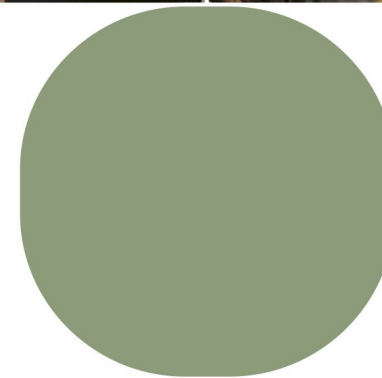


APPENDIX B



Consultation Process



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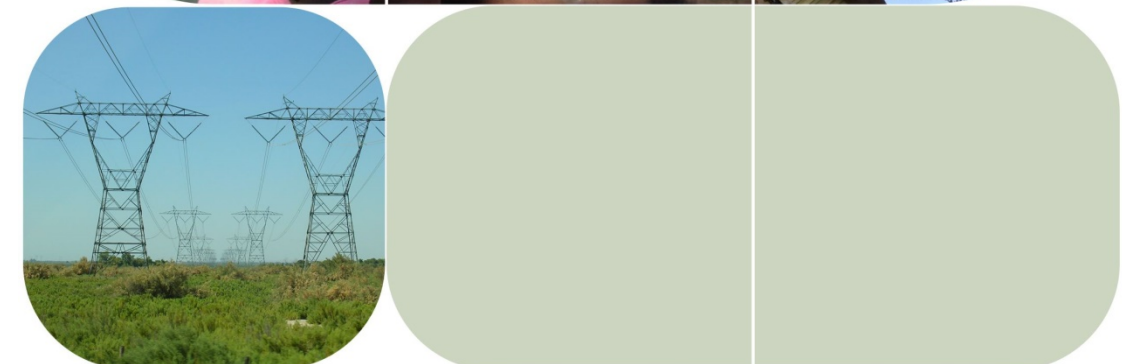
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APPENDIX B. CONSULTATION PROCESS

Appendix B.1 Introduction

B.1.1 Background and Approach

For strategic planning grid planning exercise to be successful in meeting the future supply and demand requirements of industry and society whilst ensuring suitable protection of the environment, requires inputs from a wide range of stakeholders.

This Strategic Environmental Assessment (SEA) process served as a platform for engaging with stakeholder on a wide range of issues concerning the sustainable roll out of South Africa's future electricity transmission backbone. At the highest level the SEA process was guided

in matters of legislation and policy by a Project Steering Committee (PSC) consisting of relevant authorities. In terms of technical and procedural aspects the SEA process was informed by an Expert Reference Group (ERG) consisting of key relevant stakeholder organisations.

In addition to the formal PSC and ERG structures, dedicated provincial and local government consultation was undertaken to further inform and guide the process. The broader public was provided the opportunity to engage with the process through an online platform, newspaper adverts, conference proceedings as well as wide media coverage of the process.

The following sections provide a description of the extensive consultation process that formed part of the SEA. All formal and informal submissions

received through the SEA process were considered in the development of the SEA outcomes. This SEA report constitutes the official response to all submissions received before the time of finalising this section on 01 December 2015. In addition to the report as an official response, brief feedback is provided in this section to key official submissions received.

B.1.2 Brief Overview of Consultation

The following table provides a brief overview of key stakeholder engagements during the SEA process. These interactions are described in more detail in the following sections.

Table 1: Brief overview of stakeholder engagements

PSC and ERG Consultation	
Stakeholders	Date of public meeting
PSC Meeting	19 February 2014
ERG Meetings	19 February 2014
	11 June 2014
	11 February 2015
	21 July 2015
Provincial Roadshow for Phase I Consultation	
Province	Date of consultation
Western Cape	12 May 2014
Eastern Cape	13 May 2014
Gauteng, Limpopo, Mpumalanga	22 May 2014
Free State	27 May 2014
Northern Cape	28 May 2014
North West	29 May 2014
KwaZulu Natal	3 June 2014
Provincial Roadshow for Phase II Consultation	
Consultation	Date of consultation
Gauteng Provincial and Local Government	4 November 2014
Mpumalanga Provincial and Local Government	4 November 2014
Bulk User and Generator Workshop	5 November 2014
Limpopo Provincial and Local Government	6 November 2014

Free State Provincial and Local Government	11 November 2014
Northern Cape Provincial and Local Government	12 November 2014
North West Provincial and Local Government	17 November 2014
Western Cape Provincial and Local Government	25 November 2014
KwaZulu Natal Provincial and Local Government	27 November 2014
Eastern Cape Provincial and Local Government	28 November 2014
Focus Group Consultation	
Stakeholder group consulted	Date of consultation
Department of Trade and Industry (DTI)	6 March 2014
Endangered Wildlife Trust (EWT)	31 July 2014
iGas	19 August 2014
Eskom Line Engineering Team	20 August 2014
SIP 2 Working Group	3 March 2015
Department of Water and Sanitation (DWS)	6 July 2015
Independent Power Producers (IPP) Office	20 May 2015
	18 June 2015
BirdLife South Africa	9 July 2015
Environmental Management Plan (EMP) Workshop with DEA, DWS, Eskom, CSIR	19 August 2015
Conferences and Seminars	
Events	Date
South African Institute of International Affairs BRICs Academic Forum Knowledge Sharing Event	7 March 2014
SANBI Biodiversity Planning Forum	14 May 2014
	23 June 2015
SAPVIA 14th Networking Event	22 May 2014
International Association of Impact Assessment South Africa (IAIASa) Conference	27 – 29 August 2014
	11 – 14 August 2015
International Association of Impact Assessment Conference, Florence, Italy	20 – 23 April 2015
Guest Lecture at Sustainability Institute (Stellenbosch)	21 May 2015
Eskom Environmental Management Conference	3 June 2015
Guest Lecture at University of Cape Town (UCT)	28 August 2015
Guest Lecture at Sustainability Institute (Stellenbosch)	30 September 2015
The International Renewable Energy Agency (IRENA) - Renewable Energy Zones Study- GIS Workshop	30 September 2015 – 2 October 2015
SAIREC Conference 2015	4 October 2015
5 th Council for Scientific and Industrial Research Conference	8 – 9 October 2015

Appendix B.2 Consultation with Relevant Authorities

Project Steering Committee

Since the inception of the SEA process, the project team received guidance and advice from the PSC at a strategic and governmental level. The PSC has made significant contributions to the SEA process. All members of the PSC also served on the ERG and were provided the opportunity to review the process and technical data used for the analysis. The Department of Environmental Affairs (DEA) was the lead agent and chair at all PSC meetings, which were hosted at the CSIR Knowledge Commons venue on the Pretoria CSIR campus.

The main objective of the PSC was to identify means of giving effect to the implementation of the SEA's findings while ensuring compliance with all plans, policies or legislation relevant to the SEA. The PSC has contributed to the identification of conditions for streamlining the environmental authorisation application process for electricity grid infrastructure development in the country. The following authorities were represented on the PSC:

- Eastern Cape Department of Economic Development, Environmental Affairs and Tourism (DEDEAT);
- Eskom;
- Free State Department of Tourism, Environmental and Economic Affairs (DTEEA);
- National Department of Agriculture, Forestry and Fisheries (DAFF);
- Gauteng Department of Agriculture and Rural Development (DRDLR);
- KwaZulu Natal Department of Agriculture, Environmental Affairs and Rural Development (KZNDAE);
- Limpopo Department of Economic Development, Environment and Tourism (LEDET);
- Mpumalanga Department of Economic Development, Environment and Tourism (DEDET);
- National Department of Agriculture, Forestry and Fisheries (DAFF);
- National Department of Defence (DoD);
- National Department of Energy (DoE);
- National Department of Environmental Affairs (DEA);
- National Department of Mineral Resources (DMR);

- National Department of Public Enterprises (DPE);
- National Department of Rural Development and Land Reform (DRDLR);
- National Department of Trade and Industry (DTI);
- National Department of Water and Sanitation (DWS);
- National Department of Energy Independent Power Producer Office (DoE IPP);
- National Treasury;
- North West Department of Rural, Environment and Agricultural Development (NW READ);
- Northern Cape Department of Environment and Nature Conservation (DENC);
- Presidential Infrastructure Coordinating Commission (PICC);
- South African Air Force (SAAF);
- South African Local Government Association (SALGA);
- South African National Biodiversity Institute (SANBI); and
- Western Cape Department of Environmental Affairs and Development Planning (DEADP).

Expert Reference Group

Since the inception of the SEA process, the project team received technical guidance from the ERG. The Department of Environmental Affairs (DEA) was the lead agent and chair at all ERG meetings, which were hosted at the CSIR Knowledge Commons venue on the Pretoria CSIR campus.

The main objective of the ERG was to provide technical review, inputs and insight to the SEA process. The following agencies and associations were represented on the ERG:

- Air Traffic Navigational Services (ATNS);
- Birdlife South Africa (Birdlife SA);
- Business Unity South Africa (BUSA);
- Cape Nature;
- Chamber of Mines of South Africa
- Civil Aviation Authority (CAA);
- Council for Geoscience (CGS);
- CSIR Defence, Peace, Safety and Security (DPSS);
- Endangered Wildlife Trust (EWT);
- Energy Intensive User Group (EIUG) of South Africa;

- Eskom;
- KwaZulu Natal Department of Transport (DoT) SIP 2
- Industrial Development Corporation (IDC);
- National Department of Agriculture, Forestry and Fisheries (DAFF);
- National Department of Defence (DoD);
- National Department of Energy (DoE);
- National Department of Environmental Affairs (DEA);
- National Department of Mineral Resources (DMR);
- National Department of Public Enterprises (DPE);
- National Department of Rural Development and Land Reform (DRDLR);
- National Department of Trade and Industry (DTI);
- National Department of Water and Sanitation (DWS);
- National DoE Independent Power Producer Office (DoE IPP);
- National Heritage Council South Africa (NHCSA);
- National Treasury;
- Northern Cape Department of Environment and Nature Conservation (DENC);
- Presidential Infrastructure Coordinating Commission (PICC);
- Sentech;
- South African Air Force (SAAF);
- South African Bat Assessment Advisory panel (SABAAP);
- South African Heritage Resources Agency (SAHRA);
- South African Local Government Association (SALGA);
- South African National Biodiversity Institute (SANBI);
- South African National Energy Development Institute (SANEDI);
- South African National Roads Agency Limited (SANRAL);
- South African Photovoltaic Industry Association (SAPVIA);
- Southern Africa Solar Thermal and Electricity Association (SASTELA);
- South African Weather Services (SAWS);
- South African Wind Energy Association (SAWEA); and
- Square Kilometre Array (SKA) South Africa as part of the Department of Science and Technology (DST);
- Sustainable Energy Society of Southern Africa (SESSA); and
- Transnet

Appendix B.3 Phase I Consultation

Consultation on the Constraints Mapping

A provincial roadshow was undertaken from 12 May 2014 until 3 June 2014 to consult with provincial environmental departments on results from Phase I of the SEA process. Phase I involved a wall to wall sensitivity delineation and mapping of areas where electricity grid infrastructure is likely to have a negative impact on the environment (environmental

constraints – Figure 1) and areas where the environment is likely to have a negative impact on electricity grid infrastructure (engineering constraints – Figure 2). Environmental constraints include (but are not limited to) sensitive features such as protected areas and heritage sites as well as existing and conflicting land uses, such as the Square Kilometre Array and aerodromes. Engineering constraints include, and are not limited to, steep slopes and areas with restricted road access. The full extent of South Africa was then graded and mapped for environmental and engineering sensitivity, indicating areas to be avoided (Very High sensitivity), to areas which are sensitive for various reasons

(High-Medium sensitivity), to areas which demonstrate no sensitivity (Low sensitivity). The workshop consultation presentations were made available on the project website https://egi.csir.co.za/?page_id=223.

This consultation was limited to environmental departments and stakeholder groups within the relevant provinces. Invitations were sent to the provincial ERG representatives who were asked to distribute the invitation to relevant stakeholder groups. The attendees to the Phase I provincial consultation workshops are presented in Table 2.

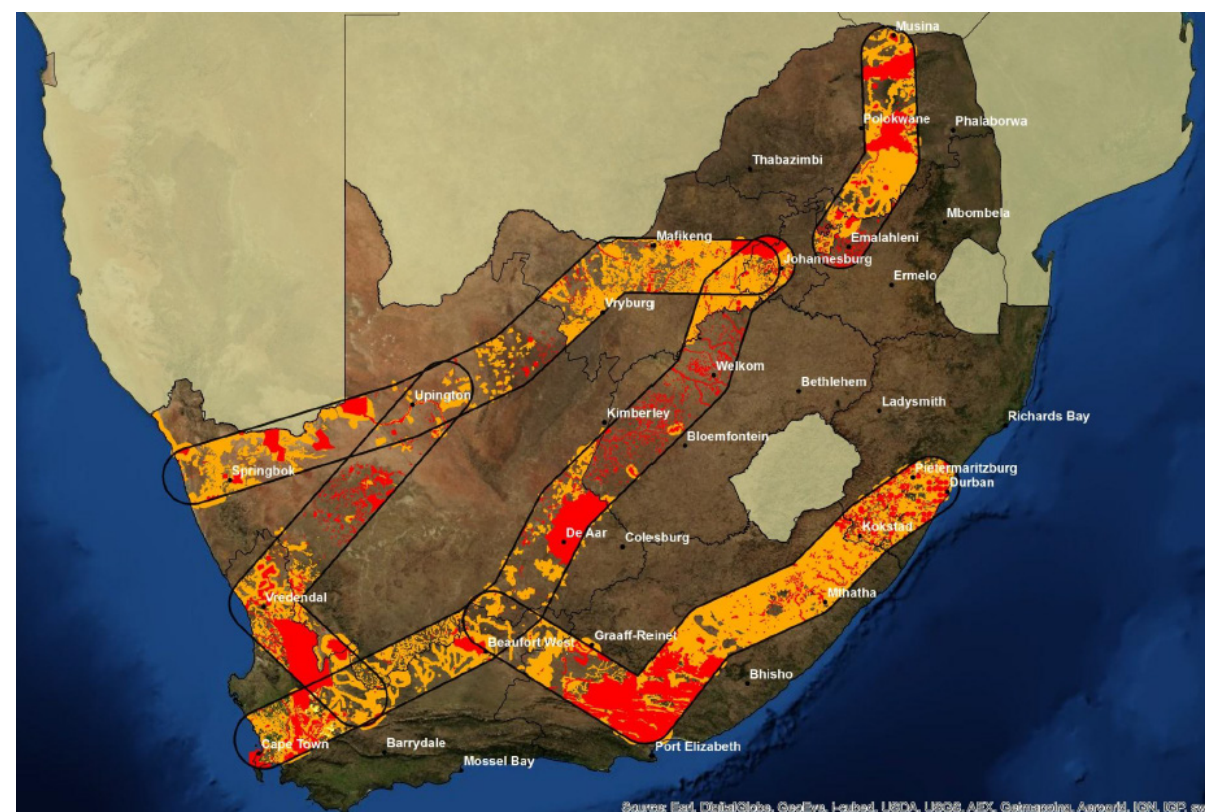


Figure 1: Negative mapping constraint results of EGI on environment (Environmental Constraints)

