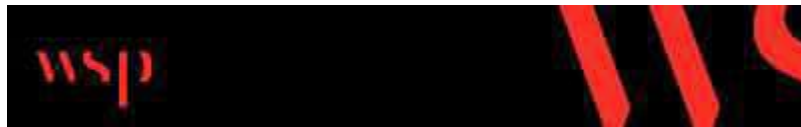


Maharaj, Jashmika

From: ZA - WSP - PPOffice
Sent: Thursday, 03 September 2026 13:28
To: Maharaj, Jashmika
Subject: FW: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

Tumelo Mathulwe
Principal Consultant

[REDACTED]



From: Wind Farm <[REDACTED]>
Sent: Wednesday, 02 September 2026 11:36
To: North Zone Wayleaves <[REDACTED]>
Cc: Wind Farm <[REDACTED]> ZA - WSP - PPOffice <PP@wsp.com>
Subject: Re: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

Greetings ,

Can we kindly, please request that all submissions should include KMZ file(s) for the proposed facilities, together with a document detailing the relevant coordinates or a link to access such material.

As part of the formal workflow, submissions are first sent to the Wayleave Departments.

Please note ,the provided link does not include the KMZ/KML files.

Kindly , could you please ensure that the required supporting documents such as the **KMZ/KML files and coordinates information**, are included with the submissions before it is forwarded for our assessments.

This will help ensure that the submission can be processed through without unnecessary delays.

Kind Regards

RFSM

Office Address : 61 Oak Avenue, Highveld,
Techno Park, Centurion 0157
Private Bag X881, Pretoria, Gauteng, 0001



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From: North Zone Wayleaves <[REDACTED]>
Sent: Monday, August 31, 2026 8:21 AM
To: Wind Farm <[REDACTED]>
Subject: FW: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

Hi

FYA

Thanks & Regards 

[REDACTED]
Wayleaves North Zone, Openserve

Tell: [REDACTED]
Cell: [REDACTED]

[REDACTED]
Address: City Deep ETE 2 Bonsmara Street 2049



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From: ZA - WSP - PPOffice <PP@wsp.com>
Sent: Monday, 24 August 2026 15:57
Subject: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

EXTERNAL EMAIL: Do not click any links or open any attachments, unless you trust the sender and know that the content is safe.

Dear Stakeholder,

NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

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 of the applications for environmental authorisations (EA) in respect of activities identified in terms of GNR 983, GNR 984 and GNR 985 (as amended)

DESCRIPTION AND LOCATION

The proponent outlined in the table below proposes to establish a Wind Energy Facility (WEF), application for environmental authorisation, near Heidelberg and Balfour in the Gauteng and Mpumalanga Provinces. The proposed authorisation includes the following Scoping and Environmental Impact Reporting (S&EIR) process:

Proponent	Project	Technology	Process
ABO Uvemvane Wind Energy Facility 1 (Pty) Ltd	Up to 170MWac WEF including associated infrastructure	Wind	S&EIR
Farm Names			
<ul style="list-style-type: none"> The Remaining Extent of Portion 2 of the Farm Lagerspoort Number 406 Portion 17 (a Portion of Portion 3) of the Farm Lagerspoort Nr 406 Remaining Extent of Portion 4 of the Farm De Hoek 411 Portion 45 of the Farm Lagerspoort 406 Portion 7 of the Farm Lagerspoort Number 406 Portion 19 of the Farm De Hoek No 411 Remaining Extent of Portion 2 of the Farm Modderfontein 410 	<ul style="list-style-type: none"> The Farm Orion No 413 Remaining Extent of Portion 5 of the Farm Lagerspoort 406 Portion 7 of the Farm Driefontein 405 Remaining Extent of Portion 9 of the Farm Malanskraal No 407 Remaining Extent of Portion 2 of the Farm Malanskraal 407 Portion 12 (a Portion of Portion 2) of the Farm Malanskraal 407 Remaining Extent of Portion 2 of the Farm Driefontein 405 Remaining Extent of the Farm Driefontein 405 	<ul style="list-style-type: none"> Remainder of Portion 6 (Kingsmead) of the Farm Malanskraal 407 Portion 17 (a Portion of Portion 8) of the Farm Malanskraal No 407 Farm Bothas Spruit Nr. 404 Portion 16 (a Portion of Portion 4) of the Farm Malanskraal No 407 Remaining Extent of Portion 13 (a Portion of Portion 2) of the Farm Malanskraal 407 Remainder of Portion 18 (a Portion of Portion 3) of the Farm Malanskraal 407 Portion 1 of the Farm Weltevreden Nr. 449 	

ENVIRONMENTAL APPLICATIONS

The proposed project triggers several listed activities contained in the Environmental Impact Assessment (EIA) Regulations Listing Notice 1 (GNR983), Listing Notice 2 (GNR984) and Listing Notice 3 (GNR985), as amended, and therefore, authorisation to undertake the listed activities must be sought via a S&EIR process. The anticipated listed activity numbers associated with the proposed project are reflected in the table below. Should you wish to obtain a complete copy of these listed activities, please contact the Environmental Assessment Practitioner (EAP), details provided below.

