
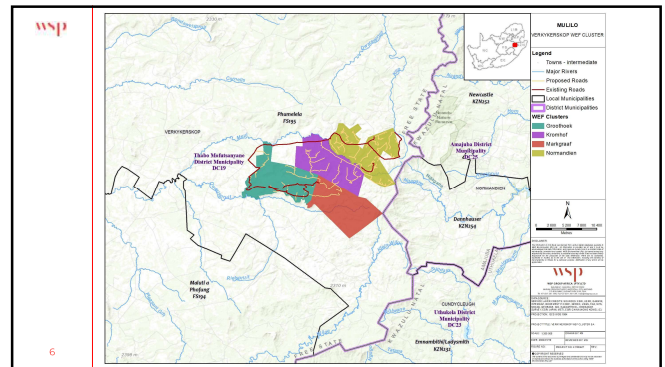



<div>  <div> <div>Overview of the Project</div> <div>Project Background</div> </div> </div>				
	Groothoek	Kromhof	Normamdien	Markgraaff
Project Extent	6 170 ha	5 721 ha	6 067 ha	5 856 ha
Export Capacity	Up to 320MW	Up to 320MW	Up to 600MW	Up to 260MW


5



6

<div>  <div> <div>Overview of the Project</div> <div>Typical Infrastructure</div> </div> </div>				
	Groothoek	Kromhof	Normamdien	Markgraaff
Number of Turbines	Up to 55	Up to 55	Up to 100	Up to 45
Rotor Diameter	Up to 200m			
Hub Height	Up to 140m			
Hard Standing Dimensions	Up to 0,8ha per turbine			
Turbine Foundations	<ul style="list-style-type: none"> <li>Area of 0,07ha per turbine and crane platform/pad – 0,5ha.</li> <li>Excavation up to 4m deep, constructed of reinforced concrete to support the mounting ring.</li> <li>Once tower established, footprint of foundation is covered with soil.</li> </ul>			
Substation	<ul style="list-style-type: none"> <li>3 x 33kV/132kV onsite collector substation (IPP Portion), each being up to 2ha.</li> </ul>			
Powerlines	<ul style="list-style-type: none"> <li>33kV cabling to connect the wind turbines to the onsite collector substations, to be laid underground where practical.</li> </ul>			
Internal Roads	Up to 8m in width			

7

<div>  <div> <div>Overview of the Project</div> <div>Typical Infrastructure</div> </div> </div>				
	Groothoek	Kromhof	Normamdien	Markgraaff
Construction camp and laydown area	<ul style="list-style-type: none"> <li>Construction compounds including site office inclusive of <ul style="list-style-type: none"> <li>Concrete Batching plant of up to 1ha</li> <li>Site office of 4ha</li> <li>Laydown area of 8ha</li> </ul> </li> </ul>			
O&M Building	O&M office of up to 1ha			
Battery Energy Storage System (BESS)	<ul style="list-style-type: none"> <li>200MW/800MWh</li> <li>Li-ion solid state batteries</li> <li>Export Capacity of up to 800MWh</li> <li>Total storage capacity 200MW</li> <li>Storage capacity of up to 6-8 hours</li> <li>The BESS will be housed in containers covering a total approximate footprint of up to 7ha</li> </ul>			

8

**WSP**

**Permitting Process**

## Environmental Authorisation Applications

**Separate Basic Assessment (BA) Process:**

- Groothoek up to 132kV Grid Connection
- Kromhof up to 132kV Grid Connection
- Normandien up to 132kV Grid Connection
- Markgraaff up to 132kV Grid Connection

**Separate Scoping and EIA (S&EIA) process:**

- Groothoek WEF (up to 240MW)
- Kromhof WEF (up to 240MW)
- Normandien WEF (up to 600MW)
- Markgraaff WEF (up to 240MW)

9

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**WSP**

**Permitting Process**

## Competent Authority

**Section 24C(2)(a) of NEMA**

- The Minister must be identified as the Competent Authority (CA) if the activity has implications for international environmental commitments or relations

**Section 24C(2)(b)(ii) of NEMA**

- The Minister must be identified as the Competent Authority (CA) if the activity is undertaken by a statutory body, excluding any municipality, performing an exclusive competence of the national sphere of government

**Section 24C(3)(b) of NEMA**

- Agreement for DFFE to process Renewable Energy and Electricity Grid Infrastructure Projects located within the Free State Province (Specific to REDZ and STC however the Free State Department of Economic, Small Business Development, Tourism and Environmental Affairs does not have capacity to handle shortened timeframes for EA Applications)

**GN 779 of 01 July 2016**

- Identifies the Minister as the CA for the consideration and processing of environmental authorisations and amendments thereto for activities related to the Integrated Resource Plan (IRP) 2010 – 2030

DFFE is therefore deemed to be the Competent Authority

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**WSP**

**Permitting Process**

## Listed Activities – Listing Notice 1

Listed Activity	Description of Project Activity
<b>Activity 11:</b> The development of facilities or infrastructure for the transmission and distribution of electricity— (i) outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts; or (ii) inside urban areas or industrial complexes with a capacity of 275 kilovolts or more; excluding the development of bypass infrastructure for the transmission and distribution of electricity where such bypass infrastructure is— (a) temporarily required to allow for maintenance of existing infrastructure; (b) 2 kilometres or shorter in length; (c) within an existing transmission line servitude; and (d) will be removed within 18 months of the commencement of development.	Each facility will have a 132kV powerline grid connection; therefore this activity is considered applicable to the following projects: • Groothoek up to 132kV Grid Connection • Kromhof up to 132kV Grid Connection • Normandien up to 132kV Grid Connection • Markgraaff up to 132kV Grid Connection
<b>Activity 27:</b> The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for: (i) the undertaking of a linear activity; or (ii) maintenance purposes undertaken in accordance with a maintenance management plan.	The footprint of the onsite substations may be more than 1 ha but less than 20 ha. This activity therefore may be applicable to the following projects: Groothoek up to 132kV Grid Connection Kromhof up to 132kV Grid Connection Normandien up to 132kV Grid Connection Markgraaff up to 132kV Grid Connection

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**WSP**

**Permitting Process**

## Listed Activities – Listing Notice 2

Listed Activity	Description of Project Activity
<b>Activity 1:</b> The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more, excluding where such development of facilities or infrastructure is for photovoltaic installations and occurs: (a) within an urban area; or (b) on existing infrastructure.	The proposed energy generation technology (i.e. Wind) will generate more than 20MW of electricity output from a renewable resource.  This activity is therefore considered applicable to the following projects: • Groothoek WEF (up to 240MW) • Kromhof WEF (up to 240MW) • Normandien WEF (up to 600MW) • Markgraaff WEF (up to 240MW)
<b>Activity 15:</b> The clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for— (i) the undertaking of a linear activity; or (ii) maintenance purposes undertaken in accordance with a maintenance management plan.	Based on the information provided with regards to total project area, it is assumed that the facilities will result in the clearance of at least 20 hectares or more of indigenous vegetation.  This activity is therefore considered applicable to the following projects: • Groothoek WEF (up to 240MW) • Kromhof WEF (up to 240MW) • Normandien WEF (up to 600MW) • Markgraaff WEF (up to 240MW)

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**Permitting Process**

**DDFE Screening Tool Identified Sensitivities – WEF**

THEME	VERY HIGH SENSITIVITY	HIGH SENSITIVITY	MEDIUM SENSITIVITY	LOW SENSITIVITY
Agriculture Theme		X		
Animal Species Theme		X		
Aquatic Biodiversity Theme	X			
Archaeological and Cultural Heritage Theme				X
Avian (Wind) Theme		X		
Bats (Wind) Theme		X		
Civil Aviation (Wind) Theme				X
Defence (Wind) Theme				X

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**WSP**

**Permitting Process**

**DDFE Screening Tool Identified Sensitivities – WEF**

THEME	VERY HIGH SENSITIVITY	HIGH SENSITIVITY	MEDIUM SENSITIVITY	LOW SENSITIVITY
Flicker Theme	X			
Landscape (Wind) Theme	X			
Palaeontology Theme	X			
Noise Theme	X			
Plant Species Theme			X	
RFI (Wind) Theme				X
Terrestrial Biodiversity Theme	X			
Vulture Species Theme		X		

14

14

**WSP**

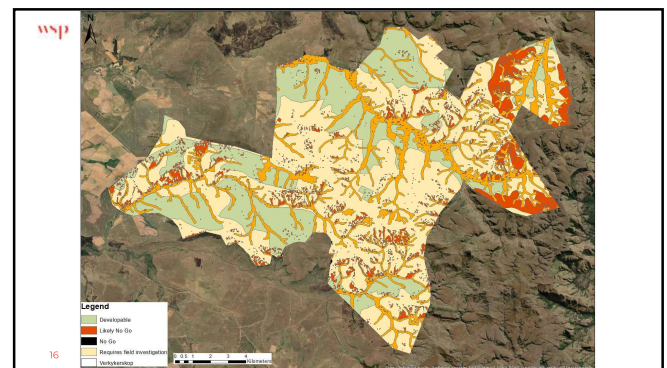
**Permitting Process**

**Specialist Assessments Identified by the DFFE Screening Tool**

<ul style="list-style-type: none"> <li>Agricultural Impact Assessment</li> <li>Landscape/Visual Impact Assessment</li> <li>Archaeological and Cultural Heritage Impact Assessment</li> <li>Palaeontology Impact Assessment</li> <li>Terrestrial Biodiversity Impact Assessment</li> <li>Aquatic Biodiversity Impact Assessment</li> <li>Avian Impact Assessment</li> </ul>	<ul style="list-style-type: none"> <li>Civil Aviation Assessment</li> <li>Defence Assessment</li> <li>RFI Assessment</li> <li>Noise Impact Assessment</li> <li>Flicker Assessment</li> <li>Traffic Impact Assessment</li> <li>Geotechnical Assessment</li> <li>Socio-Economic assessment</li> <li>Plant Species Assessment</li> <li>Animal Species Assessment</li> </ul>
--	--

15

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Public Participation Process

**Public Participation Plan**

- A Consolidated Public Participation Process is proposed for all applications
- Formally announce project via:
  - Adverts (English and a local language in local newspaper)
  - Site notices
  - Development and maintenance of a stakeholder database
- Compilation and management of I&AP Database
- Written notification:
  - Owners and occupiers on or adjacent to the proposed project site
  - Municipality Ward Councillor
  - District Municipality
  - Relevant State Departments
- Draft Reports Review for 30 days:
  - Online on the WSP website
  - Online on a data free website
  - Hard copies placed at local libraries

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Timeframes

**Timeframes**

- Authority Timeframes (without SIP Status)
  - Authority decision making timeframe is 107 days for S&EIA
  - Authority decision making timeframe is 54 days for BA

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Discussion

**Specific Clarification**

- There are currently 4 S&EIA Applications and 4 BA Applications – would it be possible to undertake four combined Applications in terms of Regulation 11(4) for the WEF and Grid Applications and issue separate environmental authorisations in terms of Regulation 25(1) and (2) of the EIA Regulations, 2014, as amended
  - The reports will be clear as to which information is dedicated to which project
  - A summary of the applicable infrastructure and listed activities for each application can be submitted as an Appendix to the report
- Can the specialists submit combined specialist reports for each project (WEF and Grid) (4 reports instead of 8)

19

19



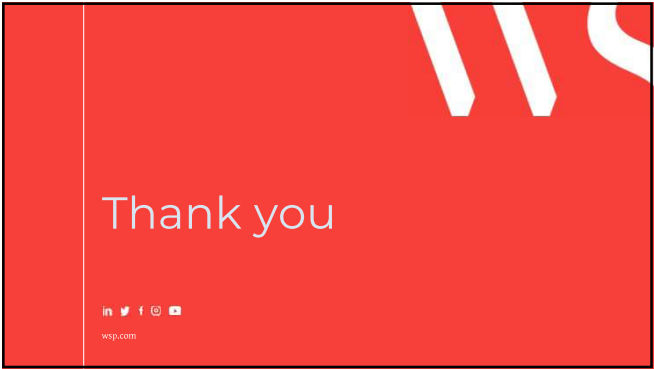
Questions



20

20





# Appendix D

## ORIGINAL COMMENTS



## Mathulwe, Tumelo

---

**From:** ZA - WSP - PPOffice  
**Sent:** Thursday, 30 January 2025 14:29  
**To:** [REDACTED]  
**Subject:** RE: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

[REDACTED]

The notification has been shared with the below and they have been added to the stakeholder database.

We look forward to your participation in this process.

Kind regards,



### Public Participation Office

T+ 27 11 361 1300

F+ 27 86 582 1561



WSP in Africa  
Building 1, Maxwell Office Park  
Magwa Crescent West  
Waterfall City  
Midrand, 1685  
P.O. Box 6001  
Halfway House  
1685

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---

**From:** [REDACTED]  
**Sent:** Wednesday, 22 January 2025 08:22  
**To:** ZA - GLD - PPOffice <gld.PP@wsp.com>  
**Subject:** Re: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

Good day

For any permit related queries, you can forward an email to the permit office;

- 
- 
- 



For Professional Hunting quiries, you can forward an email to;

- 
- 



## Mathulwe, Tumelo

---

**From:** ZA - WSP - PPOffice  
**Sent:** Thursday, 30 January 2025 14:38  
**To:** [REDACTED]  
**Subject:** RE: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE  
**Attachments:** Verkykerskop Draft EIA Layout (New Turbine Footprint).kmz

[REDACTED]

Thank you for the requirement and setback guideline documents.

As requested, please see the project kmz as requested.

Kind regards,



### Public Participation Office

T+ 27 11 361 1300

F+ 27 86 582 1561



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Building 1, Maxwell Office Park  
Magwa Crescent West  
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---

**From:** [REDACTED]  
**Sent:** Wednesday, 22 January 2025 08:47  
**To:** ZA - GLD - PPOffice <gld.PP@wsp.com>  
**Subject:** RE: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

Please send me a KMZ file of the affected properties and proposed development. Please find attached Eskom requirements as well as a setbacks guideline for RE Developments to be read in conjunction with GN R 4143.

