

**PROPOSED ISUNDU 765/400 kV SUB-STATION AND TURN-IN TRANSMISSION LINES
(DEA EIA REF: 14/12/16/3/3/2/745)
Comments and Responses Report 3
21 October 2016**

Comments have been received from the following stakeholders (alphabetical) during the impact assessment phase

Name	Organisation
Aldine Armstrong	Eversheds on behalf of Rainbow Farms (Pty) Ltd
Andrew Blackmore	Ezemvelo KZN Wildlife
M Chandulal	Mkhambathini Municipality
Sharon Gilbert	Local Resident
Brian Millard	Local Resident
Khathu Muruba	Department of Rural Development and Land Reform
Lesley S	DAFF
Ken Shand	D L Patrick & Associates Property Valuers & Appraisers
Shannon Hoffman	African Bird Of Prey Sanctuary
Bernadet Pawandiwa	AMAFA
Nandipha Sontangane	DAFF
Alan Stephenson	Mills Fitchet
David Stock	National Chicks
Esmeralda Ramburran	Msunduzi Municipality
Dave Rigby	Local Resident/Developer
Rebecca Bowd	Green Door

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1	00024	20 July 2015	David Stock – National Chicks	The Final Scoping reports are not available on line for viewing.	Please try the following link: http://www.acerafrica.co.za/index.php?option=com_docman&task=cat_view&gid=1396&Itemid=9 The report is available through Dropbox so may at times take a little time to become visible. Please let me know if you have any difficulty viewing the folders or opening the files or contact me directly.
2		22 July 2015	M Chandulal - Mkhambathini Municipality [submitted directly to DEA]	<p>At a meeting of the full Council held on Thursday, 28 May 2015, it was resolved that the consultants who have lodged an application for the construction of the Isundu 765/400 KV sub-station and turn-in transmission lines in the Lion Park area, be requested to:</p> <ol style="list-style-type: none"> 1. Address the incompatibility of this proposal with the municipal SDF and adopted Rural Planning Policy particularly as this development would necessitate a submission in terms of the KZN PDA and SPLUMA. 2. Detail the route through this municipality on a larger plan with the additional lines and servitudes being proposed into the future. 3. Address the visual aspects of this potential 60 ha structure that is being proposed in an agriculture and tourist area. 4. Elaborate on the problems with the approved site near Wartburg, and investigate the potential sites previously identified in the Cato Ridge/Harrison Flats area which will be in close proximity to the Dry Port which meets your identified criteria of siting sub-stations as close proximity to the Dry Port which meets your identified criteria of siting sub-stations as close to the demand 	<ol style="list-style-type: none"> 1. This is known and is an example of non-integrated planning between the national, provincial and local spheres of government. This does not invalidate Eskom's application. 2. Currently, the Isundu Sub-station study area and authorised VSHA transmission line corridor are shown in Figure 1. The exact servitudes for the VSHA transmission line have not yet been determined nor have the alignments or routes of any possible future lines. 3. This is being investigated. 4. Earthworks at the Wartburg site are prohibitively expensive. Sigma 6 and 7 were previously investigated; Sigma 7 was found to be too small and the transmission lines routes into Sigma 6 were found to be unfeasible. This infrastructure is needed to supply the key demand centres of the whole of KZN, not a

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				<p>centres as possible.</p> <p>5. Disclose the fact fate of structures existing within the servitudes.</p> <p>6. Prepare specialist reports in respect of:</p> <ul style="list-style-type: none"> ▪ The noise impact. ▪ Visual impact. ▪ Electromagnetic fields. <p>Whilst it is acknowledged that a modern economy cannot grow without the availability of a reliable electricity supply and that there are obviously severe constraints on the existing KZN transmission network and that a site for a new sub-station is required, this does not necessarily motivate that the proposed site in the Lion Park area is the only site for this type of development.</p> <p>Although the consultant refers to the investigation of 25 potential sites for this purpose this information is missing from the application document. The potential sites at Cato Ridge and Harrison Flats, which formed part of the previous approved Sigma investigation have not been reconsidered in terms of this submission. This is considered a serious omission. The consultants state that there is a need to place these sub-stations as close to demand centres as possible. It therefore makes every sense to re-investigate the sites at Harrison Flats in close proximity to the proposed new massive dry port facility. It is preferable to locate the sub-station in a new industrial area</p>	<p>specific local municipality, area or project such as Cato Ridge or the Dry Port. The general regional location of the various sub-stations required between Mpumalanga and KZN's North and South Coast areas are also dependent on various technical transmission factors.</p> <p>5. This comment is not understood.</p> <p>6. These are being investigated.</p> <p>Section 4 on Alternatives in the FSR does outline the sites and process of investigating alternatives. Sigma sites 6 & 7 were reconsidered when it became apparent that Sigma 1 had geotechnical constraints. However, Sigma 7 was found to be too small and the transmission lines routes into Sigma 6 were found to be unfeasible.</p> <p>These issues have been noted and are being investigated.</p>

