected to have negative socio-economic impacts for the country as a whole and is not in alignment with National Development Plan objectives in the drive for cleaner renewable energy sources. Not granting the amendments will delay and possibly prevent the construction of the switching substation and associated powerline (which will service the Beaufort West Wind Farm and Trakas Wind Farm projects) and will ultimately be detrimental to the country's aim of addressing the issue of climate change, as well as alleviating load shedding.

The construction and operation of the authorised project is also anticipated to result in several positive socio-economic impacts, such as job creation and local economic investment, which will not be realised if the EA is not corrected to allow the project to reach Financial Close and ultimately be constructed.

2.3 EXAMINATION OF AUTHORISED LISTED ACTIVITIES

As mentioned, the proposed amendments in themselves are not listed activities according to GN R326, R327, R325 and R324 of the EIA Regulations, 2014 (as amended), and do not trigger any new listed activity. In addition, the amendments will not result in an increased level of impacts previously assessed (as all alternatives and their associated impacts were assessed in the BA process) or result in a change in the nature of impacts previously assessed.

The listed activities in the table below were authorised as part of the EA with reference: 14/12/16/3/3/1/2465, **and still remain relevant**.

Table 2-1: NEMA Listed Activities authorised as part of the EA with reference: 14/12/16/3/3/1/2465

No.	Activity description	Description of activity in relation to the proposed project
GN R983 (Listing Notice 1)		
11 (i)	*The development of facilities or infrastructure for the transmission and distribution of electricity – outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts.*	*The proposed site is zoned as Agricultural land which falls outside of an urban area. The infrastructure will include one (1) 132kV on-site switching substation (including control, operation, workshop, storage buildings / areas), medium voltage (maximum 33kV) underground and overhead cables as well as one (1) 132kV overhead powerline.*
12 (ii)(a)(c)	*The development of – (ii) infrastructure or structures with a physical footprint of 100 square metres or more, where such development occurs (a) within a watercourse; and (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse.*	*The proposed project will require the placement of linear infrastructure (i.e., internal access roads, underground cables, and an internal overhead power line) with a combined physical footprint of more than 100m^2. As the site consists of a number of drainage lines and watercourses, the road and/or powerline will cross these watercourses or drainage lines or be within 32m thereof.*
19	*The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles, or rock of more than 10 cubic metres from a watercourse.*	*The proposed project will involve the construction of internal roads, upgrades to existing roads and laying of underground cables within the project area, which will require the removal and/or infilling of soil from a watercourse in excess of 10m^3.*
24 (ii)	*The development of road with (ii) a road reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8m.*	*A temporary road corridor wider than 8m will be impacted during the construction phase. During construction the roads will be up to 13.5m in some parts (i.e., for bringing in transformers etc), however, this will be rehabilitated back down to 8m or less after the completion of construction activities to allow for a permanent road surface with side drains on one (1) or both sides, where necessary.*

No.	Activity description	Description of activity in relation to the proposed project
27	*The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for—* *(i) the undertaking of a linear activity; or* *(ii) maintenance purposes undertaken in accordance with a maintenance management plan.*	*The construction of the proposed on-site substation will require the clearance of an area of up to approximately 1 hectare (ha) of indigenous vegetation.*
28 (ii)	*Residential, mixed, retail, commercial, industrial, or institutional developments where such land was used for agriculture, game farming, equestrian purposes, or afforestation on or after 01 April 1998 and where such development will (ii) occur outside an urban area, where the total land to be developed is bigger than 1 hectare.*	*The proposed project site is zoned as agricultural land and will continue to be used for agricultural purposes, should the proposed project receive environmental authorisation. A substations and associated powerline, covering 1ha or more, would form part of the application.*
56 (i)(ii)	*The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre (i) where the existing reserve is wider than 13, 5 meters; or (ii) where no road reserve exists, where the existing road is wider than 8 metres.*	*Existing roads will be upgraded where possible. A temporary road corridor between 8m and 10m will be impacted during the construction phase. This will be rehabilitated back down to 8m or less after the completion of construction activities to allow for a permanent road surface with side drains on one (1) or both sides, where necessary. The development will also involve the lengthening of these existing roads (where required) in excess of 1km.*
GN R985 (Listing Notice 3)		
4 (i) (ii)(aa)	*The development of a road wider than 4 metres with a reserve of less than 13,5 metres in the* *(i) Western Cape (ii) within areas outside urban areas and within (aa) areas containing indigenous vegetation.*	*Temporary road corridors between 8m and 10m will be impacted during the construction phase. This will be rehabilitated back down to 8m or less after the completion of construction activities to allow for a permanent road surface with side drains on one (1) or both sides, where necessary. The site is located outside urban areas, while most of the site constitutes indigenous vegetation in the Western Cape Province. In addition, Critical Biodiversity Areas (CBAs) (namely Aquatic CBAs and CBA 1 areas according to the 2017 Western Cape Biodiversity Spatial Plan) can be found within parts of the project site.* *In addition, the proposed road is expected to traverse parts of the CBAs, namely an Aquatic CBA and CBA 1 area.*

