

Appendix C

DFFE APPROVAL OF SCOPING





forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 399 9000, Fax: +27 86 625 1042

DFFE Reference: 14/12/16/3/3/2/2803

Enquiries: Ms Thulisile Nyalunga

Telephone: (012) 399 9405 **E-mail:** Tnyalunga@dffe.gov.za

Ms Ashlea Strong
WSP Group Africa (Pty) Ltd
PO Box 6001
HALFWAY HOUSE
1685

Telephone Number: +27 11 361 1392
Email Address: Ashlea.strong@wsp.com

PER MAIL / E-MAIL

Dear Ms Strong

ACCEPTANCE OF THE SCOPING REPORT FOR THE PROPOSED ABO UVEMVANE WIND ENERGY FACILITY (WEF) 1 (UP TO 170MWAC)), LOCATED IN THE DIPALESENG LOCAL MUNICIPALITY WITHIN THE GERT SIBANDE DISTRICT MUNICIPALITY AND THE LESEDI LOCAL MUNICIPALITY WITHIN THE SEDIBENG DISTRICT MUNICIPALITY, IN THE MPUMALANGA AND GAUTENG PROVINCE

The final Scoping Report (SR) and the Plan of Study for Environmental Impact Assessment dated May 2026 and received by the Department on 08 May 2026, refer.

The Department has evaluated the submitted final SR and the Plan of Study for Environmental Impact Assessment dated May 2026 and is satisfied that the documents comply with the minimum requirements of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended. The FSR is hereby accepted by the Department in terms of Regulation 22(1) (a) of the EIA Regulations, 2014, as amended.

You may proceed with the environmental impact assessment process in accordance with the tasks contemplated in the Plan of Study for Environmental Impact Assessment as required in terms of the EIA Regulations, 2014, as amended.



Batho pele – putting people first

Departement van Bosbou, Visserie en die Omgewing • Department of Forestry, Fisheries and the Environment • UmNyango wezamaHlathi, zokuThiya neBhoduluko • iSebe lezamaHlathi, ezokuLoba noKusingqongileyo • Umnyango WezamaHlathi, Ezokudoba Nezemvelo • Kgoro ya Dithokgwa, Boreahlapi le Tikologo • Lefapha la Meru, Botshwasi ba dithapi le Tikoloho • Lefapha la Dikgwa, Dithapi le Tikologo • Litiko Letemahlatsi, Tinhlanti Netendzawo • Muhasho wa zwa Vhusima-maqaka, Vhureakhovhe na Mupo • Ndzwawulo ya Swihlahla, Vunjoveri na Mbango. The processing of personal information by the Department of Forestry, Fisheries and the Environment is done lawfully and not excessively for the purpose of processing in compliance with the POPI Act, any codes of conduct issued by the Information Regulator in terms of the POPI Act, and/or relevant legislation providing appropriate security safeguards for the processing of personal information of others.



In addition, the following is required for the Environmental Impact Assessment Report (EIAR):

(a) Specific Comments

- (i) The proposed Uvemvane WEF 1 is located on a site comprising CBA Irreplaceable and Optimal, Intact Grassland Patches, Ecological Support Areas (ESA), Priority Focus Areas, and CBA and ESA Wetlands. You are required to:
 - Demonstrate how the proposed development layout has applied the mitigation hierarchy, with specific emphasis on avoidance of sensitive biodiversity features as the preferred approach.
 - Provide a detailed assessment of potential impacts on the identified biodiversity features, ecological connectivity, wetland systems, and associated ecosystem functioning during both construction and operational phases.
 - Investigate and motivate feasible layout alternatives and micro-siting options aimed at avoiding or minimising impacts on CBAs, ESAs, intact grasslands, and wetlands.
 - Include a cumulative impact assessment that considers existing and approved developments within the broader landscape and their combined effect on biodiversity and ecological processes.
 - Ensure that all specialist recommendations and mitigation measures are incorporated into the Environmental Impact Assessment Report (EIAR) and Environmental Management Programme (EMPr), including rehabilitation, monitoring, and long-term biodiversity management measures.
- (ii) In your comments and responses report on pages 90 and 91, you indicated that the terrestrial biodiversity scoping report concludes that offsetting will be required to manage residual impacts associated with CBAs. The layout and assessment of the residual impacts will be further refined during the impact assessment phase and reported in the terrestrial biodiversity specialist assessment report which will form the applicability of an offset strategy. Offsets must be confirmed as necessary, if it is confirmed, you are required to submit a Biodiversity Offset Report and/or Offset Strategy prepared by a suitably qualified specialist, addressing:
 - offset objectives and principles;
 - offset equivalence and conservation outcomes;
 - proposed offset receiving areas;
 - long-term management and monitoring measures;
 - implementation responsibilities and financial provisions; and
 - mechanisms to secure the offset area in perpetuity.
- (iii) Please ensure that the terrestrial biodiversity specialist assessment adequately assesses cumulative impacts and demonstrates whether the residual impacts, after mitigation and offset measures, can be reduced to acceptable levels.
- (iv) The findings and recommendations of the terrestrial biodiversity assessment and any proposed offset strategy must be fully incorporated into the draft EIAR and EMPr.
- (v) It is acknowledged that all turbines, laydown areas and substations (in Mpumalanga) have avoided CBAs and intact grassland patches, however, roads have not. This must be assessed in line with the requirement to potentially consider biodiversity offsets, once it has been demonstrated that all measures of avoidance have been exhausted. Any potential biodiversity offset exercise must be undertaken in accordance with the National Biodiversity Offset Guideline (2023), and must specifically provide for “Additionality” and promote connectivity in the wider landscape.