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				<p>rather than an eco-tourism area.</p> <p>The applicant acknowledges that this site falls within an area used for agriculture, tourism and conservation purposes. This site is bordered by the Raptor Centre, the Zoological Gardens, Mayibuye Game Reserve, the Rainbow breeding farms and the proposed Wild Aloe Aero Estate. There may be potentially negative visual impacts, either during the day and at night on the sense of place and the visual quality of the area, which could negatively impact on the success of these initiatives resulting in billion rand losses and extensive unemployment.</p> <p>The Isundu sub-station will not operate in isolation. Various transmission lines will as part of current and future planning be coming and going out of the sub-station. The cumulative impacts of the future lines into this 60 ha facility need to be assessed in depth as part of this submission. This submission is merely the 'tip of the iceberg' as far as long terms repercussions of this project are concerned.</p>	The cumulative impact of future lines is being considered in this assessment.
3	00026	26 July 2015	Brian Millard	<p>Thank you for forwarding a copy of the final BAR to the Msunduzi Municipal Library care of Kammy Pillay. The large clear folded plan contained in the document is appreciated.</p> <p>The responses to my comments were noted including the phone call received from Acer. It was interesting to note the number of interested parties and organisations. Best wishes for a successful project.</p>	Noted.
4	00027	27 July 2015	Email from Khunjulwa Minentle Baleni submitting comment on behalf of Nandipha Sontangane - Department of Agriculture, Forestry and Fisheries	<p>The Department acknowledges that the comments previously issued dated 05/ 1112014 for the BID and 26/05/2015 for the DSR have been incorporated in the FSR and thus still applicable. Furthermore, the Department is satisfied with the plan of study for impact assessment.</p> <p>Further comments will be issued upon receipt and review of the DEIAR which will incorporate the suite of specialist studies. This letter does not exempt you from considering other environmental legislation.</p>	Noted.

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5	00028	28 July 2015	Esmeralda Ramburran - Msunduzi Municipality	<p>The following comments are submitted for your information and attention;</p> <p>1. The EIA report needs to be evaluated against the following policies/reports:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Msunduzi Municipality's Environmental Management Framework (EMF) <input type="checkbox"/> Msunduzi Municipality's Integrated Environmental Management Policy <input type="checkbox"/> Msunduzi Municipality's Environmental Status Quo Report <input type="checkbox"/> Msunduzi Municipality's Strategic Environmental Assessment (SEA) <input type="checkbox"/> Msunduzi Municipality's Spatial Development Framework (SDF) <p>2. On Page vii 'Plan of Study for Impact Assessment' the following specialist studies;</p> <ul style="list-style-type: none"> <input type="checkbox"/> A Hydrological Study – the 1:50 year and 1:100 year floodlines need to be shown for all sites affected by watercourses. <p>3. The Ecological Assessment (vegetation, wetland and fauna assessments) terms of reference should include follow up site visits and assessments during summer in order to assess the occurrence of bulbs that would have been dormant during the time the draft assessment was done. Further, summer months are when invertebrates are most active</p> <p>4. The EIA report must take into account Offsets and Mitigation particularly for environmentally sensitive sites and watercourses to compensate for the loss of open space, grasslands, wetlands and/or social space. Potential offset sites should be listed and interrogated as well as what offset ratios will be used such as the Department of Water Affairs (DWA) or Ezemvelo KZN Wildlife offset guidelines.</p>	<p>Noted. However, please note that whilst the Isundu study area has a small corner within the Msunduzi Municipality, neither the proposed Isundu Sub-station or the preferred alignment of the turn-in transmission lines fall within the Msunduzi Municipality.</p> <p>The specialists have covered seasonal sensitivities in their reports and have also recommended plant and fauna rescue operations prior to construction.</p> <p>Offset mitigation has been recommended in the Vegetation/Wetland specialist study.</p> <p>Electronic and hard copies of all reports will be made available.</p>