Kind regards

**From:** ZA - GLD - PPOffice <[gld.PP@wsp.com](mailto:gld.PP@wsp.com)>

**Sent:** Wednesday, 22 January 2025 08:22

**Subject:** [CAUTION:EXTERNAL EMAIL] 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

Dear Stakeholder,

**NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE**

**NOTICE IS GIVEN IN TERMS OF:**

- Notice is given in terms of Regulation 41(2) of GNR 982 (as amended) published under section 24 and 24D of the National Environmental Management Act (No. 107 of 1998) (NEMA) (as amended) for submission of various applications for environmental authorisations (EAs) in respect of activities identified in terms of GNR 983, GNR 984 and GNR 985 (as amended).

The proponents outlined in the table below propose to establish a Wind Energy Facility (WEF) cluster, comprising various applications for environmental authorisation, near Verkykerskop in Free State. The proposed authorisations include the following Basic Assessment (BA) and Scoping and Environmental Impact Reporting (S&EIR) processes.


Proponent	Project	Technology	Process
Groothoek Wind Power (Pty) Ltd	Up to 300MW Wind Energy Facility (WEF) including associated infrastructure	Wind	S&EIR
	Up to 132kV Powerline, substation, and associated infrastructure	Transmission Line and Substation	BA
Kromhof Wind Power (Pty) Ltd	Up to 300MW WEF including associated infrastructure	Wind	S&EIR
	Up to 132kV Powerline, substation, and associated infrastructure	Transmission Line and Substation	BA
Normandien Wind Power (Pty) Ltd	Up to 300MW WEF including associated infrastructure	Wind	S&EIR
	Up to 132kV Powerline, substation, and associated infrastructure	Transmission Line and Substation	BA
Farm Names			
<div><div><ul style="list-style-type: none"><li>• Portion 0 of Farm Schoonzicht No.80</li><li>• Portion 0 of Farm Groothoek No. 89</li><li>• Portion 0 of Farm Kromdraai No. 273</li><li>• Portion 0 of Farm Kransbank No.288</li></ul></div><div><ul style="list-style-type: none"><li>• Portion 0 of Farm Puntje No. 1240</li><li>• Portion 0 and 1 of Farm Aanfield No. 253</li><li>• Portion 0, 1, 2 and 3 of Farm Ox Hoek No. 98</li><li>• Portion 0 of Farm Christina No. 90</li><li>• Portion 0 of Farm Mooiplaats No. 391</li><li>• Portion 0 of Farm Brak Krans No. 554</li></ul></div><div><ul style="list-style-type: none"><li>• Remaining Extent of the Farm Welgelukt No. 1416</li><li>• Portion 0 of Farm Inzicht No. 1428</li><li>• Portion 0 of Farm Rooibeesberg No. 14898</li><li>• Portion 1 of Farm Johanna No. 1395</li></ul></div></div>			

<ul style="list-style-type: none"> <li>• Portion 0 of Farm Kranspunt No.459</li> <li>• Portion 0 of Farm Van Kope No.1319</li> <li>• Portion 0 of Farm Leiden No. 2</li> <li>• Portion 0 of Farm Myn-Burg No. 3</li> <li>• Portion 0 of Farm Naauw Kloof No. 4</li> <li>• Portion 0 of Farm Krom Hof No. 530</li> </ul>	<ul style="list-style-type: none"> <li>• Portion 0 of Farm Rooi Koppen No. 600</li> <li>• Portion 0 of Farm Goedgeacht No. 724</li> <li>• Portion 0 of Farm Kruger Wens No.1062</li> <li>• Portion 0 of Farm Scotland No. 1238</li> <li>• Portion 0 of Farm Lusthof No.1321</li> </ul>	<ul style="list-style-type: none"> <li>• Portion 1 and Remainder of Farm Bull Hoek No. 329</li> <li>• Portion 1 of Farm Goede Hoop No. 982</li> <li>• Portion 2, 3, 4, 5 and Remainder of Farm Driekoppen No. 485</li> <li>• Remaining extent of Farm Johanna No. 1395</li> <li>• Portion 0 of Farm Markgraaff's Rest No. 478</li> </ul>
---	--	--

WSP Group Africa (Pty) Ltd (WSP) has been appointed as the Environmental Assessment Practitioner (EAP) by Mulilo Energy Holdings (Pty) Ltd to manage the to manage the respective BA and S&EIR processes. Parties wishing to formally register as stakeholders in order to offer their comment on the proposed projects are requested to forward their full contact details to the EAP at the details provided below. Registered stakeholders will be forwarded all future correspondence and notified individually of additional opportunities to participate in the processes.

#### DRAFT SCOPING REPORT REVIEW PERIOD

The Draft Scoping Report (DSR) will be made available from WSP on request and/or at the venues below for review and comment for a period of at least 30 days from **22 January 2025 to 21 February 2025**:

Name of Public Place	Address	Name of Public Place	Address	FOR MORE INFORMATION, PLEASE CONTACT:	Or scan the QR code
<b>Harrismith Library</b>	27 Murray St, Harrismith	<b>Zamani Library</b>	Eeufes St, Memel - 058 913 8300	<b>Public Participation Office; WSP Group Africa (Pty) Ltd;</b>  PO Box 6001, Halfway House, 1685; Tel: 011 254 4800; Fax: 086 582 1561 E-mail: <a href="mailto:gld.pp@wsp.com">gld.pp@wsp.com</a>	
<b>VKB Verkykerskop</b>	Between Harrismith & Memel on R722 Road - 058 625 0130	<b>Newcastle Library</b>	66 Scott St, Newcastle CBD, Newcastle - 034 328 7620		
<b>WSP Website</b>	<a href="https://www.wsp.com/en-za/services/public-documents">https://www.wsp.com/en-za/services/public-documents</a>	<b>WSP Data Free Website</b>	<a href="https://wsp-engage.com/">https://wsp-engage.com/</a>		

#### WSP contact details:

Public Participation Office; WSP Group Africa (Pty) Ltd

**Post:** PO Box 6001, Halfway House, 1685; **Tel:** 011 254 4800;

**Fax:** 086 582 1561;

**E-mail:** [gld.pp@wsp.com](mailto:gld.pp@wsp.com)

**Protection of Personal Information:** WSP will be processing certain personal information about you as an interested and affected party (I&AP) for purposes of enabling your registration as an I&AP and storing of your details on our database, if you consent for us to do so. WSP will use these details to contact you about other relevant projects in the future. WSP will always process your personal information in accordance with the

*Protection of Personal Information Act 4 of 2013. You are entitled to exercise your rights as a data subject and let us know if you wish to be deregistered as an I & AP or if you no longer want your contact details to be included on our database*

We look forward to your participation in this process.

Kind regards,



## Public Participation Office

T+ 27 11 361 1300

F+ 27 86 582 1561



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Building 1, Maxwell Office Park  
Magwa Crescent West  
Waterfall City  
Midrand, 1685  
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-LAEmHhHdzJzBITWfa4Hgs7pbKI

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## Mathulwe, Tumelo

---

**From:** ZA - WSP - PPOffice  
**Sent:** Thursday, 30 January 2025 15:02  
**To:** [REDACTED]  
**Cc:** EWT EIA Applications  
**Subject:** RE: Register as an interested and affected party for wind energy facilities in the northeastern Free State

[REDACTED]

Kindly note that you have been added to the project stakeholder database.

We look forward to your participation in the process.

Kind regards,



### Public Participation Office

T+ 27 11 361 1300

F+ 27 86 582 1561



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Building 1, Maxwell Office Park  
Magwa Crescent West  
Waterfall City  
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---

**From:** [REDACTED]  
**Sent:** Wednesday, 22 January 2025 09:28  
**To:** ZA - GLD - PPOffice <gld.PP@wsp.com>  
**Cc:** EWT EIA Applications [REDACTED]  
**Subject:** Register as an interested and affected party for wind energy facilities in the northeastern Free State

I would like to register as an interested and affected party for the following wind energy facilities in the northeastern Free State:

Groothoek Wind Power (Pty) Ltd  
Kromhof Wind Power (Pty) Ltd

**DON'T  
LET THEM  
DISAPPEAR**



In  
partnership  
with



**DONATE**

**WEBSITE**

**SUBSCRIBE**



Broad-Based Black Economic Empowerment – BBBEE Level 4 Certificate & 95% Civil Society Organisation PBO number: 930 001  
777 NPO number: 015-502 NPO IT number: IT 6247

Physical Address: 27 and 28 Austin Road, Glen Austin AH, Midrand, 1685, Gauteng, South Africa

Postal Address: Postnet Suite # 027, Postnet Suite 002, Private Bag X08, Wierda Park 0149, Gauteng, South Africa

**Mathulwe, Tumelo**

---

**From:** ZA - WSP - PPOffice  
**Sent:** Thursday, 30 January 2025 15:04  
**To:** [REDACTED]  
**Subject:** RE: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

[REDACTED]

Kindly note that your details have been updated on the stakeholder database.

We look forward to your participation in this process.

Kind regards,



**Public Participation Office**

T+ 27 11 361 1300

F+ 27 86 582 1561



WSP in Africa  
Building 1, Maxwell Office Park  
Magwa Crescent West  
Waterfall City  
Midrand, 1685  
P.O. Box 6001  
Halfway House  
1685

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---

**From:** [REDACTED]  
**Sent:** Wednesday, 22 January 2025 10:04  
**To:** ZA - GLD - PPOffice <gld.PP@wsp.com>  
**Subject:** FW: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

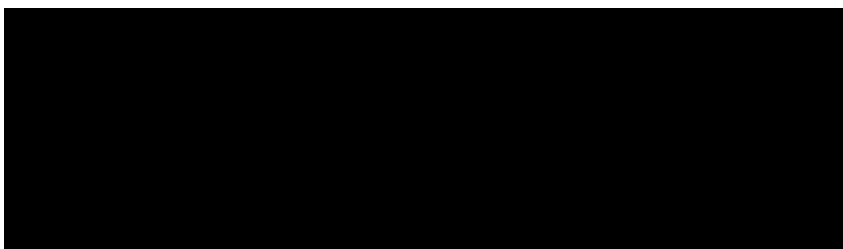
Good day

Thank you for your email.

Please register BirdLife South Africa as an I&AP.

Importantly please confirm that the relevant reports are on the website link provided, as I cannot see them my side.

Thank you  
Sam



BirdLife South Africa's Birds and Renewable Energy Project is sponsored by the Lewis Foundation and Investec Corporate and Institutional Banking

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**From:** ZA - GLD - PPOffice <[gld.PP@wsp.com](mailto:gld.PP@wsp.com)>

**Date:** Wednesday, 22 January 2025 at 08:22

**To:**

**Subject:** 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

Dear Stakeholder,

#### **NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE**

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The proponents outlined in the table below propose to establish a Wind Energy Facility (WEF) cluster, comprising various applications for environmental authorisation, near Verkykerskop in Free State. The proposed authorisations include the following Basic Assessment (BA) and Scoping and Environmental Impact Reporting (S&EIR) processes.


Proponent	Project	Technology	Process
<b>Groothoek Wind Power (Pty) Ltd</b>	Up to 300MW Wind Energy Facility (WEF) including associated infrastructure	Wind	S&EIR
	Up to 132kV Powerline, substation, and associated infrastructure	Transmission Line and Substation	BA
<b>Kromhof Wind Power (Pty) Ltd</b>	Up to 300MW WEF including associated infrastructure	Wind	S&EIR
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<b>Normandien Wind Power (Pty) Ltd</b>	Up to 300MW WEF including associated infrastructure	Wind	S&EIR
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Farm Names			
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#### DRAFT SCOPING REPORT REVIEW PERIOD

The Draft Scoping Report (DSR) will be made available from WSP on request and/or at the venues below for review and comment for a period of at least 30 days from **22 January 2025 to 21 February 2025**:

Name of Public Place	Address	Name of Public Place	Address	FOR MORE INFORMATION, PLEASE CONTACT:	Or scan the QR code
<b>Harrismith Library</b>	27 Murray St, Harrismith	<b>Zamani Library</b>	Euufees St, Memel - 058 913 8300	Public Participation Office; WSP Group Africa (Pty) Ltd;	
<b>VKB Verkykerskop</b>	Between Harrismith & Memel on R722 Road - 058 625 0130	<b>Newcastle Library</b>	66 Scott St, Newcastle CBD, Newcastle -		

			034 328 7620	PO Box 6001, Halfway House, 1685; Tel: 011 254 4800; Fax: 086 582 1561 E-mail: gld.pp@wsp.com	
<b>WSP Website</b>	<a href="https://www.wsp.com/en-za/services/public-documents">https://www.wsp.com/en-za/services/public-documents</a>	<b>WSP Data Free Website</b>	<a href="https://wsp-engage.com/">https://wsp-engage.com/</a>		

#### WSP contact details:

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**Fax:** 086 582 1561;

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We look forward to your participation in this process.

Kind regards,




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**Mathulwe, Tumelo**

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**From:** ZA - WSP - PPOffice  
**Sent:** Friday, 21 February 2025 15:02  
**To:** [REDACTED]  
**Subject:** RE: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

[REDACTED]

Thank you for your comments. They will be included in the comments and responses report.