No.	Activity description	Description of activity in relation to the proposed project
12 (i) (ii)	*The clearance of an area of 300 square metres or more of indigenous vegetation in the (i) Western Cape (ii) within critical biodiversity areas identified in bioregional plans.*	*In some areas, the development of infrastructure will require the clearance of more than 300m² of indigenous vegetation. The project site is located within the Western Cape Province and part of the project site contains Critical Biodiversity Areas (CBAs) according to the 2017 Western Cape Biodiversity Spatial Plan, namely Aquatic CBAs and CBA 1 areas.*
14 (a)(c)(i)(ii)(ff)	*The development of infrastructure or structures with (ii) infrastructure or structures with a physical footprint of 10 square metres or more where such development occurs (a) within a watercourse; and (c) if no development setback has been adopted, within 32 metres of a watercourse, measured from the edge of a watercourse in the (i) Western Cape (i) outside urban areas within (ff) critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans.*	*The development of the substation, internal road and overhead powerline will have a physical footprint in excess of 10m² and will be located within the Western Cape Province, outside urban areas. In addition, the proposed development will be required within and adjacent to watercourses and will also traverse a CBA 1 and Aquatic CBA in certain places according to the 2017 Western Cape Biodiversity Spatial Plan.*
18 (i)(ii)(aa)	*The widening of a road by more than 4 metres and the lengthening of a road by more than 1 kilometre in the (i) Western Cape (ii) all areas outside urban areas (aa) areas containing indigenous vegetation.*	*Existing roads will require widening of between 8m and 10m and/or lengthening by more than 1km, to accommodate the movement of vehicles, in areas containing indigenous vegetation. The widening of the roads will take place within the Western Cape Province, outside urban areas, and will require the clearance of indigenous vegetation.*

As mentioned, the authorised listed activities provided in the EA above remain relevant. In addition, the proposed amendments do not result in any changes to the Listed Activity Descriptions, as authorised in the EA (**Table 2-1**). No additional listed activities are triggered and/or required either due to the proposed amendment.

3. IMPACTS RELATED TO THE PROPOSED AMENDMENTS

There are no further negative environmental impacts that were identified since the BA process was concluded should the proposed amendments be granted, since the amendments requested are largely administrative in nature and do not result in any increase in the nature or level of the impacts identified and assessed as part of the project authorised under 14/12/16/3/3/1/2465 **(See Motivation for Amendments to the EA - Section 2.2)**

Since the proposed correction of the SG 21-digit code, change in Holder of EA and removal of duplication are purely administrative, these amendments have no bearing whatsoever on the impacts identified and assessed as part of the BA process, as well as any other relevant findings.

As mentioned, the most notable sensitivities affecting the site area and powerline corridor alternatives relate to Archaeology (archaeology sites found within Powerline Corridor Alternative 2), Terrestrial Ecology (section of Powerline Corridor Alternative 1 traverses a portion of CBA 1 and high sensitivity wash area, while medium sensitivity ridges and washes are found within Site Area Alternative 2) and Aquatic Ecology (powerline corridor alternatives traverse portions of Aquatic CBA). Refer to **Figure 1-2** for the identified site sensitivities in relation to the project alternatives **(See Conclusion – Section 2.2.3)**.

Although the proposed change to the authorised project alternatives do not result in further negative environmental impacts or any increase in the nature or level of the impacts identified and assessed, the specialists who undertook assessments as part of the BA process were requested to provide confirmation regarding the acceptability of approving Site Area and Powerline Corridor Alternative 1 (i.e., confirm whether there would be any objections or fatal flaws related to the authorisation of Site Area and powerline Corridor Alternative 1).

In summary, the proposed amendments were not found to have any bearing on current impacts, mitigation measures or EA conditions. The recommendations / mitigation measures provided as part of specialist studies remain valid / applicable. A few additional recommendations relating mainly to pylon positioning and powerline design have however been provided from a Biodiversity (plants and animals, excluding birds and bats) perspective, following the walkdown and micro-siting by the specialist.

A summary of the Specialist's input as part of this amendment process is provided in **Table 3-1** below.

Table 3-1: Summary of Specialist Input (Comment Letters)

Specialist	Summary of findings / comment	Additional impact management measures (if any)
	Comment Letter	
Agriculture **Johann Lanz**	The original agricultural assessment found that there was absolutely no difference in the significance of the agricultural impacts of any of the alternatives. Therefore, Site Area and Powerline Corridor Alternative 1 are acceptable for development over Site Area and Powerline Corridor Alternative 2. Johann Lanz, as the agricultural specialist, is of the view that the site location and project description can be authorised based on the findings of agricultural specialist study	None. Recommendations / mitigation measures provided as part of specialist study still applicable.
	Comment Letter	
Avifauna **Chris van Rooyen & Albert Froneman**	The Avifauna specialists considered the proposed changes, and their findings are as follows: • the proposed changes will not change the nature or significance of any of the impacts assessed in any significant manner. • The proposed changes are not likely to result in any additional impacts which were not previously assessed. • No additional management outcomes or mitigation measures in terms of avifaunal impacts would be applicable to the proposed changes. Chris van Rooyen and Albert Froneman, as the avifaunal specialists, are of the view that the site location and project description can be authorised based on the findings of avifaunal specialist study.	No additional management outcomes or mitigation measures in terms of avifaunal impacts would be applicable to the proposed changes.
	Comment Letter	
Terrestrial Ecology **Simon Todd**	The findings of the ecological study did not find a large degree of preference for one (1) option over the other. The findings of the study were as follows: "*While the smaller drainage features of the site are classified as ESAs, there is an area of CBA 1 along the grid connection Alternative 1 route for the 132kV switching station yard of the substation and 132kV powerline application / project that would be potentially*	None. Recommendations / mitigation measures provided as part of specialist study still applicable.

Specialist	Summary of findings / comment	Additional impact management measures (if any)
	impacted by the development, should this alternative be used. However, the development of the power line through this area would be unlikely to compromise any of the underlying ecological features associated with the CBA and as such, the impact on this area would be considered acceptable, should this alternative be used. It is however largely the presence of the CBA along Alternative 1 that drives the preference for Alternative 2 as the preferred alternative for the 132kV switching station yard of the substation and 132kV powerline development." As such, the study finds that both alternatives are acceptable, but there is a slight preference of one (1) alternative over the other due to the presence of the CBA within Alternative 1. However, the development of Alternative 1 would not compromise the functioning of the CBA as the footprint within the CBA would be very low and a significant long-term threat to the functioning of the CBA is not likely. The impact statement associated with the development, is applicable to **both** alternatives and states the following: *"There are no impacts associated with the proposed Substation and Grid Connection (132kV powerline) that cannot be mitigated to an acceptable level. With the application of relatively simple mitigation and avoidance measures, the impact of the substation and grid connection infrastructure on the local environment can be reduced to a low and acceptable magnitude. The contribution of the developments to cumulative impact in the area would be low and is considered acceptable. Overall, there are no specific long-term impacts likely to be associated with the development of the substation and grid (powerline) infrastructure that cannot be reduced to a low significance. As such, there are no fatal flaws associated with the respective developments and no terrestrial ecological considerations that should prevent them from proceeding."*	