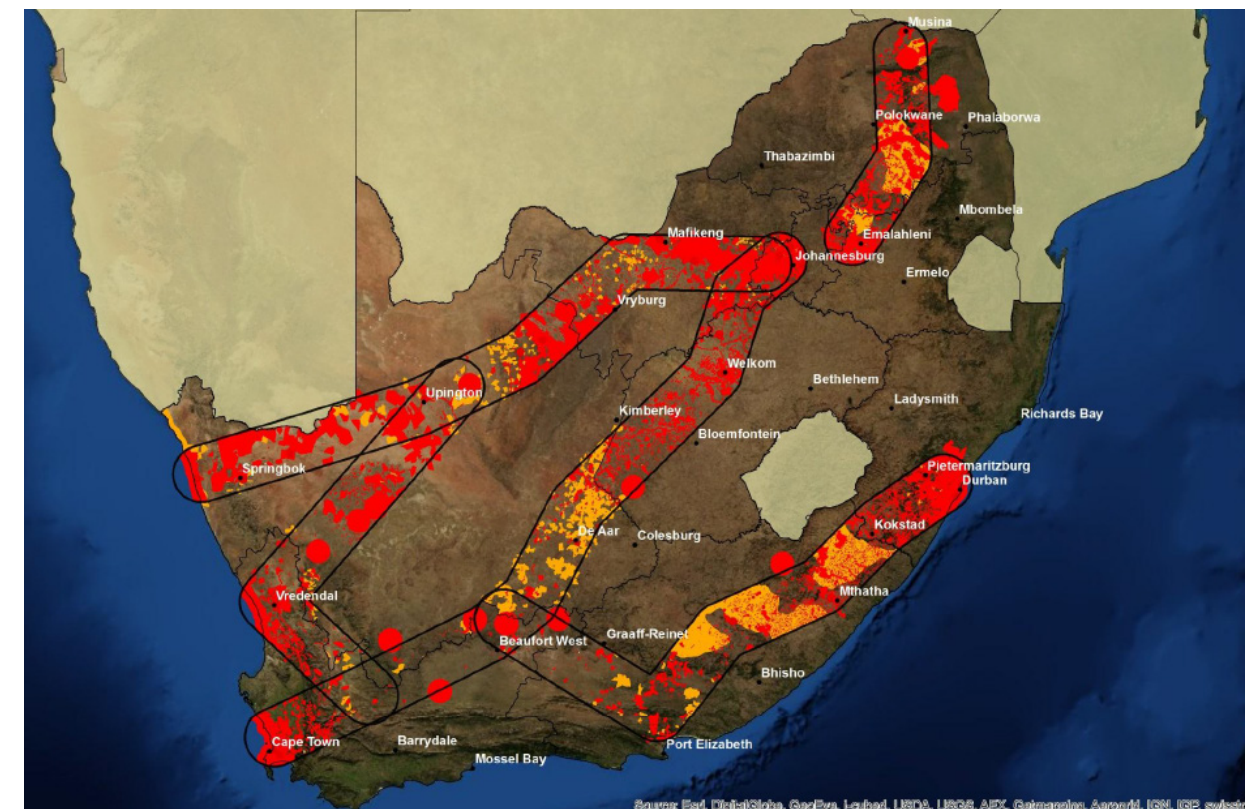


Figure 2: Negative mapping constraint results of environment on EGI (Engineering Constraints)

Table 2: Attendees for Phase I Provincial Consultation Workshops

Provincial Roadshow for Phase I Consultation		
Name	Department/ Organisation/ Affiliation	Email
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Appendix B.4 Phase II Consultation

A second series of 10 workshops was undertaken from 4 – 28 November 2014 to consult with provincial and local government departments; as well as bulk energy users and generators. The consultation focussed on receiving inputs to the Phase II utilisation mapping process.

Phase II involved the identification of areas within and immediately adjacent (a maximum distance of 25km) to the Preliminary Corridor boundary where transmission infrastructure would be best utilised from a electricity generation and load perspective. The process involved identifying areas of planned and potential generation and load activities. Information was sourced through a detailed review of provincial and local government spatial development planning documentation as well as through consultation with government and industry. The outputs of this exercise were then digitized to develop the Utilisation Corridors i.e. 100km wide corridors which represent where future transmission

infrastructure might be best utilised in the future. Presentations from these workshop sessions are available on the project website https://egi.csir.co.za/?page_id=421.

Phase II: Provincial and Local Government Consultation

Nine workshops were hosted by the relevant provincial department of each province. Attendance to the consultation was not limited to environmental planning representatives only. A concerted effort was made to include all infrastructure and spatial planning representatives from provincial and local government departments within the relevant provinces. Invitations were sent to provincial ERG representatives who were asked to distribute the invitation to relevant stakeholder groups. Invitations were also sent directly to officials for whom details could be sourced from departmental and municipal websites.

The main objectives for holding the workshop was to inform local government of the SEA process and also provide provinces and municipalities with the opportunity to actively engage with the mapping outputs from the SDF review, undertaken as part of the Utilisation Mapping process. A dedicated consultation exercise was designed which enabled provinces and municipalities to provide feedback and request updates to the SDF mapping outputs based on more recent and unpublished draft SDFs as well as local and regional knowledge. Provinces and municipalities were given two weeks to complete the exercise and submit comments to the SEA team for review.

Examples of the exercise documentation provided to provincial and municipal representatives responsible for commenting on the utilisation mapping outputs for the Eastern Corridor is illustrated in Figures 3 – 5 below. The attendees of the Phase II provincial and local government consultation workshops are listed in Table 3.

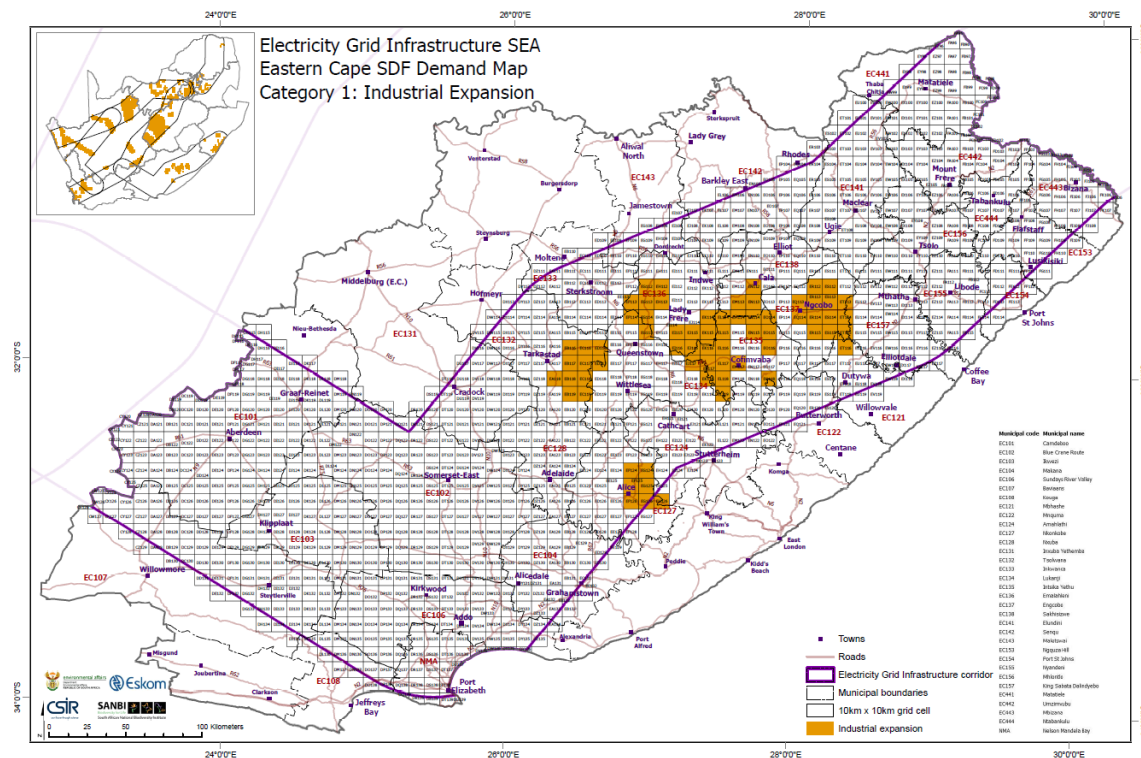


Figure 3: An Example of the Eastern Corridor SDF mapping output for areas delineated for industrial expansion

EGI SEA Demand Mapping Exercise Instructions

STEP 1	<ul style="list-style-type: none"> Identify the relevant person(s) within your institution with knowledge on future spatial development plans for your province/municipality, concerning industry and mining related development in particular. Request their input and participation in this exercise.
STEP 2	<ul style="list-style-type: none"> Visit the EGI SEA Website at: https://egi.csir.co.za/?page_id=421 Access your relevant provincial folder Access the 'Working Exercise Materials' folder Open the 'Maps' folder and download each of the three maps within: <ul style="list-style-type: none"> Category 1: Industrial Expansion Category 2: SEZ and IDZ Category 3: Priority Mining Areas Return to 'Working Exercise Materials' folder Open the 'Attributes' folder and download the attributes table Return to 'Working Exercise Materials' folder Open the 'Feedback forms' folder and download each of the forms within: <ul style="list-style-type: none"> Category 1: Industrial Expansion Category 2: SEZ and IDZ Category 3: Priority Mining Areas
STEP 3	<ul style="list-style-type: none"> Review each of the maps to determine whether the shaded cells are an accurate representation of spatial development plans in your province/municipality with regards to industrial expansion, SEZ and IDZ and or priority mining. Review the grid cells on each map in combination with the attributes table to determine whether the documents used by the EGI SEA Team to populate the maps are the best available documents.
STEP 4	<ul style="list-style-type: none"> Based on your knowledge of future developments plans in your province/municipality, identify what changes you would like to be made to each of the three maps i.e. which cells you would like to be changed from 'shaded to unshaded' or 'unshaded to shaded'.
STEP 5	<ul style="list-style-type: none"> Capture any proposed changes in the appropriate feedback forms. Therefore, if you would like changes to be made to the Category 1 Map, then complete the Category 1 Feedback Form. Proposed changes to the Category 2 Map must be captured in the Category 2 Feedback Form, and changes to the Category 3 Map must be captured in the Category 3 Feedback Form.
STEP 5A	<ul style="list-style-type: none"> Each Feedback form is separated into two sections. Section 1 relates to cells INSIDE the corridor which must be changed from 'shaded to unshaded'. Please capture the grid cell reference number for the cell you would like to be 'unshaded' together with a comment, i.e. an explanation of why the cell must be unshaded.
STEP 5B	<ul style="list-style-type: none"> Section 2 of the Feedback Form concerns cells INSIDE the corridor which you are proposing to be changed from 'unshaded' to 'shaded'. Please capture the cell reference number for each proposed cell. In addition, please capture the sector and activity to which the cell relates (referring to the table at the start of Section 2).
STEP 5C	<ul style="list-style-type: none"> Section 3 of the Feedback Form concerns areas completely OUTSIDE the corridor extent only. Please identify areas (coordinates of area/nearest town to area) falling outside the corridors which could motivate shifting the corridors in support of these areas.
STEP 6	<ul style="list-style-type: none"> Capture your municipality or departmental contact details on the front cover of each Feedback Form. Please submit a maximum of one Feedback Form for each map per department/municipality.
STEP 7	<ul style="list-style-type: none"> Submit completed Feedback Forms to Wisaal Osman at wosman@csir.co.za by 5th December 2014. As per STEP 3, please also submit any documents which you would like to be considered as part of the review that have not yet been included. Contact Wisaal Osman at 021 888 2482/2432 if you have any questions regarding the exercise.

Figure 4: Exercise instructions

SECTION 1: DEACTIVATE 'SHADED' GRID CELLS (INSIDE CORRIDOR EXTENT ONLY)

PLEASE COMPLETE THE TABLE BELOW FOR CELLS THAT SHOULD BE DEACTIVATED FOR INDUSTRIAL EXPANSION.

GRID CELL REFERENCE NUMBER	COMMENTS
EQ 113	THIS AREAS ARE PROPOSED FOR RESIDENTIAL AREA ON THE SDF
ER 112	
ER 113	
ER 114	
ER 115	

Figure 5: Eastern Cape SDF Feedback Form for Industrial Expansion

Table 3: Attendees for Phase II Provincial and Local Government Consultation Workshops

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Intsika Yethu	A Makhanya	makhanyaa@intsikayethu.gov.za
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Kind Sabata Dalindyebo Local Municipality	Bantu Gwadiso	Bantu.gwadiso@live.co.za
OR Tambo District Municipality	Nombasa Msebi	nombasamsebi@hotmail.com
Sakhisizwe Local Municipality	Sifundo Tunzi	STunzi@sakhisizwe.gov.za
Sarah Baartman District Municipality	Keleltes Makgake	kenakgola@sbdm.co.za
Senqu Local Municipality	Rob Crozier	Crozierr@senqu.gov.za
South African National Biodiversity Institute (SANBI)	Fahiema Daniels	f.daniels@sanbi.org.za
	Shahieda Davids	s.davids@sanbi.org.za

Bulk Generator Workshop

Due to the competitive nature of the renewable energy industry in South Africa, much data and knowledge exist in the private sector that cannot be made available for public studies such as this SEA. In order to afford the industry an opportunity to provide inputs, without having to actually disclose such information publically, an appropriate consultation process was designed. This process was communicated to industry associations at a workshop session hosted on the 4th November 2014 at the CSIR Pretoria Campus.

The consultation process consisted of a survey including a map of the Buffered Corridors divided into 10km x 10km grid cells. The survey was distributed to the members of the South African Wind Energy Association (SAWEA), the South African Photovoltaic Industry Association (SAPVIA), South African Solar Thermal and Electricity Association (SASTELA) and any other renewable energy developers registered as stakeholders in the SEA process. A commitment was made that all individual submissions by developers would be treated as confidential while the aggregated results would be used for the study. Eskom Holdings Limited was also provided the opportunity to provide inputs.

Each developer were requested to select up to 15 different grid cells where grid development should be prioritised inside of the Buffered Corridors to support plans for renewable energy development in these areas over a 0-5 year, 5-15 year and 15-30 year time horizon (Figure 6). Developers were afforded the opportunity to select an additional five grid cells outside of the Buffered Corridors as well at a 0-30 year time horizon. Upon selection of each grid cell developers were required to indicate the generation potential of the selected cell in MW. The workshop presentations and exercise were made available via the project website (https://egi.csir.co.za/?page_id=352).