Kind regards,

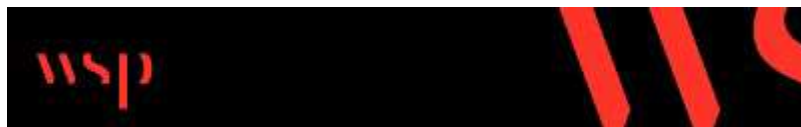
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**From:** [REDACTED]  
**Sent:** Friday, 21 February 2025 14:22  
**To:** ZA - WSP - PPOffice <PP@wsp.com>  
**Subject:** Re: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

Good Day  
Please see our comments attached.  
Kind regards

[REDACTED]

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**Date:** Wednesday, 22 January 2025 at 08:22

**To:**

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WSP Website	<a href="https://www.wsp.com/en-za/services/public-documents">https://www.wsp.com/en-za/services/public-documents</a>	WSP Data Free Website	<a href="https://wsp-engage.com/">https://wsp-engage.com/</a>		

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**wsp**



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Reg No: 001 – 298 NPO  
PBO Exemption No: 930004518

WSP Group Africa (Pty) Ltd

E-mail: [gld.pp@wsp.com](mailto:gld.pp@wsp.com)

21 February 2025

To Whom It May Concern:

**RE: DRAFT SCOPING REPORTS FOR THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, FREE STATE (I.E. GROOTHOEK, KROMHOF AND NORMANDIEN WIND ENERGY FACILITIES AND ASSOCIATION INFRASTRUCTURE)**

Thank you for the opportunity to comment on the draft Environmental Scoping Reports for the above proposed wind energy facilities (WEFs). BirdLife South Africa supports the responsible development of renewable energy infrastructure. However, **we are concerned that the location of the proposed facilities is not compatible with the desired state of the habitat**, as outlined in provincial, national, and international conservation plans. We are also concerned that the proposed WEFs could have **significant residual negative impacts** (i.e. after mitigation) on a number of threatened birds and migratory species. It is unlikely that biodiversity offsets and compensation will be effective in addressing these impacts.

*The desired state of the habitat:*

All three proposed WEFs overlap with a Key Biodiversity Area (KBA) and Critical Biodiversity Areas (CBAs), including irreplaceable CBAs, Ecological Support Areas, National Protected Area Expansion Strategy Areas, wetlands, and core habitats for threatened species. **Most of these areas should, therefore, be maintained or rehabilitated to a natural, or near natural state.**

Furthermore, there are KBAs to the south and to the east of the proposed development cluster (i.e. Eastern Free State Grassland and KZN Escarpment KBA respectively). These KBAs are both triggered by birds, which are likely to move through the landscape, and their locations should be reflected in subsequent reports.

The proposed WEFs are also close to the Sneeuwberg Protected Environment (PE). A request has recently been submitted to declare additional properties as part of this PE, specifically in the area between the existing PE and the proposed WEFs.

Similarly, the WEFs are near the Upper Wilge PE, with the Normandien site located approximately 10 km from this protected area.

A further gap is that the scoping reports fail to mention the Free State Protected Area Expansion Strategy. We suggest that this should be indicated in the final Scoping and EIA Reports.

---

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### *Risk of significant residual negative impacts*

With regards to impacts on birds, BirdLife South Africa is deeply concerned about the proposed wind energy facility (WEF) sites, as all three locations contain and border critical bird habitats. These areas support breeding and foraging grounds, as well as flight corridors for numerous species of conservation concern. Several threatened species, including Endangered and Critically Endangered species, rely on these habitats for survival.

While we understand the proposed “optimised” layouts are preliminary, we are extremely concerned that **proposed roads and turbines overlap with areas identified as high sensitivity** and recommended for avoidance.

We are particularly concerned by the risks of habitat loss, fragmentation, disturbance, and species displacement, especially for species that have specific habitat requirements. Furthermore, there is a significant collision risk for both resident and migratory birds. The proximity of the Normandium site to the Great Escarpment is especially alarming, as this area serves as a migratory corridor where flocks of global significance move through and would face a high risk of turbine collisions, including mass mortalities. Some migratory species, for example Amur Falcon, have already suffered high mortality rates at operational WEFs in South Africa. Altitudinal migrants such as Denham’s Bustard may also be affected.

**Given these concerns, we urge the applicant to withdraw these applications and investigate alternative locations that present a lower risk to biodiversity.** The following, more detailed comments and recommendations should in no way be seen as a BirdLife South Africa support further consideration of these sites for WEF development.

#### *Habitat condition - mining:*

According to the Terrestrial and Aquatic Biodiversity Scoping Report(s), the area is described as “*ecologically stressed due to anthropogenic impacts such as agriculture and mining.*” Additionally, Table 8-1 of the Scoping Report(s) states: “*Limit vegetation removal to the infrastructure and mining footprint area only.*” As far as we are aware, there is no mining in the area. This should be clarified or corrected in the final Scoping and EIA Reports.

#### *Habitat condition - crops and wetlands*

The Aquatic Biodiversity Scoping Report(s) indicate that the wetlands in the area were previously part of a larger wetland system, have been damaged by agricultural activities. However, this does not mean that these habitats are of low conservation value.

The draft Scoping Report(s) are also inconsistent about the degree to which the habitat has been transformed. For example section 6.2.4.4 for Kromhof WEF states that the “*Project area is situated in a largely untransformed landscape, interspersed by low density cultivated fields, pastures and occasional exotic tree plantations, from which a low level of impact has occurred through habitat transformation*”, while Table 8-1 states that “*(m)ost of the project area is however transformed*”. Similar ambiguity occurs in the draft Scoping Report for Groothoek. It may be more accurate to describe the environment as largely intact grassland, with some parts degraded and/or converted to croplands.

It is also important to bear in mind that despite their transformed state, croplands remain important habitat for birds. Their conservation value should not be discounted. For example, crops may be overwintering grounds for Endangered Botha's Lark and they are important foraging habitat for cranes during the winter. Cranes are likely feed in the croplands and to roost and breed in the remaining wetlands. These birds may move between these two habitats and face a risk of turbine collisions.

#### *Data collection and modelling:*

Given the sensitivity of the receiving environment, BirdLife South Africa welcomes that two years of bird data has been collected. It is a pity that these data (i.e. from November 2023 to October 2024) were not presented in the Avifaunal Scoping Report(s) dated January 2025. This would have afforded us an opportunity to engage in more detail.

We are, however, surprised that, **given the outcome of the first year of monitoring, the applicant chose to continue investing in bird studies, despite the obvious red flags to development.** Had we been consulted, BirdLife South Africa's recommendation would have been to investigate more suitable locations for WEF development (site alternatives).

While we generally support more robust data analysis and acknowledge that refined habitat suitability modelling and collision-risk modelling will be undertaken, we are concerned that there is **already sufficient information to indicate that the sites are unsuitable for wind energy development.** Additional studies are only likely to confirm this. At best, further studies may help marginally reduce the potential significance of impacts, but it is unlikely that this reduction will be significant enough to reduce impacts to acceptable levels.

#### *Limitations in data collection*

While we note that the data presented thus far is preliminary, the following limitations have been noted:

- a) The Avifaunal Scoping Report(s) (Section 2.2.4) indicate that focal point surveys were conducted at the *same time each survey*. We assume these surveys were timed to maximise the detection probability of the target species, but suggest that should be clarified.
- b) With regards to the Kromhok site, we are concerned that the intact grassland on the plateau north of Vantage Point 5 on the appears to have been poorly surveyed (see Figures 2-2 and 2-4).
- c) The southern part of Kromhof, between GPS coordinates number 33, 34 and 70 in Figure 3-1 of the Scoping Report, was also not included the avifaunal specialist report, although roads are proposed in this area.
- d) The southern section of the proposed Normandien WEF was also not well surveyed. There was only one walked transect there, and no point counts. This is the largest section of CBA1 in the proposed WEF (Figure 3-1), and has lots of potentially suitable habitat for Yellow-breasted Pipit and several other priority species (Figure 3-3 and 3-4).
- e) The northern arm of the proposed Goothoek WEF also not surveyed.

While the terrain and access might be challenging, a lack of data should not be translated into a low assessed sensitivity. We trust that the next phase of the assessment will include more robust delineation and verification of avifaunal habitats in all areas where turbines and associated

infrastructure have been proposed. We strongly urge that a precautionary approach is adopted, taking into account the limitations of available data and likelihood of interannual variation.

### *Site Ecological Importance*

We strongly recommend that approach of assessing Site Ecological Importance, as outlined in SANBI's Species Environmental Assessment Guidelines should be used. This helps ensure a consistent recommendation across different proposed developments.

### *High to very high avifaunal sensitivity not clearly reflected in the Scoping Reports*

**We are concerned that the overall high to very high avifaunal sensitivity has not been clearly reflected in the Scoping Reports and associated maps.** For example, the consolidated sensitivity maps presented in the Scoping Reports omit to show the buffer for Cape Vultures, although this defined as high sensitivity. It is also not clear why the preliminary sensitivity maps in the avifaunal report (Figures 5-2) were not included in the draft Scoping Report, but kernel density maps were (Figure 6-16). The latter presents an incomplete indication of the avifaunal sensitivity.

### *Significance*

It would be helpful if the methodology and rationale for the preliminary significance rating presented in the Avifaunal Screening Report(s) were provided in more detail. For example, we are of the opinion that, if a site includes a large portion of suitable habitat for high-altitude threatened endemic species like Yellow-breasted Pipit (Vulnerable) and Rudd's Lark (Endangered), and the species have been confirmed breeding at this location, the loss and fragmentation of habitat could be of Very High significance. As the specialist notes: "*Even relatively small habitat losses or alterations in these areas could have a significant impact on these highly range restricted and rare habitat specialists.*" These species are triggering species for the KBA.

Similarly, the record of Botha's Lark at the proposed Normandien WEF is highly noteworthy, given the dire status of this species.

### *Unreasonable comparisons*

The Scoping Reports (e.g. P 159-160 for Groothoek) compare the loss of habitat to that of other developments (e.g. solar farms). This is not very helpful, unless a solar farm is a realistic alternative that will be assessed in the EIA process.

### *Loss and fragmentation of CBAs*

BirdLife South Africa does not support the loss and fragmentation of habitat, and therefore the development of wind energy and associated infrastructure, within CBAs. CBAs represent the most efficient network needed to meet biodiversity targets. Irreplaceable CBAs are the *only* place available to meet these targets. In addition to the loss, degradation and fragmentation of habitats, plus the likely fatalities of birds and bats, WEFs can result in a number of sub-lethal impacts that may negatively affect the functioning of ecosystems and the delivery of ecosystem services (e.g. changes in microclimate and trophic cascades). We do not, therefore, believe that WEFs are compatible with conservation objectives of CBAs, unless those WEFs will result in the restoration of degraded habitats.



*Botha's Lark, Rudd's Lark and Yellow-breasted Pipit:*

The proposed wind energy farm development in Verkykerskop presents a serious threat to several highly sensitive and endangered grassland bird species, particularly Botha's Lark (*Spizocorys fringillaris*), Rudd's Lark (*Heteromirafr ruddi*), and Yellow-breasted Pipit (*Anthus chloris*).

Habitat suitability models indicate that the entire Verkykerskop area, including all three proposed WEF, is unsuitable for wind energy development, as it consistently ranks as high-priority habitat for these species. The presence of these threatened birds underscores the ecological significance of this site and the need for its protection.

The Normandien Wind Energy Facility (WEF) is particularly concerning, as data from the past two years confirm the presence of Botha's Lark and Rudd's Lark within the project area, reinforcing the area's importance as a stronghold for this highly localized species. With an estimated global population of only 340 individuals, the loss of habitat in this region would be devastating. The repeated observations of Rudd's Lark, another range-restricted and highly threatened species, further highlight the **critical need to safeguard this site from development**.

The scoping report for the project explicitly acknowledges the threats posed to these species, yet the proposed development continues to move forward despite these risks. This raises serious concerns about the adequacy of mitigation measures and the overall suitability of the site for wind energy infrastructure. Given that **Botha's Lark is extremely sensitive to disturbance** and avoids modified landscapes, even minor habitat alterations could have significant negative consequences for the species.

The construction of roads, turbine infrastructure, and maintenance activities will fragment and degrade this fragile grassland ecosystem, reducing available habitat and likely displacing already dwindling populations. Wind turbines also introduce the risk of direct collisions, further endangering species already facing steep declines. The cumulative impact of infrastructure expansion and habitat alteration in this critical area could accelerate the decline of Botha's Lark, Rudd's Lark, and Yellow-breasted Pipit, pushing them closer to extinction.

These species are habitat specialists and tend to be restricted to small patches of intact, high rainfall, plateau grasslands. While restricted to specific habitats, these species may also have minimum thresholds for habitat size and may not occupy patches reduced by habitat loss or fragmentation. **We therefore do not support the construction or expansion of roads and other infrastructure in habitat for these species.**

The avifaunal specialist regards the "*destruction of nestlings of ground-nesting species during access road construction*" as low significance. We suggest that this needs to be revisited. Nests of some endemic species (e.g. Yellow-breasted Pipit and Denham's Bustard) are exceptionally difficult to find, and impacts will be difficult to mitigate during construction. Signage and induction are not likely to be adequate and stopping construction during the summer months is unlikely to be feasible (species such as Rudd's Lark and Yellow-breasted Pipit that breed throughout summer). It is unclear if displaced birds will return to the site after construction.

Similarly, the scoping report(s) suggest that mitigation for sensory disturbances could include limiting construction to areas and times outside of breeding seasons for birds. This would include the majority

of spring and summer months, and given the presence of ground nesting, threatened, grassland endemics, some of which were recorded during the surveys, would also include large territories in intact grassland. Is this considered feasible by the applicant?

### *Impacts on wetlands*

The project area has been assessed as having High sensitivity due to its proximity to significant aquatic features, specifically a National Freshwater Ecosystem Priority Areas (NFEPA) wetland cluster and rivers in good ecological condition within 500 m of the project boundary. These aquatic ecosystems warrant particular conservation attention, as estuaries and wetlands represent South Africa's most threatened and least protected ecosystem types (Skowno *et al.*, 2019<sup>[1]</sup>). Their limited spatial extent makes them inherently more vulnerable to ecological collapse compared to larger, more widely distributed ecosystems.

Although the wetlands are located on the outskirts of the proposed WEF sites, their proximity and the area's topography raise significant concerns. The placement of WEF infrastructure and roads above these wetlands may lead to sedimentation and erosion, both during construction and throughout operations. Additionally, spillages and other sources of pollution could negatively impact these largely natural freshwater systems and the species they support, including the potentially White-winged Flufftail (Critically Endangered).

The proposed mitigation measures for habitat loss and alteration of wetlands are insufficient as they fail to consider impacts at the catchment scale. While direct modifications to wetlands are addressed, the measures do not account for indirect effects from broader catchment-level changes that could significantly alter or degrade wetland ecosystems. Changes to hydrology, sedimentation patterns, and water quality within the wider catchment area have the potential to adversely impact wetland persistence and ecological function, even when the wetlands themselves are not directly modified.