Specialist	Summary of findings / comment	Additional impact management measures (if any)
	Simon Todd, as the terrestrial ecological specialist, is of the opinion that the Site Area Alternative 1 and Powerline Corridor Alternative 1 can be authorised based on the findings of terrestrial biodiversity study (Todd, 2021).	
Biodiversity (plants and animals, excluding birds and bats) **Wynand Vlok**	**Comment Letter**	
	During the biodiversity assessment (22 – 27 April and 9 – 11 May) the area associated referred to as Alternative 1 was visited. The assessment was undertaken in two phases: phase 1 was the desktop evaluation prior to the site visit and phase 2 was the field assessment. The latter included a comprehensive walk down of the areas and it included the area demarcated as the alternative 1 powerline corridor. It was noted that the power line will traverse the area highlighted as a CBA 1 area and the issues relate to the sensitivity of the area associated with the Traka River (with its associated drainage lines), draining from the north to the south across the study area. The vegetation unit in the CBA classification (Western Cape Biodiversity Spatial Plan - Pool-Stanvliet *et al.*, 2017) is listed of significance due to the diversity in the study area. During the desktop assessment, it was noted that McDonald (2010) in a baseline study of the vegetation unit on site, found no noticeable variation in the plant community and therefore described "*the natural vegetation variation in the area as low and therefore the larger plant community is considered to be uniform. It was noticed that the vegetation in the drainage lines differ and was noticeably distinct from the open areas and therefore one can accept that it is similar to the Southern Karoo Riviere vegetation unit (least threatened)*". From a biodiversity perspective the vegetation variation therefore is not considered as sensitive. If the corridor is accepted for the proposed powerline, it will be important to consider the delineation from the water resources report. This will give the proposed buffer zone considered to be employed around the Traka River.	It is recommended that: • Pylons are placed outside the water resource delineated area and associated buffer zone. • All assembly of structures must be undertaken in the construction camp area and the subassembly components transported for erection of the pylons. • Limited vehicle traffic (to transport sub assembled structures) is allowed in the sensitive demarcated area under the powerline/within the powerline servitude. • No clearing of vegetation is permitted in the sensitive zone – apart from the footprint area where the mono structure pylon to be erected. • The powerline design must attempt to affect the longer spans, in order to reduce disturbance in the sensitive area.

Specialist	Summary of findings / comment	Additional impact management measures (if any)
	Site Area Alternative 1 and Powerline Corridor Alternative 1 are not fatally flawed from an environmental perspective as the vegetation variation is not considered as sensitive. Wynand Vlok, as the biodiversity specialist, is of the view that the site location and project description can be authorised based on the findings of biodiversity specialist study. It is recommended that: • The placement of the pylons will have a very low impact on the ecosystem if all precautions are taken to lower any influences on the area. ○ From a biodiversity perspective the activity will have a very limited impact on the sensitive zone. • Mono structure pylons can be erected in the sensitive area and impacts are low and can be further reduced with careful mitigation.	
Karoo Dwarf Tortoise **Marius Burger**	**Comment Letter**	
	The main findings of the Karoo Dwarf Tortoise Site Sensitivity Verification and Compliance Statement report (Burger 2021) were that: • The Karoo Dwarf Tortoise probably does not occur within either of the respective proposed development nodes of the Beaufort West Cluster of Wind Farms. This conclusion is based primarily on 1) the absence of suitable or optimal habitat for this species, 2) the absence of evidence of live or dead specimens during the field survey, 3) the absence of observations by two (2) tortoise experts that have worked in the general region, and 4) the absence of observations by the landowner. • The terrain within the proposed **Site Area Alternative 1** is generally devoid of rocky elements and is less suitable as Karoo Dwarf Tortoise habitat compared to the habitat of the proposed **Site Area Alternative 2**. • Although some of the sections of rocky terrain within the proposed **Site Area Alternative 2** contain large rocks, these are not of the type that provide suitable shelter to Karoo Dwarf Tortoises. This habitat is rated to be mostly unsuitable or at best only semi-suitable.	None. Recommendations / mitigation measures provided as part of specialist study still applicable.

Specialist	Summary of findings / comment	Additional impact management measures (if any)
	• Consequently, the terrain of **Site Area Alternative 1** and **Powerline Corridor Alternative 1** was thus considered to be less suited for Karoo Dwarf Tortoises than the terrain of **Site Area Alternative 2** and **Powerline Corridor Alternative 2**. Therefore, **Site Area Alternative 1** and **Powerline Corridor Alternative 1** were regarded as preferred alternatives over that of **Site Area Alternative 2** and **Powerline Corridor Alternative 2**. However, this preference is not based on significant habitat sensitivity differences between the various alternatives, and thus the specific choice of alternatives as based on Karoo Dwarf Tortoise considerations is not absolutely the one or the other. **As such, both site area and powerline corridor alternatives for both respective projects/applications were deemed to be acceptable for authorisation**. • In the context of the Applicant's Part 2 Amendment undertaking to change the project alternatives as approved, the findings of the herpetofaunal study (Burger 2021) do not present limitations in terms of the reallocation of preferred alternatives. Marius Burger, as the herpetofaunal specialist, is of the view that the site location and project description can be authorised based on the findings of the herpetofaunal specialist study.	
Heritage **Dr Lita Webley**	**Comment Letter** The findings are set on page 40 and 41 of the Heritage Impact Assessment dated November 2021 as follows: It is therefore recommended that the proposed developments be authorised, subject to the following recommendations: • Substation Alternative 1 is the recommended substation alternative, although Substation Alternative 2 is not considered to be a 'no-go' option • Powerline Alternative 1 is the recommended powerline route for the 132kV yard of the substation and 132kV powerline, although Powerline Alternative 2 is not considered to be a 'no-go' option.	None. Recommendations / mitigation measures provided as part of specialist study still applicable.