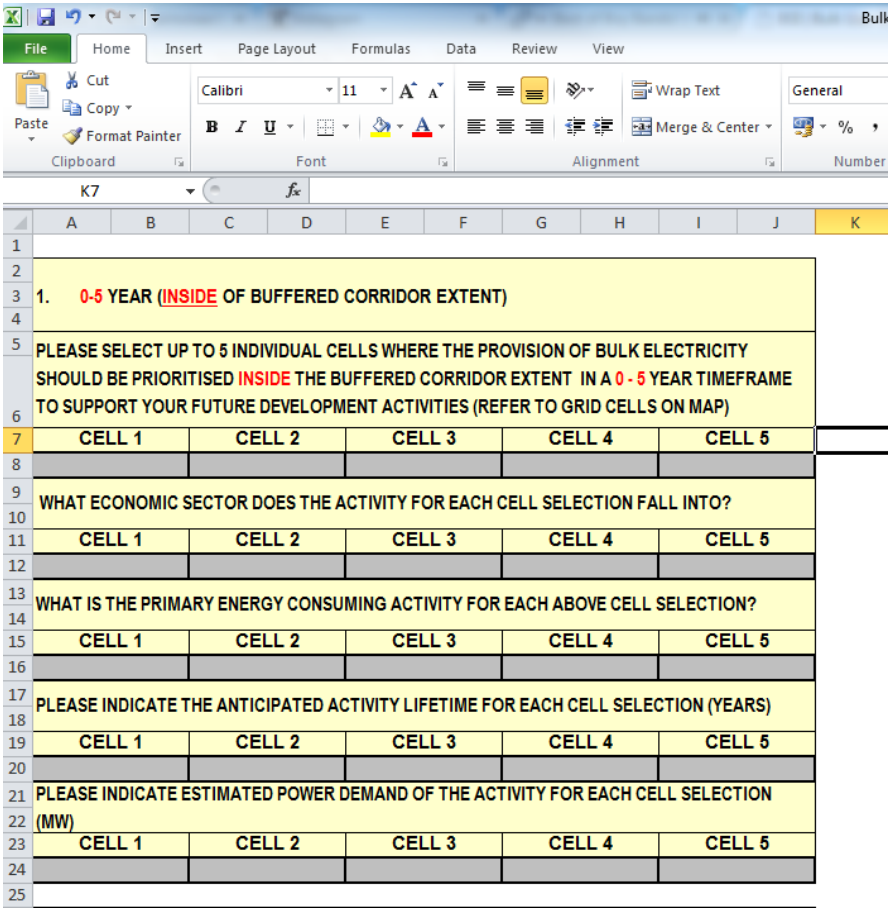


Figure 6: Example of the form which Bulk Energy Generators were asked to complete.

Bulk Electricity User Workshop

The same consultation process for bulk generators was followed for bulk users. In this instance, energy intensive users including members of the Energy Intensive User Group (EIUG), Business Unity South Africa (BUSA), Chamber of Mines (CoM) and other institutions such as Transnet, Industrial Development Corporation and Eskom, were consulted for inputs on the location of planned bulk energy consuming projects. Respondents were requested to identify the position of such planned projects through the selection of grid cells at a 0-5, 5-15 and 15-30 year horizon. Respondents were required to indicate the power requirements of projects in MW.

The bulk user workshop was hosted by the project team at CSIR Pretoria Campus on 5 November 2014. The workshop presentations and exercise were made available via the project website (https://egi.csir.co.za/?page_id=352). Attendees at the workshop are indicated in Table 4.

Table 4: Bulk Energy User and Generator workshop attendees at CSIR Pretoria Campus on 5 November 2014.

Phase II Bulk Energy User and Generator Workshop		
Department/ Organisation/ Affiliation	Name	Email
Business Unity South Africa (BUSA)	Wayne Glossop	wayne.glossop@gmail.com
Chamber of Mines (CoM)	Christiaan Teffo	cteffo@chamberofmines.org.za
Coega Development Corporation (CDC)	Luvuyo Mkontwana	Luvuyo.Mkontwana@coega.co.za
Council for Mineral Technology (Mintek)	Godfrey Mothapo	GodfreyMo@mintek.co.za
Council for Scientific and Industrial Research (CSIR)	Marshall Mabin	mmabin@csir.co.za
	Wisaal Osman	wosman@csir.co.za
Department of Environmental Affairs (DEA)	Surprise Zwane	SZwane@environment.gov.za
Energy Intensive User Group (EIUG)	Jarredine Morris	jmorris@bdo.co.za
	Takalani Gangazhe	takalani.gangazhe@angloamerican.com
Eskom	Kevin Leask	LeaskK@eskom.co.za
	Ronald Marais	MaraisRo@eskom.co.za
	Snyman Mojapelo	MojapeS@eskom.co.za
	Crescent Mushwana	crescent.mushwana@eskom.co.za
iGas	Neville Ephraim	nevilleE@cefgroup.co.za
Industrial Development Corporation (IDC)	Jennifer Crossman	JenniferC@idc.co.za
South African National Roads Agency Limited (SANRAL)	Mpati Makoa	makoam@nra.co.za
	Willem van der Merwe	vdmerwew@nra.co.za
South African National Biodiversity Institute (SANBI)	Fahiema Daniels	f.daniels@sanbi.org.za
	Jeff Manuel	j.manuel@sanbi.org.za
	Shahieda	s.manyike@sanbi.org.za
	Sagwata	s.davids@sanbi.org.za
South African Wind Energy Association (SAWEA)	Kilian Hagemann	kilian@g7energies.com
Southern Africa Solar Thermal and Electricity Association (SASTELA)	Ntombikanina Malinga	ntombikanina@gmail.com
	Saheed Okuboyejo	sokuboyejo@brightsourceenergy.com
Transnet	Shepherd Nkosi	Shepherd.Nkosi@transnet.net
	Charl du Toit	charl.dutoit@transnet.net
	Johan Marais	Johan.Marais@transnet.net
	Sandile Magenuka	Sandile.Magenuka@transnet.net

Appendix B.5 Consultation with the Public

Project Initiation

The public consultation process undertaken for this SEA aimed at providing any interested stakeholder the opportunity to engage with the process. For this purpose, various means of communication were used and included online articles, newspaper notifications, and a project website. Announcements for the initiation of the SEA were published in local, provincial and national newspapers. The enlarged version of the notice for the initiation of the SEA is provided in Figure 7 below.

Strategic Environmental Assessment (SEA) notice

NOTIFICATION OF INTEREST TO BE PART OF A PROCESS TO DEVELOP A STRATEGIC ENVIRONMENTAL ASSESSMENT AND PRE-CONSTRUCTION SITE SPECIFIC ENVIRONMENTAL ASSESSMENT CRITERIA TO ENSURE THE EFFICIENT AND EFFECTIVE EXPANSION OF THE ELECTRICITY GRID INFRASTRUCTURE FOR SOUTH AFRICA

The Department of Environmental Affairs (DEA) hereby informs all interested stakeholders of its intention to embark on a process to develop a Strategic Environmental Assessment (SEA) to identify routing corridors for the efficient and effective expansion of the electricity grid infrastructure in South Africa, and to develop pre-construction site specific environmental assessment protocols.

Should you wish to contribute to the SEA development process you are requested to register your interest with DEA. You are also requested to make an initial input by identifying issues which should be considered by DEA in the development of the SEA. As a registered interested party you will be informed of the availability of any draft documents for your input.

Please register by submitting your name and e-mail details to the address mentioned below to:

Ms Agnes Mainganye
Email: amainganye@environment.gov.za

Please note that should you not receive a response from the Department within a month from date of your submission, your interest has not been registered and you will need to resubmit your details.

For further information you are also welcome to call **Mr Surprise Zwane** at the Department of Environmental Affairs at: (012) 310 3145 or email on szwane@environment.gov.za

www.environment.gov.za
Call centre: 086 111 2468



environmental affairs
Department:
Environmental Affairs
REPUBLIC OF SOUTH AFRICA



Figure 7: Initial notice of initiation of the Electricity Grid Infrastructure (EGI) Strategic Environmental Assessment (SEA)

B.5.1 Project Website

A project website was launched at the inception of the project. The project website was created as a platform for the exchange of information and data between the SEA team and all stakeholders including government officials, local communities, industry representatives, and anyone else interested in electricity grid infrastructure planning in South Africa.

The project website is accessible at: <https://egi.csir.co.za/> and enables stakeholders to register on the SEA database and also send comments to the SEA team via an online form. The home page of the project website is illustrated in Figure 8.



Figure 8: Home page of the Electricity Grid Infrastructure (EGI) Strategic Environmental Assessment (SEA) project website (<https://egi.csir.co.za/>)

B.5.2 Stakeholder Database

A total of 169 stakeholders registered on the EGI SEA database via the project website, phone calls or emails sent directly to the SEA team. The names and affiliations of the registered stakeholders are provided in Table 5.

Table 5: Stakeholders registered on the EGI SEA database

Organisation / Association / Department / Affiliation	Name
Air Traffic Navigational Services (ATNS)	Ettienne Pienaar
	Mr Carel Gersbach
Alstom Grid	Olivier Monteil
Atlantic Energy Partners	David Peinke
Aurecon	Rabagolo Melesi
BioTherm Energy (Pty) Ltd	Marc Wright
Birdlife South Africa (Birdlife SA)	Ms Samantha Ralston
	Simon Gear
	Ernst Retief
	Hanneline Smit-Robinson
Business Unity South Africa (BUSA)	Brian Day
	Wayne Glossop
Cape Nature	Kerry Maree
	Wilfred Williams
	Rhett Smart

Organisation / Association / Department / Affiliation	Name
	Alana Duffell-Canham
Chamber of Mines of South Africa	Dick Kruger
	Christiaan Teffo
Council for Geoscience (CGS)	Dr Stewart Foya
	Livhu Wani
	Chameney Engelbrecht
	Mashudu Matshivha
CSIR DPSS	Rian De Wind
CSIR Research & Development Centre	Crescent Mushwana
	Tobias Bischof-Niemz
DELTA BUILT ENVIRONMENT CONSULTANT	Cilliers van der Merwe
	Gerhard Schoeman
	Phathu Mudau
Department of Defence	Colonel SC Williams
Eastern Cape Department of Economic Development, Environmental Affairs and Tourism (DEAET)	Noluthando Bam
	Alistair McMaster
	Albert Mfenyana
	Mr Bongani Gxilishe
Eastern Cape Department of Economic Development, Environmental Affairs and Tourism (DEAET)	Mr Bongani Gxilishe
ELECNOR SOUTH AFRICA	ripio vicente
Endangered Wildlife Trust (EWT)	Stephanie Aken
	Constant Hoogstad
	Megan Murison
	Lourens Leeuwner
Energy Intensive User Group (EIUG) of southern Africa	Jarredine Morris
	Takalani Gangazhe
	Dave Krumm
Eskom	Ronald Marais
	Kevin Leask
	John Geeringh
	Ernest Grunewald
	Tobile Bokwe
	Gift Matsabatsa
	Ms Fiona Havenga
Falcon Oil & Gas Ltd	Anne Flynn
Free State Department of Tourism, Environmental and Economic Affairs (DETEA)	Coenie C. Erasmus
Free State Department of Tourism, Environmental and Economic Affairs (DETEA)	Grace Mkhosana
G7 Renewable Energies	Karen de Bruyn
Gauteng Department of Agriculture and Rural Development (GDARD)	Sizakele Ndzhukula
	Ronald Mathe
	Nontokozo Mahlalela

Organisation / Association / Department / Affiliation	Name
	Marc Leroy
	Basani Ndindani
Gert Sibande District Municipality	Nomsa Thabethe
GIBB	Urishanie Govender
Hydro SA	Mercia Grimbeek
Independent Power Producer (IPP) Office	Gary Lloyd
	Nokuthula Mncube
	Riana van Wyk
	Maduna Ngobeni
	Louis Moyse
	Deshan Padayachee
	Pervelan Govender
	Karen Breytenbach
	Dr Clinton Carter-Brown
Industrial Development Corporation (IDC)	Annmarie BUCK
	Herbert Kofang
	Jennifer Crossman
KwaZulu Natal Department of Agriculture, Environmnetal Affairs and Rural Development (KZNDAE)	Ms Nombulelo Zungu
	Mr Zama Mathenjwa
KZN DoT (SIP2)	Gideon Treurnich
Limpopo Department of Economic Development, Environment & Tourism (LEDET)	Victor Mongwe
Mpumalanga Department of Economic Development, Environment & Tourism (DEDET)	Sam Maluleka
	Selby Hlatshwayo
National Department of Agriculture, Forestry and Fisheries	Izak van de Merwe
	Mulalo
	Anneliza Collett
National Department of Energy	Nomawethu Qase
	Mokgadi Modise
	Dominic Milazi
	Pheladi Masipa
	Babalwa Mbobo
National Department of Environmental Affairs	Dee Fischer
	Marlanie Moodley
	Nicolene Fourie
National Department of Mineral Resources	Kgauta Mokoena
National Department of Public Enterprises (DPE)	Ms Makgola Makololo
	Ms Andretta Tsebe
National Department of Rural Development and Land Reform	Mr Enock Mhlanga
	Ms Mpho Mashau
National Department of Trade and Industry	Maoto Molefane
	Witness Mokwana
	Ofentse Sebitlo

Organisation / Association / Department / Affiliation	Name
	Phillip Gcina Ninela
National Department of Water & Sanitation	Ms Ndileka K Mohapi
	Namisha Muthraparsad
	Ms Anet Muir
	Khwezi Mpumlwana
National Heritage Council South Africa	Ms Natalie Uys
	Ms Elsabe Swart
	Bryan Fisher
NW FEED (Finance, Economy and Enterprise Development)	Kgomotso Gaobepe
	Lebogang Diale
NW READ (Rural, Environment and Agricultural Development)	Tharina Boshoff
	Portia Krisjan
Presidential Infrastructure Coordinating Commission (PICC)	Martie Janse van Rensburg
	Willie Croucamp
Sasol Mining Secunda	Aldine Bezuidenhout
Sentech	Alishea Viljoen
SIP10	Hannes van der Westhuizen
	Jonella Paul
	Saba Derakhshani
	Trisha Daya
	Kelisha Panday
SiVEST	Rebecca Thomas
Solid Rock HR Specialists	Vuyiseka Mkele
South African Air Force	Colonel Elma de Villiers
	Colonel Weilbach
	Lt Col T Arpin
	Maj TV Turnbull
	Rene Muller
South African Bat Assessment Advisory Panel (SABAAP)	Kate MacEwan
South African Civil Aviation Authority (SACAA)	Harry Roberts
South African Heritage Resources Agency (SAHRA)	Ms Kathryn Smuts
	Mrs Colette Scheermeyer
South African Local Government Association (SALGA)	Linda Manyuchi
South African Local Government Association (SALGA)	Intelligent Chauke
South African National Biodiversity Institute (SANBI))	Jeff Manuel
	Fahiema Daniels
	Sagwata Manyike
	Ernest Mmonoa
	Tsamaelo Malebu
	Shahieda Davids
South African National Defence Force (SANDF)	Hannes Potgieter
	Adri Liebenberg

Organisation / Association / Department / Affiliation	Name
South African National Energy Development Institute (SANEDI)	Dr Karen Surridge-Talbot
	Dr Minnesh Bipath
	Andre Otto
South African National Roads Agency Limited (SANRAL) ANRAL)	Ms Mpati Makoa
	Willem van der Merwe
	Victoria Bota
South African Photovoltaic Industry Association (SAPVIA)	Natalie Bezuidenhout
	Davin Chown
	Mike Levington
	Moeketsi Thobela
South African Weather Services (SAWS)	(Dr) A C Kruger
	Lucky Ntsangwane
South African Wind Energy Association (SAWEA)	Johan van den Berg
	cc in emails
	Werner Engelbrecht
	Tatenda Ziso
	Jo-Anne Thomas
	Katherine Persson
Southern Africa Solar Thermal and Electricity Association (SASTELA)	Ntombikanina Malinga
	Pancho Ndebele
	Daniel Schwab
	Saheed Okuboyejo
Square Kilometre Array (SKA) Africa	Dr. Adrian Tiplady
	Tshegofatso Monama
	Craig Smith
Sustainable Energy Society of Southern Africa (SESSA)	James Shirley
	Mark Aspeling
Transnet	Shepherd Nkosi
	Charl du Toit
	Johan Marais
	Makhosini Shongwe
	Sandile Magenuka
	Jogikaya George
Western Cape Department of Environmental Affairs and Development Planning (DEADP)	Mr Paul Hardcastle
	Zaahir Toefy
World Bank	Kisas Mfalila
	Oliver Knight

B.5.3 Frequently Asked Questions

Among all comments received from stakeholders since the start of the SEA process, several issues have been recurring and were summarised into a “Frequently Asked Questions” (FAQs) document. This FAQ document was uploaded onto the project website enabling stakeholders to pro-actively access information that would potentially address questions/concerns. The FAQs are presented in the box below (see Box 3).