Wetlands are highly sensitive to disturbance. If they are affected during construction, the impacts could persist through the operational phase and even into decommissioning, when turbine removal may result in similar disturbances as those experienced during construction.

The wetlands potentially affected by the proposed developments may be stop-over sites for migrants transitioning through the landscape. We therefore recommend that tracking data should be acquired from past studies/literature to identify which migrants are using this area and when. Alternatively, other methods (e.g., radar or tracking studies) should be included in the plan of study for impact assessment to assess the risk to migratory birds.

### *White-winged Flufftail:*

The report identifies extensive sedge-dominated habitat suitable for White-winged Flufftail (WwF), though this habitat faces potential disruption due to inundation from a recently constructed large dam. The full impact of the dam on habitat availability cannot be determined for several years, as seasonal variations in water levels will influence the extent and quality of suitable wetlands.

The reports note documented WwF populations both north and south of the proposed Wind Energy Facility (WEF). This spatial distribution suggests the WEF site may intersect a potential migration corridor between these populations. We endorse the recommendation to engage an avian specialist



to conduct comprehensive habitat modeling and acoustic monitoring. To ensure robust data collection, we recommend this assessment be conducted across multiple seasons, encompassing both drought and high-rainfall periods.

#### *Recommendations for spatial avoidance and buffers:*

While we understand that the data presented is preliminary, we suggest that “industry best practice” is not a good rationale for the buffers presented in Table 5-1 of the Avifaunal Report(s). We suggest that data should be presented to justify the recommendations, and it should be clear whose expert opinion these recommendations are based on.

It is not clear what the basis was for suggesting that “intensive mitigation” is appropriate in the second tier of proposed buffers. BirdLife South Africa’s approach is to recommend “no go” buffers and “precautionary buffers”, with the understanding that robust data collection can be used to refine site-specific *avoidance* and mitigation recommendations within the latter. We suggest that it was premature for the specialist to suggest mitigation may be appropriate within these areas.

#### *Verreaux’s Eagle:*

In the absence of two years of data collection, or the use of the Verreaux’s Eagle Risk Assessment (VERA) model, BirdLife South Africa recommends a buffer of 5.2 km around Verreaux’s Eagle nest (see the *second edition* of BirdLife South Africa’s *Guidelines for Verreaux’s Eagle and Wind Farms* (2021)<sup>1</sup>. This precautionary buffer is missing from Table 5-1 of the Avifaunal Scoping Report(s). This should be corrected.

#### *Secretarybird:*

Please refer to BirdLife South Africa's Guidance note for minimising the impacts of infrastructure development on Secretarybirds<sup>1</sup>. In addition to the avoidance of nests buffer, we recommend a habitat-based approach - i.e. the **avoidance the loss of large, contiguous habitat**. This recommendation is not reflected in the Scoping Reports.

#### *Bearded Vulture:*

The Avifaunal Scoping Report(s) also incorrectly states: “... following the COVID 19 pandemic, the nest has not been comprehensively monitored.” BirdLife South Africa monitors this nest annually on behalf of the Bearded Vulture Task Force. Following a period where no birds were present, they have returned in recent years (est. around 2021 or 2022) and have shown definite breeding behaviour even though a specific nest could not be located. Carina Pienaar has also recorded a Bearded Vulture feeding near the Witkoppe mountain, and landowners have reported them recently more and more

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<sup>1</sup> Available at <https://www.birdlife.org.za/what-we-do/policy-and-advocacy/what-we-do/birds-renewable-energy/>

[1] Skowno, A.L., Poole, C.J., Raimondo, D.C., Sink, K.J., Van Deventer, H., Van Niekerk, L., Harris, L.R., Smith-Adao, L.B., Tolley, K.A., Zengeya, T.A., Foden, W.B., Midgley, G.F. & Driver, A. 2019. *National Biodiversity Assessment 2018: The status of South Africa’s ecosystems and biodiversity. Synthesis Report*. South African National Biodiversity Institute & Department of Environment, Forestry and Fisheries.

throughout the AOI all the way from Nelsonskop to Memel, suggesting that it is likely that likelihood of Bearded Vulture will flying in the Verkykerskop Cluster.

Reid et al. (2015) developed a collision risk model for Bearded Vulture which takes into account topography and may assist in developing a site specific indication of areas recommended for avoidance than the circular buffers used in the Scoping Report. This model is available through Prof. Amar at the Percy Fitzpatrick Institute at the University of Cape Town.

#### *Cape Vulture:*

A Cape Vulture occupancy model (Cervantes et al.2023) is also available to support avoidance recommendations, and would provide a more nuanced indication of the collision risk compared to the limited buffers used in Table 5-1. The National Environmental Screening Tool includes a simplified version of this model, and indicates that the area is of *high sensitivity*. Fatality monitoring at WEFs elsewhere in South Africa suggests that fatalities of Cape Vulture are very likely within this sensitivity class, including at WEFs with livestock carcass management and observer-led shutdown on demand in place.

Furthermore, while we understand that the reports present just one year of survey data, please note that the number of Cape Vultures breeding at Nelsonskop has increased to an estimated 7 nests (based on expert input received from Sonja Krueger and Brent Coverdale (Ezemvelo KZN Wildlife) during a visit in November 2024).

The Avifaunal Scoping Report indicates that the applicant, *“Mulilo will be initiating a carcass management project within the project area in collaboration with the local landowners and their staff”* with the intention of recording any changes in vulture attendance. BirdLife South Africa recognises that Livestock Carcass Management may be a useful mitigation measure at operational wind farms, but the ethics of implementing this strategy at *proposed* facilities warrant serious consideration. South Africa’s Multi-Species Biodiversity Management Plan for Vultures lists food availability as secondary threat to Cape and Bearded vultures. No details about this management approach were provided, and it unclear if the intention is to move carcasses to another location or remove them.

#### *Core habitat of threatened raptors (slopes >20%):*

We support the avoidance of slopes greater than 20%, and recommend that these areas should be buffered – birds are not likely to be restricted to those slopes. Turbine blades also should not be permitted to extend into these buffers.

#### *Connectivity between habitats:*

In addition to buffering roosts and breeding sites, habitats for threatened species (including high altitude grassland and wetlands) should be buffered and connectivity modelling undertaken to reduce the risk of disturbance, displacement and collisions of birds moving to and from these areas. We assume this work will be undertaken by AfriAvian and presented in the next report.

#### *Flight corridors:*

We assume the “flight corridors” (Figures 5-1) were delineated based on the flight density models presented in the avifaunal reports, but it is unclear how the thresholds were set to delimit these areas.

We understand that these figures will be updated in the next phase of the assessment, and suggest that further details be provided.

Based on a visual comparison of the flight density model in Figure 4-17, and the “flight corridors” in Figure 5-1, it seems that the western flight corridor may be missing from the latter figure for Kromhof. Please clarify.

#### *Powerline collisions*

Quarterly monitoring at Ingula Nature Reserve can be used to help assess the likely significance of powerline collisions, after mitigation. An average of 5 priority threatened species (e.g. Cape Vulture, cranes, Denham’s Bustard) are killed by collision per annum along the Ingula-Majuba 400kV line, which traverses a similar habitat type, land use, and avifaunal species composition.

The undulating landscape and frequent misty/rainy conditions of the Eastern Free State, contribute to high powerline collision rates for birds, even when the lines are marked with conventional flappers or alternating black/white pigtales. Increased wind speeds during winter, when mist/rain are less likely, makes manoeuvrability for large species like cranes more difficult.

In light of the above, we question the finding in the Scoping Report(s) that the significance of the impacts from roadkill/other mortalities, and from sensory disturbances during construction will be low (Table 8-4).

#### *Mitigation (collision risk):*

Even if the proposed layouts are further “optimised” and significant efforts are made to avoid important habitats and flight corridors, BirdLife South Africa remains concerned that effectively mitigating the impacts on bird species to acceptable levels may not be possible or feasible.

Observer-led shut down-on-demand (SDoD) and livestock food management may help reduce impacts on large bodied raptors, these measures have not been effective in *eliminating* the risk of fatalities in South Africa. In light of the high passage rates of species of conservation concern, we are concerned that the residual fatality rate (after mitigation) on large bodied birds may not be sustainable, even under ideal conditions. The effectiveness of shutdown on demand (observer-lead and camera assisted) will, however, be compromised by the frequent misty/cloudy conditions and low visibility experienced in summer. In winter, the challenging weather is likely to further hinder observer-led SDoD.

Importantly, SDoD is unlikely to be effective for small-bodied species (e.g. White-winged Flufftail, Rudd’s and Botha’s Lark, Yellow-breasted Pipit) or night-flying birds. There is also insufficient data about the temporal movement patterns of these species inform a robust “temporal avoidance” or curtailment strategy.

In short, although we acknowledge the list of mitigation measures proposed, which includes a contingency budget “to cater for significant mortality events”, tracking studies, and a Biodiversity Management Plan, but **we are unconvinced that it will be possible or feasible reduce impacts to acceptable levels.**

## Offsets

We note that biodiversity offsets for the loss of have been proposed as “mitigation” for the loss of habitat for range-restricted grassland species. However, we are concerned that

- 1) Opportunities to avoid and minimise impacts have not been thoroughly exhausted.
- 2) It has not been demonstrated that it will be possible or feasible to effectively offset (or compensate) the loss of habitat. We are concerned that effective offsetting will be very difficult to achieve for habitat specialists that occur in very small ranges and are already threatened.

While a robust policy framework for offsetting fatalities of threatened species is not available in South Africa, should development proceed (against BirdLife South Africa’s recommendations), we suggest that compensation or offsets for fatalities will be required.

## Biodiversity Stewardship

BirdLife South Africa encourages WEFs to contribute to the protection and rehabilitation of biodiversity in and around their sites. However, this can be complicated by the fact that WEFs are typically not the landowners. It is therefore essential that the applicant demonstrates that they have secured the necessary agreements needed for measures proposed in the EIA to be implemented, including Biodiversity Stewardship.

The feasibility of using Biodiversity Stewardship as a mitigation strategy must also be carefully considered. WEFs and Biodiversity Stewardship can only coexist if the development does not compromise the reasons for designating the site as a Protected Environment. Given that such declarations often aim to safeguard pristine grasslands, wetlands, and the diverse populations of threatened bird species—including high-altitude grassland endemics, vultures, and cranes—the establishment of a WEF in these areas may well conflict with the conservation objectives.

## Cumulative impact assessment

We support the proposal to extend the area considered in the cumulative impact assessment beyond the minimum 30km radius recommended by DFFE. However, we suggest that, in the context of bird fatalities and loss of habitat of range-restricted endemics, it would be appropriate extend the cumulative impact assessments to a more biologically meaningful scale (e.g. the affected population). We recommend consulting IUCN’s recently released *Guidance on biodiversity cumulative impact assessment for wind and solar developments and associated infrastructure*<sup>2</sup>.

## Conclusion

Should the applicant wish continue with the EIA processes despite the substantial concerns, we urge that:

- a) a more robust avoidance strategy is implemented, based on the outcome additional avifaunal studies and taking into consideration our above recommendations;
- b) the applicant confirms that the all the proposed mitigation measures are considered feasible (including temporal curtailment of wind turbines);

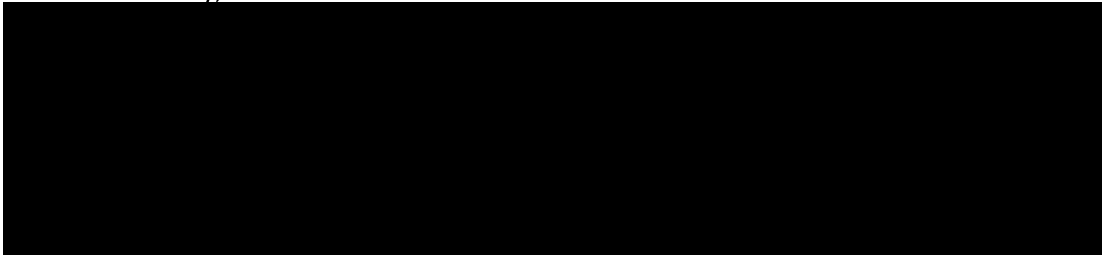
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<sup>2</sup> Available at: <https://iucn.org/resources/jointly-published/guidance-biodiversity-cumulative-impact-assessment-wind-and-solar>

- c) that necessary landowner agreements are in place to allow for monitoring and mitigation for the duration of impacts;
- d) a robust biodiversity offset and compensation strategy is developed, and it is confirmed that it will be possible and feasible to reduce the residual impacts on birds to sustainable levels; and
- e) compliance with commitments to monitor, mitigate and offset impacts on birds are audited by an independent expert annually, with consequences for non-compliance.

Please note that, despite the above recommendations, **BirdLife South Africa does not support the proposed developments.**

Yours sincerely,



## Mathulwe, Tumelo

---

**From:** ZA - WSP - PPOffice  
**Sent:** Thursday, 30 January 2025 15:08  
**To:** [REDACTED]  
**Subject:** RE: Register me as I & AP for the Verkykerskop Wind Energy Cluster

[REDACTED]

Kindly note that you have been added to the project stakeholder database.

We look forward to your participation in the process.

Kind regards,



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**From:** [REDACTED]  
**Sent:** Wednesday, 22 January 2025 10:10  
**To:** ZA - GLD - PPOffice <gld.PP@wsp.com>  
**Subject:** Register me as I & AP for the Verkykerskop Wind Energy Cluster

Good day,

I hope you are well.

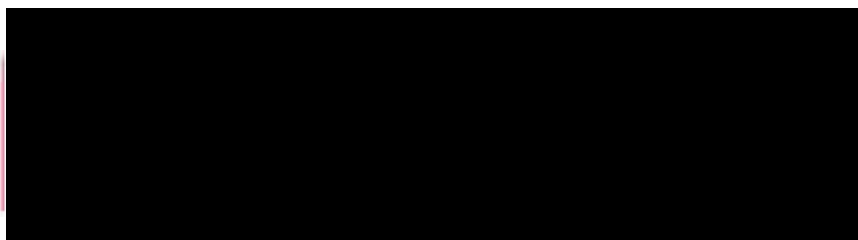
Please Register me as I & AP for the Verkykerkop Wind Energy Facility Cluster.