Specialist	Summary of findings / comment	Additional impact management measures (if any)
	• *There is no objection on heritage grounds to the proposed substation location and either location is acceptable. This is true for both applications / projects, as the substation alternatives are the same for both applications / projects.* • If Powerline Alternative 2 is the preferred option for the 132kV yard of the substation and 132kV powerline, then it is recommended that a buffer of 20m is maintained around site 005/006. No Pylons should be placed on the site, and the servitude road should avoid it. • No further archaeological walk downs of the substation or powerline is required. • The Environmental Control Officer (ECO) should be made aware of the potential for palaeontological fossils to be uncovered during excavation. Monitoring for fossil material of all major surface clearance (including access roads) and deeper (>1m) excavations by the Environmental Site Officer (ESO) on an on-going basis during the construction phase is therefore recommended. • A Palaeontological chance finds procedure must be incorporated into the respective project EMPrs; • If any archaeological material is uncovered during the course of the respective developments, then work must stop in the immediate area. The find must be reported to the heritage authorities and may require inspection by an archaeologist. The find may require archaeological excavation under a permit (or workplan) issued by Heritage Western Cape. Any material which is recovered must be curated in an approved institution and will require a letter of approval from the repository. • If any unmarked human burials are uncovered, then HWC must be alerted immediately as per S36(6) of the NHRA. A professional archaeological must be contracted as soon as possible to inspect the findings. Dr Lita Webley, the Heritage Impact Assessment specialist, is of the view that the site location and project description can be authorised based on the findings of Heritage study	
Palaeontology	**Comment Letter**	

Specialist	Summary of findings / comment	Additional impact management measures (if any)
Dr John Almond	The original palaeontological heritage study by Almond (2021)[6] concluded that: *"Given the similar underlying geology (and hence palaeontology), there are no preferences on palaeontological heritage grounds for either one of the two on-site substation and associated infrastructure project areas of for any specific powerline corridor option under consideration, all of which are of LOW palaeosensitivity. The projects are not fatally flawed, and there are no objections on palaeontological grounds to their authorisation."* There are therefore no palaeontological heritage objections to the proposed Part 2 Amendment. Dr John E. Almond of *Natura Viva* cc, Cape Town, as the palaeontological heritage specialist, is of the view that the site location and project description can be authorised based on the findings of palaeontological heritage study.	None. Recommendations / mitigation measures provided as part of specialist study still applicable.
<u>Aquatic Ecology</u> **Dr Brian Colloty**	**Comment Letter**	
	The findings of the aquatic assessment are thus upheld as all the delineated areas with a High sensitivity will still be avoided, while no changes to the level of impacts (low) or the cumulative impacts (low) are anticipated. This is also based on the consideration that all the recommended mitigations, and impact avoidance measures have been accounted for in this proposal. Dr Brain Colloty, as the aquatic specialist, is of the view that the site location and project description can be authorised based on the findings of aquatic specialist study	The findings of the aquatic assessment are upheld. This is based on the consideration that all the recommended mitigations, and impact avoidance measures have been accounted for in this proposal.
<u>Visual</u>	**Comment Letter**	

[6]ALMOND, J.E. 2021. Proposed 33kV/132kV substation, 132kV powerline and associated infrastructure for the authorised Beaufort West Cluster wind farms, Central Karoo District Municipality, Western Cape Province.
Site sensitivity verification report (in terms of Part A of the Assessment Protocols published in GN 320 on 20 March 2020), 22 pp. Natura Viva cc, Cape Town.

Specialist	Summary of findings / comment	Additional impact management measures (if any)
Graham Young	Section 11 of the Visual Impact (GYLA 2021: 28) report concluded that "*It should be noted that the visual impacts during the Construction, Operational and Decommissioning Phases for both respective applications / projects are identical*." The rated impact was stated as 'insignificant' given the context of the activities within an approved Wind Farm. Furthermore, the study (GYLA 2021:32)[7] concluded that "*It is the opinion of GYLA that the visual effects associated with the proposed developments are of neutral significance. Given the low level of human habitation and the absence of sensitive receptors, the spatial extent of the zone of potential influence is reduced and the impact of the powerline, substation and associated infrastructure would be dwarfed by the cumulative effect of the other renewable energy developments [in the area]. The respective projects [i.e., either option] are thus deemed acceptable from a visual perspective, and should each be approved, provided that the mitigation/management measures are effectively implemented, managed, and monitored in the long term*." Graham Young Landscape Architect, as the Visual Impact specialist, is of the view that the site location and project description can be authorised based on the findings of the Visual Impact specialist study (GYLA 2021) study.	None. Recommendations / mitigation measures provided as part of specialist study still applicable.

Considering the information above, the amendment to change the authorised Site Area and Powerline Corridor Alternative 2 to Site Area and Powerline Corridor Alternative 1 will not result in an increase in the environmental impacts or result in additional environmental impacts which were not identified and assessed as part of the BA process.

The identified site sensitivities in relation to the project alternatives are shown in **Figure 3-1** below.

[7] Graham Young Landscape Architect, 2021. *Beaufort West Wind Farm 33kV/132kV Substation, 132 kV Powerline and Associated Infrastructure Projects, Visual Impact Assessment Report.* 21 October 2021. GYLA Unpublished Report, Pretoria.