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				5. This Unit requests electronic and hard copies of all Draft and Final reports. Please do not hesitate to contact this office should you have any further queries	
6		3 August 2015	Aldine Armstrong – Eversheds on behalf of Rainbow Farms (Pty) Ltd [submitted directly to DEA]	Eversheds provided a detailed objection on the Final Scoping Report for the proposed Isundu 765/400KV Sub-station and turn-in transmission lines near Cato Ridge, KwaZulu-Natal. This is provided in Appendix 2 of the EIR.	These objections were noted and Poultry Veterinarian Specialist Input was included into suite of specialist studies. The issues raised are under investigation as part of the EIA.
7	00030	12 Aug 2015 00030	Lesley S - DAFF	Requested the property description of the application.	The EAP provided the property description for Isundu.
8	00029	20 Aug 2015 00029	Alan Stephenson - Mills Fitchet	Mr Stephenson is a land evaluator working on instruction from the State Attorney who deals with land claims in the area. Alan Stephenson contacted the EAP about Isundu requesting the details of the project and the status of the work so far. He wishes to be kept informed and obtain further information.	The EAP explained that we are currently finalising the draft EIR for public review. Mr Stephenson was added to the I&AP database and the FSR was emailed on 20 August 2015. Mr. Stevenson confirmed receipt
9		18 June 2015 – 25 August 2015	Aldine Armstrong – Eversheds on behalf of Rainbow Farms (Pty) Ltd	Mariette Steynberg (Tourism and Economic Development Specialist) liaised with Eversheds and Rainbow to confirm economic production costs and value-chain calculations and that she had interpreted the information correctly in her economic assumptions and calculations.	The findings from these interactions is contained in the specialist report.
10		18 June 2015 – 28 August 2015	Various stakeholders	During the course of the specialist work, Mariette Steynberg (Tourism and Economic Development Specialist) liaised and met with David Bozas (Mayibuye Estate), Elaine Donaldson (Mkhambathini Municipality), Dean Boswell (farm resident and manager at Lion Park) and Henry Heyns (Aloe Wildlife Estate).	The findings from these interactions is contained in the specialist report.

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11		28 Aug 2015	Shannon Hoffman - African Bird Of Prey Sanctuary	<p>In response to an email request from Mariette Steynberg (Specialist), Ms. Hoffman provided the following information:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Grants etc. from government or other NGOs <input type="checkbox"/> Average range of annual visitors to the centre for the period 01.02.2013 to 18.08.2015 <input type="checkbox"/> A range for the centre's annual revenue and noted that the venue was closed to the public for four months for upgrades over the peak Christmas tourist season. This obviously reflected badly on visitor numbers for direct income as well as the long-term residual effect of closing a facility and reopening again. <input type="checkbox"/> Running costs for the centre. i.e.: breakeven point <p>Ms. Hoffman also reiterated that these figures cannot realistically be used to ascertain the value of this project as everything has been done to keep overheads down and build up the assets of the property for which it was presumed that there would be long-term benefits (99 years lease on the land). The only fair way to value what they do here, as was discussed with Eskom representatives, is to cost the relocation of the project to a location with similar assets, tourist access, and environmental requirements.</p>	Mariette Steynberg (Specialist) thanked Ms. Hoffman for the information
12	00031	18 Sept 2015	Ken Shand D L Patrick & Associates Property Valuers & Appraisers	<p>Refer to our conversation this morning regarding the possibility of an Electrical Substation on Lorraine Hebblethwaite farm: We have been commissioned to do the valuations for Umgeni Water for a 6-metre water pipeline along the boundary road but within the property owner's property. Please can you help with a few questions:</p> <ol style="list-style-type: none"> 1. How far is the impact assessment? 2. We understand most of the neighbours have objected due to this large steel structure on their doorstep and the possibility of 18 overhead lines with resultant servitudes. 	<ol style="list-style-type: none"> 1. We are currently preparing the draft EIA report which will then go out for public comment. The final Scoping Report has just been accepted. 2. Yes there are a lot of objections. This is not necessarily unusual though, everyone objects to electrical infrastructure no matter where