Please send me the link to the documents as well.

Please send me a confirmation for the registration.

Best Regards

--



## Mathulwe, Tumelo

---

**From:** ZA - WSP - PPOffice  
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**To:** Personal Details have been redacted as required by the POPI Act  
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**Subject:** RE: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

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Please find the documents at the following link: [Verkykerskop Wind Energy Cluster - Draft Scoping Reports](#)

Additionally, the reports can be accessed on the following websites: <https://www.wsp.com/en-za/services/public-documents> and <https://wsp-engage.com/>

Kindly note that those in copy have been added to the project database.

Kind regards,



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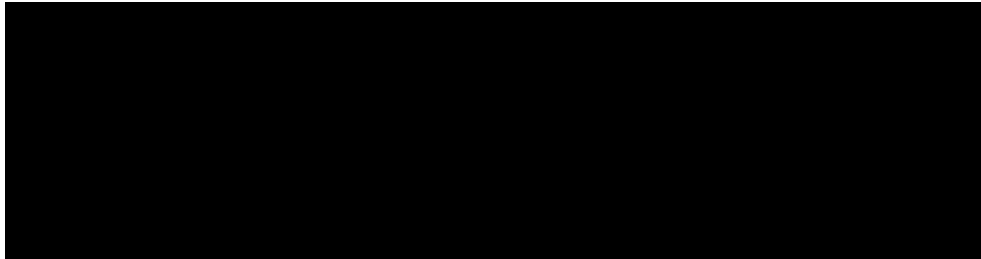
**From:** Personal Details have been redacted as required by the POPI Act  
**Sent:** Wednesday, 22 January 2025 12:15  
**To:** ZA - GLD - PPOffice <gld.pp@wsp.com>  
**Cc:** Personal Details have been redacted as required by the POPI Act  
**Subject:** RE: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

Greetings



Kindly send us the documents for our comments.

Kind regards,



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**Sent:** Wednesday, 22 January 2025 08:25

**Subject:** 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

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Dear Commenting Authorities,

**NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE**

**NOTICE IS GIVEN IN TERMS OF:**

- Notice is given in terms of Regulation 41(2) of GNR 982 (as amended) published under section 24 and 24D of the National Environmental Management Act (No. 107 of 1998) (NEMA) (as amended) for submission of various applications for environmental authorisations (EAs) in respect of activities identified in terms of GNR 983, GNR 984 and GNR 985 (as amended).

The proponents outlined in the table below propose to establish a Wind Energy Facility (WEF) cluster, comprising various applications for environmental authorisation, near Verkykerskop in Free State. The proposed authorisations include the following Basic Assessment (BA) and Scoping and Environmental Impact Reporting (S&EIR) processes.

Proponent	Project	Technology	Process
Groothoek Wind Power (Pty) Ltd	Up to 300MW Wind Energy Facility (WEF) including associated infrastructure	Wind	S&EIR
	Up to 132kV Powerline, substation, and associated infrastructure	Transmission Line and Substation	BA
	Up to 300MW WEF including associated infrastructure	Wind	S&EIR

<b>Kromhof Wind Power (Pty) Ltd</b>	Up to 132kV Powerline, substation, and associated infrastructure	Transmission Line and Substation	BA
<b>Normandien Wind Power (Pty) Ltd</b>	Up to 300MW WEF including associated infrastructure	Wind	S&EIR
	Up to 132kV Powerline, substation, and associated infrastructure	Transmission Line and Substation	BA
<b>Farm Names</b>			
<ul style="list-style-type: none"> <li>• Portion 0 of Farm Schoonzicht No.80</li> <li>• Portion 0 of Farm Groothoek No. 89</li> <li>• Portion 0 of Farm Kromdraai No. 273</li> <li>• Portion 0 of Farm Kransbank No.288</li> <li>• Portion 0 of Farm Kranspunt No.459</li> <li>• Portion 0 of Farm Van Kope No.1319</li> <li>• Portion 0 of Farm Leiden No. 2</li> <li>• Portion 0 of Farm Myn-Burg No. 3</li> <li>• Portion 0 of Farm Naauw Kloof No. 4</li> <li>• Portion 0 of Farm Krom Hof No. 530</li> </ul>	<ul style="list-style-type: none"> <li>• Portion 0 of Farm Puntje No. 1240</li> <li>• Portion 0 and 1 of Farm Aanfield No. 253</li> <li>• Portion 0, 1, 2 and 3 of Farm Ox Hoek No. 98</li> <li>• Portion 0 of Farm Christina No. 90</li> <li>• Portion 0 of Farm Mooiplaats No. 391</li> <li>• Portion 0 of Farm Brak Krans No. 554</li> <li>• Portion 0 of Farm Rooi Koppen No. 600</li> <li>• Portion 0 of Farm Goedgedacht No. 724</li> <li>• Portion 0 of Farm Kruger Wens No.1062</li> <li>• Portion 0 of Farm Scotland No. 1238</li> <li>• Portion 0 of Farm Lusthof No.1321</li> </ul>	<ul style="list-style-type: none"> <li>• Remaining Extent of the Farm Welgelukt No. 1416</li> <li>• Portion 0 of Farm Inzicht No. 1428</li> <li>• Portion 0 of Farm Rooibeesberg No. 14898</li> <li>• Portion 1 of Farm Johanna No. 1395</li> <li>• Portion 1 and Remainder of Farm Bull Hoek No. 329</li> <li>• Portion 1 of Farm Goede Hoop No. 982</li> <li>• Portion 2, 3, 4, 5 and Remainder of Farm Driekoppen No. 485</li> <li>• Remaining extent of Farm Johanna No. 1395</li> <li>• Portion 0 of Farm Markgraaff's Rest No. 478</li> </ul>	

WSP Group Africa (Pty) Ltd (WSP) has been appointed as the Environmental Assessment Practitioner (EAP) by Mulilo Energy Holdings (Pty) Ltd to manage the to manage the respective BA and S&EIR processes. Parties wishing to formally register as stakeholders in order to offer their comment on the proposed projects are requested to forward their full contact details to the EAP at the details provided below. Registered stakeholders will be forwarded all future correspondence and notified individually of additional opportunities to participate in the processes.

#### DRAFT SCOPING REPORT REVIEW PERIOD

The Draft Scoping Report (DSR) will be made available from WSP on request and/or at the venues below for review and comment for a period of at least 30 days from **22 January 2025 to 21 February 2025**:

Name of Public Place	Address	Name of Public Place	Address	FOR MORE INFORMATION, PLEASE CONTACT:	Or scan the QR code
<b>Harrismith Library</b>	27 Murray St, Harrismith	<b>Zamani Library</b>	Euufes St, Memel - 058 913 8300	Public Participation Office; WSP Group Africa (Pty) Ltd;	
<b>VKB Verkykerskop</b>	Between Harrismith & Memel on R722 Road - 058 625 0130	<b>Newcastle Library</b>	66 Scott St, Newcastle CBD, Newcastle - 034 328 7620		

<b>WSP Website</b>	<a href="https://www.wsp.com/en-za/services/public-documents">https://www.wsp.com/en-za/services/public-documents</a>	<b>WSP Data Free Website</b>	<a href="https://wsp-engage.com/">https://wsp-engage.com/</a>	PO Box 6001, Halfway House, 1685; Tel: 011 254 4800; Fax: 086 582 1561 E-mail: <a href="mailto:gld.pp@wsp.com">gld.pp@wsp.com</a>
<b>OneDrive Link</b>	<input type="checkbox"/> <a href="#">Verkykerskop Wind Energy Cluster - Draft Scoping Reports</a>			



#### WSP contact details:

Public Participation Office; WSP Group Africa (Pty) Ltd

**Post:** PO Box 6001, Halfway House, 1685; **Tel:** 011 254 4800;

**Fax:** 086 582 1561;

**E-mail:** [gld.pp@wsp.com](mailto:gld.pp@wsp.com)

**Protection of Personal Information:** WSP will be processing certain personal information about you as an interested and affected party (I&AP) for purposes of enabling your registration as an I&AP and storing of your details on our database, if you consent for us to do so. WSP will use these details to contact you about other relevant projects in the future. WSP will always process your personal information in accordance with the Protection of Personal Information Act 4 of 2013. You are entitled to exercise your rights as a data subject and let us know if you wish to be deregistered as an I & AP or if you no longer want your contact details to be included on our database

We look forward to your participation in this process.

Kind regards,



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## Mathulwe, Tumelo

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**From:** ZA - WSP - PPOffice  
**Sent:** Thursday, 30 January 2025 15:32  
**To:** [REDACTED]  
**Cc:** ZA - WSP - PPOffice  
**Subject:** RE: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

[REDACTED]

Your comments have been received and will be incorporated into the project comments and responses report.

Kind regards,



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WSP Group Africa (Pty) Ltd, Registered Office: Building C, Knightsbridge, 33 Sloane Street, Bryanston, 2191, South Africa Registered Number: 1999/008928/07 South Africa

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**From:** [REDACTED]  
**Sent:** Wednesday, 22 January 2025 13:51  
**To:** ZA - GLD - PPOffice <gld.PP@wsp.com>  
**Subject:** RE: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

Good afternoon WSP Group Africa

Thank you for contacting WESSA for comments on these three EIA applications.

WESSA supports the development of renewable energy power installations, as a cleaner alternative to the burning of fossil fuels. In balancing the positives and negatives of this technology, WESSA is satisfied that

wind power plants are a much cleaner power generating technology than carbon-based energy extraction. But wind energy facilities (WEFs) do have a few negatives that need to be considered and mitigated, namely:

#### **Land-use issues:**

WESSA recommends that WEFs are only sited at lower-quality locations such as brownfields, abandoned mining land, or existing transportation and transmission corridors. Greenfield sites should be avoided.

The EIA should consider assessing the impact of this large-scale solar facility on the receiving land's diversity and abundance of native pollinator insects, birds, and bats. The EIA should also develop technologies and methodologies to better monitor and understand interactions between large-scale wind facilities and avifauna species, as well as mitigate any currently known and later identified impacts.

Understanding that vegetation around and under the turbines needs to be managed for fire risk, WESSA recommends very careful management of the site vegetation, so as to prevent erosion, alien invasive plant infestation and loss of local biodiversity.

The impacts of the service roads, pipelines and electricity lines need to be also carefully considered as part of the project. For instance, while the power plant infrastructure may have minimal impacts, the installation of a connecting powerline across a wetland or known (large) bird flightpath may cause severe environmental harm.

#### **Water-use:**

WESSA recognises that the power plant infrastructure and facilities may periodically need to be cleaned with water. We are concerned about where this water will be sourced, and what impact that this will have; as well as to the cumulative impact of whatever cleaning chemicals are used on the receiving environment? Can rainwater be collected for use for cleaning instead? Can water and chemical use be limited by alternative, less impactful methods (such as air-hosing?)

#### **Birds Mortality:**

*Mortality through birds' collision with turbines blades or transmission lines.*

The developments of wind energy affect birds through direct mortality and through habitat loss and degradation. High mortality rate of birds has been recorded due to the development of wind farms and thus this poses a threat to wildlife species. The birds can be injured or get killed when they collide with the rotating wind blade due to changes in air pressure caused by the spinning turbines, as well as from habitat disruption. Birds flying in the turbine rotor swept zone are potentially at risk of collision and serious injury or death. Birds can collide with the earth wire of transmission lines which are thin and hard to see and thus leads to birds being killed or injured.

*Mortality through electrocution on distribution lines.*

Raptors and other large perching birds are the greatest threat from electrocution at the pylons of wind farm-associated powerlines. Electrocution rates at the pylons of low- or medium-voltage lines can be high and disproportionately affect some species that use pylons of low-voltage lines as perches when hunting or for nesting. Some of these birds that are at risk due to wind turbines collision and electrocution are the Southern African martial eagle, black harrier, Ludwig's bustard, blue crane and Verreaux's eagle.

*Barrier effects to migratory birds*

Multiple wind farms in the same landscape may create barriers for bird species although such impacts have not been extensively studied. As some species do show high collision avoidance rates, it is likely that their flight paths will change, especially if there are large numbers of closely spaced turbines in a landscape. Migratory birds are particularly affected by wind turbines as they often travel in large flocks along set routes. Any obstacles blocking their flight paths will not only cause fatalities but may force them to burn crucial energy reserves diverting their route or abandon much-needed rest stops altogether. For example, migrating raptors appear to adjust their flight trajectories to avoid new wind farms. Such barrier effects may become increasingly apparent as more wind farms are developed and monitoring (including of tagged birds) improves.

#### **RECOMMENDED MITIGATION MEASURES**

Winds turbines should also include the new technology enhancement such as Avian radar system that detects birds as far as approximately 6 and half kilometres. If the system detects that there are birds that are in danger of flying into the rotating turbines, then it automatically shut the rotating turbines and restart when the birds have passed.

The scoping studies in an EIA process should ensures that there is an incorporation of existing internationally and national research on birds' activities, such as peak seasons of migration of bird, the distribution of bird's species in an ecosystem, habitat data, the time of the day when birds usual fly by at rotor-swept height. This information may assist to temporary pause rotation of turbines to avoid collisions.

Painting two-thirds of a single blade of each wind turbine blades a different colour to increase visibility to birds and making it easier for birds of prey to detect the rotating blades.

Designing low- or medium-voltage powerlines, or adding insulation to existing poles and wires, to reduce the risk of electrocution of birds or other wildlife from contact. Measures to change the design of transmission lines to reduce bird collisions aim to reduce the vertical spread of lines, increase the visibility of lines, and/or decrease the span length. Specific measures could include:

- Reducing the number of vertical wires levels by adjusting the conductor heights to reduce the number of potential collisions points.
- Stringing wires as low as possible.
- Keeping wire span lengths as short as possible to minimise line height as birds usually respond to seeing lines by increasing height.
- Using wires with a thicker diameter or bundling wires to increase visibility.