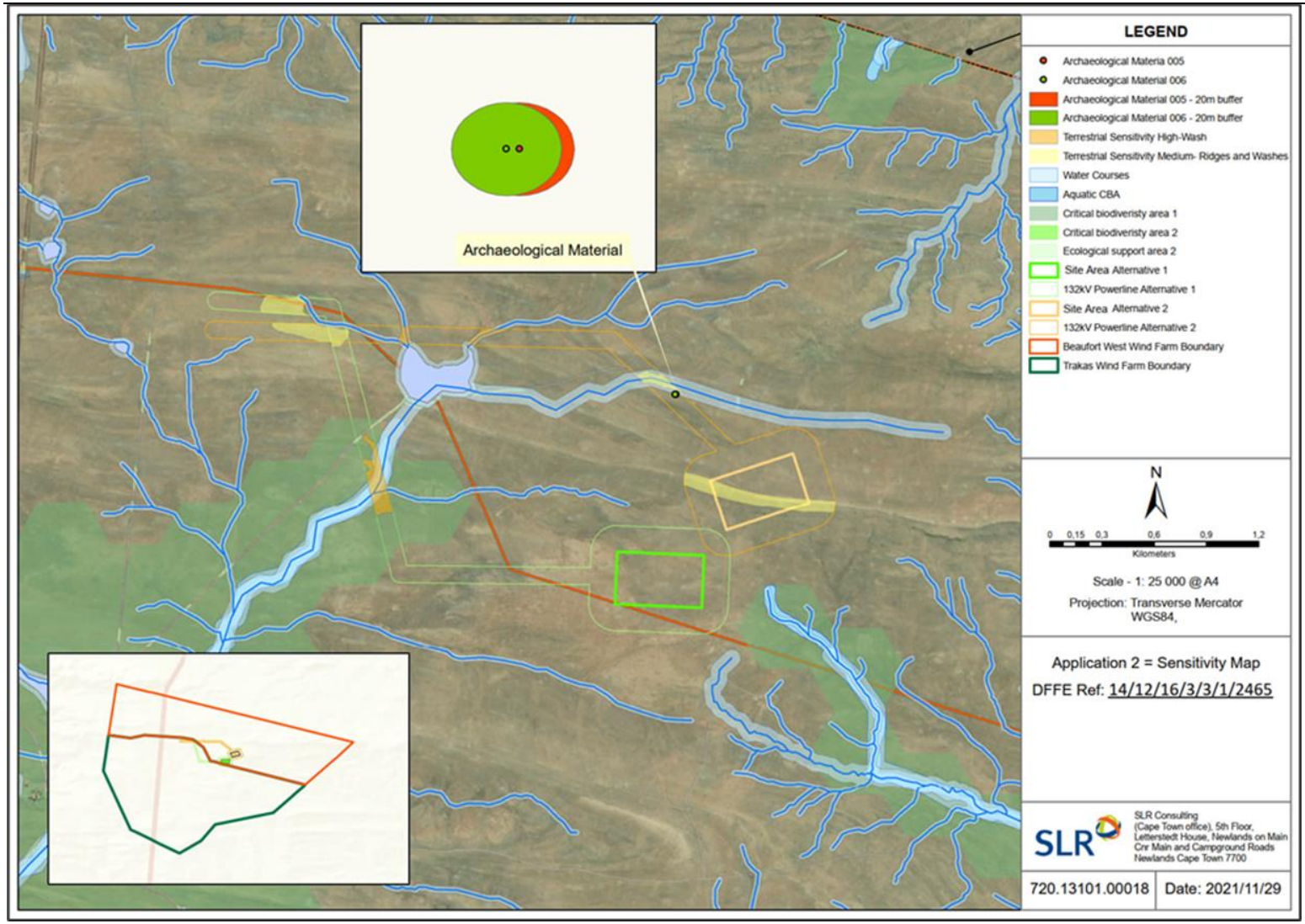

Figure 3-1: Site Sensitivity Map (including alternatives) based on Specialist findings

3.1 CHANGES TO IMPACT RATINGS

As mentioned, there are no further negative environmental impacts that were identified since the BA process was concluded. In addition, the proposed amendments do not result in any increase in the nature or level of the impacts identified and assessed as part of the project authorised under: 14/12/16/3/3/1/2465.

A summary of the results of the impact rating undertaken by the specialists as part of the BA process are provided in **Table 3-2** below, noting that there are **no changes to the findings of the BA process due to the proposed amendments**.

Key

Significance Rating (+ and -)	Colour Code
Very Low +	
Very Low -	
Low +	
Low -	
Medium +	
Medium -	
High +	
High -	

Table 3-2: Summary of changes in overall impact ratings

Specialist	Impacts	Impact Rating		Changes to Impact Rating
		Without Mitigation	With Mitigation	
Agriculture	Although an Agricultural Compliance Statement is not required to formally rate agricultural impacts, it is confirmed that the agricultural impact of the proposed development is negligible. The only potential source of impact is minimal disturbance to the land during construction and decommissioning of the project. This impact can be completely mitigated. There is likely to be some nuisance disturbance to agricultural activities during construction. However, nuisance disturbances are highly unlikely to translate into a change in agricultural production and therefore do not constitute an agricultural impact.			**NO CHANGE – SEE Table 3-1**