- (vi) The project area contains areas classified as Critical Biodiversity Areas (CBA) as identified in the Mpumalanga Biodiversity Sector Plan (MBSP) (2024) and the delineations indicate that large areas in the east and centre of the PAOI are classified as CBA Irreplaceable, with smaller areas designated as CBA Optimal and ESAs. These areas should remain in a natural state that is maintained in good ecological condition and therefore must be excluded from the development footprint.
- (vii) A number of objections have been raised regarding the proposed wind energy development. The EAP is therefore requested to ensure that all issues and concerns raised by interested and affected parties are comprehensively and adequately addressed in the draft EIAR.
- (viii) It has been noted that the proposed development is located within a highly sensitive biodiversity area comprising Critical Biodiversity Areas, intact grassland patches, Important Bird Areas, and habitat supporting numerous threatened bird species. In this regard, you are required to critically evaluate the suitability and environmental acceptability of the proposed development within the receiving environment.
- (ix) The potential impacts on biodiversity, particularly avifauna, are considered to be significant and may be of such a magnitude that they could compromise the viability of the affected ecological systems and species populations. You are therefore requested to undertake a comprehensive ecological assessment that adequately assesses the significance of impacts, including cumulative impacts, on sensitive biodiversity features and threatened species.
- (x) You are required to investigate and provide a comprehensive assessment of feasible alternatives, including alternative site locations and layout configurations, to avoid and minimise potential impacts on sensitive ecological features. The outcomes of these investigations must be clearly incorporated into the draft EIAR and must demonstrate whether the proposed development can be considered environmentally acceptable within the identified sensitive landscape.

(b) Listed Activities

- (i) The draft EIAR must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for.
- (ii) The draft EIAR must assess the correct sub listed activity for each listed activity applied for.
- (iii) Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure (including thresholds) as described in the project description.
- (iv) It is imperative that the relevant authorities are continuously involved throughout the environmental impact assessment process, as the development property falls within geographically designated areas in terms of Listing Notice 3 Activities. Written comments must be obtained from the relevant authorities (or proof of consultation if no comments are received) and submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided.

(c) Coordinates

- (i) Please provide coordinate points for the proposed development site (note that if the site has numerous turning points, at each turning point coordinates must be provided) as well as the start, middle and end point of all linear activities (Indicate the position of the proposed activity with the latitude and longitude at the centre point for each alternative site. The co-ordinates should be in degrees and decimal minutes. The minutes should be to at least three decimal

places. The projection that must be used in all cases is the WGS-84 spheroid in a national or local projection).

(d) Alternatives

- (i) You are further required to provide details of all the alternatives considered for this development and indicate the preferred alternatives as per Appendix 2 (2) (1) (g) (i) (v) (vi) of the NEMA EIA Regulations, 2014, as amended in the final report. Alternatively, you should submit written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 2 taking into consideration the mitigation hierarchy to manage impacts identified.