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				<p>Are there objections?</p> <p>3. From our discussion we understand that if the project goes ahead the first phase will be were the house is situated occupied by Dean Boswell and when completed will occupy approximately 100 hectares</p> <p>4. Will the assessment have any impact on Umgeni Water pipeline?</p> <p>5. Any additional information you get can give me would be greatly appreciated.</p>	<p>you go.</p> <p>3. The 100 ha area is the EIA application area, within this area the sub-station will be sited. Probably around 35-40 ha at the initial phase and around 60 ha if fully developed into the future. I have attached a kml file of the current preferred layout of the substation.</p> <p>4. Not that we have currently identified, we are noting your planned pipeline but believe there is sufficient room for your pipeline between the proposed sub-station and the road reserve. Please contact me to discuss if you feel there is something we may have missed and if there may be an impact or land-use conflict somewhere.</p> <p>5. You can find more details on the project on the ACER website www.acerafrica.co.za</p>
13 a	00032	1 Oct 2015	Sharon Gilbert	Could you please send me some information for the proposed Eskom Substation in Umlaas Road, near Camperdown, KZN. If you are not working on this project please could you give me the contact details for someone at Eskom Transmission.	ACER is currently undertaking an EIA for the proposed Isundu Sub-station, which is the one I believe you are referring. There is information on the project on ACER's website www.acerafrica.co.za , but you may also contact ACER to discuss what information you are specifically interested in and we could then assist you.
13 b		1 Oct 2015	Sharon Gilbert	Many thanks, I'll have a look on the website.	Noted.
14	00034	30 Nov 2015	Dave Rigby	Mr. Rigby noted that at the first public meeting it was agreed that the Eskom representative would meet with him regarding the issue of zoning and the need for compensation considering	The EAP referred to the meeting arranged between Mr. Rigby, Mr. Heyns, the Eskom negotiator and himself which took place on 11

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				that the municipality had stipulated the area be rezoned to an ecotourism / green development. It has taken 9 years and great cost to comply. As a result of the proposed sub-station they would have to re-apply for a different type of development due to the nature of the ESKOM development, which is contrary to what the municipality had planned for the area. Mr. Rigby stated that should ESKOM not be in contact within 30 days this matter will be referred to their lawyers to take the necessary action to protect their interests.	<p>June 2015 has had been requested at the public meeting. The EAP included the minutes of this meeting in the email and noted that these minutes were also included in the project records (Final Scoping Report) of which he was notified and was made available to the public.</p> <p>The EAP explained that Mr. Rigby's concerns are being considered in the EIR but the finalisation of the draft EIR has been delayed as per the recent progress communication that sent out.</p> <p>The EAP also explained that Eskom does not commence with landowner negotiations until environmental authorisation has been obtained and thus further meetings or correspondence now would not change the outcomes of what was already discussed at the meeting on 11 June 2015. However, the EAP advised that should Mr. Rigby wish to contact Eskom, the correct person to deal with will be Annah Motalane (contact details were provided).</p>
15	00035	8 Feb 2016	Khathu Muruba Department of Rural Development and Land Reform	<p>Acknowledge receipt of notification.</p> <p>The Department of Rural Development and Land Reform (DRDLR) would like to convey its gratitude for being updated on the availability of the Draft Environmental Impact Assessment report for the proposed Isundu sub-station.</p> <p>The Department does not have any objections to the project as it contributes towards the development of renewable energy generation facilities in South Africa, therefore ensuring sustainable rural communities and promoting green economy in the affected communities.</p>	Noted.
16	00039	5 Feb	Rebecca Bowd –	As I recall that you were the consultant who was doing the	I am assuming this attached plan is showing the