Box 3: Frequently Asked Questions

Purpose of the Electricity Grid Infrastructure SEA

“How will the SEA process facilitate the efficient and effective expansion of strategic electricity grid infrastructure in South Africa?”

Integration

The SEA process is aimed at integrating environmental, economic and social factors to identify areas where electricity grid infrastructure expansion will have the lowest possible impact on the environment whilst yielding the highest possible social and economic development opportunities to the country. This process will ensure that future electricity grid infrastructure development in these areas is done sustainably.

Agreement

The SEA process provides a platform for Eskom, government departments, private sector, and non-government institutions to provide input into where strategic transmission infrastructure should be prioritised and Corridors established. The intent is for agreement and commitment to be officiated through Cabinet approval and a gazetting process.

Alignment

The cabinet approval and gazetting of the Corridors will allow for alignment of the three spheres of government (including National, Provincial and Local Government) by adopting the Corridors and its associated processes into future policies and spatial plans (e.g. Integrated Development Plans: IDPs and Spatial Development Framework: SDFs). This will in turn create an enabling environment which will allow for the streamlining of development processes in these areas. The development of all electricity grid infrastructure requiring environmental authorisation within the corridors will necessitate a Basic Assessment (BA) process.

Strategic Planning

The certainty resulting from the adoption of the corridors will allow Eskom to be more proactive when undertaking servitude negotiation with landowners and agree on land parcels and route options based on environmental sensitivity upfront. Gazetted corridors will also help Eskom to motivate for the necessary funding to build in these corridors. Furthermore, the gazetted corridors will provide confidence to the renewable energy industry of transmission infrastructure investment in these areas.

“What will incentivise Eskom to develop in the corridors rather than outside?”

The corridors represent areas where transmission infrastructure investment is required in order to balance South Africa’s future power supply and demand needs. Therefore Eskom need and want to build in these areas. The outcomes of the SEA will assist Eskom in developing in these areas by:

Decreasing Risk

The high level agreement and commitment to the corridors will decrease the risk of not obtaining authorisation, should Eskom target areas for development that have been pre-assessed and classified as having lower levels of environmental sensitivity.

Eskom will be able to assess many risks upfront (including environmental, access to land and cost of land) prior to seeking authorisation for a specific route.

Streamlined Process

In addition to scoping level assessment of the corridors, interdepartmental and intergovernmental alignment will allow for streamlined authorisation processes. This will include obtaining the necessary authorisations for other permit requirements such as Water Use Licenses and Forest Clearing Permits. No, the SEA is not looking to replace the need for project level environmental authorisation.

“How many lines/infrastructure will be built in each of the corridors?”

The corridors can be considered the future transmission backbone of South Africa. Transmission level power lines already exist within each of the corridors. Where possible, existing lines will be upgraded to support additional capacity. It is difficult to comment on exactly how many new lines will be necessary in each corridor as the composition and geographical distribution of South Africa’s future generation footprint is still unclear. In most instances, no more than three or four new transmission level lines will be needed within each corridor over the course of the next 30 years. The upgrade and development of major transmission substations will also be necessary in each of the corridors.

Environmental authorisation in the Corridors

“Will the EGI SEA replace the need for project level environmental authorisation within the corridors?”

The level of environmental assessment undertaken as part of the SEA is equivalent to the scoping phase of an Environmental Impact Assessment (EIA) in terms of National Environmental Management Act. The results are thus not sufficient for project level decision making in terms of NEMA, and further impact assessment is still necessary at a project level. With the scoping requirements being met inside of the corridors, all electricity grid infrastructure projects, and associated infrastructures, that require environmental authorisation will follow a streamlined project level environmental assessment process in the form of a Basic Assessment (BA). The scope of the project level BA process in corridors will be informed by the development protocols, and will be undertaken in accordance with the relevant regulations current at the time. The project level BA process will also include the associated project level public participation process.

“How will integrated authorisation be accomplished?”

The SEA process provides a platform for competent authorities and other permitting or commenting agencies to provide upfront requirements for development in the corridors. Consensus will be reached on how these requirements will be incorporated into the development protocol. If a proposed project complies with the development protocol’s requirements it would imply that all authorising and permitting authorities’ requirements have been met, and thus either a single or multiple

authorisations and permits can be issue

Scope of the EGI SEA

“Is the EGI SEA only considering transmission infrastructure within the Corridors?”

The location of the preliminary corridors is based on the results of a detailed Eskom Strategic Grid Plan study to determine future transmission needs across South Africa in the context of balancing major power supply and demand requirements up to 2040. Therefore the final location of the corridors will be based on transmission level need only (rather than distribution level) and will facilitate the future transmission backbone of South Africa. However, any change in the environmental authorisation process within the Corridors, which may be brought about as a result of this assessment, will apply to both transmission and distribution level infrastructure.

“Why is there not a corridor connecting KwaZulu Natal to the interior?”

Currently the majority of power provided to the KZN is sourced from the coal generating areas in Mpumalanga. A large number of transmission lines are already in place which traverse the Drakensburg range and connect Mpumalanga with KZN. Over the course of the next 30 years it is expected that many of the coal power generating facilities in Mpumalanga will be decommissioned which will mean that no new transmission lines between Mpumalanga and KZN will be necessary. Instead, much of KZN's future power requirements will be sourced via the Eastern Corridor through a range of energy sources likely to include renewable, gas and nuclear.

Timeframe of the SEA

“What are the timeframes for the SEA process?”

Completion of SEA

It is planned that the SEA process will be completed by end -2015.

Completion of Cabinet Approval and Gazetting Process

It is aimed for the cabinet approval and gazetting process to be completed by mid-2016

B.5.4 Project Articles Online

- ✓ Many people utilise online platforms to keep abreast of current affairs. For this reason, an effort was made to publish articles about the EGI SEA project in key online publications. A summary of online articles published is listed in Table 6 below.

Table 6: EGI SEA project articles published online

Online Articles		
Platform Name	Date	Article Link
Engineering News	16 May 2014	http://www.engineeringnews.co.za/article/sea-to-assist-in-electricity-grid-infrastructure-expansion-2014-05-16
Infrastructure News	4 June 2014	http://www.infrastructurenews.co.za/2014/06/04/enabling-the-expansion-of-electricity-infrastructure/
Business Day	27 June 2014	http://www.bdlive.co.za/business/energy/2014/06/27/private-sector-keen-to-bridge-eskoms-power-gap
Engineering News	15 May 2015	http://www.engineeringnews.co.za/print-version/position-of-strategic-transmission-corridors-confirmed-2015-05-15
Engineering News	10 September 2015	http://www.engineeringnews.co.za/article/govt-seeks-comment-on-power-corridor-enviro-framework-2015-09-10

B.5.5 Project Advertisements in Newspapers

Many stakeholders do not have access to online platforms. Print newspaper advertisements were placed in national newspapers so that a wider audience may be reached to inform about the EGI SEA project. A summary of the print newspaper adverts is listed in Table 7.

Table 7: Summary of the print newspaper advertisements published for the EGI SEA project.

Advertisements and Articles		
Platform Name	Date	Evidence
Sunday Times	6 September 2015	<p>The Great Transformation Debate</p> <p>Judge blows whistle for change in white rugby</p> <p>Failed application to halt Boks could yield long-term results</p> <p>What former Springboks think</p> <p>Unite around SA's team</p> <p>Give black talent a chance</p>

Haunted by the three schoolgirls he could not save, this fearless matric pupil now knows he wants to be a **fireman** some day

Though he saved 13 girls from a fire, Thabang Moruti is haunted by the memory of the three girls he couldn't help. The 21-year-old matric pupil at the North West Secondary School for the Deaf in Levensdoringstad has emerged as the hero of a fire that claimed the lives of three of his friends.

Wearing nothing but a pair of shorts and with his ripped, wet T-shirt tied around his face, Thabang climbed a tree and used a crowbar to force open a window to the hostel's first floor. He went from room to room and bed to bed, getting the girls up and out of the raging inferno.

After he had rescued 13 of them, he came across the bodies of fellow pupils Katlego Ditsoko (16), Bulehla Koni (18) and Emily Oengeng (22).

"I saw the two bodies in the bathrooms. One of the girls was lying face up on the floor with her arms crossed over her chest while the other one was badly burnt," he said.

"I loved them. I knew them and they were also my friends. I went outside and all the deaf pupils were crying. I cried a lot."

Thabang spoke to City Press from his home in Ottsodad, North West, this week through his friend and sign language interpreter, Thapelo Mmonoi.

Dressed in a winter cap, hooded top and tracksuit pants, he said he was more determined than ever to become a firefighter.

Two weeks ago, Thabang was asleep in his bed when he smelt smoke. He went outside to investigate and saw that the floor above his dormitory - where 50 deaf girls were sleeping - was on fire.

He could not see any of them from where he was standing, looking up. He ran up the stairs but the door



YOUNG SAVIOUR Deaf pupil Thabang Moruti climbed a tree to reach the top floor of the dormitory, where smoke and flames were ravaging the girls' rooms. He used an iron bar to break a window and then climbed inside. PHOTO: LUCKY MURIELLO

Hero saves 13 girls from fire

was locked.

He ran outside again, tore his T-shirt, dipped it in water and wrapped it around his mouth and nose to keep the smoke at bay. He climbed a tree dressed only in his shorts.

"I got up there and, with an iron rod, broke the window and slipped through it into the girls' rooms. There was not

much movement and only a few were up. The others were still sleeping," he said.

"There was lots of smoke and it was dark. I walked towards the door and used the same iron rod to force it open."

With the exit now cleared, some girls ran out, leaving

Thabang behind to search for others. He reached for the first girl he stumbled on and dragged her out. From there, he rushed up and down the stairs, in and out of the building, dragging girls out of the fire.

"Some were still sleeping and I went from room to room in the dark searching with my hands for the girls."

"I woke up those who were sleeping and others were too confused and made it hard for me to get them out of the building because they were pulling out of my grip," he said.

"At one point I found two girls, grabbed them both, using one arm for each of them, and rushed out. Once outside, other boys helped to pour water on them, as they were coughing and struggling to breathe."

One of the teachers was also there and rescued one girl, he said.

"Another boy was also helping me search for more girls and take them out of the building. It was hot in there and the smoke was not making it easy for us, but we continued searching while other boys with water buckets were trying to put out the flames," he said.

"When most of the girls were already out, I walked into the bathrooms. Before I entered, part of the burning roof collapsed in front of me. I am not sure if it was the geyser or burst pipes, but there was a lot of water coming from the roof. But I was too late to save the three girls."

The rescued girls had lost their clothing and most of their belongings in the fire and all were still wearing their pyjamas. Moruti stepped in again.

"It was about 1am and too cold, especially for those who had had water poured over them. They were freezing and I went to the boys' rooms and brought some of my clothes and gave to those I could... I was sad I could not help all of them," he said.

Thabang couldn't think of his own fear as he rescued the girls from the fire.

"I was only thinking of the girls who were trapped in their rooms. I was not scared at all. All I wanted was to save lives."

Thabang now knows what he wants to do with his life.

"I have always dreamt of being a fireman and saving lives, but now I am sure this is what I want. I am very sad that the firemen arrived too late and the police could also not help much," he said.

"If I could, I would have a fire station in each and every town and village, and not some distance away. Lives could have been saved had a fire station been close by."

Overworked SABC editors go to CCMA

HLENGWE NHLABATHI
hnlengwe@khaba.co.za

Four "overworked" SABC assignment editors have taken their bosses to the Commission for Conciliation, Mediation and Arbitration (CCMA), demanding senior positions and better benefits equal to the workload they were forced to take on since the broadcaster launched its 24-hour news channel about two years ago.

City Press has learnt that the four editors in the jobbing office are under immense pressure and unhappy about their increasing workload as a result of "incompetence" in some of the other regions.

Work is said to be piling up on them while they get paid less than their colleagues who work in the same positions around the country.

"They are acting as de facto central desk editors," said an insider.

The four are Crosby Amos, Olive Gwendolwe, Faith Daniels and Ronel van Zyl.

Their attempts to negotiate a settlement with the public broadcaster were rejected this week.

According to three insiders, their fight, which could force the SABC to create new positions of national assignment editors, could result in head of news Jini Mathews being subsumed by the CCMA when the case goes under way next month.

The group asked for better pay but was told there were budgetary constraints. The four want backup for additional duties performed from the day they took on their new unofficial roles. For some, this dates back to 2011.

"They were told to take over because management realised the regional editors could not do the

work," said an insider.

President of the Broadcasting, Electronic, Media and Allied Workers' Union Hannes du Buisson said the dispute was not based on getting positions, but the group was performing and deserved to be rewarded accordingly.

He said the SABC had expressed concern about being forced to change its organisational structure to accommodate the group's request.

All the parties spent Wednesday debating whether the CCMA had jurisdiction over the matter or not.

The SABC argued that the labour court had the authority to mediate in the matter, but this was rejected.

Du Buisson said this was the first case of its kind and could set a precedent for other workers who were short-changed by their employers while they battled with piles of work they were not contracted to do.

"You can't employ people in roles and, when they complain about doing extra work, you say it's messing up the organisational structure and there will be salary anomalies."

"If that is your argument, then get people in regions to do what they are supposed to do," said Du Buisson.

"They have more responsibility than their counterparts in other regions."

"They are doing more senior work and must get a senior salary."

He said he was confident of victory but that, in the meantime, he hoped his members would not be victimised for "such a simple matter".

The CCMA is there to deal with these things. We are confident we are right. If you perform a role, then you must be recognised," he said.

SABC spokesperson Katzer Kganyago could not be reached for comment.

Jolie quit Princess Diana's charity

Angelina Jolie resigned as a trustee from a land mine-clearing charity the late Princess Diana made famous after she discovered the trustees paid themselves £500 (R10 500) a day.

The Times newspaper says the Halo Trust works in 16 countries. It made headlines after Princess Diana visited an Angolan minefield.

The newspaper said that Jolie resigned in May last year after becoming "uncomfortable" with the cash the charity spent on a review, including "structural, remuneration and governance arrangements".