(e) Layout & Sensitivity Maps

- (i) The draft EIAR must provide coordinate points for the proposed development site and all proposed infrastructure (note that if the site has numerous bend points, at each bend point coordinates must be provided) as well as the start, middle and end point of all linear activities.
- (ii) All preferred turbine positions must be clearly numbered. The turbine position numbers must be consistently used in all maps to be included in the reports and the specialist studies.
- (iii) The draft EIAR must provide a copy of the final preferred layout map. All available biodiversity information must be used in the finalisation of the layout map. Existing infrastructure must be used as far as possible e.g., roads. The layout map must indicate the following:
 - A clear indication of the envisioned area for the proposed wind energy facility;
 - Position of the wind turbines;
 - Powerlines;
 - Internal roads;
 - All supporting onsite infrastructure such as laydown area, guard house and control room etc.;
 - Substations, transformers, switching stations and inverters;
 - Battery Energy Storage System;
 - The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected by the facilities and its associated infrastructure;
 - Connection routes (including pylon positions) to the distribution/transmission network;
 - All existing infrastructure on the site, especially railway lines and roads; and
 - Buildings, including accommodation.
- (iv) Please provide an environmental sensitivity map which indicates the following:
 - The location of sensitive environmental features identified on site, e.g. CBAs, protected areas, IBAs, heritage sites, wetlands, drainage lines, nest and roosting sites, etc. that will be affected by the facility and its associated infrastructure;
 - Buffer areas; and
 - All “no-go” areas.
- (v) The above layout map must be superimposed (overlain) with the sensitivity map and a cumulative map which shows neighbouring and existing infrastructure.
- (vi) Please note that Google maps will not be accepted.

(f) Public Participation

- (i) Please ensure the language used to inform potential I&APs in the newspaper advertisement is not only communicated in English but should also utilise other dominant languages spoken in the study area. The EAP must ensure that the newspaper medium adequately caters for all potential I&APs in the study area. This should also apply to any site notification boards as well.
- (ii) Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAR. This includes but is not limited to the Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs (DARDLEA), the Mpumalanga Tourism & Parks Agency, the Msukaligwa Local Municipality, the Gert Sibande District Municipality, the Department of Water and Sanitation (DWS), the South African Heritage Resources Agency (SAHRA), the Endangered Wildlife Trust (EWT), BirdLife SA, the Department of Mineral Resources, the Department of Forestry, Fisheries and the Environment: Directorate Biodiversity and Conservation, and the Directorate Protected Areas.
- (iii) Please ensure that all issues raised, and comments received on the draft SR and draft EIAR from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section: BCAdmin@environment.gov.za) in respect of the proposed activity are adequately addressed in the Final SR. Proof of correspondence with the various stakeholders must be included in the Final EIAR. Should you be unable to obtain comments, proof must be submitted to the Department of the attempts that were made to obtain comments.
- (iv) A comments and response trail report (C&R) must be submitted with the final EIAR. The C&R report must incorporate all comments (pre and post-submission of the draft EIAR) received for this development. The C&R report must be a separate document from the main report and the format must be in the table format which reflects the details of the I&APs and date of comments received, actual comments received, and response provided. Please ensure that comments made by I&APs are comprehensively captured (copy verbatim if required) and responded to clearly and fully. Please note that a response such as "Noted" is not regarded as an adequate response to I&APs comments.
- (v) Please ensure that the EIAR indicates when and where the draft SR and EIAR were made available for a 30-day review and comment period.
- (vi) The Public Participation Process must be conducted in terms Regulations 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.

(g) Specialist Assessments

- (i) The EAP must ensure that the terms of reference for all the identified specialist studies must include the following:
 - A detailed description of the study's methodology; indication of the locations and descriptions of the development footprint, and all other associated infrastructures that they have assessed and are recommending for authorisation.
 - Provide a detailed description of all limitations to the studies. All specialist studies must be conducted in the right season and providing that as a limitation will not be allowed.
 - Please note that the Department considers a 'no-go' area, as an area where no development of any infrastructure is allowed; therefore, no development of associated infrastructure including access roads is allowed in the 'no-go' areas.
 - Should the specialist definition of 'no-go' area differ from the Department's definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable.