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		2016	Green Door	<p>environmental work for the Eskom powerline, which ran through a property which was proposed for development near to the Lion Park, Ashburton. I attach a previous layout plan which shows the routing of the Eskom servitude. The houses which were in the servitude have now been removed.</p> <p>Please can you confirm whether this alignment is correct for the present proposal, and whether there are any future lines which may impact on this development.</p>	<p>current servitude of the 275 kV line which is already existing. Our current application includes 2 x 400 kV double circuit lines running from the proposed sub-station in a south-westerly direction alongside this existing 275 kV line. The current preferred route for these new proposed lines is to the east of this existing 275 kV line. Thus, in terms of your question, this layout appears now more preferable than previous layouts.</p> <p>It is not possible for me (or anyone else really) to confirm that no future lines will impact upon this development as it is not possible to predict what electricity demands or requirements will be into the future. If your development is in place then any future lines would obviously need to take this into account during the assessment and planning of any future lines.</p> <p>What I can confirm is that of the 2 x 400 kV lines now proposed, one line will be spare, so there will be a servitude and line already defined and in place that could accommodate a future line entering the sub-station from this south-west side.</p> <p>There are two future lines proposed from the sub-station towards Empangeni, but these are out from the east of the sub-station and will not affect your development.</p>
17	00041	14 March 2016	Bernadet Pawandiwa – AMAFA CaseID: 8448	<p>Thank you for the opportunity rendered to Amafa to make a decision regarding this development proposal. The development area has been subjected to a Heritage Impact Assessment and expert recommendations have been put forward by eThembeni as captured in the application submitted to Amafa. The report indicates that the area is not likely to yield</p>	Noted.

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				<p>fossil deposits as it falls in a zone of low paleontological sensitivity. There is no reference to presence of archaeological deposits or graves but it provides evidence of farm structures. The heritage legislation stipulates that no heritage resources should be damaged, destroyed, excavated, altered, disturbed, exhumed, collected or removed from original position without a permit.</p> <p>The developer is required to comply with the condition of non-intrusion in any way without approval. A farm house and ancillary agricultural buildings of the Thorndale farmstead are older than sixty years and the developer requires to contact the Built Environment Section for a Permit if any direct or indirect intrusion of the structure and the cultural landscape is envisaged.</p> <p>In view of the findings outlined in the report by eThembeni that we received for the above proposed development, we have no objection to the proposed development within limits of the prescribed mitigation measures and recommendations.</p> <p>You are also required to adhere to the below-mentioned standard conditions:</p> <ol style="list-style-type: none"> 1. Amafa should be contacted if any heritage objects are identified during earthmoving activities and all development should cease until further notice. 2. No structures older than sixty years or parts thereof are allowed to be demolished altered or extended without a permit from Amafa. 3. No activities are allowed within 50m of a site, which contains rock art. 4. Sources of all natural materials (including topsoil, sands, natural gravels, crushed stone, asphalt, etc.) must be obtained in a sustainable manner and in compliance with the heritage legislation. <p>Failure to comply with the requirements of the National Heritage Resources Act and the KwaZulu Natal Heritage</p>	

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				Resources Act could lead to legal action being instituted against the applicant.	
18	00042	7 April 2016	Andrew Blackmore – Ezemvelo KZN Wildlife	<p>The Final Scoping Report, dated July 2015, for the abovementioned application has been reviewed by Ezemvelo KZN Wildlife (Ezemvelo).</p> <p>We are satisfied that the specialist studies to address key biodiversity issues have been commissioned. These include:</p> <ol style="list-style-type: none"> 1) Issues of concern to the African Bird of Prey Sanctuary and Raptor Rescue Centre, which are outlined in the terms of reference for the avifaunal specialist study. These concerns are related, particularly with regards to the following: <ol style="list-style-type: none"> a. Impacts of light, noise and electromagnetic fields on the rehabilitation of injured birds and captive breeding of vulnerable species such as the Bearded Vulture. b. Impacts of additional transmission lines on free-flying raptors used for flight demonstrations as well as the release of rehabilitated birds. These relate both to risk of line collisions and the interference with radio tracking devices used to track lost demonstration birds that are unable to fend for themselves in the wild. c. Loss of a controlled release site where the proposed sub-station is to be built. 2) Potential impacts on wetlands and vegetation. 3) Impacts on faunal habitat and direct impacts on the animals themselves, with specific reference to vulnerable species. <p>We trust that these specialist studies will be undertaken as outlined in the Scoping Report and that findings and recommendations derived from them will be included in the final Environmental Impact Assessment. Should any other biodiversity issues arise, please do not hesitate to contact this office.</p>	Noted.
19	00043	9 May 2016	Shannon Hoffman - African Bird of Prey Sanctuary	<p><u>An update on the Bearded Vulture Breeding Program at the African Bird of Prey Sanctuary, adjacent to the proposed Isundu 765/400 KV Substation and turn-in transmission lines.</u></p>	Thank you for these comments. The update on the breeding programme has been noted.