Project Name	Listing Notice	Applicable Triggers							
Scoping EIA for: <ul style="list-style-type: none"> ABO Uvemvane WEF 1 	GNR 983	11(i)	12(ii) (a)(c)	14	19	24 (ii)	28(ii)	48 (i) (a) (c)	56 (ii)
	GNR 984	1	15						
	GNR 985	4	10	12	14(ii) (a)(c)	18	23(ii) (a)(c)		

MPRDA	Section 53	Surface use in terms of Section 53 of the Mineral and Petroleum Resources Development Act (no. 28 of 2002)
NHRA	Section 38(8)	Review of an Impact Assessment related to an application for Environmental Authorisation

REGISTRATION

WSP Group Africa (Pty) Ltd (WSP) has been appointed as the EAP by ABO Energy South Africa (Pty) Ltd, on behalf of ABO Uvemvane Wind Energy Facility 1 (Pty) Ltd, to manage the S&EIR process. Parties wishing to formally register as stakeholders in order to offer their comment on the Proposed Project 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 process.

DRAFT EIA REPORT REVIEW PERIOD

Due to an unforeseen delay, the Draft Environmental Impact Assessment Report (DEIAR) will be available for public comment from **25 August 2026 to 28 September 2026**.

Please see the attached letter for more information.

Kind regards,

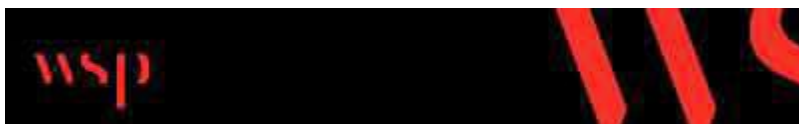
Public Participation Office

T +27 11 254 4800
T +27 11 361 1300

WSP

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

wsp.com



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Registered Number: 1999/008928/07 South Africa

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<https://openserve.co.za/assets/documents/LegalEmail/OpenserveEMailLegalNotice.pdf> =====

Maharaj, Jashmika

From: Maharaj, Jashmika
Sent: Wednesday, 09 September 2026 08:17
To: 'Mervyn Lotter'
Cc: Strong, Ashlea
Subject: RE: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)
Attachments: DEIA_Layout_version2.kmz

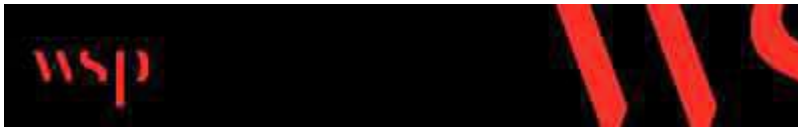
Dear Mervyn,

Please can you use this kmz file instead.

We refined the layers for the roads, and this is more accurate to all of our maps.

Thank you.

Kind regards,
Jashmika Maharaj
Senior Consultant



From: Mervyn Lotter [REDACTED]
Sent: Tuesday, 08 September 2026 18:41
To: Maharaj, Jashmika [REDACTED]
Cc: Strong, Ashlea [REDACTED]
Subject: Re: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

Dear Jashmika

Received, thank you.

Best wishes
Mervyn

On Mon, 7 Sept 2026 at 21:24, Maharaj, Jashmika [REDACTED] > wrote:

Dear Mervyn,

The link to the project information was shared with Celia to pass on. Apologies for the inconvenience caused.

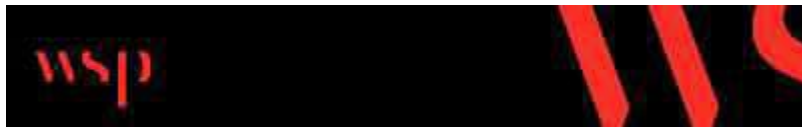
Please see the attached KMZ file.

The EIA documentation is available at the following link:  [14.12.16.3.3.2.2803_ABO Uvemvane Wind Energy Facility 1_Draft EIR](#)

Please let me know if you can access the information.

Kind regards,

Jashmika Maharaj
Senior Consultant



From: Mervyn Lotter < >
Sent: Monday, 07 September 2026 18:01
To: ZA - WSP - PPOffice <PP@wsp.com>; Strong, Ashlea 
Subject: Re: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

Dear Ashlea

Can you please help. I was unable to download the EIA documentation as I did not have "permission" to do so. I requested permission about 2 weeks ago but have not heard back from WSP.

Please can I be provided with (1) access to the ABO Uvemvane WEF and (2) a kml file of the proposed turbine and infrastructure layouts?

Thank you.