Specialist	Impacts	Impact Rating		Changes to Impact Rating
		Without Mitigation	With Mitigation	
	The cumulative impact of loss of agricultural land use can confidently be assessed as not having an unacceptable negative impact on the agricultural production capability of the area. In terms of cumulative impact, the proposed development is therefore acceptable, and it is therefore recommended that it be approved.			
Aquatic	**Construction & Decommissioning Phases**			**NO CHANGE – SEE Table 3-1**
	Loss of aquatic species of special concern	Low -	Insignificant	
	Damage or loss of riparian systems and disturbance of the waterbodies in the construction phase	Medium -	Very Low +	
	Potential impact on localised surface water quality	Medium -	Very Low +	
	Operational Phase			
	Impact on aquatic systems through the possible increase in surface water runoff on form and function - Increase in sedimentation and erosion	Medium -	Very Low +	
	Cumulative Impacts			
	Cumulative Impacts on Aquatic Environment	Low -	Very Low -	
Terrestrial Ecology	**Pre-Construction & Construction Phase**			**NO CHANGE – SEE Table 3-1**
	Impacts on vegetation and protected plant species	Medium -	Medium -	
	Impacts on fauna due to construction activities	Medium -	Medium -	
	Operational Phase			
	Impacts on fauna due to operational activities	Very Low -	Very Low -	
	Impacts on CBAs and ESAs due to the presence and operation of the facility	Low -	Very Low -	
	Habitat degradation due to erosion and alien plant invasion	Medium -	Low -	
	Decommissioning Phase			
	Impacts on fauna due to construction activities	Medium -	Medium -	
	Habitat degradation due to erosion and alien plant invasion due to decommissioning	Medium -	Low -	
	Cumulative Impacts			
	Cumulative impact on ecological processes	Low -	Low -	
Avifauna	**Construction Phase**			

Specialist	Impacts	Impact Rating		Changes to Impact Rating
		Without Mitigation	With Mitigation	
	Displacement due to disturbance associated with the construction of the substation and 132kV powerline	Low -	Very Low +	**NO CHANGE – SEE Table 3-1**
	Displacement due to habitat transformation associated with the construction of the substation and 132kV powerline	Low -	Low -	
	Operational Phase			
	Collisions with the 132kV powerline	Medium -	Low -	
	Electrocutions within the substation yard	Low -	Very Low +	
	Decommissioning Phase			
	Displacement due to disturbance associated with the decommissioning of the substation and 132kV powerline	Low -	Very Low +	
	Cumulative Impacts			
	Displacement of priority species due to disturbance associated with construction of on-site substations and powerlines	Low -	Very Low +	
	Displacement of priority species due to habitat transformation associated with construction of on-site substations and powerlines	Low -	Low -	
	Collisions with 132kV overhead powerlines	High -	Medium -	
	Electrocution mortality associated with substations	Low -	Very Low -	
	Displacement of priority species due to disturbance associated with decommissioning of on-site substations and associated infrastructure	Low -	Very Low +	
Heritage & Archaeology	**Construction Phase**			**NO CHANGE – SEE Table 3-1**
	Destruction of Pre-Colonial and Colonial Archaeological sites and Graves.	Low -	Low -	
	Negative impact on the Cultural Landscape	Medium -	Medium -	
	Operational Phase			
	Negative impacts on the Cultural Landscape	Medium -	Medium -	
	Decommissioning Phase			
	Impacts to the Cultural Landscape	Very Low -	Very Low -	
	Cumulative Impacts			

Specialist	Impacts	Impact Rating		Changes to Impact Rating
		Without Mitigation	With Mitigation	
	Construction activities may destroy or damage surface or sub-surface archaeological pre-colonial or colonial era remains or unmarked graves	Low -	Low -	
	Construction and Operational activities may have a negative impact on the Cultural Landscape	Medium -	Medium -	
Palaeontology	**Construction Phase**			**NO CHANGE – SEE Table 3-1**
	Impacts to fossil resources as a result of the construction of any infrastructure that requires excavation into bedrock or is located at sites of surface exposures of bedrock	Very Low -	Very Low -	
	Cumulative Impacts			
	Construction activities may destroy or damage palaeontological fossils	Very Low -	Very Low -	
Visual	**Construction, Operational and Decommissioning Phases**			**NO CHANGE – SEE Table 3-1**
	Visual impact on sensitive receptors during construction, operational and decommissioning phases	Insignificant	Insignificant	
	Cumulative Impacts			
	Intervisibility for the project within a 30km radius of the development site	High -	Medium-High -	
Karoo Dwarf Tortoise	The general distribution pattern of the Karoo Dwarf Tortoise as per the map of all known records plotted shows that the proposed development area falls within the distribution of this species. The nearest records to the proposed development areas are located about 20 to 40km away. The general impression gained from these distribution records is thus that the species may possibly occur within the proposed development area. No evidence of live specimens or shell fragments of Karoo Dwarf Tortoise was detected during the half-day site visit that was conducted during the September 2021 survey. However, observations of two (2) other tortoise species were made during this period, i.e., that of Leopard Tortoises (*Stigmochelys pardalis)* and Tent Tortoises (*Psammobates tentorius)*. The IUCN conservation status of these two (2) tortoise species are both *Least Concern*. Due to the issue of low detectability, the absence of Karoo Dwarf Tortoise observations during the survey should not summarily be taken as proof that the species does not occur within the study area. However, judging by the general lack of suitable habitat within the proposed development units, it would appear as though this species is indeed absent from this particular area.			**NO CHANGE – SEE Table 3-1**

As can be seen from the table above, no new environmental risks or impacts were identified, and the impacts identified will remain unchanged.

4. ADVANTAGES & DISADVANTAGES

Advantages and disadvantages related to the proposed amendments have been detailed in the table below:

Table 4-1: Advantages / Disadvantages related to the proposed amendments

ADVANTAGES	DISADVANTAGES
By making use of Site Area Alternative 1 and Powerline Corridor Alternative 1, the Applicant can completely avoid the identified archaeology sites, thereby reducing the impact on archaeology.	Section of Powerline Corridor Alternative 1 traverses a portion of a CBA 1 (**Figure 3-1**), which would result in a minor impact on CBAs (**namely Very Low negative with mitigation**). However, the Terrestrial Ecology specialist (Simon Todd) confirmed that the impact on this area would be considered acceptable, should Powerline Corridor Alternative be used, and the impact of the substation and grid connection on CBAs will be minor (see original specialist study & comment letter in **Appendix C**). Following walkdowns and micro-siting of Powerline Corridor Alternative 1, Aquatic (Brian Colloty) and Terrestrial Ecology (Dr Wynand Vlok) specialists confirmed that the CBA is not uniform or contiguous and that proposed pylon positions for Powerline Corridor Alternative 1 can avoid highly sensitive areas by being placed in areas with little or no conservation value. In addition, any minor negative effects can be mitigated during pre-construction planning and construction (see specialist comment letter in **Appendix C**).
Site Area Alternative 1 and Powerline Corridor Alternative 1 are the most feasible alternatives from a technical perspective and have been submitted to the design Engineers as part of Financial Close. With no identified environmental fatal flaws, Site Area Alternative 1 and Powerline Corridor Alternative 1 layout makes more sense from a technical perspective, largely due to contours / topography.	
The proposed amendments are required to ensure correctness of the EA so that the project will be able to reach Financial Close and prevent delays to Eskom's issuing of Budget Quotes. Any delay in construction would prevent the project from supplying urgent power into the already strained national grid and meeting and achieving the identified need of providing a renewable energy source and reducing carbon emissions for South Africa.	
The proposed amendments will ensure that the project reaches Financial Close and can proceed to construction, which would assist with meeting the identified need of providing a renewable energy source for South Africa by feeding urgent power into the already strained national grid and reducing carbon emissions. The project infrastructure will service the Beaufort West Wind Farm and Trakas Wind Farm	

ADVANTAGES	DISADVANTAGES
projects (which received Preferred Bidder status as part of the Round 5 REIPPPP and are now SIPs i.e., SIPs 8 and 10) by supplying urgent power generated by the wind farms into the national grid. By not amending the EA to include the correct project alternatives, detailed design work would need to be undertaken on a less preferred alternative, which would result in an increase in project costs (thereby reducing feasibility) as well as cause a delay in construction or possibly prevent the realisation of both Wind Farm projects. There would also be an increase in costs and time to build on more complex terrain associated with the currently authorised alternatives. This will substantially delay or even prevent construction, as it affects the issuing of Budget Quotes by Eskom, which is critical to Financial Close and the signing of Power Purchase Agreements (PPAs) by Eskom.	
Any delay to Financial Close and the signing of PPAs, and ultimately any delay to construction, would have negative consequences for the environment in South Africa as a whole, as the country's coal dependency would be alleviated to a lesser degree if construction of the proposed wind farms is delayed or prevented, and they cannot feed electricity into the national grid. This in turn is expected to have negative socio-economic impacts for the country as a whole and is not in alignment with National Development Plan objectives in the drive for cleaner renewable energy sources. Not granting the amendments will delay and possibly prevent the construction of the project (which will service the Beaufort West Wind Farm and Trakas Wind Farm projects) and will ultimately be detrimental to the country's aim of addressing the issue of climate change, as well as alleviating load shedding.	
The construction and operation of the project is also anticipated to result in several positive socio-economic impacts, such as job creation and local economic investment, which will not be realised if the EA is not corrected to allow the project to reach Financial Close and ultimately be constructed.	

ADVANTAGES	DISADVANTAGES
Granting the amendments to the EA will ensure that the project proceeds to implementation phase so that the positive impacts associated with the overall project can be realised. This includes inter alia a reduced reliance on coal for energy generation, meeting the objectives of the NDP for cleaner and greener power generation, as well as the positive socio-economic impacts associated with the construction and operational phases of the project.	

Considering the information above, there are several advantages related to the proposed amendments, while only one (1) disadvantage has been identified.

While there is a disadvantage related to a section of the preferred powerline route traversing a CBA, the Aquatic and Terrestrial Ecology specialists (following walkdowns and micro-siting) confirmed that the CBA is not uniform or contiguous and that proposed pylon positions for Powerline Corridor Alternative 1 can avoid highly sensitive areas by being placed in areas with little or no conservation value. In addition, any minor negative effects can be mitigated during pre-construction planning and construction.

Considering the information above, it can be concluded that the advantages of the proposed amendments outweigh the disadvantage and thus the proposed amendments should be granted by the Competent Authority.

5. PUBLIC PARTICIPATION PROCESS

A 30-day Public Participation Process is being undertaken in line with Chapter 6 of the EIA Regulations, 2014 (as amended), as outlined in the sections below. The key steps in the Public Participation Process are tabulated below:

Table 5-1: Public Participation Process

Process	Description
Stakeholder Identification and registration of I&APs	• I&AP / Stakeholder database utilised as part of the original BA process to be used • Potential I&APs can also register via SMS, email or telephonically • State interest in the project • All project information shared in preferred medium
Public Involvement and Consultation	• Submissions of questions / queries or information requests to SLR via email, SMS or telephonically • Availability of DBAR on online platform • Availability of DBAR (in form of digital table) at Beaufort West Municipal Offices & Library as well as Central Karoo District Municipality Offices
Notifications	• Notifications regarding amendment process and details how to contact SLR sent 25 July 2022 • Notification regarding availability of project report (Draft EA Amendment Report) for public review sent via email
Comment on the Draft Report	• Availability of the Draft EA Amendment Report for a 30-day comment period **from 28 July 2022 (day email notifications were sent) to 29 August 2022 (excluding public holidays)** • Submission of comments on the draft report via email, SMS or via telephone • I&APs and Key stakeholders (such as OoS) will be reminded to provide comments before close of 30-day review and comment period via email (proof to be included as part of final report)
Identification and recording of comments received	• Comments and Response Report (C&RR), including all comments received and formal responses thereto (where required / applicable), to be included within the Final EA Amendment Report for decision making

All proof related to the Public Participation Process will be provided as part of the final report.

5.1 NOTIFICATION OF I&APS AND KEY STAKEHOLDERS

The I&AP / Stakeholder database utilised as part of the original BA process has been used to notify all registered I&APs and Key Stakeholder (such as OoS, including the Western Cape Department of Environmental Affairs and Development Planning - WC DEA&DP) of the proposed amendments (including required amendment process), as well as the availability of the Draft EA Amendment Report for review and comment for a period of 30-days. Proof of this will be provided as part of the Final EA Amendment Report.