She also questioned the trust's policy of making "significant contributions" towards the boarding school fees of the children of some of its staff.

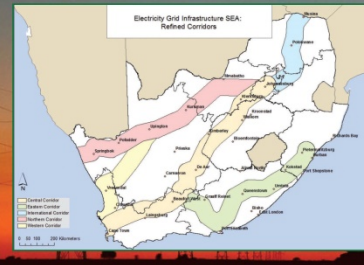
"She left because she was extremely uncomfortable with the actions of the trustees. The main thing was the trustees paying themselves," said a source.

Halo Trust chief executive James Cowan said Jolie had joined in a unanimous vote in favour of the governance review and her resignation letter said she wanted to "do other things". - Staff reporter



Angelina Jolie

Department of Environmental Affairs Leads Power Corridors Project



The Department of Environmental Affairs (DEA) is working together with the Council for Scientific and Industrial Research (CSIR), the South African National Biodiversity Institute (SANBI) and Eskom Holdings Limited to facilitate the Electricity Grid Infrastructure Strategic Environmental Assessment (EGISA). EGISA aims to ensure the efficient and effective expansion of strategic electricity grid infrastructure for South Africa.

In order to coordinate the strategic infrastructure projects (SIP) planned as part of the infrastructure development plan, Cabinet established the Presidential Infrastructure Coordinating Commission (PICC) and tasked them with integrating, coordinating and accelerating the roll out of eighteen Strategic Integrated Projects (SIPs).

SIP 10 prioritises the expansion of South Africa's electricity grid infrastructure to facilitate future growth and development.

EGISA projects trigger a number of different environmental authorisations, each managed by different authorising departments and according to different timeframes. This cascading process means that it often takes five to six years for all the necessary environmental authorisations to be granted for a major electricity grid infrastructure project before development can commence. These conditions have significant economic growth implications and are considered an impediment to addressing South Africa's energy constraints.

Five preliminary corridors were identified at the start of the EGISA on the back of the Eskom Strategic Grid Plan Study. The study formulated long-term strategic

transmission corridor requirements based on three potential future generation scenarios for South Africa up to 2040, including the 2010 Integrated Resource Plan (IRP) extended to 2040 base scenario, an increased renewable scenario replacing the nuclear component of the IRP with base load renewable energy equivalent and an increased imports scenario which assumed a doubling of imported electricity by 2030.

As part of the SEA process, the position of the preliminary corridors has been refined to ensure consistency with national, provincial, local government and industry development plans. Consideration was also given to key environmental aspects such as protected areas, existing land uses including the Square Kilometre Array and engineering sensitivities, for instance steep slopes.

This analysis assisted with determining the optimal position for the corridors, viz where provision of electricity grid infrastructure will best enable the unlocking of development whilst also minimising potential impact to the environment. The refined corridor positions are illustrated in the above map.

The DEA invites stakeholders to provide comments on the location of the corridors. The closure date for comments is 31 October 2015. Please submit any comments in writing to egisa@csir.co.za

To register as a project stakeholder and receive period project updates or to simply learn more about the EGISA, please visit the project webpage at <https://egi.csir.co.za/>

Website: www.environment.gov.za • Call Centre number: 0861 11 2468



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Sport

Meyer lone ranger among coaches in banking on crooked players to deliver

THE Springfield, to be successful at the Rugby World Cup, must trust players whose pedigree endears risk for reward.

The critique of Hogenble Meyer's World Cup contenders is that everything centres on players whose recent international game time berries their international quality as being among the world's best at some stage of their career.

Young Marfield, at 30 years old, remains the manner of kick-off receiver, of managing the lineout and of punting pressure on the opposition innoce. Marfield, named player of the 2007 World Cup final, retired after a less successful 2011 quarterfinal defeat.

Meyer, who coached Marfield at the Bulls for a decade, has enticed Marfield to



Mark Keohane

put right the wrong of the 2011 defeat against Australia. Marfield will select the Bulls in the World Cup opener because equal captain Jean de Villiers is unlikely to play in the first two pool matches.

It could be that De Villiers only returns for the last out-

standing, was second only

to 21-year-old Bulls utility back

June Krut.

Meyer, a defending

Marfield's guaranteed selection,

was inasmuch that Marfield's 2007

rugby team had no equal

among South African forwards.

Meyer said he trusted

Marfield as a player and leader

believed him still to be the best

No 5 international lock and a

player whose X-factor would be

defining at the World Cup.

Marfield, in his comeback

last year, did enough to

vindicate his selection but the

2015 World Cup year has not

been a kind to the veteran,

whose 35-year-old body

undoubtedly has been

vulnerable to injury.

It has also dented Meyer's

enthusiasm. Neither has it

blunted the coach's view that

Marfield, even at 35, is the first

name pencilled into his World

Cup lineup.

But Marfield, for all his

career genius as the best No 5

international specialist of the

professional era, has in 2015

not been the robust 2007

World Cup presence. He has

missed Tait's through injury

and others, among the

opponents and within the

squad, have moved water in their

all-round contribution.

Experience is vital as any

World Cup, and within the lock

squad context, Marfield is the

most capped Test Springbok

yes. But he is not the Marfield

of 2007 and it would be

surprising to expect him to

match the peak of his

international career.

Meyer is convinced

Marfield, like Pierre du Preez,

will inspire the Bulls to the

title. But Du Preez hasn't

played a Test this year due to

injury and has played

regularly for the Bulls in the

last two years since being lured

out of international retirement.

Marfield and Du Preez are

two of our game's greatest and

among the elite to have played

in the professional era. But

they're being backed on

harsh terms and the benefits

of the World Cup-winning

2007 campaign.

Du Preez admitted after the

winning of the World Cup 21 he

was not Test match fit but he

he could play himself into

fitness during the tournament.

Drummond de Villiers and

Duanne Vermeulen, whose first

showing at the World Cup

could be in the quarterfinal.

That there's Walter Alberts

and Peter-Ster du Bok, who

between them have played 40

minutes of Test rugby this year,

Meyer has raised in his

selection. It's not the quality

of the player that is questioned

but their medical history.

No other coach, among the

tournament's top six

coaches, has trusted the

medical recovery of a group of

injured senior players.

Coaches have admitted to

making bets, at best, two

players in 21, who won't

feature in the opening round

because of injury.

Meyer takes seven players,

each with huge standing in the

international game, to the

World Cup with the belief all

seven will play in the

quarterfinal and be influential

in guiding the Bulls to victory

in the final.

It's loyalty at its most

extreme and Meyer's legacy

will be determined by the

injured warriors to whom he

gave a free World Cup pass.

He will either be remembered

for making the bravest call or

his failure will be defined by an

act of laziness in picking so

many crooked players.

Meyer has spoken of

passion, of desire and of

partners. He says the players

will die for the cause.

It'd have been more inspired

and more of a believer if he

had said he had players who

wanted to be for a champion.

After all, rugby is only a sport.

No one should be thinking a

life is worth losing a 20.

I would also have preferred

if the Bulls' reconstruction

focus was on the X-factor

players Marcellus Erasmus and

June Krut, two youngsters

who in one Test against the All

Blacks did more than some do

in a decade.

There has to be hope for

the Springboks with players

such as Erasmus and Krut,

among the most talented and

fearless of the next generation

of potential Test-match greats.

But there simply cannot be

any conviction of a Bok

success, based on South

Africa's sporting pride and the

simplicity that passion will

rescue those whose successes

this year have modelled on

skill, passion and commitment

that are tested.

Perhaps those won't win

it for the Springboks.

And for all the passion

among the supporters, the

Boks don't have the results or

the forward player pedigree

this year to match those who

refuse to believe the Bulls can

lose World Cups.

Boks, the Bulls do lose

World Cups.

In fact, they have lost more

than they have won.

Read Keohane on

Twitter.com/mark_keohane and

on newsroom@mg.co.za and

connect with him on his

Facebook page.



LIBERATED: Rico Snyman and Dries Snyman celebrate with Bulls teammates after their victory over Free State at Loftus Versfeld. Picture: JOHAN KREMER/GALLO IMAGES

Bulls in selection poser for Lions

CHEMUN BAHIAN

MORE tough selection decisions await Blue Bulls coach Wally Meyer after the return of experienced players.

The side from Pretoria remained unbeaten after the weekend's Currie Cup action with a 24-17 win over the Free State Cheetahs at Loftus Versfeld on Friday night.

It was their fifth consecutive victory of the season.

The new Bulls front row of props Marcel van der Merwe and Pierre Schoeman and hooker Rennie Moko both their own.

Proby Dreyer van der Werfhuizen has been consistent of the bench.

The experienced duo of Werner Kruger, who has played over 100 Currie Cup and Super Rugby matches, and Dean Grobler will battle to return.

Centre Jan Strydom also returned to the side coming off the bench in the second half. With Burger Odendaal and Dries Snyman having formed a deadly

midfield partnership things will not get easier for Meyer as he tries to decide who to play and who to leave out of the starting XV against the in-form Golden Lions this week.

Looker Dries Snyman is expected back in action in the next week after sustaining a fractured chestbone.

His replacement, Rennie Moko, was the man of the match.

"We're going to make it tough for us to make a decision when Dries Snyman returns soon. He said he wanted a

chance and he's been very good."

The Bulls showed maturity against the Cheetahs in adverse playing conditions and maintained level heads.

Other sides who are young like the Bulls, bearing an average age of 24, would have faltered under the pressure. While there were errors on attack, their defence was superb.

"We had an outstanding defence," Meyer said. "Whatever mistakes we made, we made up for it with the outstanding defence which won us the game. The first 30 minutes were not good again – it's something we need to discuss," he added.

Despite the defeat, the Cheetahs were not defeated. The side from Bloemfontein were unlucky to lose an evenly poised encounter.

"We are a young side, and we are still learning. We created opportunities in the first half which, had we covered them, no points, the result could have been different," Free State coach Franco Smith said.

"We are in a building process and regardless of the two wins (so far this season) there is still a lot of work to be done. This young side has grown in leaps and bounds, but we will not get there overnight. I know exactly what it is that we need to do in order to remain competitive at the business end of the competition – a lot of hard work."

The Cheetahs travel to Benoni on Friday, while the Jomojet derby will be at Loftus on Saturday evening.

Young hooker suffers cardiac arrest during Leopards match

A WESTERN Province (WP) under-21 player remains in a critical condition in hospital after collapsing on the field during a match against the Leopards at the weekend, writes Only Eye.

Hooker Daniel du Plessis appeared unwell earlier in the match before a scum midway through the second half. He had only been on the field for a few minutes when the incident occurred. Medical staff were quickly on the scene and spent several minutes trying to resuscitate the player as

downright players looked on. Witnesses said that the player "fainted" but the continued efforts of the medical staff saved his life.

WP released a statement late on Saturday night, saying that rapid response emergency procedures had been immediately activated.

"This resulted in a successful resuscitation on field and the player was subsequently transferred to intensive care for further investigations and medical care," the statement read.

WP coach unhappy with performance despite win

GRAND RAY

Cape Town

DESPITE a confidence-boosting 24-14 Currie Cup win over Griqualand West on Saturday, coach John Dawes is still not convinced his side are at their best.

Western Province (WP) trailed 14-13 with 20 minutes to go, but three goals in the final quarter secured a comfortable win and also earned a bonus point towards the top of the standings on 14 points.

"The performance doesn't make us optimistic, or give us reason for optimism and self-congratulation," Dawes said. "But we had to win to restore confidence."

"Signs of a momentum shift were turned against us at Loftus a few

weeks ago and the guys have taken a beating recently, which has been the biggest worry for me.

"When you're confident, you win games and obviously, and I can see this effort, scoring four tries and not conceding one, has given the guys a lift. The view was good."

The coach was unhappy with the lineouts and also perplexed by the shifting of the line. He said WP dominated that area and were not rewarded. "Our lineout was not perfect. It's been all year and I couldn't explain what was going on in the scrums," Dawes said. "Some searching emails will be written to the authorities this week."

"It's irritating when you have two scrum-halfs signed members (Scrum Numbi and Steven Kibiboff), who

are clearly dominant in the scrum, but are getting penalised all the time. We are going to take this up."

Pleasant remains a difficult issue after Kurt Goosen delivered a patchy performance. The team appeared more balanced here in the game when Rob du Preez stepped in to replace him.

But that was overshadowed by the introduction of wing Dries Lategan, who popped up in the first receiver channel to win. Lategan has 11 years' experience and wants to play there. Dawes is considering it.

"It's going to be tricky to move Dries out of the team again," the coach said. "The 11th year is one we're going to have to think long and hard about. It's as clear as mud sometimes. Kim (du Preez) gave Dries a try on attack, but the 11th year position is

difficult. We perhaps have to take a longer-term view about what is best for WP in the long run."

"It's a little regretful that I didn't get Rob du Preez on a bit earlier, not because I think he's a bit better, but because I think he's a bit better."

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Appendix B.6 Formal Submissions from I&APs

The SEA team has received numerous inputs from a range of stakeholders throughout the SEA process. Although all inputs received were taken into consideration during the process, only key official submissions are included in this Appendix. Other forms of contact with stakeholders that are not included in this document include telephone conversations and emails.

Commenters

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 date 10 February 2016

Council for Scientific and Industrial Research
 P.O. Box 320
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Attention: Wisaal Osman
 By email: egi@csir.co.za

Dear Wisaal

Strategic Environmental Assessment for Electricity Grid Infrastructure in South Africa

CapeNature would like to thank you for the opportunity to comment on the project and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts of the project.

The proposed project aims to identify broad corridors for placement of transmission powerlines for evacuation of electricity from current and future sources of generation to areas of demand. Constraints, including biodiversity, have been identified based on baseline information and specialist studies in order to refine the corridors as well as to define the most appropriate placement within the corridor. Of the five corridors identified, only the central and western corridors affect the Western Cape, and therefore our more regional-specific comments will focus on these two corridors.

The specialist studies that were undertaken from a biodiversity perspective were terrestrial and aquatic biodiversity and avifauna. We have reviewed the methodology employed in the specialist studies which was desktop based, however utilizing a wide range of available datasets for input into the findings. It would appear that the datasets that have been accessed and utilised for the studies are sufficient to provide relatively accurate sensitivity mapping at the scale of the proposed corridors. The datasets utilised for the terrestrial and aquatic biodiversity assessment and the avifaunal assessment is fairly comprehensive and we do not have any additional recommendations for inputs or the need for ground-truthing within the scope of this Strategic Environmental Assessment (SEA), although this will be necessary at the project-specific stage.

It is noted that some of the datasets are biased when viewed at a landscape level e.g. nesting sites on existing transmission powerlines and province-specific data, however it is acknowledged that this is making use of available data that was not necessarily designed for the scope of this study. It should be noted that the Western Cape Provincial Spatial Biodiversity Plan (along with the Critical Biodiversity Areas) is currently being updated, however it is unlikely to differ significantly from the current product which was used to inform this project.

The design of the corridors has been according to the least-cost path analysis, and is strongly endorsed by the terrestrial and aquatic biodiversity assessment. CapeNature agrees with this approach as it is understood that bends and deviations in a powerline route

The Western Cape Nature Conservation Board trading as CapeNature

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have a significant cost implications. It is noted that the initial 100 km corridors were expanded by 25 km each side during the utilization mapping process. It must be clarified that they were reduced again to 100 km width following refinement.