Best wishes

Mervyn

On Mon, 24 Aug 2026 at 15:59, ZA - WSP - PPOffice <PP@wsp.com> wrote:

Dear Commenting Authority,

NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

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Proponent	Project	Technology	Process
<ul style="list-style-type: none"> Portion 19 of the Farm De Hoek No 411 Remaining Extent of Portion 2 of the Farm Modderfontein 410 	<ul style="list-style-type: none"> Remaining Extent of the Farm Driefontein 405 	<ul style="list-style-type: none"> of the Farm Malanskraal 407 Portion 1 of the Farm Weltevreden Nr. 449 	

ENVIRONMENTAL APPLICATIONS

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MPRDA	Section 53	Surface use in terms of Section 53 of the Mineral and Petroleum Resources Development Act (no. 28 of 2002)							
NHRA	Section 38(8)	Review of an Impact Assessment related to an application for Environmental Authorisation							

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DRAFT EIA REPORT REVIEW PERIOD

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Please see the attached letter for more information.

Kind regards,

Public Participation Office

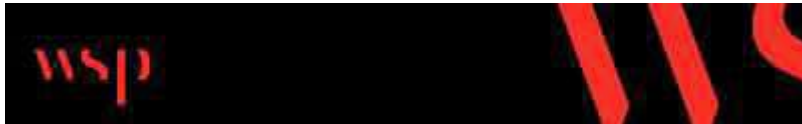
T [+27 11 254 4800](tel:+27112544800)

T [+27 11 361 1300](tel:+27113611300)

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--

Dr Mervyn Lötter

[REDACTED]

Mpumalanga Tourism and Parks Agency
South Africa

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Postal: P/Bag X1088, Lydenburg, 1120

Website: www.mpumalanga.com

Useful links

<http://mtpa.maps.arcgis.com/>

[MBSP Web Map](#)

[Climate change corridors](#)

--

Dr Mervyn Lötter

[REDACTED]

Mpumalanga Tourism and Parks Agency
South Africa

[REDACTED]

Postal: P/Bag X1088, Lydenburg, 1120

Website: www.mpumalanga.com

Useful links

<http://mtpa.maps.arcgis.com/>

[MBSP Web Map](#)

[Climate change corridors](#)

Mathulwe, Tumelo

From: ZA - WSP - PPOffice
Sent: Tuesday, 08 September 2026 13:44
To: Garth Denton; ZA - WSP - PPOffice
Subject: RE: Please email a copy of this report

Good day Garth,

Please see the project information at the links below:

1. WSP Website: <https://www.wsp.com/en-za/services/public-documents>
2. WSP Datafree Website: <https://wsp-engage.com/>

Kind regards,

Public Participation Office

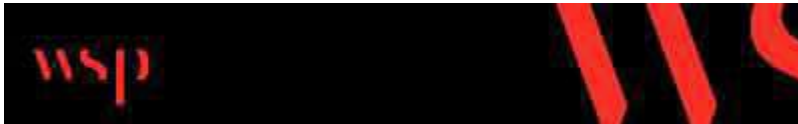
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T +27 11 361 1300

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Registered Number: 1999/008928/07 South Africa

From: Garth Denton <[REDACTED]>
Sent: Monday, 07 September 2026 16:39
To: ZA - WSP - PPOffice <PP@wsp.com>
Subject: Please email a copy of this report

Notice of Public Review of Draft Environmental Impact Assessment Report for the ABO Uvemvane Wind Energy Facility 1 in Mpumalanga & Gauteng. Due to an unforeseen delay the report is available from 25/08 - 28/09/26. Contact WSP at pp@wsp.com

Yours Truly

Garth Denton

[REDACTED]

[REDACTED]

Mathulwe, Tumelo

From: Mayinga, Solomon (SH) <[REDACTED]>
Sent: Wednesday, 09 September 2026 14:37
To: ZA - WSP - PPOffice
Cc: Mathibeng, Gwen (G)
Subject: RE: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

Good day

Thank you so much and will revert to you soon.

Kind regards
Solomon

From: ZA - WSP - PPOffice <PP@wsp.com>
Sent: Wednesday, September 9, 2026 1:36 PM
To: M [REDACTED]
[REDACTED]

Subject: RE: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

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Good day Solomon

Kindly see the kmz attached.

Kind regards,

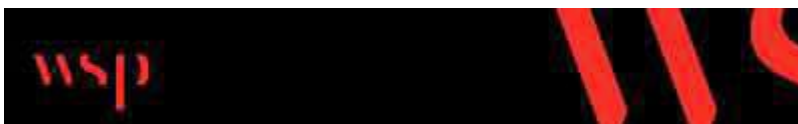
Public Participation Office

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Registered Number: 1999/008928/07 South Africa

From: Mayinga, Solomon (SH) [REDACTED]
Sent: Tuesday, 08 September 2026 09:09
To: ZA - WSP - PPOffice <PP@wsp.com>
Cc: Mathibeng, Gwen (G) [REDACTED] >
Subject: FW: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

Good morning,

Im following up on request below regarding the above-mentioned project.