### **Bats Mortality**

Mortality of bats through electrocution

Electrocution of large bat species, particularly fruit bats, has been identified as an issue associated with distribution lines. Some of the groups of bats are long-lived species with a low reproductive rate and thus this makes them more vulnerable to extinction due to electrocution. There is limited evidence of risks to bats, although electrocution of large bat species, particularly fruit bats, has been identified as an issue associated with distribution lines.

#### *Mortality of bats through collisions*

Moving wind turbines creates zones of low pressure as the air flows over them. Species that comes near to the moving wind turbines may suffer from barotrauma because of injury caused by sudden pressure changes. Barotrauma is a significant cause for bats fatalities at wind turbines. Wildlife biologists have found that bats are most active when wind speeds are low.

### **RECOMMENDATIONS:**

The wind turbines should be kept motionless during the times of low speeds to reduce the bat deaths by more than the half without significantly affecting the production of power. Another effective minimisation measure is thus to increase the wind speed at which turbines become operational.

The scoping study should include the following: Collation and review of existing literature (including the latest research undertaken both locally and internationally); maps and aerial photographs; and habitat data to identify habitats which may be used by bats; data on bat distributions, roosts, bat sightings, migration routes, and likely foraging and commuting areas on or close to the proposed wind energy facility site.

### **Habitat Loss Through Disturbance and Displacement**

Wind farm general have a small scale of physical footprint and man land uses such as agriculture are compatible, with only small areas of turbine foundations and infrastructure made unavailable for use. However, the construction of wind energy turbines and their associated facilities requires clearance of vegetation and displacement of lands and thus this has caused habitat loss. Wind farms triggers some species to avoid places where wind farms are developed, resulting in displacement and effective loss of habitat. Changes in species abundance with the presence of wind farms can affect predator-prey dynamics and ecosystem function although, the nature and prevalence of this impact is still poorly understood.

#### WESSA RECOMMENDS:

Screening tools should be used to determine Key biodiversity areas and critical biodiversity areas and such areas should be avoided or minimised. The screening tools should be used at initial stages of planning and design to guarantee and safeguard that best practices in micro siting should be developed so that it can help to reduce the potential land use impacts of offshore and land-based wind projects.

#### *Landscape Visuality:*

Wind farms should not be located near the nature game reserves as this may affect the visibility of the landscape scare the giant herbivores animals and affect the visibility of the nature reserves. The tourism industry located near wind farms might as well be affected as the major tour operators will direct their tourists to game reserves where there are no visual impacts caused by the wind farms. Local communities may also feel a loss of cultural values (e.g., where sacred sites are impacted), including a sense of place and belonging. Wind farms may also impact the aesthetic value of an area, in turn negatively impacting the tourism potential or land value.

WESSA RECOMMENDS: That wind farms should not be located within 25 kilometres of any nature/game reserve, protected/wilderness area, natural heritage site or biosphere core area.

#### *Fire:*

Wind turbines can start fire as a result from lightning strike or electrical or mechanical malfunction leading to ignition, which spreads to the surrounding plastics and fibreglass nacelle. Most of the times when turbines catch fire cannot be easily extinguished due to the heights of the wind turbines. They are normally left to burn and, in the process, toxic fumes and sparks are generated and can scatter flaming debris over a wide area, starting secondary fires. A wind turbine fire can spread to the surrounding environment, sparking wildfires, and potentially spreading into nearby communities.

#### WESSA RECOMMENDS:

The operators must continuously ensure that electronic controllers and safety sub-systems that monitor different aspects of wind turbines such as generator, tower, and environment are functioning well to determine electrical and mechanical faults within wind turbine and to ensure that they are operating in a safe manner within prescribed limits. These systems can temporarily shut down the turbine due to high wind, electrical load imbalance, vibration, and other problems.

The owners, facilitators, or operators of the wind farms must communicate their commitment and assurance on prevention and protection of fire suppression with landowners and other community stakeholders.

#### *Noise and Vibrations*

The wind turbines generate sound as they turn in wind. The sound generated by wind turbines is aerodynamic, caused by the movement of turbine blades through the air. There is also mechanical sound generated by the turbine itself. Overall sound levels depend on turbine design and wind speed. The noise and vibrations of the giant turbines may negatively impact on mega-fauna, especially elephants, as previously existing studies have shown that the sound generated from wind turbines interferes with the ability of elephants to communicate. Elephants hear and communicate using low frequency sound; they can hear up to 10 kilometres away. The sound generated from wind blades affects people as well as they cause nuisance and increase stress level.

#### WESSA RECOMMENDS:

That wind farms not be located within 10 kms of elephant habitats. That technological advance, such as minimizing blade surface imperfections and using sound-absorbent materials can be used to reduce wind turbine noise.

#### *Introduction of invasive alien species*

Movement of equipment, people or components may facilitate the introduction of invasive alien species (IAPs), for example through its transport in soil on machinery or attached to clothing, etc. The creation of new habitats, for instance by land disturbance during construction or by creating open spaces, may also facilitate the spread of invasive alien species already present on the site.



#### WESSA RECOMMENDS:

That due care is taken to prevent IAPs from invading and spreading from the development footprint, including the service corridors. The EMP for the site should long-term IAP control.

#### **Hazardous construction materials:**

The turbine blades, tower and generation unit include hazardous materials. WESSA calls upon by the applicant/WEF developer to comply with national environmental standards and international best practice in the manufacturing, recycling and disposing of these hazardous materials.

#### **Local Community Beneficiation:**

Wind power plant construction and operation in some of the country's most begotten and poverty-stricken areas can go a long way to providing much needed employment and skills to local communities. The development can contribute to a long-term positive through committing to socio-economic upliftment and (enviro-)education programmes, environmental stewardship and conservation initiatives.

We refer you to the attached IUCN comprehensive guide for project developers on mitigating biodiversity impacts associated with solar and wind energy development.

WESSA trusts that these issues will be taken into consideration in the preparation of the EIA documents and in the decision-making process.

#### **Battery Energy Storage Systems**

Many renewable energy generation applications now include Battery Energy Storage Systems (BESS). They form a strategic technology, aimed at storing energy produced by the proposed generation facility, for later release into the transmission grid as required. This then smooths the supply of renewable energy into the energy grid reducing the need for carbon-based energy generation. However, BESS technology does have some negative environmental impacts that need to be mitigated.

The BESS systems require cleared land for the containerized battery units, transformer facility, roads and fencing; which creates impacts of cleared vegetation, loss of biodiversity and hardening of surfaces. These impacts need to be mitigated, with WESSA advocating that the BESS be built only on disturbed land. Most of the BESS systems are composed of sealed battery packs. Batteries suffer from cycle ageing: deterioration caused by charge-discharge cycles; which causes a loss of performance (capacity or voltage decrease) and can cause overheating leading to critical failure (electrolyte leaks, fire, explosion). The BESS site then needs a fire response plan and possibly fire-breaks around them.

The disposal of these batteries poses a severe environmental risk, from toxic chemicals and minerals leaking from cracked battery cases. Hence these batteries will preferably need to be recycled, otherwise properly disposed of. The BESS operational management plan should include dealing with aged/broken batteries. WESSA recommends that there should be a national initiative that manages, promotes and fosters the responsible recycling and/or disposal of these type of batteries. This initiative could be funded by renewable energy producers, their associations, battery manufacturers and battery importers. Funding could be from a surcharge on the import or local manufacture of these types of batteries.

Yours faithfully

Personal Details have been redacted as required by the POPI Act

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**From:** ZA - GLD - PPOffice <[gld.PP@wsp.com](mailto:gld.PP@wsp.com)>

**Sent:** Wednesday, 22 January 2025 08:22

**Subject:** 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

Dear Stakeholder,

**NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE**

**NOTICE IS GIVEN IN TERMS OF:**

- Notice is given in terms of Regulation 41(2) of GNR 982 (as amended) published under section 24 and 24D of the National Environmental Management Act (No. 107 of 1998) (NEMA) (as amended) for submission of various applications for environmental authorisations (EAs) in respect of activities identified in terms of GNR 983, GNR 984 and GNR 985 (as amended).

The proponents outlined in the table below propose to establish a Wind Energy Facility (WEF) cluster, comprising various applications for environmental authorisation, near Verkykerskop in Free State. The proposed authorisations include the following Basic Assessment (BA) and Scoping and Environmental Impact Reporting (S&EIR) processes.

Proponent	Project	Technology	Process
Groothoek Wind Power (Pty) Ltd	Up to 300MW Wind Energy Facility (WEF) including associated infrastructure	Wind	S&EIR
	Up to 132kV Powerline, substation, and associated infrastructure	Transmission Line and Substation	BA
Kromhof Wind Power (Pty) Ltd	Up to 300MW WEF including associated infrastructure	Wind	S&EIR
	Up to 132kV Powerline, substation, and associated infrastructure	Transmission Line and Substation	BA
Normandien Wind Power (Pty) Ltd	Up to 300MW WEF including associated infrastructure	Wind	S&EIR
	Up to 132kV Powerline, substation, and associated infrastructure	Transmission Line and Substation	BA
Farm Names			
<ul style="list-style-type: none"><li>• Portion 0 of Farm Schoonzicht No.80</li><li>• Portion 0 of Farm Groothoek No. 89</li><li>• Portion 0 of Farm Kromdraai No. 273</li><li>• Portion 0 of Farm Kransbank No.288</li><li>• Portion 0 of Farm Kranspunt No.459</li><li>• Portion 0 of Farm Van Kope No.1319</li><li>• Portion 0 of Farm Leiden No. 2</li><li>• Portion 0 of Farm Myn-Burg No. 3</li><li>• Portion 0 of Farm Naauw Kloof No. 4</li><li>• Portion 0 of Farm Krom Hof No. 530</li></ul>	<ul style="list-style-type: none"><li>• Portion 0 of Farm Puntje No. 1240</li><li>• Portion 0 and 1 of Farm Aanfield No. 253</li><li>• Portion 0, 1, 2 and 3 of Farm Ox Hoek No. 98</li><li>• Portion 0 of Farm Christina No. 90</li><li>• Portion 0 of Farm Mooiplaats No. 391</li><li>• Portion 0 of Farm Brak Krans No. 554</li><li>• Portion 0 of Farm Rooi Koppen No. 600</li><li>• Portion 0 of Farm Goedgedacht No. 724</li><li>• Portion 0 of Farm Kruger Wens No.1062</li><li>• Portion 0 of Farm Scotland No. 1238</li><li>• Portion 0 of Farm Lusthof No.1321</li></ul>	<ul style="list-style-type: none"><li>• Remaining Extent of the Farm Welgelukt No. 1416</li><li>• Portion 0 of Farm Inzicht No. 1428</li><li>• Portion 0 of Farm Rooibeesberg No. 14898</li><li>• Portion 1 of Farm Johanna No. 1395</li><li>• Portion 1 and Remainder of Farm Bull Hoek No. 329</li><li>• Portion 1 of Farm Goede Hoop No. 982</li><li>• Portion 2, 3, 4, 5 and Remainder of Farm Driekoppen No. 485</li><li>• Remaining extent of Farm Johanna No. 1395</li><li>• Portion 0 of Farm Markgraaff's Rest No. 478</li></ul>	

WSP Group Africa (Pty) Ltd (WSP) has been appointed as the Environmental Assessment Practitioner (EAP) by Mulilo Energy Holdings (Pty) Ltd to manage the to manage the respective BA and S&EIR processes. Parties wishing to formally register as stakeholders in order to offer their comment on the proposed projects are requested to forward their full contact details to the EAP at the details provided below. Registered stakeholders will be forwarded all future correspondence and notified individually of additional opportunities to participate in the processes.

**DRAFT SCOPING REPORT REVIEW PERIOD**

The Draft Scoping Report (DSR) will be made available from WSP on request and/or at the venues below for review and comment for a period of at least 30 days from **22 January 2025 to 21 February 2025**:

Name of Public Place	Address	Name of Public Place	Address	FOR MORE INFORMATION, PLEASE CONTACT:	Or scan the QR code
<b>Harrismith Library</b>	27 Murray St, Harrismith	<b>Zamani Library</b>	Euufees St, Memel - 058 913 8300	<b>Public Participation Office; WSP Group Africa (Pty) Ltd;</b>  <b>PO Box 6001, Halfway House, 1685;</b> <b>Tel: 011 254 4800;</b> <b>Fax: 086 582 1561</b> <b>E-mail: <a href="mailto:gld.pp@wsp.com">gld.pp@wsp.com</a></b>	
<b>VKB Verkykerskop</b>	Between Harrismith & Memel on R722 Road - 058 625 0130	<b>Newcastle Library</b>	66 Scott St, Newcastle CBD, Newcastle - 034 328 7620		
<b>WSP Website</b>	<a href="https://www.wsp.com/en-za/services/public-documents">https://www.wsp.com/en-za/services/public-documents</a>	<b>WSP Data Free Website</b>	<a href="https://wsp-engage.com/">https://wsp-engage.com/</a>		



**WSP contact details:**

Public Participation Office; WSP Group Africa (Pty) Ltd

**Post:** PO Box 6001, Halfway House, 1685; **Tel:** 011 254 4800;

**Fax:** 086 582 1561;

**E-mail:** [gld.pp@wsp.com](mailto:gld.pp@wsp.com)

**Protection of Personal Information:** WSP will be processing certain personal information about you as an interested and affected party (I&AP) for purposes of enabling your registration as an I&AP and storing of your details on our database, if you consent for us to do so. WSP will use these details to contact you about other relevant projects in the future. WSP will always process your personal information in accordance with the Protection of Personal Information Act 4 of 2013. You are entitled to exercise your rights as a data subject and let us know if you wish to be deregistered as an I & AP or if you no longer want your contact details to be included on our database

We look forward to your participation in this process.

Kind regards,



## Public Participation Office

T+ 27 11 361 1300

F+ 27 86 582 1561



WSP in Africa  
Building 1, Maxwell Office Park  
Magwa Crescent West  
Waterfall City  
Midrand, 1685  
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-LAEmHhHzdJzBITWfa4Hgs7pbKI

## Mathulwe, Tumelo

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**From:** ZA - WSP - PPOffice  
**Sent:** Thursday, 30 January 2025 18:31  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

Good day,

Noted, Thank you

Kind regards,



### Public Participation Office

T+ 27 11 361 1300

F+ 27 86 582 1561



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**From:** [REDACTED]  
**Sent:** Thursday, 30 January 2025 15:44  
**To:** ZA - WSP - PPOffice <PP@wsp.com>  
**Cc:** [REDACTED]

**Subject:** RE: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

Good afternoon,

Thank you for confirming. Just including Caryn in the database is sufficient.