In terms of the specific recommendations for the sections of the corridors, CapeNature agrees with the recommendations of the terrestrial and aquatic biodiversity specialists. As stated, the lowland renosterveld vegetation types are all amongst the most threatened vegetation types in South Africa, however the remaining extent consists almost entirely of small fragments and therefore it is possible to route the powerline corridors around the fragments or for the towers to span the smaller fragments. It must however be emphasized that these fragments must be considered no-go areas for any powerline infrastructure.

As mentioned in the biodiversity study, the other sections of the corridors traversing intact natural vegetation within the Fynbos Biome can be considered a sensitive environment with high levels of diversity and threatened species. One of the key issues in these sections is vegetation management in the servitude during the operational phase, particularly with regards to fire management – a key ecological driver in this biome. This is discussed in more detail below.

There are also high diversity sections within the Succulent Karoo such as the Bokkeveld Escarpment, Knersvlakte and Tanqua Karoo, however there should not be any vegetation clearing with the servitudes of these sparse vegetation types and the primary focus should be on the correct alignment.

The identification of freshwater features as very high sensitivity is supported and should be avoided. In many cases the freshwater features can be spanned by the towers, which should be in accordance with recognised wetland delineation. If this is not possible, the powerline should deviate around the feature.

Apart from these specific recommendations regarding the regional biodiversity sensitivities (which have been largely reflected in the specialist study), the other concerns regarding biodiversity impacts have been addressed within the datasets used in the sensitivity analysis.

In terms of the recommendations, CapeNature supports the recommendation that a detailed walk-through must be undertaken by an appropriately qualified specialist during the detailed design phase, which must be undertaken for all projects.

In terms of the datasets used for the avifaunal studies these were comprehensive and are the most current and includes the full extent of available data to CapeNature's knowledge. It should also be noted that the impacts on birds due to powerlines within a South African context is much better understood than for wind energy as was relevant to the previous SEA, and therefore there is a higher level of confidence in the recommendations. There are already existing transmission lines within the vicinity of a large proportion of the sections of the corridors which can be used to infer the potential impacts to a large degree.

In terms of the interpretation of the sensitivity ratings for the specialist studies and the implications for the project specific studies, CapeNature agrees with this interpretation. It is however recommended that the areas which have been identified as very high sensitivity should be avoided as far as possible in the design process.

The proposal for the process for powerline applications within the corridor being reduced from a full EIA process to a Basic Assessment process is deemed acceptable, provided that the specialist input is sufficiently detailed, accurate and reliable.

It should further be noted that cumulative impacts need to be considered in terms of the number of powerlines that will be placed within a corridor. In many cases it is likely to be most suitable to place the powerlines adjacent to one another so as to minimize the additional impacts, however this may not be the case if the initial powerline was placed in a sensitive environment e.g. provincial nature reserve.

A generic construction phase environmental management plan has been included. This is useful as it will ensure that there are minimum standards for EMPs for transmission powerlines. CapeNature agrees with the contents as a generic document, however it is recommended that in practice it should be updated with any relevant site-specific information on a project specific level.

In previous comments on this process CapeNature has raised concern regarding management of the vegetation within the powerline servitudes during the operational phase as a primary concern of ours, which remains relevant. Therefore, we would have considered an operational phase EMP as an even higher priority than the construction phase EMP included within the SEA.

While the focus of this study is to identify powerline alignments, management of the vegetation within the servitude can have a significant impact on the acceptability of the powerline. It is noted that reference is made to vegetation clearing during the operational phase in Section 6.10.10. However this is not sufficient. In terms of vegetation clearing, it should be noted that clearing or alien invasive species should not only be in terms of the Conservation of Agricultural Resources Act (Act 43 of 1983), but also the National Environmental Management: Biodiversity Act (NEM:BA) Alien and Invasive Species Regulations (GN 598 of 2014)

CapeNature was hopeful that issues regarding operational servitude management could be addressed to a degree within this process, as it deals with a strategic level of powerline planning. In particular, our concerns relate to the powerlines that cross provincial nature reserves, with some of the key areas of concern being the mountain crossings.

We are aware that there is an existing guideline for vegetation management within transmission line servitudes for Eskom Transmission (Transmission Vegetation Management Guideline TGL41-334, 2009). While this document was compiled apart from the current process, in the absence of other guidelines for operational phase management of the servitudes, this document must be referred to. While the document does refer to management within different vegetation types, it appears that the document is incomplete. The section on Fynbos is a third of a page in length and not nearly adequate. The concluding paragraph is that "The management of servitudes in Fynbos areas is clearly a very complex matter. Fire must be used with great caution and veld management practices have to be developed in a site-specific EMP for this biome by experts with the appropriate knowledge".

It is not apparent that compilation of site specific EMPs are being developed for operational servitude vegetation management. CapeNature is only aware of one such case. As mentioned, fire is a key issue in this regard, and there does not appear to be clarity on this specific issue. It is acknowledged that there are various factors that must be taken into account such as the impact of fire frequency and intensity on biodiversity, impact of fire on the powerlines and property and the potential for the powerlines to initiate fires. This is however an issue that requires resolution.

It is noted that nature reserves have been selected as very high sensitivity with a 5 km buffer of medium sensitivity. This is supported by CapeNature and as recommended above, the very high sensitivity areas should be avoided as far as possible in the design of the powerline routes. By adopting the precautionary principle, this will avoid addressing the risks regarding management of new powerline servitudes (apart from the existing servitudes) until such time as there is more clarity on correct protocols for servitude management. Also, it should be noted that it appears that routing powerlines through provincial nature reserves is selected as the preferred option in cases where other alternatives are located on disturbed or transformed private land with unwilling landowners. Selecting alternatives with greater biodiversity impacts but easier land negotiations is not supported by CapeNature.

The Western Cape Nature Conservation Board trading as **CapeNature**

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In terms of the proposal for implementation, CapeNature in general supports the proposed way forward. In terms of the impacts on avifauna it is recommended that there is further research and projects implemented building on the existing work in addressing the impacts on identified species at risk e.g. Ludwig's Bustard, as in general, birds are highly mobile and impacts can't be as easily addressed through site-specific re-alignment. In terms of the general impacts on terrestrial and aquatic habitat, CapeNature is satisfied that the issues related to alignment are sufficiently addressed, although the aspects related to management of the servitudes need to still be resolved, although this does not necessarily have to be part of this process (we have made explicit the link between management of the servitude and the alignment above).

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Yours sincerely



Rhett Smart

For: Manager (Scientific Services)

with contributions from Alana Duffell-Canham and Kevin Shaw



agriculture, forestry & fisheries

Department:
Agriculture, Forestry and Fisheries
REPUBLIC OF SOUTH AFRICA

Directorate: Land Use and Soil Management, Department of Agriculture, Forestry and Fisheries
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Reference: EGI SEA DRAFT REPORT FEBRUARY 2016

February 07, 2016

Mr Marshall Mabin
CSIR Environmental Services

COMMENTS ON THE DRAFT STRATEGIC ENVIRONMENTAL ASSESSMENT FOR ELECTRICITY GRID INFRASTRUCTURE IN SOUTH AFRICA REPORT

1. Your report: *"The draft Strategic Environmental Assessment for Electricity Grid Infrastructure in South Africa"*, dated February 2016 has reference.

The Department of Agriculture, Forestry and Fisheries (DAFF), has completed a review of the mentioned report and respectfully submit the following comments. Please note that these comments represent the Agricultural component within DAFF, whilst comments from the other components within the Department will be submitted separately.

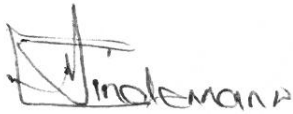
2. The mandate of DAFF is to ensure long term food security for the country. In order to achieve this objective a number of acts as well as other legislative and decision-making tools have been developed. It is the jurisdictional responsibility of DAFF to administer the relevant acts within the legislative mandate of the Department. In support of these acts, scientists and technical officials have been appointed to oversee related processes but also to make decisions that impact on the natural agricultural resources and the legislative mandate of ensuring long term food security for the country. In view thereof DAFF cannot transfer these powers to another Department to give authorization on activities that will impact on agricultural production. The recommendation made within the draft report pertaining to DAFF being a "Commenting authority" (irrespective of the sensitivity class) and that authorization on activities within the proposed electricity corridors be concluded under the provisions of the National Environmental Management Act (NEMA) is therefore not supported. The Department of Environmental Affairs do not have the jurisdiction to take decisions on behalf of DAFF. Should DAFF concur with a proposed activity within the corridor a consent will be issued to the Applicant under the relevant legislation within DAFF's mandate. This consent can thereafter be submitted as part of the application documentation required under the provisions of NEMA (Part 3, Chapter 1; p 26, 27, 28). The mentioned concerns regarding the aspect of a commenting authority approach reiterated in Part 3, Introduction; p 5 is also applicable.

3. It is agreed that ESKOM (or any statutory body) is exempted from the provisions of the Sub-division of Agricultural Land Act, 70 of 1970 (the relevant act responsible for the management of agricultural land in South Africa). However, as was also stated in DAFF's comments on the draft Agricultural Specialists report, dated 22 June 2015, there is a well-established mutual agreement between DAFF and ESKOM. Any activity that is planned on agricultural land and that may impact on agricultural production potential is referred to DAFF by ESKOM for inputs and comments. Therefore any relevant decision by ESKOM as a statutory body is inclusive of a consultative process with DAFF (Part 3, Chapter 1; p 3).
4. It is of concern contained within the Agricultural Study and also reiterated in Part 3 of the report that unsubstantiated references to the draft Preservation and Development of Agricultural Land Framework Bill (PD-ALF) has been made. This proposed Bill is to replace Act 70 of 1970. The draft Bill was gazetted for comments in 2015 and provision was made to supply comments thereon through the appropriate channels. A formal public participation process is to unfold within 2016. A SEA is not the correct forum to express views on a draft Bill that may still be subjected to changes in the future. The impression is created that Bill is flawed with limited insight by the authors of the reports pertaining to operational procedures that may followed once the Bill come into operation (Part 3, Chapter 1; p3, 25).
 - 4.1 Within the provisions of the PD-ALF Bill specific reference is made as to the occurrence of corridors. It is stated that where such a corridor is planned and depending on the potential of the agricultural land, an agricultural impact assessment (Agro-Ecosystems Report) may be required. No details as to the requirements of such a report has been provided in the Bill as it forms part of the regulations still in the process of being developed. Therefore the comment made in the report on a cumbersome, expensive and unneeded exercise is questioned (Part 3, Chapter 1; p3). The development processes related to a corridor cannot be exempted from PD-ALF and addressed under NEMA as is proposed in the report. NEMA is neither authorised to take decisions pertaining to agricultural production requirements not whether the proposed corridor will have a negative impact on agricultural production including conducting an assessment pertaining to the adherence to strategic as well as legislative mandates regarding national food security (Part 3, Chapter 1; p4, 26).
 - 4.2 Further a corridor will extent over a large number of farm portions and the impact of the proposed corridor within the various farm portions will differ. This has to be investigated and analysed from an agricultural perspective. In addition once a servitude is registered on a land parcel the servitude specifications are included in the land owner's title deed. Separate authorizations are therefore required as authorizations are linked to land parcels and land owners (Part 3, Chapter 1; p3).
 - 4.3 Within the requirements of PD-ALF reference is made to the demarcation of agricultural zones and specifically Agricultural Protected Areas. The demarcation of these zones is based on the agricultural potential (both from a cultivation as well as rangeland perspective). Within each zone specific norms and standards will be developed that is to guide the allowed land use changes and the extent there off within the zone. Aspects such as electricity provision are one of the potential land uses changes that are considered.

- 4.4 In addition to the above-mentioned, depending on the agricultural production potential within a zone as well as the impact of the proposed activity an Agricultural Ecosystems Report with a variance in the level of detail may be required. As previously stated it is premature at this stage to conclude on the purpose thereof as well as the required level of detail (Part 3, Chapter 1; p4).
5. The interpretation of the agricultural sensitivity of a power corridor should not be based on the cultivation status of the area concerned. It should, in order of priority firstly refer to the capability of the land as not all agricultural land with a high agricultural potential is currently under cultivation (Part 3, Chapter 1; p 26, 27, 28).
6. Mitigation aspects referred to in the report such as the movement of a pivot point needs to be carefully considered and should be a last resort but through thorough investigations including costing (Part 3, Chapter 1; p27).
7. It is acknowledged that once the updated version of the land capability data set is released as well as the demarcated agricultural zones, the SEA has to be updated and amended accordingly (Part 3, Chapter 1; p3).

The Department appreciates the opportunity to comment on the report.

Yours faithfully



Mr. H. Lindemann

Acting Director: Directorate Land Use and Soil Management



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Date : 10 February 2016
Lettha :
Datum :
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Reference :
Tshupelo : Electricity Grid Infrastructure Strategic
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CSIR EGI SEA Team
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Dear Marshall Mabin

RE: ELECTRICITY GRID INFRASTRUCTURE STRATEGIC ENVIRONMENTAL ASSESSMENT DRAFT INPUTS

Your e-mail dated 20/1/2016 requesting inputs and comments on the draft EGI documents refers.

Attached herewith is some detailed comments for your perusal. We would like to reiterate some overarching concerns that we hope would be taken into consideration in taking this project forward.

1. A comprehensive legislative referencing is imperative to ensure that clients interpret the SEA in accordance to all legislative responsibilities. Agreements that will be negotiated and reached (where applicable) between government departments regarding licences and/or permits to fast-track developments within the SEA zones are not in place yet and it is strongly suggested that the supporting SEA reports pertain all the legislations applicable. Care should also be taken to reference the correct and updated legislations.
2. With specific reference to the Northern Cape, it has already been communicated to ESKOM that grid lines, power lines, etc. will be assessed

accumulatively. Already under the National Forests Act and the “Basic Guidelines for handling of EIAs and license applications for ESKOM SOC Holding linear infrastructure affecting natural forests, protected trees or state forests, version 2, Oct 2012” current developments are triggering ‘offsets’ due to the number of protected trees being removed. This is an ongoing negotiation process currently.

To not consider the current situation that ESKOM infrastructure already triggers offsets, could result in a contradictive communication from the SEA process and DAFF licences & DENC permits.

3. With reference to the Solar/Wind SEA zones (REDZ), many developments have actually commenced outside these areas within the Northern Cape (the map, figure 1, is in the process of being updated again). One has to question the value then of the SEA process on the ground as it did not facilitated any incentive for developers to develop primarily within these zones in the Northern Cape.