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				<p>In pursuit of professional accuracy, a principle to which you undoubtedly adhere, I need to bring to your attention some recent developments regarding our onsite activities and their significance in the national management plan for the conservation of the Bearded vulture species.</p> <p>A recap on the conservation status of the Bearded Vulture: The Bearded vulture (<i>Gypaetus barbatus</i>) is a large, iconic and highly specialized bird of prey, unique in both behaviour and adaptation. In 1984, Hiraldo et al divided the species in two, with each sub-species occupying the opposite hemisphere of the world. The last 320 odd individuals of the southern sub-species reside in the Maluti-Drakensberg mountains. Their population is in severe decline and has now been regionally up-listed to 'critically endangered'.</p> <p>The S. Krueger et al 2014 study confirmed that the <i>Gypateuas barbatus meridionalis</i> subspecies has:</p> <ul style="list-style-type: none"> - Suffered a 32 to 51% occupied territory decline - Shows a 27% breeding distribution decline - And a 20% population density decline <p>Conversely, in 1978 a group of conservationists in Europe started an EEP (European Endangered Species Program) for the northern sub-species. Since then this network, now coordinated under the VCF (Vulture Conservation Foundation), has bred over 422 bearded vultures in captivity and have subsequently released and repopulated birds in the Alps, Spain and the Cévennes mountains. The success of this conservation breeding program has resulted in the northern Bearded vulture population going from being recorded as extinct in the wild in Europe to being listed as 'near threatened'.</p> <p>From this, two facts pertain. If we cannot prevent our ex-situ population decline, then our priority conservation action must be to first establish a genetic reserve in the form of a captive</p>	

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				<p>population. Secondly, by following the proven methodology of the European breeding management-model, we stand a high chance of breeding success ourselves. To date the European programs have, in fact, bred more birds in captivity than we have left in the wild.</p> <p>The South African Biodiversity Management Plan (BMP) for <i>Gypaetus barbatus meri dionalis</i>, compiled in 2013, identified captive breeding as a proposed action should the conservation status of the species warrant it. The African Bird of Prey Sanctuary was the organization recorded in this document to undertake the venture. On the 18th of April 2015, due to the perilous future and continued decline of the Maluti-Drakensberg Bearded vulture population, the Bearded Vulture Taskforce confirmed that the time was right to initiate such a breeding program. Last year, in the immediate 2015 winter breeding season, the African Bird of Prey Sanctuary, in conjunction with Ezemvelo KZN Wildlife, undertook a pilot project (utilizing available skills, expertise and resources) to reap second eggs from two nests. Both these eggs hatched and the chicks were successfully raised at the Sanctuary where they now live with the resident adult female.</p> <p>The long-term objective of such a captive breeding program is two-fold:</p> <ul style="list-style-type: none"> ➤ Firstly to establish an ex-situ genetic reservoir of breeding stock for the African subspecies (between 20 and 30 birds) ➤ And secondly to be able to produce viable chicks for reintroduction, to bolster the in-situ populations, whether in current habitats or new territories. <p>The relevance of all this in relation to the proposed construction of the Isundu Sub-station is the following:</p>	