Thank you.

Kind Regards,



Kathryn Winstanley - Environmental Project Developer

**From:** ZA - WSP - PPOffice <[PP@wsp.com](mailto:PP@wsp.com)>

**Sent:** Thursday, 30 January 2025 15:40

**To:**

**Cc:**

**Subject:** RE: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

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Kindly note that Caryn du Rand has been included in the stakeholder database.

Should yourself and Wasim also be added on the database?

Kind regards,



#### Public Participation Office

T+ 27 11 361 1300

F+ 27 86 582 1561



WSP in Africa  
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**From:**

**Sent:** Thursday, 23 January 2025 16:50

**To:** ZA - GLD - PPOffice <[gld.PP@wsp.com](mailto:gld.PP@wsp.com)>

Cc [REDACTED]

**Subject:** RE: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

Good afternoon,

I trust you are well.

As per the email below, please could I request that **Caryn du Rand** with email address [eia@g7energies.com](mailto:eia@g7energies.com) be registered as an I&AP for the Verkykerskop Wind Energy Facility Cluster.

Thank you very much.

Kind Regards,



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**From:** ZA - GLD - PPOffice <[gld.PP@wsp.com](mailto:gld.PP@wsp.com)>

**Sent:** Wednesday, 22 January 2025 08:22

**Subject:** 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

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Farm Names			
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<b>Harrismith Library</b>	27 Murray St, Harrismith	<b>Zamani Library</b>	Eeufes St, Memel - 058 913 8300	Public Participation Office; WSP Group Africa (Pty) Ltd;	
<b>VKB Verkykerskop</b>	Between Harrismith & Memel on R722 Road - 058 625 0130	<b>Newcastle Library</b>	66 Scott St, Newcastle CBD, Newcastle - 034 328 7620		



<b>WSP Website</b>	<a href="https://www.wsp.com/en-za/services/public-documents">https://www.wsp.com/en-za/services/public-documents</a>	<b>WSP Data Free Website</b>	<a href="https://wsp-engage.com/">https://wsp-engage.com/</a>	PO Box 6001, Halfway House, 1685; Tel: 011 254 4800; Fax: 086 582 1561 E-mail: <a href="mailto:gld.pp@wsp.com">gld.pp@wsp.com</a>
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**WSP contact details:**

Public Participation Office; WSP Group Africa (Pty) Ltd

**Post:** PO Box 6001, Halfway House, 1685; **Tel:** 011 254 4800;

**Fax:** 086 582 1561;

**E-mail:** [gld.pp@wsp.com](mailto:gld.pp@wsp.com)

**Protection of Personal Information:** WSP will be processing certain personal information about you as an interested and affected party (I&AP) for purposes of enabling your registration as an I&AP and storing of your details on our database, if you consent for us to do so. WSP will use these details to contact you about other relevant projects in the future. WSP will always process your personal information in accordance with the Protection of Personal Information Act 4 of 2013. You are entitled to exercise your rights as a data subject and let us know if you wish to be deregistered as an I & AP or if you no longer want your contact details to be included on our database

We look forward to your participation in this process.

Kind regards,



## Public Participation Office

T+ 27 11 361 1300

F+ 27 86 582 1561



WSP in Africa  
Building 1, Maxwell Office Park  
Magwa Crescent West  
Waterfall City  
Midrand, 1685  
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-LAEmHhHdzJzBITWfa4Hgs7pbKI

## Mathulwe, Tumelo

---

**From:** ZA - WSP - PPOffice  
**Sent:** Thursday, 30 January 2025 17:04  
**To:** Aviation Environmental Compliance; ZA - WSP - PPOffice  
**Cc:** Pamela Madondo; Evelyn Shogole  
**Subject:** RE: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

[REDACTED]

The email was received, thank you.

Kind regards,



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Fr  
Se  
To  
Co

**Subject:** RE: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

Good day,

I hope this email finds you well.

SACAA has no comments for the proposed development of the Verkykerskop wind energy facility cluster. The proposed development is outside the vicinity of aviation infrastructure which show no indication of major/negative impacts to aviation infrastructure and activities within the airport. However, a formal obstacle assessment is required for the proposed development as includes the wind turbines, powerline and associated infrastructure. Kindly lodge an application as published on the SACAA website: [www.caa.co.za/industryinformation/obstacles/](http://www.caa.co.za/industryinformation/obstacles/). The list and contact details of the approved obstacles assessment services providers can be obtained from the CAA website: [www.caa.co.za](http://www.caa.co.za).

Kind regards

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**From:** ZA - GLD - PPOffice <[gld.PP@wsp.com](mailto:gld.PP@wsp.com)>

**Sent:** Wednesday, January 22, 2025 8:22 AM

**Subject:** 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

---

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Dear Stakeholder,

## **NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE**

### **NOTICE IS GIVEN IN TERMS OF:**

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The proponents outlined in the table below propose to establish a Wind Energy Facility (WEF) cluster, comprising various applications for environmental authorisation, near Verkykerskop in Free State. The proposed authorisations include the following Basic Assessment (BA) and Scoping and Environmental Impact Reporting (S&EIR) processes.


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<b>VKB Verkykerskop</b>	Between Harrismith & Memel on R722 Road - 058 625 0130	<b>Newcastle Library</b>	66 Scott St, Newcastle CBD, Newcastle - 034 328 7620	Office; WSP Group Africa (Pty) Ltd;  PO Box 6001, Halfway House, 1685; Tel: 011 254 4800; Fax: 086 582 1561 E-mail: <a href="mailto:gld.pp@wsp.com">gld.pp@wsp.com</a>	
<b>WSP Website</b>	<a href="https://www.wsp.com/en-za/services/public-documents">https://www.wsp.com/en-za/services/public-documents</a>	<b>WSP Data Free Website</b>	<a href="https://wsp-engage.com/">https://wsp-engage.com/</a>		

#### WSP contact details:

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**Fax:** 086 582 1561;

**E-mail:** [gld.pp@wsp.com](mailto:gld.pp@wsp.com)

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We look forward to your participation in this process.

Kind regards,



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---



**Mathulwe, Tumelo**

---

**From:** ZA - WSP - PPOffice  
**Sent:** Thursday, 30 January 2025 17:32  
**To:** [REDACTED] RSKOP  
**Subject:** WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

[REDACTED]

Thank you. The notification has been shared with them.

Kind regards,



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---

**From:** [REDACTED]  
**Sent:** Monday, 27 January 2025 11:02  
**To:** ZA - GLD - PPOffice <gld.PP@wsp.com>  
**Subject:** Re: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

Good day

Please forward your application to SANRAL Eastern Region [REDACTED] as this falls under their jurisdiction.



Kind regards



**Mathulwe, Tumelo**

---

**From:** ZA - WSP - PPOffice  
**Sent:** Thursday, 30 January 2025 17:34  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

[REDACTED]

Thank you for your comment.

Kind regards,



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**From:** [REDACTED]  
**Sent:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

Greetings Applicant

Kindly note that the received application is in Verkykerskop in Free State which outside our KwaZulu-Natal province.

[REDACTED]

---

**Subject:** FW: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** Fw: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

[REDACTED]

---

**From:** ZA - GLD - PPOffice <[gld.PP@wsp.com](mailto:gld.PP@wsp.com)>  
**Sent:** Wednesday, January 22, 2025 8:24:58 AM  
**Subject:** 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

Dear Commenting Authorities,

**NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE**

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Name of Public Place	Address	Name of Public Place	Address	FOR MORE INFORMATION, PLEASE CONTACT:  Public Participation Office; WSP Group Africa (Pty) Ltd;  PO Box 6001, Halfway House, 1685;	Or scan the QR code
<b>Harrismith Library</b>	27 Murray St, Harrismith	<b>Zamani Library</b>	Eeufes St, Memel - 058 913 8300		
<b>VKB Verkykerskop</b>	Between Harrismith & Memel on R722 Road - 058 625 0130	<b>Newcastle Library</b>	66 Scott St, Newcastle CBD, Newcastle - 034 328 7620		
<b>WSP Website</b>	<a href="https://www.wsp.com/en-za/services/public-documents">https://www.wsp.com/en-za/services/public-documents</a>	<b>WSP Data Free Website</b>	<a href="https://wsp-engage.com/">https://wsp-engage.com/</a>		

			Tel: 011 254 4800; Fax: 086 582 1561 E-mail: <a href="mailto:gld.pp@wsp.com">gld.pp@wsp.com</a>
OneDrive Link	<input type="checkbox"/> <a href="#">Verkykerskop Wind Energy Cluster - Draft Scoping Reports</a>		

#### WSP contact details:

Public Participation Office; WSP Group Africa (Pty) Ltd

**Post:** PO Box 6001, Halfway House, 1685; **Tel:** 011 254 4800;

**Fax:** 086 582 1561;

**E-mail:** [gld.pp@wsp.com](mailto:gld.pp@wsp.com)

**Protection of Personal Information:** WSP will be processing certain personal information about you as an interested and affected party (I&AP) for purposes of enabling your registration as an I&AP and storing of your details on our database, if you consent for us to do so. WSP will use these details to contact you about other relevant projects in the future. WSP will always process your personal information in accordance with the Protection of Personal Information Act 4 of 2013. You are entitled to exercise your rights as a data subject and let us know if you wish to be deregistered as an I & AP or if you no longer want your contact details to be included on our database

We look forward to your participation in this process.

Kind regards,



#### Public Participation Office

T+ 27 11 361 1300  
F+ 27 86 582 1561



WSP in Africa  
 Building 1, Maxwell Office Park  
 Magwa Crescent West  
 Waterfall City  
 Midrand, 1685  
 P.O. Box 6001  
 Halfway House  
 1685

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**Mathulwe, Tumelo**

---

**From:** ZA - WSP - PPOffice  
**Sent:** Thursday, 30 January 2025 17:41  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

[REDACTED] added in the project database.

Kind regards,



**Public Participation Office**

T+ 27 11 361 1300

F+ 27 86 582 1561



WSP in Africa  
Building 1, Maxwell Office Park  
Magwa Crescent West  
Waterfall City  
Midrand, 1685  
P.O. Box 6001  
Halfway House  
1685

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**Subject:** RE: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

Dear Sir/Madam



DFFE Directorate: Biodiversity Conservation hereby acknowledge receipt of the invitation to review and comment on the project mentioned on the subject line. Kindly note that the project has been allocated to Mrs P Makitla and Ms Nompumelelo Lekalakala (Copied on this email). In addition, kindly share the shapefiles of the development footprints/application site with the Case Officers.

Please note: All Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries must be submitted to the Directorate: Biodiversity Conservation at Email: [REDACTED] for attention of Mr Seoka Lekota



---

**From:** ZA - GLD - PPOffice <[gld.PP@wsp.com](mailto:gld.PP@wsp.com)>

**Sent:** Wednesday, 22 January 2025 08:22

**Subject:** 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

Dear Stakeholder,

**NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE**

**NOTICE IS GIVEN IN TERMS OF:**

- **Notice is given in terms of Regulation 41(2) of GNR 982 (as amended) published under section 24 and 24D of the National Environmental Management Act (No. 107 of 1998) (NEMA) (as amended) for submission of various applications for environmental authorisations (EAs) in respect of activities identified in terms of GNR 983, GNR 984 and GNR 985 (as amended).**

The proponents outlined in the table below propose to establish a Wind Energy Facility (WEF) cluster, comprising various applications for environmental authorisation, near Verkykerskop in Free State. The proposed authorisations include the following Basic Assessment (BA) and Scoping and Environmental Impact Reporting (S&EIR) processes.

Proponent	Project	Technology	Process
Groothoek Wind Power (Pty) Ltd	Up to 300MW Wind Energy Facility (WEF) including associated infrastructure	Wind	S&EIR
	Up to 132kV Powerline, substation, and associated infrastructure	Transmission Line and Substation	BA
	Up to 300MW WEF including associated infrastructure	Wind	S&EIR

<b>Kromhof Wind Power (Pty) Ltd</b>	Up to 132kV Powerline, substation, and associated infrastructure	Transmission Line and Substation	BA
<b>Normandien Wind Power (Pty) Ltd</b>	Up to 300MW WEF including associated infrastructure	Wind	S&EIR
	Up to 132kV Powerline, substation, and associated infrastructure	Transmission Line and Substation	BA
<b>Farm Names</b>			
<ul style="list-style-type: none"> <li>• Portion 0 of Farm Schoonzicht No.80</li> <li>• Portion 0 of Farm Groothoek No. 89</li> <li>• Portion 0 of Farm Kromdraai No. 273</li> <li>• Portion 0 of Farm Kransbank No.288</li> <li>• Portion 0 of Farm Kranspunt No.459</li> <li>• Portion 0 of Farm Van Kope No.1319</li> <li>• Portion 0 of Farm Leiden No. 2</li> <li>• Portion 0 of Farm Myn-Burg No. 3</li> <li>• Portion 0 of Farm Naauw Kloof No. 4</li> <li>• Portion 0 of Farm Krom Hof No. 530</li> </ul>	<ul style="list-style-type: none"> <li>• Portion 0 of Farm Puntje No. 1240</li> <li>• Portion 0 and 1 of Farm Aanfield No. 253</li> <li>• Portion 0, 1, 2 and 3 of Farm Ox Hoek No. 98</li> <li>• Portion 0 of Farm Christina No. 90</li> <li>• Portion 0 of Farm Mooiplaats No. 391</li> <li>• Portion 0 of Farm Brak Krans No. 554</li> <li>• Portion 0 of Farm Rooi Koppen No. 600</li> <li>• Portion 0 of Farm Goedgedacht No. 724</li> <li>• Portion 0 of Farm Kruger Wens No.1062</li> <li>• Portion 0 of Farm Scotland No. 1238</li> <li>• Portion 0 of Farm Lusthof No.1321</li> </ul>	<ul style="list-style-type: none"> <li>• Remaining Extent of the Farm Welgelukt No. 1416Portion 0 of Farm Inzicht No. 1428</li> <li>• Portion 0 of Farm Rooibeesberg No. 14898</li> <li>• Portion 1 of Farm Johanna No. 1395</li> <li>• Portion 1 and Remainder of Farm Bull Hoek No. 329</li> <li>• Portion 1 of Farm Goede Hoop No. 982</li> <li>• Portion 2, 3, 4, 5 and Remainder of Farm Driekoppen No. 485</li> <li>• Remaining extent of Farm Johanna No. 1395</li> <li>• Portion 0 of Farm Markgraaff's Rest No. 478</li> </ul>	

WSP Group Africa (Pty) Ltd (WSP) has been appointed as the Environmental Assessment Practitioner (EAP) by Mulilo Energy Holdings (Pty) Ltd to manage the to manage the respective BA and S&EIR processes. Parties wishing to formally register as stakeholders in order to offer their comment on the proposed projects are requested to forward their full contact details to the EAP at the details provided below. Registered stakeholders will be forwarded all future correspondence and notified individually of additional opportunities to participate in the processes.

