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AFRICAN BIRD OF PREY SANCTUARY

18th December 2014

Eskom SOC Ltd
c/o Acer (Africa) Environmental Management Consultants

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 the African Bird of Prey Sanctuary Operations

Thank you for opening discussions regarding the proposed Isundu 765/400 KV substation and its associated turn-in transmission lines. Subsequent to the two meetings with Acer representative, Paul Scherzer and then Eskom's Annah Motalane, about the proposed expansion of Eskom's transmission network, I would like to please formally reiterate our concerns regarding the impact of such a development on our neighbouring operations.

The African Bird of Prey Sanctuary, and the associated rehabilitation centre, Raptor Rescue, currently constitute the biggest dedicated conservation and awareness facility housing indigenous raptors in Africa. All the resident birds of prey at this working facility are protected species and many are CITES listed. We have, in partnership with the Mayebuye Community, been in operation at this site since 2006 and hold a registered 99 year lease on the 60 hectares of land (Portion 184 of the Farm Vaalkop and Dadelfontein 885) which lies immediately adjacent to the proposed substation. The African Raptor Trust (Reg. No IT 1467/2005/PMB) also operates from this property. The object of this NPO is to aid the conservation of indigenous birds of prey both in and ex-situ of their natural environment.

Part of the unique nature of our operations is that the facility conducts free-flight raptor demonstrations daily from an open-air amphitheatre. Visiting guests participating in these shows fund our operations. This particular site was chosen for its ideal aspect and land gradient providing suitable flying winds, as well as its beautiful natural scenery and views which facilitate both maximum welfare for the raptors and guest enjoyment. The site proximity to both of the largest KwaZulu-Natal cities and the easy N3 highway access also promotes visitor patronage. All these factors were taken into consideration and enable us to support the endangered wildlife in our care.

Thirteen species of raptor have also been bred at our working facility. These include the African Grass Owl (listed in the Red Data Book as vulnerable), Taita Falcon (near threatened) and White-headed Vulture (vulnerable). In partnership with KZN Wildlife and Birdlife, we are also the planned breeding station for the critically endangered Bearded Vulture. There are approximately 320 bearded vultures left in the wild, which reside around the Drakensberg mountain range. The skills found at the facility, the sight tenure and location supported the initiation of this 20 year project and first two dedicated breeding chambers (to a value of R 450 000.00) have been already been built on the site. The Sanctuary currently houses the only Bearded Vulture of this sub-species in captivity.

It was with concern that we heard of Eskom's altered development plans and of the seemingly conclusive decision to now construct the new Isundu substation within such close proximity to the Sanctuary. While we fully understand the need for expansion and growth, this form of development is probably the most invasive and potentially detrimental to the Sanctuary possible. The fact that a good portion of the permanently injured and non-releaseable raptors housed at the Sanctuary are power-line victims (of either collision or electrocution) thoroughly confirms this statement.

Our concerns regarding the location of the proposed substation are two-fold:

1) The sheer size of the substation and the immediate proximity of the Sanctuary to the hub of the development (approximately 150m) pose a potential health risk to both the people living permanently on site and certainly the housed raptors. While the effect of electro-magnetic fields on humans is argued, the indirect increase in human ailments associated with people living in close proximity to large electrical installations doesn't really seem a risk worth taking. There is, however, proven research that birds are highly sensitive to electro-magnetic fields, so it becomes completely nonviable, for example, to take some of the last remaining species individuals (such as in the case of the bearded vulture) and hope for them to breed in enclosures right next to a large substation. There is neither time, nor birds available, to explore or argue this risk.

2) Due to the unique aerial nature of our operations, overhead cables near, or over, Sanctuary boundaries are of major concern. The radiating transmission lines from the proposed Isundu substation pose a serious threat to the core of our Sanctuary business and future educational capabilities. Currently the major lines running parallel to the southern border of our property pose no more than a 25% threat to the birds' safety as they fly in the aerial displays. Considering the distance of the power-lines and that the flight arena faces in the opposite direction, this is currently a manageable risk. Our flying activities have been sanctioned as permissible by the local permitting authority KZN Wildlife for this reason. Any additional lines running to the north or west of the arena obviously increase the collision or electrocution risk considerably. So the flying of the birds at this site could then be advanced from what is currently a controllable activity (where risk is negated through slope aspect and suitable training), into undertaking that is almost negligent in nature.

The operations of the Sanctuary, Raptor Rescue and the African Raptor Trust rely heavily on the solicitation of funds and the development of skills partnerships between multiple NGO's, government departments and the private sector. If our core operations are severely compromised by Eskom's proposed expansion then we will not be in a position to responsibly negotiate or plan

future advancements or continue conservation projects of our own. This effectively puts on hold any planning for our future, immediate or otherwise, until such time as a concrete proposal is presented by Eskom regarding this development. We would therefore be most grateful, if we could continue to discuss these challenges and pursue solutions with the relevant ESKOM representatives at your earliest convenience.

Please can you include in our negotiations the possible options available to us as we proceed amicably and reach a mutual agreement? Would any of the following actions, for example, be considered by Eskom as possible solutions?

- Alterations to the position or design of the substation to accommodate Sanctuary requirements
- Finite and documented expansion plan parameters protecting the Sanctuary's interest long-term
- Offsets for possible Sanctuary relocation
- Compensation for lost assets and/or income potential.

I would like to thank you in advance for your consideration and I look forward to hearing from you in the New Year.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Shannon Hoffman', with a long horizontal flourish extending to the right.

Shannon Hoffman

African Bird of Prey Sanctuary Director
African Raptor Trust (Secretary)