Kindly provide the kmz file so that we can determine whether the project will have positive or negative impacts on our operations and would like to participate in the planning and decision-making processes.

Kind regards
Solomon

From: Mayinga, Solomon (SH)
Sent: Monday, August 31, 2026 11:01 AM
To: 'pp@wsp.com' <pp@wsp.com>
Cc: [REDACTED]
Subject: FW: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

Good morning ,

I trust that you are well.

Please register Sasol Mining (Pty) Ltd (Sasol Mining) as an interested and affected (A&AP) regarding the above-mentioned project.

Sasol Mining (Pty) Ltd (Sasol Mining) is the holder of mining right, MP30/5/1/2/2/138 MR granted by the Department of Mineral, Petroleum Resources (DMPR) in respect of various farms situated within Govan Mbeki Local Municipality area of jurisdiction.

Kindly provide the kmz file so that we can determine whether the project will have positive or negative impacts on our operations and would like to participate in the planning and decision-making processes.

We would appreciate receiving all relevant information and notifications related to the project, including public hearings, reports and updates.

Thank you for your time and attention to this matter.

Sincerely



Paul Kruger Street,
Trichardt
PO Box 699, Trichardt, 2300
www.sasol.com

Solomon Mayinga

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: Mathibeng, Gwen (G) [REDACTED]
Sent: Thursday, August 27, 2026 10:13 AM
To: Mayinga, Solomon (SH) <[REDACTED]>
Subject: FW: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

Hi Solomon,

Kindly attend to the below.

Kind regards



Walter Sisulu road, Secunda
Private Bag X1015, Secunda 2302
www.sasol.com

[REDACTED]
[REDACTED]
[REDACTED]
Sasol Mining (Pty) Ltd
[REDACTED]
[REDACTED]

From: Cronje, Paul (PJM) [REDACTED]
Sent: Tuesday, 25 August 2026 19:28
To: Mathibeng, Gwen (G) [REDACTED]
Subject: FW: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

Hi Gwen,

Can we please request Solomon to register as an I&AP and with the help from Lizeth to obtain a map showing the possible impact on mining?

Thanks
Paul

From: ZA - WSP - PPOffice <PP@wsp.com>
Sent: Monday, 24 August 2026 3:57 PM
Subject: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY

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Dear Stakeholder,

NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

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 of the applications for environmental authorisations (EA) in respect of activities identified in terms of GNR 983, GNR 984 and GNR 985 (as amended)

DESCRIPTION AND LOCATION

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Farm Names			
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• ABO Uvemvane WEF 1			(a)(c)			(ii)		(i) (a) (c)	(ii)
	GNR 984	1	15						
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REGISTRATION

WSP Group Africa (Pty) Ltd (WSP) has been appointed as the EAP by ABO Energy South Africa (Pty) Ltd, on behalf of ABO Uvemvane Wind Energy Facility 1 (Pty) Ltd, to manage the S&EIR process. Parties wishing to formally register as stakeholders in order to offer their comment on the Proposed Project 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 process.

DRAFT EIA REPORT REVIEW PERIOD

Due to an unforeseen delay, the Draft Environmental Impact Assessment Report (DEIAR) will be available for public comment from **25 August 2026 to 28 September 2026**.

Please see the attached letter for more information.

Kind regards,

Public Participation Office

T +27 11 254 4800

T +27 11 361 1300

WSP

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

wsp.com



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Registered Number: 1999/008928/07 South Africa

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From: Helena Spies [REDACTED]
Sent: Tuesday, 25 August 2026 07:32
To: ZA - WSP - PPOffice
Subject: Re: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

There will be NO such windfarm build on our land
This is Suikerbosrand Nature Reserve and wild life and it will be kept that way

As land owners we say NO !!!!!

On Mon, 24 Aug 2026, 16:01 ZA - WSP - PPOffice, <PP@wsp.com> wrote:

Dear Stakeholder,

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Kind regards,

Public Participation Office

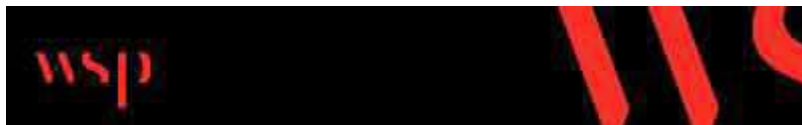
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Registered Number: 1999/008928/07 South Africa

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Mathulwe, Tumelo

From: [REDACTED]
Sent: Monday, 24 August 2026 18:55
To: ZA - WSP - PPOffice
Cc: Frans Swart
Subject: RE: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)
Attachments: WSP Group Africa (Pty) Ltd-Letter of no objection..pdf

Good day,

Please see attached our letter of no objection.