A copy of the I&AP / Stakeholder database is provided in **Appendix D**. Please note that considering the Protection of Personal Information Act (Act 4 of 2013) (POPIA), this database will only include the name of the I&AP / stakeholder and relevant organisation and/or department (if relevant). A copy of the full database, including contact details, will however be submitted to be Competent Authority as part of the Final Amendment Report.

5.2 COMMENT AND REVIEW OF DRAFT EA AMENDMENT REPORT

The Draft Report (and all associated documentation) will be made available for public review and comment **from 28 July 2022 until 29 August 2022 (30 days, excluding public holidays)**. Hard copies (in the form of digital tablets) of the full Draft EA Amendment Report (including appendices) will be placed at suitable venues which are accessible by the public for review during the relevant 30-day public review and comment period. The digital tablets will be made available for the entire 30-day public review and comment period at the following public locations / venues:

Name of Location	Contact Details	Address
Beaufort West Public Library & Local Municipality Offices	083 408 3781 (Librarian)	112 Donkin Street, Beaufort West, 6925 Open Monday – Friday, 10:00 am - 4:00 pm
Central Karoo District Municipality Offices	081 587 9376 (Rene van Tonder)	63 Donkin Street, Beaufort West, 6925 Open Monday – Friday, 8:00 am - 4:00 pm

I&APs and Key Stakeholders will be given an opportunity to review and comment on the full draft report and will be notified about the venues accordingly (proof to be included as part of final report). Should I&APs / Key Stakeholders contact SLR to indicate that they are not able to access any of the online project documentation due to lack of internet connectivity, SLR will implement suitable alternative means of providing the I&AP / Key Stakeholder with the requested project information. Proof of this will be included as part of final report (if required).

A copy of the Draft EA Amendment Report (including appendices) will also be made available on the SLR website (**at https://www.slrconsulting.com/en/public-documents/BWest-grid-amendments**), which I&APs / Key Stakeholders can use to access and download the draft report and the associated appendices.

Comments can be forwarded to SLR at the address, telephone or email address provided in the draft report (see below) and the relevant project related notifications.

SLR Consulting (South Africa) (Pty) Ltd
Attention: Liandra Scott-Shaw
PO Box 1596, Cramerview, 2060 (***if using post please call SLR to notify us of your submission***)
Tel: (011) 467 0945
E-mail: **lscottshaw@slrconsulting.com**

All I&APs and Key Stakeholders registered on the project database will be notified of the submission of the draft report and the above-mentioned 30-day review and comment period accordingly. A notification (via e-mail) will be sent to all I&APs and Key Stakeholders to inform them of the availability of the draft report

for review and comment. The notification will contain a link to the SLR website, which can be used to access and download the draft report and associated appendices (**proof to be included as part of final report**).

All comments received during the 30-day review and comment period will be collated and responded to in the C&RR (where a response is required), which will be submitted to the DFFE for decision-making with the final report. Comments received will be taken into consideration as part of the process of updating the draft report (where required).

Copies of all notification proofs and comments received (including C&RR with responses, where required) will be provided as part of the final report.

6. CONCLUSIONS & RECOMMENDATIONS

The amendments being requested are required to ensure correctness of the EA, so that the project will be able to reach Financial Close. The proposed amendments will ensure that the project can proceed to construction, which would assist with meeting the identified need of providing a renewable energy source for South Africa by feeding urgent power into the already strained national grid and reducing carbon emissions.

There are no further negative environmental impacts that were identified since the BA process was concluded should the proposed amendments be granted. In addition, the amendments requested do not result in any increase in the nature or level of the impacts identified and assessed as part of the project.

The proposed changes have been assessed by the specialists who undertook assessments as part of the BA process, who confirmed that there were no objections or fatal flaws associated with the request for approval of Site Area and Powerline Corridor Alternative 1 (see Section 3.1).

As indicated in Table 3-1, the proposed changes will not result in changes to the specialist findings or require amendments to the specialist mitigation measures. A few additional recommendations have however been provided from a Biodiversity perspective, following the walkdown and micro-siting by the specialist, and include the following:

- Pylons are placed outside the water resource delineated area and associated buffer zone.
- The placement of the pylons will have a very low impact on the ecosystem if all precautions are taken to lower any influences on the area.
    - From a biodiversity perspective the activity will have a very limited impact on the sensitive zone.
- Mono structure pylons can be erected in the sensitive area and impacts are low and can be further reduced with careful mitigation.
- All assembly of structures must be undertaken in the construction camp area and the subassembly components transported for erection of the pylons.
- Limited vehicle traffic (to transport sub assembled structures) is allowed in the sensitive demarcated area under the powerline/within the powerline servitude.
- No clearing of vegetation is permitted in the sensitive zone – apart from the footprint area where the mono structure pylon to be erected.

- The powerline design must attempt to affect the longer spans, in order to reduce disturbance in the sensitive area.

The Beaufort West Wind Farm and Trakas Wind Farm projects (which this project will service) have received Preferred Bidder status as part of the Round 5 REIPPPP and have become SIPs, which target the development of green energy in support of the South African economy and the provision of electricity transmission and distribution respectively. Since the project will service wind farms which are strategically important for South Africa (in terms of electricity generation and distribution / transmission) and will result in positive socio-economic impacts, it is to the country's advantage that the EA be amended to allow the project to reach Financial Close and ultimately be constructed.

6.1 ENVIRONMENTAL IMPACT STATEMENT

It is the opinion of SLR that since no further negative environmental impacts were identified and the amendments do not result in any increase in the nature or level of the impacts identified and assessed, as well as the fact that there were no objections or fatal flaws associated with the request for approval of Site Area and Powerline Corridor Alternative 1, that the requested amendments should be granted by the Competent Authority.

It is trusted that this report provides the reviewing authority with sufficient information to make an informed decision regarding the requested amendments.

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