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				<p>1) The Bearded vulture is one of the few species significant enough to warrant a biodiversity management plan (BMP) governing its conservation. And the African Bird of Prey Sanctuary is recorded as the implementing agent of the captive breeding operations in this <u>legislated</u> document that has been approved and signed by the Minister of Water and Environmental Affairs. (See Government Notice No. 350 of 8 May 2014 in Gazette 37620)</p> <p>2) Since our last communications, the conservation status of the Bearded vulture in the regional red data book has been formally up-listed from <i>Endangered</i> to <u>Critically Endangered</u>.</p> <p>3) In November 2015 Dr Sonja Kruger and I went to Europe, presented our work at their international conference and met with EU representatives of the Vulture Conservation Foundation (VCF) who now endorse our operations and proposed breeding plan for the species.</p> <p>4) The idea of a captive breeding project is becoming a reality. This necessitates planning the construction of further a further nine dedicated enclosures as permanent homes. Following the precautionary principal, however, which is obviously imperative in the management of a critically endangered species, it is in no way viable to establish this breeding group immediately alongside a substation of the proportions that is planned.</p> <p>5) As the next breeding season approaches it is necessary to expand project borders to include Lesotho. This is to be formalized imminently at the next Bearded Vulture Task Force meeting (17th to 19th May 2016) with Lesotho government representatives, again necessitating continuity of plan as the project is taken to an international level.</p> <p>I am sure that you have already been cognisant of the negative</p>	

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				<p>effect that Eskom's proposed substation would have on the breeding of any extremely vulnerable avian species (a fact that has of course already been brought to your attention in our previous discussions). So, this correspondence will probably merely serve to confirm your current determinations that, should the construction of the substation proceed, then as a mitigation measure the Sanctuary would have to be moved to another location. I merely wish, however, to bring your attention to these advancements.</p>	
20	00044	24 Feb 2016 to 22 June 2016	Alan Reddy (Aldine Armstrong – Eversheds on behalf of Rainbow Farms (Pty) Ltd)	<p>The EAP asked RCL to follow up on two aspects arising from their meeting and interaction regarding the Isundu sub-station.</p> <p>Firstly, as per my previous email, have you managed to find any examples of production drops which you can link to specific thunderstorms or other loud noise incidences.</p> <p>Secondly, we received Rainbow's estimated cost to close in House L14 in order to endeavour to mitigate light and dust. I have a few questions on this:</p> <ol style="list-style-type: none"> 1. If these houses were to be closed up, how long would the contractor get to do the work i.e. if all six L14 houses were taken out of production to close up these houses, how would this affect Rainbow's production or would you be able to work around this whilst the work was being done? I assume Rainbow has probably closed up houses like this before, do you have an indication of what time the contractor took? 	<p>There has been production drops as much as 5% to 7% drops the day after the storms and thunderstorms across all the Laying Farms in the area but we do not record the dates on the house charts when the thunderstorms occur but do notice drops in production. Production generally takes approximately 3-5 days to recover depending on the age of the flocks in production.</p> <ol style="list-style-type: none"> 1. We have done this type of work previously and work could be done within a 4 - 6 week period, which normally is within the period the birds are removed and the site cleaned and disinfected, in preparation for the new stock arrival.

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				2. Are any of the sensors, winches, fans and ventilation equipment you list, specifically ordered and manufactured items with long lead times prior to delivery.	2. 8 - 10 weeks delivery from date of order and yes these are specifically ordered from poultry equipment suppliers. The equipment is standard and are used globally within the poultry industry.
21	00045	22 July 2016	Aldine Armstrong – Eversheds on behalf of Rainbow Farms (Pty) Ltd)	Various emails were exchanged with regard to having two sets of minutes relating to the same meeting. Both sets have been provided.	N/a
22	00046	27 Sept 2016	Aldine Armstrong – Eversheds on behalf of Rainbow Farms (Pty) Ltd)	Not Read email message received for the email sent notifying stakeholders of the availability of the FSR.	N/a
23	00047	17 Oct 2016	Aldine Armstrong – Eversheds on behalf of Rainbow Farms (Pty) Ltd)	A detailed letter was submitted responding to Eskom's letter of 12 September 2016.	Comment received and a response is being prepared.