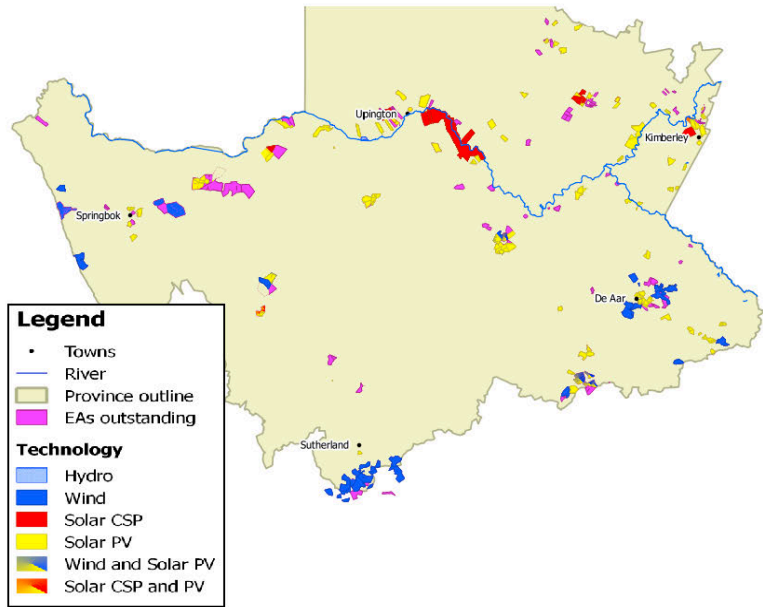


Figure 1. Renewable energy developments in the Northern Cape by mid-2015.

4. The use of desk-top studies alone to assess vulnerability within the Northern Cape is high risk due to the limited information available for the Province. We have found that the vegetation map (Mucina et al. 2006) mostly used is not appropriate for vegetation unit assessments in the Northern Cape, due to the discrepancies being found with the vegetation map and where vegetation units are on the ground. The limited baseline information can also be illustrated by the grid-map (grid-data) created by SANBI (Figure 2).

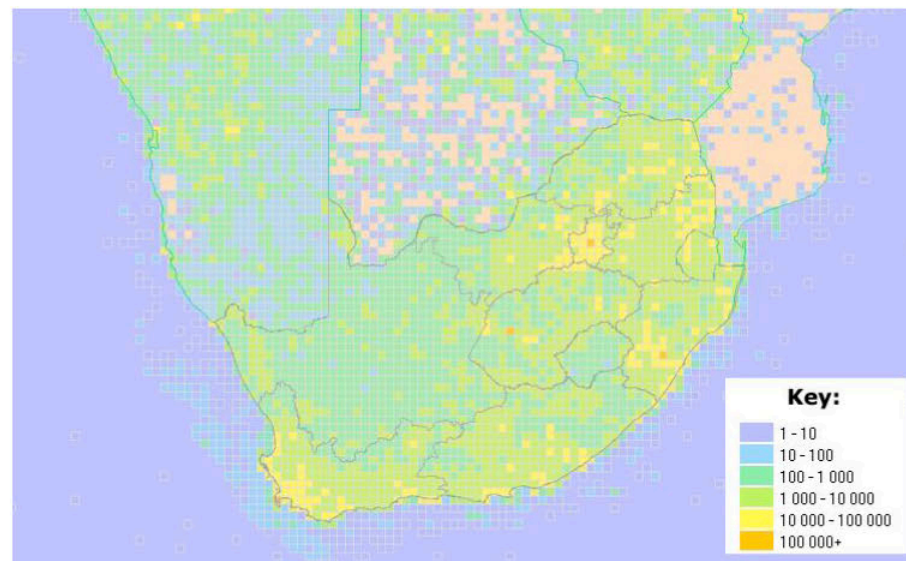


Figure 2. Grid-data map reflecting the number of data points available per grid within the country and provinces. This map clearly illustrates that the least data exists for the Northern Cape of all nine provinces.

5. It is suggested that buffer zones be referenced to support the reasoning why the distances chosen was used. The reasoning for prescribing buffer zones needs to be provided.
6. Although it does not form part of the direct aims of this SEA process, it is highly recommended that a water resource availability assessment is done to calculate the volume of water that is available for renewable energy developments. The Northern Cape is an arid area and agriculture, urban areas and mining also compete for this resource already and the latest reports

indicated that all surface water available has been allocated – implying that there is no more available for further developments. Qualitative information is needed urgently on our water availability.

It is inferred that the quality control of the documentation will be corrected as the reviewed versions were drafts, therefore these aspects have not been addressed in detail.

Yours sincerely

G BOTHA
HEAD OF DEPARTMENT: DEPARTMENT OF ENVIRONMENT AND NATURE
CONSERVATION



the denc

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Enquiries :
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Christine Kraft

Date :
Letlha:
Datum:
Umhla:

9 February 2016

Reference :
Tshupelo
Verwysing
Isalathiso

Electricity Grid Infrastructure Strategic
Environmental Assessment

ATTENTION:

MS E. SWART: DEPUTY DIRECTOR: RESEARCH & DEVELOPMENT SUPPORT
MS N. VAN OLMEN: DIRECTOR: ENVIRONMENTAL POLICY & PLANNING
COORDINATION

RE: ELECTRICITY GRID INFRASTRUCTURE STRATEGIC ENVIRONMENTAL ASSESSMENT DRAFT INPUTS

The comments / recommendations provided for this documentation will be laid out below according to the main document and the appendixes where deemed necessary related to biodiversity issues. Some comments / recommendations may therefore be repeated under the various sections; however this will highlight the importance of these specific issues.

Main Document

PART 1: Background to the Electricity Grid Infrastructure (EGI) Strategic Environmental Assessment (SEA)

1.1 On Page 5 it was noted that the maps do not indicate town locations. It is recommended that at least the main towns located in and around the proposed corridors be included in all the maps to provide persons reading the document with better orientation. This is important to ensure that persons can locate specific attributes on the maps especially if the persons are not familiar with locations within various provinces.

1.2 On Page 8 under the Context section it is very important to highlight the second paragraph to proposed developers. It is important that they understand how important it is to take biodiversity issues into account at a much finer scale than what is provided by this EGI SEA document. Site specific information is needed for each proposed development.

1.3 It is very important that the sensitivity of river and other water systems be highlighted for the proposed Northern Corridor (map on Page 11). It might not be deemed as sensitive by some persons due to transformation which has taken place at various of these water systems, however, due to the climatic conditions within the Northern Cape Province (it is becoming warmer and drier) it is necessary to protect these systems as they play a vital role to conserve biodiversity and ecosystem functioning as well as provide vital resources to humans. It is thus recommended that any proposed developments be kept away from water resources as far as possible as these developments can also impact on water quality and quantity.

PART 3: Chapter 2: Avifauna

1.4 On Page 4 the species name of *Torgos trachilotos* must be spelled "*tracheliotos*".

1.5 Also on Page 4 under the section Data Sources it is stated that no ground truthing or on-site assessments were undertaken as part of the study. This once again highlights the importance of site specific surveys which will be necessary for any proposed development as several biodiversity issues of importance may be noted within a proposed development site, even if the area has been transformed.

1.6 On Page 10 it is stated that a 500 m buffer has to be maintained from wetlands and waterbodies for all the proposed corridors. How was this buffer determined and is it enough for certain waterbodies which might have a well-developed

riverine vegetation layer? It is important to keep the important ecological role of flora into account when it comes to water resources.

- 1.7 From the map from Page 17 it is noted that some river areas are classified as Low Sensitivity. This might be of concern since no specific ground thruthing was done for these areas. Even if transformation has taken place in these areas there might still be issues of concern related to biodiversity. Example, various waterbirds and raptors such as Fish Eagles, which are not usually exposed to electricity grid infrastructure might now become exposed if development is to take place near these water sources. This can lead to electrocutions and collisions of species which are not usually associated with electricity infrastructure.
- 1.8 In Table 3 on Page 23 it is stated that sensitivities must be confirmed by a competent bird specialist via further desktop review. This is of extreme concern since this will not always be possible due to the lack of data for specific areas. There are not many specialists that are familiar with all sensitive areas, especially for the Northern Cape Province. A significant amount of issues of concern might be overlooked if at least a basic site visit is not conducted.
- 1.9 Also in Table 3 it is stated that the Competent Authority must provide a statement whether the very high sensitivity feature(s) represent a fatal flaw. This is of concern since the Provincial Authority for the Northern Cape (DENC) does not have an ornithologist and also does not have the financial capacity to conduct site visits to all sites to determine if it will present a fatal flaw. This is one of the main concerns regarding the implementation of the SEA since proper specialist documents, which included proper site visits, will now be cut from the process.
- 1.10 Also in Table 3 it states that should the development envelope encroach upon high, medium or low sensitivity features only, the EAP will be able to proceed with the assessment process according to the requirements of the development protocol (Table 4) without the need to obtain a letter from the relevant

competent authority. This is now the reverse situation as discussed in point 1.9 above. This can be problematic for the Northern Cape Province as some very high sensitivity areas might have been overlooked due to the lack of data available for the province.

- 1.11 On Page 24 under Medium and Low Sensitivity: A desktop assessment will not be able to identify possible sensitivities if sufficient information is not available. What happens in the case of lack of information? Will the developers be required to appoint a specialist to conduct at least a basic site visit in these cases?

Appendix C2: Avifauna Scoping Assessment Report

- 1.12 On Page 13 in the first paragraph reference is made to "... to areas which demonstrate no sensitivity (Low sensitivity)." There will be no area which has "no" sensitivity as there will always be some type of impact related to biodiversity eventhough it might be very limited. It is therefore recommended that the term "low" be used rather than "no".
- 1.13 On Page 24 it is stated that the absence of records does not imply absence of the species within an area, but simply that this area may not have been sampled. Once again this issue has to be addressed in the documentation. How is this going to be addressed if no site visits are required?
- 1.14 One of the limitations of the study is that no verification of current statuses have been done. This is very important to be addressed by a suitable specialist during each proposed development.
- 1.15 On Page 27 reference is made to the Northern Cape Nature Conservation Act (NCNCA). It should however be Act 9 of 2009 and not Act 10.

1.16 On Page 24 the genus name *Vacchellia* should be spelled *Vachellia*. Also no reference is made to the genus *Senegalia* which is a gap since not only *Vachellia* species occur within the country.

1.17 On Page 31 the maps does not indicate the location of sensitive areas such as river systems. These attributes should be included in the maps.

1.18 On Page 43 reference is made again to the 500 m buffer for wetlands and waterbodies. For rivers with varying high watermarks, season related, will this buffer be enough?

1.19 On Page 59 it seems as if all the planned substations will be located in High Sensitivity areas in the Northern Corridor related to avifauna. This also seem to be the case for the Central Corridor. This is of concern and needs to be discouraged.

1.20 On Page 64 under the Interpretation and Implementation of four tier map section, under Permit requirement, it is necessary to include provincial government under all the sensitivity classes. Provincial government authorities has the mandate to protect the biological resources within the various provinces. The EGI SEA document cannot exempt the proposed developers from complying with the various provincial legislation and they will still need to apply for provincial permits for the removal and impact on fauna and flora which will be caused by the developments.

1.21 Once again it is highlighted that desktop assessments (as listed under Medium and Low Sensitivities) might not be enough due to the lack of information. A basic site visit at least needs to be conducted to determine if any species of concern may be present, e.g. all raptor species are protected in the Northern Cape Province.

1.22 It is important that the proposed mitigation measures provided in this document be implemented, especially the buffer zones for the various bird species.

1.23 On Page 65 under the Western Corridor it is stated that a buffer of at least 500 m from waterbodies must be kept or further. It is important that the impacts on specific populations within a specific area must also be taken into account even if they are not threatened. The impact of the proposed development might have significant impacts on waterbirds (which are not threatened) if the infrastructure are not build correctly or too close to water sources.

1.24 Also on Page 65 the mitigation measures provided under Black Storks provided too much leeway in terms of the buffer zone. It has to be at least included that the developers has to provide proof why they cannot keep to the proposed buffer zones and why not.

1.25 It is very important to only use bird-friendly powerlines to protect especially threatened species such as the raptors. This has to be done by all companies which might be appointed as service providers and not just ESKOM. It is recommended that all powerlines be fitted with suitable bird flight diverters suitable to the specific species of concern within the various areas.

1.26 On Page 70 it is stated that suitable cliffs must be searched for Black Stork nest sites and the nests must be buffered by 2,5 km. The site inspections have to be done by a professional registered avifaunal expert, preferably one that is familiar with the site, as an unqualified person may overlook the nest sites. This is applicable to all bird species of concern.

1.27 It is recommended that monitoring needs to be included as a mitigation measure especially to determine the impacts of the infrastructure on raptors such as vultures in areas where they are known to be active.

1.28 On Page 83 under the Central Corridor reference is only made to the Cape Vultures in the Magliesberg area. What about the vulture colonies present in the Kimberley area in the Northern Cape Province? This has to be addressed.

1.29 Another gap that was noted is that Lappet-faced vultures are not included in the Central Corridor for the Kimberley area within the Northern Cape Province. This species needs to be included due to its conservation status.

1.30 Please find attached research articles of research which was conducted on vultures of which the references were not noted in the document. It provides valuable information which is applicable to the SEA in terms of the habits of the species.

1.31 On Page 102 the following statement is made: "It might therefore be a useful exercise to repeat this analysis without electrocution, as it may have a significant impact on the outcome of the analysis, in that it may reduce the risk rating of some of the habitat classes." This cannot be done as it still remains a threat currently and implementation of the SEA is going to take place now. It cannot be said with certainty the electrocution will not have an impact on birds in the future.

1.32 The document states that there is a strong need for a set of best practice guidelines to be compiled to standardise methodology. This is supported, but it will also be necessary to take the specific areas into account as this might affect the suitable methodologies to be used.

PART 3: Chapter 4: Terrestrial and Aquatic Biodiversity

1.33 On Page 4 under the section Vegetation clearing and management in powerline servitudes it is stated that where trees are present or where there is a risk that fire could cause shorting of lines, vegetation beneath the powerlines may need to be cleared. It is very important to make it clear to the proposed developers

that they need to apply for provincial permits for vegetation clearing, especially if protected plant species are to be removed. Developers cannot be exempted from provincial legislations such as the NCNCA (No. 9 of 2009) through the SEA.

1.34 Under the section of Access Roads it is stated that where roads are not subsequently managed or rehabilitated, especially where construction does not follow best practice for water and erosion management, serious ongoing erosion and associated incremental habitat degradation will result. This needs to be prevented at all cost. It is necessary to have a best practice guideline document which needs to be implemented by all developers.

1.35 On Page 5 under the Water Use Authorisation. Even if the SEA is approved it cannot prevent developers from obtaining all the necessary permits and licences from the relevant authorities, especially a Water Use Licence Application (WULA) or General Authorisation if they want to impede or divert the flow of water in a watercourse or altering the bed, banks, course or characteristics of a watercourse. This is of concern specifically in drought prone areas which is currently experienced throughout most parts of the country.

1.36 Even if the proposed development does not need a WULA the developers still need to apply for permits from provincial authorities for the removal of fauna and flora.

1.37 On Page 6 under Aquatic Regional data there is no specific data for the Northern Cape Province. This is of concern due to the climatic conditions in the province which makes water a very scarce resource and needs to be addressed.

1.38 With reference to the Terrestrial Regional Datasets it is clear that there is a lack of information for the Northern Cape Province. This is of tremendous concern since informed decisions will not be able to be made by only using desktop assessments.

1.39 From the information provided from Page 7 it is clear that not enough data was used for this Appendix study. Many information such as Red Data Books, information from the Animal Demography Unit, South African Reptile Conservation Assessment, Museum records, South African National Spider Atlas, etc. were not taken into account for this assessment, which makes this document not suitable to provide basic guidance regarding which areas are sensitive and which not.