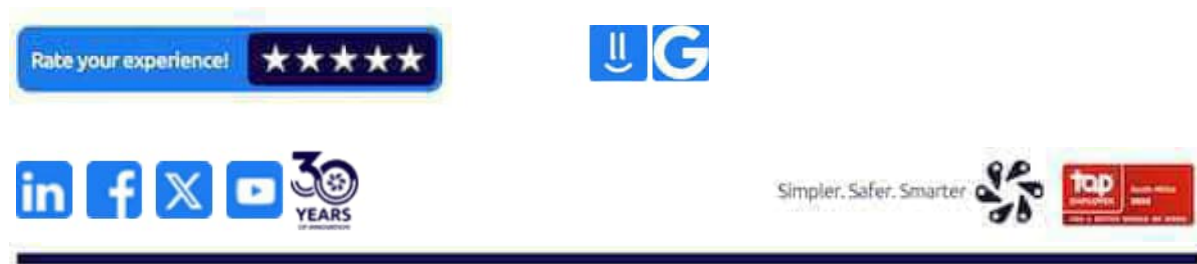
Regards,

Joe Vermaak

Netstar

NETSTAR

W: www.netstar.co.za



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From: ZA - WSP - PPOffice <PP@wsp.com>
Sent: Monday, 24 August 2026 15:57
Subject: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

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Kind regards,

Public Participation Office

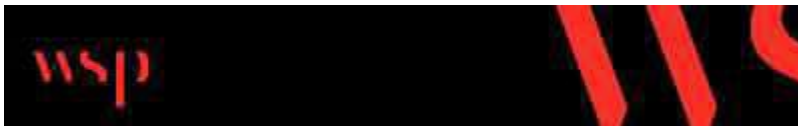
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Registered Number: 1999/008928/07 South Africa

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Date: 24/08/2026

WSP Group Africa (Pty) Ltd
DFFE Reference Number: 14/12/16/3/3/2/2803
Ref: 41106304

Letter of no Objection

Attention: The Directors.

As requested, Netstar (Pty) Ltd, is a vehicle tracking and asset management company that utilizes a land-based radio frequency network and has evaluated the proposed installation and documents.

After considering the information and location of the "PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803).

Netstar does not foresee any Electromagnetic interference, or any interference on their RF equipment in that specific area concerning your proposed project.

Therefore, Netstar (Pty) Ltd has no objection regarding the development and building of the installation. This letter of no objection will be valid for one year from the date.

Kind regards,

[REDACTED]
[REDACTED] Supervision F Network
[REDACTED]



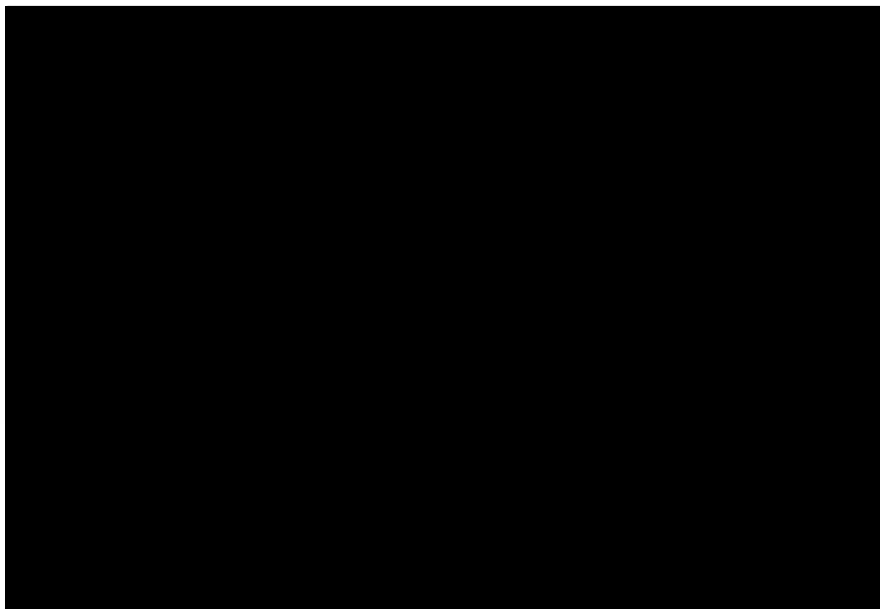
Mathulwe, Tumelo

From: Municipal Manager <[REDACTED]>
Sent: Monday, 24 August 2026 16:22
To: ZA - WSP - PPOffice
Subject: Re: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

Good day.

The Office of the Municipal Manager formally acknowledges receipt of the received correspondence with sincere appreciation.

