

---

## Planning Division: IEM Section

---

Enquiries: Nhlakanipho Nkwanyana/Dominic Wieners

Ref: 14/12/16/3/3/2/745

Tel: 012 399 8815

Email: oletlalo@environment.gov.za

**Attention: Miss Olivia Letlalo**

14 December 2016

### **PROPOSED ISUNDU 765/400KV SUB-STATION AND TURN-IN TRANSMISSION LINES.**

#### **Applicant: ESKOM HOLDING SOC Limited**

The Draft Environmental Assessment Report (DEIR) for the abovementioned application has been reviewed by the Ezemvelo KZN Wildlife (Ezemvelo) IEM Planning Committee. According to the DEIR, the proposed site is located close to the African Bird of Prey Sanctuary (ABOP<sup>1</sup>). The site is also characterized by areas that have potential to provide habitat for vulnerable and threatened species.

The following biodiversity issues have been identified by Ezemvelo:-

#### Avifaunal species:

- Ezemvelo KZN Wildlife is concerned regarding the potential impact of the development on the African Bird of Prey Sanctuary (ABOPS). The ABOPS performs a critical educational function in terms of raptor conservation, more notably highlighting the threats that the various species, specifically South Africa's vulture populations, currently face. In addition, Ezemvelo KZN Wildlife and the ABOPS have recently commenced the implementation of a captive breeding programme for the Critically Endangered Bearded Vulture.
- Furthermore, Raptor Rescue which is also located in close proximity to the proposed development performs a vital function in terms of raptor rehabilitation in the province. Numerous individual species are rehabilitated each year and returned safely back into the wild, thereby contributing to the conservation of such species. There is no other similar institution in the province able to perform this function at present and Ezemvelo KZN Wildlife is concerned that the development may impact upon the ability of Raptor Rescue to perform such function.

#### Faunal species:

- It is evident from the report (only a single day field visit) that very little on site verification of species predicted to occur was undertaken. The specialist has indicated that for a number of species, their

---

<sup>1</sup> ABOPS- the African Bird of Prey Sanctuary is a working facility dedicated to the conservation of indigenous raptors and is base to ongoing research, breeding and rehabilitation projects for birds of prey.

Ezemvelo KZN Wildlife Official Comment	14/12/16/3/2/745	PROPOSED ISUNDU 765/400KV SUB-STATION AND TURN-IN TRANSMISSION LINES.	Page 1 of 2
---	------------------	--	-------------

presence is unlikely and thus any potential impact is negligible, yet no attempt for adequate verification was undertaken.

- The specialist indicates however that a specialist amphibian survey must be undertaken and mitigation implemented prior to construction:-

Conservation of the species listed below is necessary and vital as they are only found in a small area of KwaZulu-Natal and no-where else in the world. These species have to be conserved where they occur as they cannot move far to other habitat in the vicinity.

- I. The giant green- earthworm *Microchaetus papillatus*;
- II. The flat-toothed *shagreened millipede Camaricopectus planidens*, the visible keeled millipede- *Gnomeskelus spectabilis*, the urban lumpy keeled millipede *Gnomeskelus tuberosus urbanus*, the resembling two-toothed slender spined millipede *Patinatus bidentatus simulator*, the destroyed slender spined millipede *Spinotarsus destructus*, the glomerate slender spined millipede *Spinotarsus glomeratus* and the Maritzburg slender spined millipede *Spinotarsus maritzburgensis*;
- III. The warty hunter snail *Gulella euthymia* and the jigsaw-piece hunter snail *Gulella separata*.
- IV. The spotted shovel-nosed frog *Hemisis guttatus*.

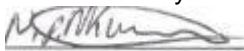
Ezemvelo therefore makes the following recommendations:

- The specialist report is clear in that the proposed development will impact upon such and cannot be suitably mitigated. Thus Ezemvelo KZN Wildlife is supportive of the recommendation that the ABOPS be relocated to an alternative property. However, it is imperative that such relocation must ensure that there is no negative impact upon the facilities ability to firstly provide the much needed educational output and secondly to be able to implement the captive breeding programme for Bearded Vultures.
- Ezemvelo KZN Wildlife is of the opinion that the EIA should not be accepted and an Environmental Authorisation should not be issued prior to an amphibian survey to been undertaken. The verification of the riparian species that are present on site is considered necessary because it will assist in making an informed decision. Field sampling should need only a week to be completed provided it is carried out before the end of January 2017.

## Conclusion

- In conclusion, **if neither of the ABOPS and Raptor Rescue can be suitably relocated on a 'like-for-like' basis, then the authorisation for such development should not be granted.** The riparian species survey must be conducted by the specialist prior to an Environmental Authorisation being issued, should the competent Authority feel they have sufficient information to make an informed decision.

Yours sincerely



pp.

Coordinator IEM

For CEO: EZEMVELO KZN WILDLIFE

DATE: 14 December 2016

C:\Sandile 2016\Eskom\Transmission\_Line\9588\_Isundu\_OfficialComment\_14/12/2016

P O Box 13053, Cascades, 3202 • 1 Peter Brown Drive, Montrose, 3202 • Tel : +27 33 845 1346 Fax : +27 33 845 1499  
www.kznwildlife.com

Ezemvelo KZN Wildlife Official Comment	14/12/16/3/2/745	PROPOSED ISUNDU 765/400KV SUB-STATION AND TURN-IN TRANSMISSION LINES.	Page 2 of 2
---	------------------	--	-------------