1.40 On Page 10 it is not clear if the Endangered Ecosystems as set out by NEMBA was taken into account. There is a lot of gaps in this assessment document.

1.41 On Page 10 under the Terrestrial Data Processing section it is stated that fortunately areas where vegetation and biodiversity feature mapping and CBA planning tend to be extremely poor, most notably for the Nama-Karoo biome and large parts of the Northern Cape and Eastern Cape, are also areas where habitats are relatively intact, such that impacts of the type and scale contemplated in this study are unlikely to impact unknown very high or high sensitivity habitat types. This is not necessarily the case and this statement is of concern. That is why it is necessary to conduct ground truthing with all developments in the Northern Cape.

1.42 On Page 11 it is clear that the buffer set out for river systems are very low and impacts from the developments such as oil spillages from vehicles, dust, etc. may still have an impact on the river systems. This has to be taken into account for all developments near water resources.

1.43 On Page 14 under the Species section it is clear that not enough was done to cover this specific area. Much more information is needed to provide more guidance regarding species specific issues of concern.

1.44 On Page 15 no headings are included for the various maps and need to be added.

1.45 On Page 20 under the heading Terrestrial and Aquatic Specialist Study Requirements it is stated that these recommendations are thus considered the minimum requirements for specialist studies within each tier of sensitivity but do not preclude or limit the possibility that a higher level of detail may be required. This has to be highlighted as this document does not even cover the basic information needed for a document such as the SEA.

1.46 Where the importance of Keystone species for specific areas need to be taken into account for the sensitivity assessment, as for the importance of Centres of Endemism as well, needs to be referenced as no reference to this could be found in the document (?).

1.47 In Table 10 under Additional Recommendations it is stated that a preconstruction walk-through of the intact portions of habitat along the route should be a condition of authorisation. Why only for intact areas and as what is "intact" defined? For the Northern Cape Province a walk-through will almost always be needed due to the lack of information for the province.

1.48 On Page 21 in Table 11 mention is made of species for search and rescue which should be moved prior to construction. It is important that the developers be made aware that they are not allowed to move or injure / kill any animal species within the Northern Cape without the necessary permits from DENC.

1.49 On Page 22 in Table 13 the following statement is made: "The study must include any additional assessment requirements stated by the Competent Authority as a condition to continue with the Environmental Authorisation process in these areas." This needs to be made very clear to proposed developers.

1.50 It is stated that the verification of aquatic features can be undertaken either at a desktop or at a field level. The desktop level is of concern since almost all consultants being used for aquatic information does not come from the Northern

Cape and will not know the specifics of the area if they only do a desktop assessment. It might be necessary to develop a letter for the consultants to sign to state that they will implement criteria correctly. They must be SACNASP registered to ensure accountability for their actions.

1.51 On Page 24 it is stated that proponents intending to develop an electricity grid infrastructure development for which the proposed project footprint is limited to areas defined as “Low” sensitivity will not be required to register for a non-consumptive water use. This still needs to be verified in some way as features could have been missed especially in the Northern Cape due to the lack of data.

1.52 It is important that invertebrates also be taken into account to determine the sensitivity of various areas for developments (indicator species).

APPENDIX C3: Terrestrial and Aquatic Biodiversity Scoping Assessment Report

1.53 On Page 14 it is once again noted that not all available information was used for this assessment report. For example Red Data information should have been used even if some of them might be old. In the absence of more current information what is available should be implemented.

1.54 On Page 15 it is agreed that standardised and recognised sensitivity mapping methodologies must be used to determine the sensitivities for each feature for each of the corridors.

1.55 On Page 19 under Data Sources it is stated that reptile, bats, butterflies, mammal and other data were not included for the assessment. This means that an adequate guideline for the corridors could not be included as part of this SEA as this document is inadequate. This once again illustrates the concern regarding lack of data and therefore at least a site visit is needed for all tiers of sensitivity development.

1.56 Page 19: Numerous conservation related spatial information within the Northern Cape is either outdated or very limited. Hence, how accurate are these maps that were generated for especially the Northern Cape section? Apart from the Namakwa District Biodiversity Sector Plan (2008), there are currently no CBA maps for the rest of the Northern Cape Province. Due to a gap in data, areas unknown to having potential high sensitivity could have been overlooked.

1.57 On Page 26 it is stated that field verification of datasets and extensive local expert consultation has been excluded for this assessment. This is a huge lack in information and renders this Appendix questionable.

1.58 One of the assumptions that has been made as part of this Appendix it that field verification will take place on a site by site basis linked to development proposals. This has to be done since the information provided in this document is not sufficient to guide properly regarding the specific sensitivity of areas.

1.59 On Page 27 the National Environmental Management: Protected Areas Act has not been included as part of the legislation to be taken into account.

1.60 On Page 28 under the Provincial legislation it is stated that the Nature and Environmental Conservation Ordinance is applicable in the Northern Cape Province. This is not true as this ordinance has been replaced by the NCNCA (No. 9 of 2009). It is therefore clear that not enough verification has been done for this document and these acts have to be taken into account as it indicates the requirements in terms of permits from which developers cannot be exempted.

1.61 Page 33: The biome to be mostly affected is stated as the Nama Karoo biome. Large parts of this biome, where the landscape is currently still mostly intact, could be lost due to a gap in biodiversity related information.

1.62 Figure 11.3 on page 34 illustrates that the sensitivity of the Nama Karoo is displayed as being of low sensitivity. This emphasises the lack in biodiversity related information within this biome.

1.63 It should be noted that there is at present a moratorium in place in the Northern Cape on the removal of *Aloe dichotoma* trees from the wild due to historic trade related pressures on populations (Proclamation No. 968, 1 April 2005). As a result, no *Aloe dichotoma* trees may be removed.

1.64 On Page 41 no reference is made to species of concern such as leopard and cheetah.

1.65 The heading on Page 42 refers to the Western Corridor and it should be the Northern Corridor. Quality control is necessary.

1.66 It is important to note the permits might also have to be obtained from the Department of Agriculture, Forestry and Fisheries if protected trees as listed under the Forest Act needs to be damaged or removed in any way.

1.67 It is necessary that all developers must include road rehabilitation in their Environmental Management Programme Reports as well as erosion prevention measures.

1.68 On Page 60 it is stated that it is important that EGI planning in these biomes should provide for specialist input to preferentially locate footprints and access impacts away from pristine condition habitat into poorer condition areas, where possible. This has to be done and verification by site visits have to be conducted.

1.69 Why has no buffer zones been included for the areas as listed on Page 60, especially for protected areas? It is important that these areas be protected from developments.

1.70 From the information provided in this Appendix it is clear that specialist studies will always be needed for Terrestrial and Aquatic biodiversity due to the tremendous lack of information presented here. A simple desktop review will not be sufficient as is shown in this study.

1.71 On Page 81 it is stated that permanent access route construction and maintenance must be designed by a road engineer and the requirements must be reflected in the Environmental Management Programme.

1.72 On Page 91 it is recommended that ESKOM must develop a knowledge base, map database and decision framework to provide an objective and consistent approach to vegetation clearing. This is highly supported to prevent the unnecessary loss of biodiversity.

1.73 The need for at least a basic site visit needs to be included in the Additional Mitigation Recommendations as set out from Page 98 to address the lack of data present for especially the Northern Cape.

1.74 On Page 100 it has to be explained which protection statuses for species will be used as they can differ between national and provincial legislation. It is recommended that the applicable provincial legislation must be applied for the corridor to which it applies as it is much more specific for each area.

1.75 As with the Avifaunal study it is once again recommended that specialist inputs for terrestrial and aquatic issues have to be done by a suitable qualified registered scientist who is familiar with the specific area.

1.76 On Page 100 it is also recommended that all impacts associated with EGI development should be assessed at the cumulative level for the whole development. It is very important that cumulative impacts have to be taken into account especially since many vegetation units are fragmented and the

cumulative impacts on these specific units can be detrimental to the future existence thereof.

1.77 On Page 101 it is stated that the sensitivity maps provided here should not be seen as set in stone, but rather representing a baseline point from where the detail and accuracy of the maps can be improved over time. This is very important to highlight as the information provided in this Appendix is really only a very broad baseline starting point.

1.78 On Page 104 it is strongly recommended that the buffers provided not be reduced for any development.

1.79 From Page 107 to 111 it is recommended that the provided mitigation measures should be included in each development's EMP, but to note that much more mitigation measures might need to be included. They might need to be stricter depending on the receiving environment and more impacts might be identified which needs more mitigation.

1.80 On Page 110 it is not recommended that soil applied herbicides be used for the clearing of vegetation. This is because these type of herbicides are not plant specific and can damage or kill vegetation away from the development site due to the potential of the herbicides to spread through the soil due to rain adhesion infiltration, etc.

1.81 It is necessary to include that the necessary national and provincial permits needs to be obtained for all developments related to the EGI.

1.82 On Page 121 it is necessary to take all faunal species into account for the SEA and as species information and protection statuses are updated the SEA must be adapted to become more specific. It must be an ongoing process.

General

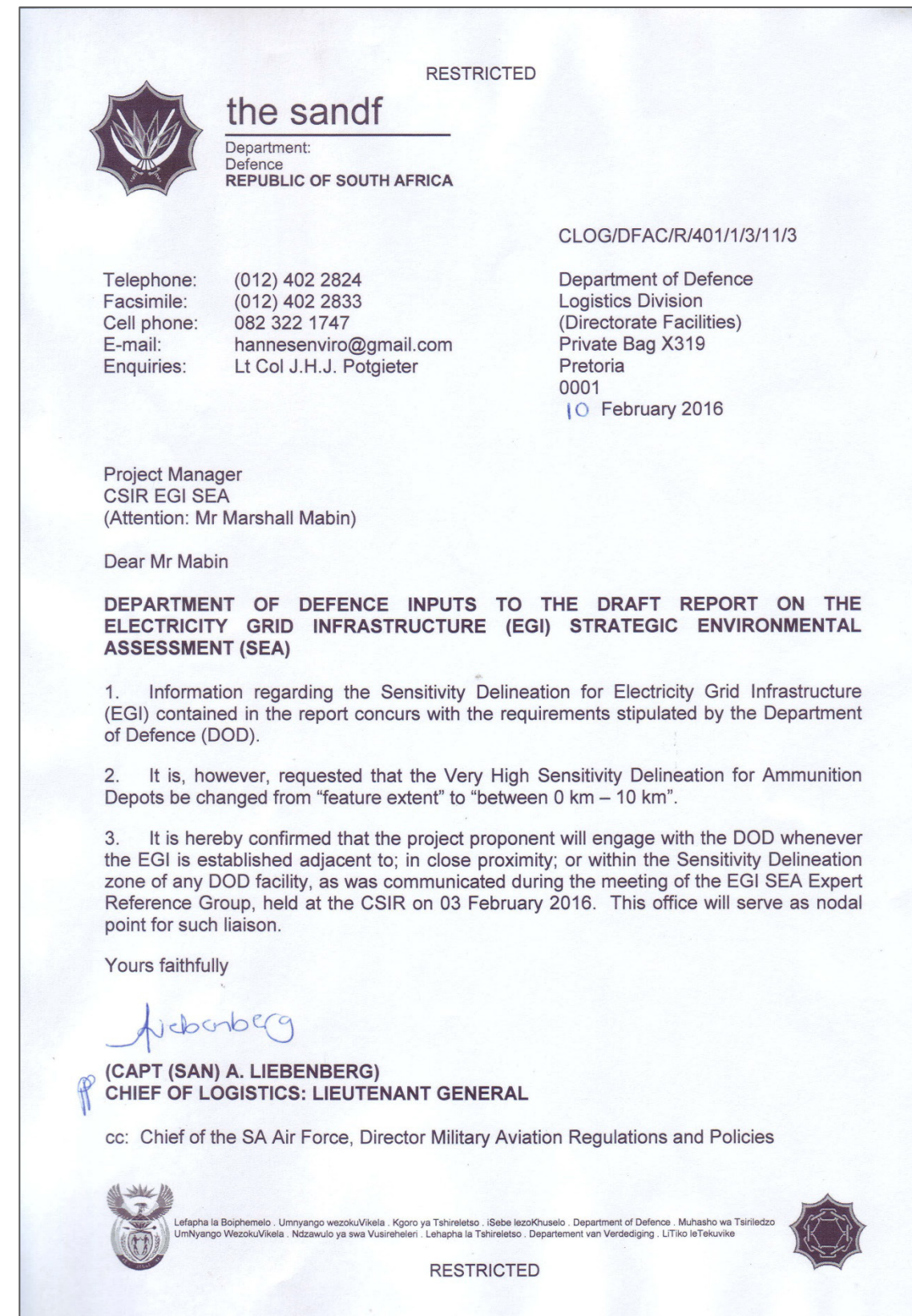
1.83 Various spelling mistakes and sentence construction errors were noted throughout the document. It is necessary to correct this.

We hope you find these recommendations in order and please do not hesitate to contact the Research and Development Support Unit of DENC if there are any uncertainties.

Yours sincerely

Pp 

CHRISTINE KRAFT
PRODUCTION SCIENTIST GRADE A: ECOLOGIST





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9 February 2016

CSIR EGI TEAM

egi@csir.co.za

Dear EGI Team

SAWEA COMMENTS ON STRATEGIC ENVIRONMENTAL ASSESSMENT FOR ELECTRICITY GRID INFRASTRUCTURE

On behalf of the SAWEA Environmental Working Group (EWG), I would like to thank you for the opportunity to comment on the Strategic Environmental Assessment for Electricity Grid Infrastructure.

Our comments and queries are summarized below:

1. Clarity is sought on whether a signed option agreement for the powerline servitudes is required as a pre-requisite to submit an application to DEA. It is clearly far more practical and feasible to enter into servitude negotiations once the outcome of the impact assessment process is known. The developer is already burdened with additional development costs during pre-application phase under the 2014 EIA regulations and to add option agreement negotiations & finalization will contradict the intended SEA outcome of streamlining the process.
2. We are concerned that the ability to develop and fully permit a renewable energy project outside a corridor may be hindered due to ill-informed authorities and other stakeholders deeming these projects to be non-suitable for development without further consideration as "they are not in a grid corridor". We seek confirmation that this issue will be addressed and projects will not be prejudiced based purely on being outside a defined corridor. We also thus request that clear instructions on how the SEA should and should not be applied in specifically included in the SEA.
3. Obtaining letters of no objection from commenting parties (SKA, CAA, Defence Force, DAFF, etc.) must be subject to strict timeframes and protocols. We believe that commenting authorities must respond within 4 weeks of submission of the request from the developer. If no response is received within that timeframe, a formal "no objection" will be noted for that authority.

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4. Clarity is sought on projects where the powerline spans both corridor and non-corridor areas i.e. how is a project treated procedurally where the line lies in both corridor and non-corridor areas?
5. Please note that we support the SEA EGI and particularly the reduced decision-making timeframe for DEA and the option to apply for a corridor to allow for micro-siting.

Yours Sincerely,

Jadon Schmidt
SAWEA Environmental Working Group Chair