Kind regards,



-26.4955394,
+28.3608789



lesedi-lm.gauteng.gov.za



From: ZA - WSP - PPOffice <PP@wsp.com>

Sent: 24 August 2026 15:57

Subject: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

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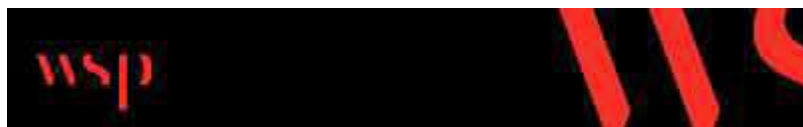
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Registered Number: 1999/008928/07 South Africa

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not an authorized or intended recipient, please notify the sender immediately by replying to this message, delete this message and all copies from your e-mail system and destroy any printed copies.



Mathulwe, Tumelo

From: Harry Mphahlele, Vodacom <[REDACTED]>
Sent: Wednesday, 16 September 2026 09:54
To: ZA - WSP - PPOffice
Subject: RE: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UMEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG.
Attachments: ABO Uvemvane Wind Energy Facility 1.pdf

Hi
See attached

From: ZA - WSP - PPOffice <PP@wsp.com>
Sent: Friday, 17 April 2026 17:56
To: Harry Mphahlele, Vodacom <H[REDACTED]> ZA - WSP - PPOffice <PP@wsp.com>
Subject: RE: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UMEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG.

This email originated from outside of the organisation: Be cautious about the sender, attachments and links. If uncertain use [Report button](#)

Good day Harry

Please see the kmz attached

Kind regards,

Public Participation Office

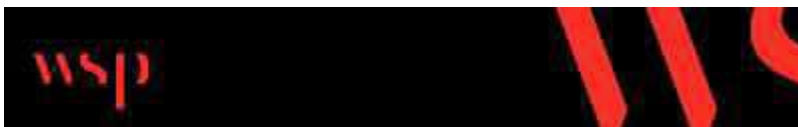
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Registered Number: 1999/008928/07 South Africa

From: Harry Mphahlele, Vodacom <[REDACTED]>
Sent: Monday, 13 April 2026 10:58

To: ZA - WSP - PPOffice <PP@wsp.com>

Subject: RE: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG.

Hi There,

Kindly share the KMZ file with proposed turbine locations

From: ZA - WSP - PPOffice <PP@wsp.com>

Sent: Friday, 13 March 2026 15:47

Subject: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG.

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Dear Stakeholder,

NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG.

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)**

DESCRIPTION AND LOCATION

The proponent outlined in the table below proposes to establish a Wind Energy Facility (WEF), application for environmental authorisation, near Heidelberg and Balfour in the Gauteng and Mpumalanga Provinces. The proposed authorisation includes the following Scoping and Environmental Impact Reporting (S&EIR) process:

Proponent	Project	Technology	Process
ABO Uvemvane Wind Energy Facility 1 (Pty) Ltd	Up to 170MWac WEF including associated infrastructure	Wind	S&EIR
Farm Names			
<ul style="list-style-type: none">• Remaining Extent of Portion 4 of the Farm De Hoek 411• The Farm Orion No. 413• Portion 7 of the Farm Driefontein 405• Remaining Extent of Portion 1 of the Farm Driefontein 405• Portion 5 (a Portion of Portion 1) of the Farm Driefontein 405• Remaining Extent of Portion 9 of the Farm Malanskraal No. 407• Remaining Extent of Portion 2 of the Farm Malanskraal No.407	<ul style="list-style-type: none">• Portion 17 (a Portion of Portion 8) of the Farm Malanskraal No. 407• Portion 16 (a Portion of Portion 4) of the Farm Malanskraal No. 407• Remainder of Portion 18 (a Portion of Portion 3) of the Farm Malanskraal 407• Portion 20 (a Portion of Portion 13) of the Farm Malanskraal 407• Remaining Extent of Portion 13 (a Portion of Portion 2) of the Farm Malanskraal 407• Portion 1 of the Farm Weltevreden No. 449• Farm Bothas Spruit No. 404	<ul style="list-style-type: none">• The Remaining Extent of Portion 2 of the Farm Lagerspoort No. 406• Portion 17 of the Farm Lagerspoort Number 406• Portion 24 (a portion of Portion 23) of the Farm Steynskraal 399• Remaining Extent of Portion 2 of the Farm Modderfontein 410• Portion 7 of the Farm Lagerspoort No. 406• Portion 35 of the Farm Lagerspoort 406• Portion 15 of the Farm Lagerspoort 406• Remaining Extent of Portion 5 of the Farm Lagerspoort 406• Portion 32 (a portion of Portion 5) of the Farm Lagerspoort No. 406	

<ul style="list-style-type: none"> Portion 12 (a Portion of Portion 2) of the Farm Malanskraal No. 407 Remaining Extent of Portion 2 of the Farm Driefontein No.405 Remaining Extent of the Farm Driefontein 405 Remainder of Portion 6 (Kingsmead) of the Farm Malanskraal 407 	<ul style="list-style-type: none"> Remaining Extent of Portion 1 of the Farm Steynskraal 399 Portion 25 (a portion of Portion 11) of the Farm Steynskraal 399 	<ul style="list-style-type: none"> Remaining Extent of Portion 11 (a Portion of Portion 1) of the Farm Steynskraal 399
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ENVIRONMENTAL APPLICATIONS