- All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA.
 - Bird and bat specialist studies must have comments from Birdlife South Africa and SABAA.
 - Should a specialist recommend specific mitigation measures, these must be clearly indicated.
- (ii) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expert advice.
- (iii) It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting in identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols") and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. Please note that specialist assessments must be conducted in accordance with these protocols.
- (iv) Please also ensure that the EIAR includes the Site Verification Report and Compliance Statements (where applicable) as required by the relevant themes.
- (v) Please note further that the protocols, if applicable, require certain specialists' to be SACNASP registered in the field of expertise of the specialist study being undertaken e.g. An aquatic assessment must be prepared by a specialist registered with SACNASP, with expertise in the field of aquatic sciences. Please ensure that the relevant specialist certificates are attached to the relevant reports.
- (vi) As such, the Specialist Declaration of Interest forms must also indicate the scientific organisation registration/member number and status of registration/membership for each specialist.
- (vii) The following Specialist Assessments will form part of the EIAR:
- Agriculture Impact Assessment;
 - Aquatic Biodiversity Impact Assessment ;
 - Avifauna Impact Assessment ;
 - Bats Impact Assessment;
 - Heritage Impact Assessment;
 - Noise Impact Assessment;
 - Terrestrial Biodiversity Impact Assessment;
 - Visual Impact Assessment;
 - Socio-Economic Impact Assessment;
 - Traffic Impact Assessment; and
 - Geotechnical Assessment.
- (viii) Please ensure that each specialist study has the correct and same project description and layout to assess.
- (ix) Please include a table that shows the proposed studies and the relevant specialists carrying out the study. In addition, a summary must be included of the specialist's recommendations in terms of the alternatives that are preferred based on the findings of their study

(h) Environmental Management Programme

- (i) It is drawn to your attention that for substation and overhead electricity transmission and distribution infrastructure, when such facilities trigger activity 11 or 47 of the EIA Regulations Listing Notice 1 of 2014, as amended, and any other listed and specified activities necessary for the realisation of such facilities, the generic Environmental Management Programmes (EMPr), contemplated in Regulations 19(4) must be used over and above the EMPr for the wind facility. Accordingly, there needs to be a generic EMPr for the on-site substation, a generic EMPr for the overhead powerline, and a third, separate EMPr for the wind facility.
- (ii) Please ensure that any specific mitigation measures identified in the EIAr and specialist reports for the on-site substation and powerline are incorporated into the site-specific section of the generic EMPrs.
- (iii) Please ensure that the mitigation measures specified in the EIAr and specialist reports for the PV facility are also incorporated into the EMPr for the PV facility. In addition, please ensure that the EMPr complies with the content of the EMPr in terms of Appendix 4 of the EIA Regulations, 2014, as amended.
- (iv) Please also include in the EMPrs, a recommended frequency for the auditing of compliance with the conditions of the EA and EMPr, and the submission of such compliance reports to the competent authority.

(i) General

- (i) The EIAr must provide the technical details for the proposed facility in a table format, as well as their description and/or dimensions, per the sample below.

Sample of minimum technical details required for the proposed facility.

Component	Description/dimensions
Height of PV structures	
Capacity of the PV facility	
Surface area to be covered by the facility (i.e., the area occupied by both permanent and construction laydown areas, including PV array area and associated infrastructure such as roads)	
Proximity to grid connection	
Number of overhead power lines required and voltage of overhead power lines	
Height of the Power Line	
Number of substations required and voltage of substations	
Area occupied by inverter/transformer stations/substations	
Area occupied by buildings	
Number of access roads, including length and width	
Length and width of internal roads	
Additional Infrastructure	

- (ii) Please ensure that the final EIAr includes the period for which the Environmental Authorisation (EA) is required, the date on which the activity will be concluded, and the post-

construction monitoring requirements finalised, as per Appendix 3(3)(1)(r) of the NEMA EIA Regulations, 2014, as amended.

- (iii) Confirmation of the availability of services (e.g., sewage, water, etc. if required) must be included in the EIAR.
- (iv) Should a Water Use License be required, proof of application for a license needs to be submitted.

The applicant is hereby reminded to comply with the requirements of Regulation 45 of GN R982 of 04 December 2014, as an amendment, with regard to the time period allowed for complying with the requirements of the Regulations.

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an environmental authorisation being granted by the Department.

Yours faithfully



Dr Sabelo Malaza

Chief Director: Integrated Environmental Authorisations

Department of Forestry, Fisheries and the Environment

Letter signed by: Ms Sindiswa Dlomo

Designation: Deputy Director: National Integrated Authorisation Projects

Date: 22/06/2026

cc:	Kelli Ross	ABO Umemvane Wind Energy Facility 1 (Pty) Ltd	Email: Kelli.Ross@aboenergy.com
-----	------------	---	---------------------------------