



SCIENTIFIC SERVICES EZEMVELO KZN WILDLIFE

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Concerns about potential impacts of the proposed Isundu 765/400 KV sub-station and turn-in transmission lines (DEA EIA Ref: 14/12/16/3/3/2/745; 12/12/20/1397/AM2) on conservation of raptors in KZN

Please note that official comments on development applications come from the Ezemvelo KZN Wildlife Integrated Environmental Management Unit. However, the comments below are provided as an early warning of some issues associated with the Mbewu - Isundu Power Line Project with a view to encourage early consideration of alternatives.

The proposed site of the sub-station is in close proximity to the African Birds of Prey Sanctuary and Raptor Rescue. These facilities are an essential part of raptor conservation in the province. In particular the sanctuary assists Ezemvelo KZN Wildlife in the conservation of raptors in KZN by:

- Providing for education, awareness and recreation opportunity for many thousands of people in the metropolitan areas of Pietermaritzburg and Durban. However, most importantly, the sanctuary provides for education of 10 000 to 12 000 school children per year, many from rural schools. The hands-on approach to conservation can only be achieved through the physical interaction with birds, including the display flights, and cannot be achieved in a classroom setting. If this type of education were to cease this would have a significant negative impact on the attitudes of people to this threatened group of birds and hence a negative impact on the biodiversity of the province. The proposed development of this nature and scale would almost certainly affect the economic viability of the African Birds of Prey Sanctuary and force its closure.
- In addition, the sanctuary has been approached by Ezemvelo KZN Wildlife to take non-releasable raptors on "road shows" to schools and farmers days in areas where there is human-wildlife conflict and use of poisons. This is an essential component of the KZN Vulture Conservation Strategy.
- It serves as a site for undertaking research on breeding methods, raptor biology and for testing the impacts of toxic substances on raptors. As more raptor species are threatened so the need for captive breeding is increasing, and this facility not only allows for research on appropriate techniques and approaches, but has been selected to breed the Critically

Endangered Bearded Vulture as part of a recovery programme endorsed by the Department of Environmental Affairs and Ezemvelo KZN Wildlife. Electricity production (wind farms in Lesotho and Eastern Cape) and electricity distribution (power lines) are one of the main reasons for the need for a captive breeding programme for Bearded Vultures in the first place, and now the planned infrastructure is threatening that programme. The non-releasable raptors in the sanctuary also provide a unique opportunity to test the effects of various toxic compounds (veterinary drugs, lead, poisons) on birds of prey, thus providing vital information to guide conservation programmes.

- The Raptor Rescue component of the sanctuary provides an essential service to conservation in terms of treating, rehabilitation and ultimately releasing injured raptors back into the wild. Without this service, raptors - and vultures in particular - would be in even more trouble. Again, it is ironic that electrical infrastructure is one of the leading causes of declines in raptor numbers, but this proposed development is threatening the existence of the most important facility for rescue of raptors injured by power line collisions in KZN.

In addition, the site and new power lines will have a significant negative effect on the economic viability of the Mayibuye Nature Reserve. This is a very important community-owned and -managed project based on the establishment of a Big 5 Nature Reserve. The site meets the requirements for formal declaration as a Nature Reserve because of its biodiversity and processes are at an advanced stage to get the MEC to declare the nature reserve in terms of the NEM: Protected Areas Act; it has political support at the highest levels and is also strongly supported by the Local and District Municipalities, Ezemvelo KZN Wildlife and NGOs. In our opinion, new power lines traversing the nature reserve would have a significant negative effect on the economic viability of the area, threatening many sustainable jobs, in addition to impacting directly on vegetation types that are under-represented in the protected area network. If the project fails than the land use will revert to subsistence agriculture and settlement with associated negative impacts on biodiversity and water production. It is essential that the affected communities are given an opportunity to understand the potential impacts on their livelihoods.

Given the issues above it is strongly recommended that alternative sites for the sub-station and alternative alignments of power lines are investigated.

Yours sincerely



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