The proposed project triggers several listed activities contained in the Environmental Impact Assessment (EIA) Regulations Listing Notice 1 (GNR983), Listing Notice 2 (GNR984) and Listing Notice 3 (GNR985), as amended, and therefore, authorisation to undertake the listed activities must be sought via a S&EIR process. The anticipated listed activity numbers associated with the proposed project are reflected in the table below. Should you wish to obtain a complete copy of these listed activities, please contact the Environmental Assessment Practitioner (EAP), details provided below.

Project Name	Listing Notice	Applicable Triggers							
Scoping EIA for: <ul style="list-style-type: none">ABO Uvemvane WEF 1	GNR 983	11(i)	12(ii)(a)(c)	14	19	24(ii)	28(ii)	48(i)(a)(c)	56(ii)
	GNR 984	1	15						
	GNR 985	4	10	12	14(ii)(a)(c)	18	23(ii)(a)(c)		
MPRDA	Section 53	Surface use in terms of Section 53 of the Mineral and Petroleum Resources Development Act (no. 28 of 2002)							
NHRA	Section 38(8)	Review of an Impact Assessment related to an application for Environmental Authorisation							

REGISTRATION

WSP Group Africa (Pty) Ltd (WSP) has been appointed as the EAP by ABO Energy South Africa (Pty) Ltd, on behalf of ABO Uvemvane Wind Energy Facility 1 (Pty) Ltd, to manage the S&EIR process. Parties wishing to formally register as stakeholders in order to offer their comment on the Proposed Project 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 process.

DRAFT SCOPING REPORT REVIEW PERIOD

The Draft Scoping Report (DSR) is available for public comment from **13 March 2026 to 15 April 2026**. The report will be available for download from the link and QR code below. Printed copies of the DSR will be available for review at the following venues:

- Ratanda Proper Library - Nkomo St, Ratanda, Heidelberg - GP, 1443
- Heidelberg Public Library - 7 Jacobs St, Heidelberg, Heidelberg - GP, 1441
- Ward 3 Public Library - Joubert street, Balfour, 2410
- Grootvlei Power Station Stores - Seventh Street, Grootvlei
- WSP Website - <https://www.wsp.com/en-ZA/services/public-documents>

- Datafree Website - <https://wsp-engage.com/>

Kindly ensure that all comments on the proposed project or requests to be registered as an Interested and Affected Party are submitted to the contact details provided herewith, by **15 April 2026**. Should you have any queries/comments, please do not hesitate to contact the WSP Public Participation Office

Contact the WSP Public Participation Office to register as a stakeholder and to receive further information:

Public Participation Office; WSP Group Africa (Pty) Ltd

Tel: 011 254 4800; **E-mail:** 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.*

Kind regards,

Public Participation Office

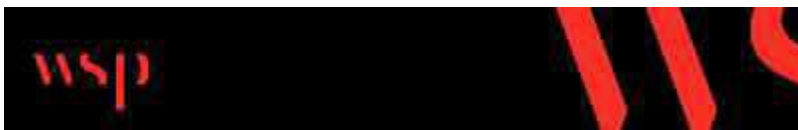
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-LAEmHhHzdJzBITWfa4Hgs7pbKI

C2 General

C2 General

16-09-2026

Vodacom Mpumalanga
Riverside Office Park
Block 2, Level 1
1 Aqua Street
Riverside, Mbombela
1201

Telecoms Impact Assessment – ABO Uvemvane Wind Energy Facility 1 (Pty) Ltd

Dear Sir/Madam,

I refer to your request for Vodacom to assess the impact of the proposed project: **ABO Uvemvane Wind Energy Facility 1** and its infrastructure on the Vodacom network.

After our assessment, I can confirm that Vodacom services will not be affected by the proposed project as submitted.

Yours sincerely

Harry Mphahlele

[Redacted signature block]