#### DRAFT SCOPING REPORT REVIEW PERIOD

The Draft Scoping Report (DSR) will be made available from WSP on request and/or at the venues below for review and comment for a period of at least 30 days from **22 January 2025 to 21 February 2025**:

Name of Public Place	Address	Name of Public Place	Address	FOR MORE INFORMATION, PLEASE CONTACT:	Or scan the QR code
<b>Harrismith Library</b>	27 Murray St, Harrismith	<b>Zamani Library</b>	Euufees St, Memel - 058 913 8300	Public Participation Office; WSP Group Africa (Pty) Ltd;	
<b>VKB Verkykerskop</b>	Between Harrismith & Memel on R722 Road - 058 625 0130	<b>Newcastle Library</b>	66 Scott St, Newcastle CBD, Newcastle - 034 328 7620		

<b>WSP Website</b>	<a href="https://www.wsp.com/en-za/services/public-documents">https://www.wsp.com/en-za/services/public-documents</a>	<b>WSP Data Free Website</b>	<a href="https://wsp-engage.com/">https://wsp-engage.com/</a>	PO Box 6001, Halfway House, 1685; Tel: 011 254 4800; Fax: 086 582 1561 E-mail: <a href="mailto:gld.pp@wsp.com">gld.pp@wsp.com</a>
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**WSP contact details:**

Public Participation Office; WSP Group Africa (Pty) Ltd

**Post:** PO Box 6001, Halfway House, 1685; **Tel:** 011 254 4800;

**Fax:** 086 582 1561;

**E-mail:** [gld.pp@wsp.com](mailto:gld.pp@wsp.com)

**Protection of Personal Information:** WSP will be processing certain personal information about you as an interested and affected party (I&AP) for purposes of enabling your registration as an I&AP and storing of your details on our database, if you consent for us to do so. WSP will use these details to contact you about other relevant projects in the future. WSP will always process your personal information in accordance with the Protection of Personal Information Act 4 of 2013. You are entitled to exercise your rights as a data subject and let us know if you wish to be deregistered as an I & AP or if you no longer want your contact details to be included on our database

We look forward to your participation in this process.

Kind regards,



## Public Participation Office

T+ 27 11 361 1300

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-LAEHhHdzJzBITWfa4Hgs7pbKI

**Mathulwe, Tumelo**

**From:**

**Sent:**

**To:** [REDACTED] energy

**Cc:**

**Subject:** RE: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

**Attachments:** Verkykerskop Draft EIA Layout (New Turbine Footprint).kmz

**Importance:** High

[REDACTED]

It seems like some communication was not send through, apologies for this

The developer must send the request to [#Renewable Energy Applications \[MTN SA\]](#) who will then forward it to the relevant parties for approval.

[@#Renewable Energy Applications \[MTN SA\]](#), please see if we ca expedite a response.



Warm regards,

[REDACTED]

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Sensitivity: MTN Internal

[REDACTED]

**Subject:** RE: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

[REDACTED]

Warm regards,

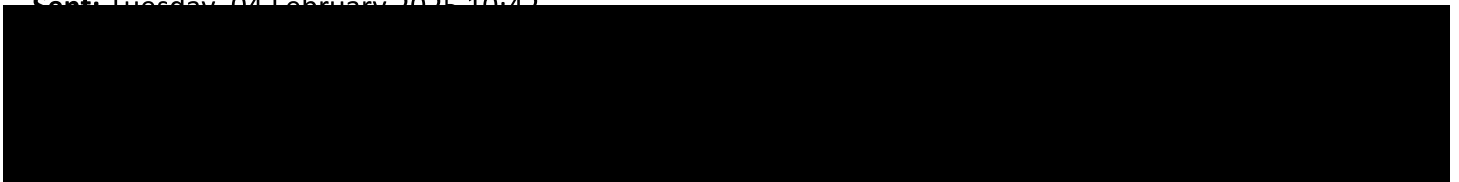


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Sensitivity: MTN Internal

**From:** ZA - WSP - PPOffice <[PP@wsp.com](mailto:PP@wsp.com)>

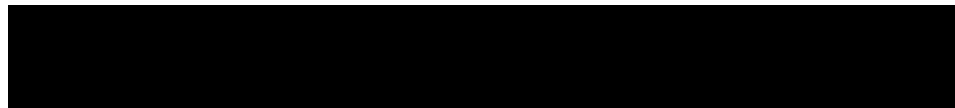
**Sent:** Tuesday, 04 February 2025 10:42



**Subject:** RE: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

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Please see the project kmz attached as requested.

Kind regards,



## Public Participation Office

T+ 27 11 361 1300

F+ 27 86 582 1561



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Magwa Crescent West  
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Sensitivity: MTN Internal

[REDACTED]

**Subject:** RE: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

[@gld.PP@wsp.com](mailto:@gld.PP@wsp.com) Good day, Further to the below, please provide more information wrt the site build plans in order for our planners to identify potential network impacts.

Thanks



Warm regards,

[REDACTED]

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Sensitivity: MTN Internal

[REDACTED]

**Subject:** RE: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

**Importance:** High

[REDACTED]

It would be great if we can have the plans, you are also mentioning.

It would make it easier to identify the locations of the said developments.

[REDACTED]



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**Subject:** RE: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE



Warm regards,



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Sensitivity: MTN Internal



**Subject:** FW: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE



I'm sending this as I'm not sure if any of our towers will be affected in the below.

Warm regards,





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Sensitivity: MTN Internal

**From:** ZA - GLD - PPOffice <[gld.PP@wsp.com](mailto:gld.PP@wsp.com)>

**Sent:** Wednesday, January 22, 2025 8:22 AM

**Subject:** 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

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Farm Names			

<ul style="list-style-type: none"> <li>• Portion 0 of Farm Schoonzicht No.80</li> <li>• Portion 0 of Farm Groothoek No. 89</li> <li>• Portion 0 of Farm Kromdraai No. 273</li> <li>• Portion 0 of Farm Kransbank No.288</li> <li>• Portion 0 of Farm Kranspunt No.459</li> <li>• Portion 0 of Farm Van Kope No.1319</li> <li>• Portion 0 of Farm Leiden No. 2</li> <li>• Portion 0 of Farm Myn-Burg No. 3</li> <li>• Portion 0 of Farm Naauw Kloof No. 4</li> <li>• Portion 0 of Farm Krom Hof No. 530</li> </ul>	<ul style="list-style-type: none"> <li>• Portion 0 of Farm Puntje No. 1240</li> <li>• Portion 0 and 1 of Farm Aanfield No. 253</li> <li>• Portion 0, 1, 2 and 3 of Farm Ox Hoek No. 98</li> <li>• Portion 0 of Farm Christina No. 90</li> <li>• Portion 0 of Farm Mooiplaats No. 391</li> <li>• Portion 0 of Farm Brak Krans No. 554</li> <li>• Portion 0 of Farm Rooi Koppen No. 600</li> <li>• Portion 0 of Farm Goedgedacht No. 724</li> <li>• Portion 0 of Farm Kruger Wens No.1062</li> <li>• Portion 0 of Farm Scotland No. 1238</li> <li>• Portion 0 of Farm Lusthof No.1321</li> </ul>	<ul style="list-style-type: none"> <li>• Remaining Extent of the Farm Welgelukt No. 1416</li> <li>• Portion 0 of Farm Inzicht No. 1428</li> <li>• Portion 0 of Farm Rooibeesberg No. 14898</li> <li>• Portion 1 of Farm Johanna No. 1395</li> <li>• Portion 1 and Remainder of Farm Bull Hoek No. 329</li> <li>• Portion 1 of Farm Goede Hoop No. 982</li> <li>• Portion 2, 3, 4, 5 and Remainder of Farm Driekoppen No. 485</li> <li>• Remaining extent of Farm Johanna No. 1395</li> <li>• Portion 0 of Farm Markgraaff's Rest No. 478</li> </ul>
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#### DRAFT SCOPING REPORT REVIEW PERIOD

The Draft Scoping Report (DSR) will be made available from WSP on request and/or at the venues below for review and comment for a period of at least 30 days from **22 January 2025 to 21 February 2025**:

Name of Public Place	Address	Name of Public Place	Address	FOR MORE INFORMATION, PLEASE CONTACT:	Or scan the QR code
<b>Harrismith Library</b>	27 Murray St, Harrismith	<b>Zamani Library</b>	Eeufes St, Memel - 058 913 8300	<b>Public Participation Office; WSP Group Africa (Pty) Ltd;</b>  PO Box 6001, Halfway House, 1685; Tel: 011 254 4800; Fax: 086 582 1561 E-mail: <a href="mailto:gld.pp@wsp.com">gld.pp@wsp.com</a>	
<b>VKB Verkykerskop</b>	Between Harrismith & Memel on R722 Road - 058 625 0130	<b>Newcastle Library</b>	66 Scott St, Newcastle CBD, Newcastle - 034 328 7620		
<b>WSP Website</b>	<a href="https://www.wsp.com/en-za/services/public-documents">https://www.wsp.com/en-za/services/public-documents</a>	<b>WSP Data Free Website</b>	<a href="https://wsp-engage.com/">https://wsp-engage.com/</a>		

#### WSP contact details:

Public Participation Office; WSP Group Africa (Pty) Ltd

**Post:** PO Box 6001, Halfway House, 1685; **Tel:** 011 254 4800;

**Fax:** 086 582 1561;

**E-mail:** [gld.pp@wsp.com](mailto:gld.pp@wsp.com)

**Protection of Personal Information:** WSP will be processing certain personal information about you as an interested and affected party (I&AP) for purposes of enabling your registration as an I&AP and storing of your details on our database, if you consent for us to do so. WSP will use these details to contact you about other relevant projects in the future. WSP will always process your personal information in accordance with the Protection of Personal Information Act 4 of 2013. You are entitled to exercise your rights as a data subject and let us know if you wish to be deregistered as an I & AP or if you no longer want your contact details to be included on our database

We look forward to your participation in this process.

Kind regards,



#### Public Participation Office

T+ 27 11 361 1300

F+ 27 86 582 1561



WSP in Africa  
Building 1, Maxwell Office Park  
Magwa Crescent West  
Waterfall City  
Midrand, 1685  
P.O. Box 6001  
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[wsp.com](http://wsp.com)

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-LAEhHhHzdJzBITWfa4Hgs7pbKI

**Mathulwe, Tumelo**

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**From:** [REDACTED]  
**Sent:** [REDACTED]  
**To:** ZA - WSP - PPOffice  
**Subject:** RE: Wind farm near Groothoek (Verkykerskop/ Normandien)

Thank you so much!

---

**From:** ZA - WSP - PPOffice <PP@wsp.com>  
**Sent:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** RE: Wind farm near Groothoek (Verkykerskop/ Normandien)

Good day,

Kindly note that you have been included on the project database.

We look forward to your participation in this process.

Kind regards,



**Public Participation Office**

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F+ 27 86 582 1561



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**Sent:** Monday, 03 February 2020 14:51

**To:** ZA - WSP - PPOffice <PP@wsp.com>  
**Subject:** Wind farm near Groothoek (Verkykerskop/ Normandien)


Good day,

Can you please add us to the interested and affected parties register regarding the Wind farm planned for the Verkykerskop/ Normandien area



We live on a farm halfway between Groothoek and Verkykerskop. Approximately 2km from the T junction with the Normandien road, opposite west of Groothoek where your notices were put up.. Please refer to the attachments – photographs of the notices.

Kind Regards



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-LAEmHhHzdJzBITWfa4Hgs7pbKI

**Mathulwe, Tumelo**

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**From:** ZA - WSP - PPOffice  
**Sent:** Tuesday, 11 February 2025 07:53  
**To:** [REDACTED]  
**Subject:** [REDACTED]

WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL  
AUTHORISATION PROCESSES, FREE STATE

Good day [REDACTED]

Kindly note that the notification is to inform the public as well as commenting authorities on an environmental application taking place as per the information in the email.

Kind regards,

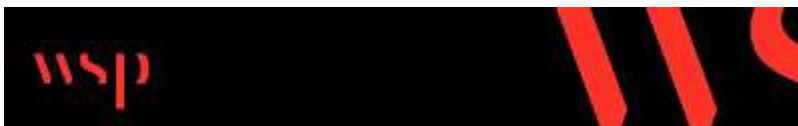
**Public Participation Office**

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**WSP**

Building 1, Maxwell Office Park, Magwa Crescent West, Waterfall City, Midrand  
1685 South Africa

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Registered Number: 1999/008928/07 South Africa

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**From:** [REDACTED]  
**Sent:** Wednesday, 22 January 2025 10:18  
**To:** ZA - GLD - PPOffice <gld.PP@wsp.com>  
**Subject:** Re: 41106427 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE VERKYKERSKOP WIND ENERGY FACILITY CLUSTER, COMPRISING VARIOUS ENVIRONMENTAL AUTHORISATION PROCESSES, FREE STATE

Greetings

Kindly find apologies from Phumelela Local Municipality due to the short notice.

Regards