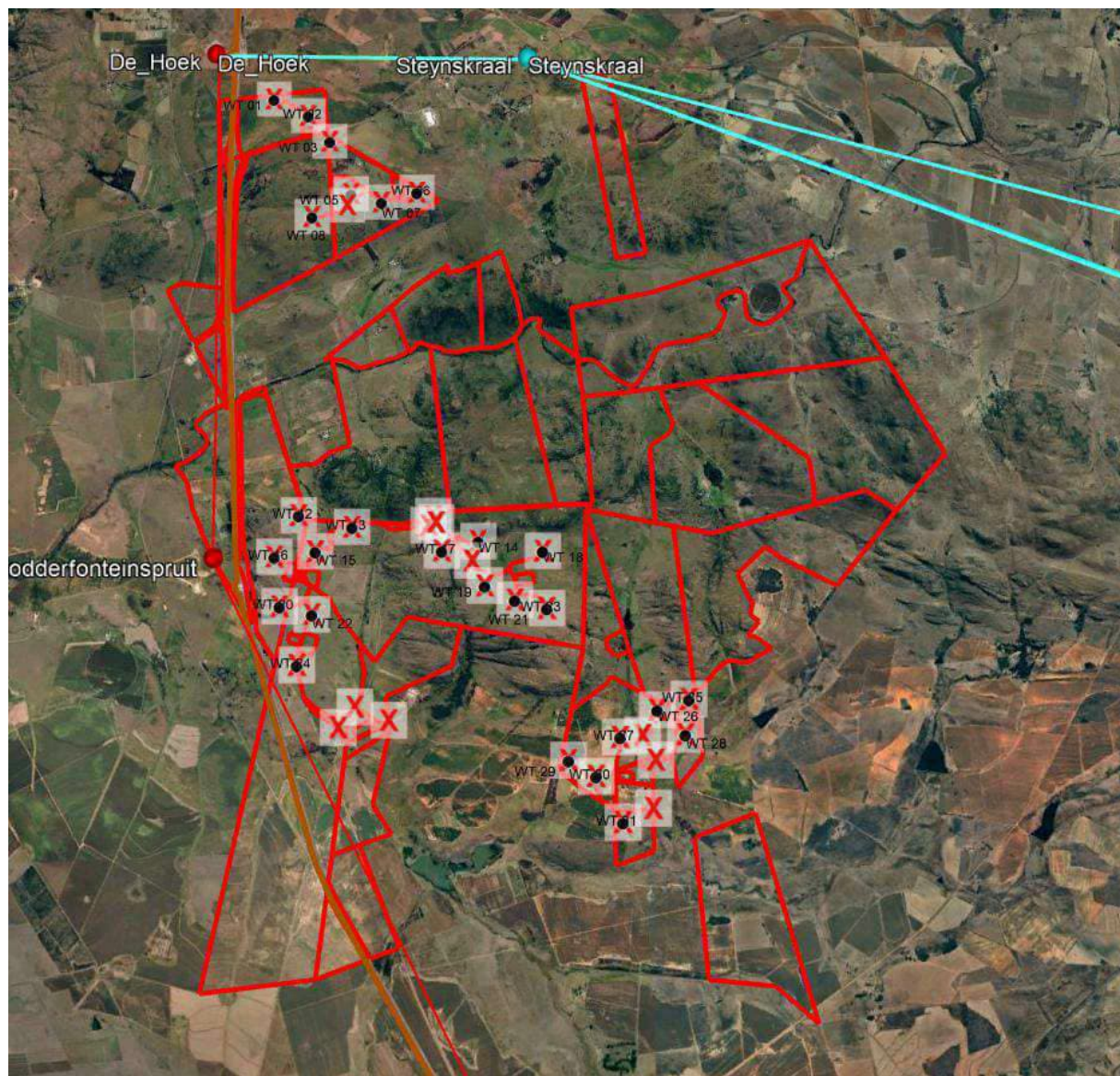
Vodacom (Pty) Ltd
Riverside Office Park, Block 1 Level 1
1 Aqua Street, Riverside, Mbombela 1200
P.O. Box 3114, Nelspruit, 1200
Phone: +27 (0)82 276 8000

vodacom.com

Directors: MS Aziz Joosub (Group CEO and Chairman), S Mdlalose (CEO)*, R Nkabinde (Financial Director), NM Mashigo, RK Morathi, WP Mzimba, TE Netshitenzhe, B Ngwenya, TD-M Nel. Company Secretary: NR Imasiku

*British

Reg. No. 1993/003367/07



Mathulwe, Tumelo

From: Huseyin Kartal <[REDACTED]>
Sent: Wednesday, 16 September 2026 13:29
To: ZA - WSP - PPOffice
Subject: Re: Reply: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

Thanks I will.

On Wed, 16 Sep 2026, 13:27 ZA - WSP - PPOffice, <PP@wsp.com> wrote:

Good day Huseyin,

Thank you. We will await your comments

Kind regards,

Public Participation Office

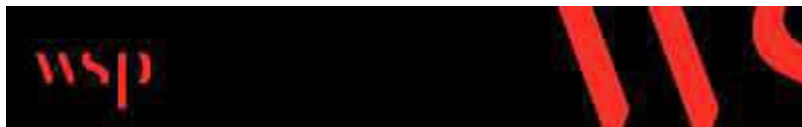
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Registered Number: 1999/008928/07 South Africa

From: Huseyin Kartal <[REDACTED]>
Sent: Friday, 11 September 2026 19:05
To: ZA - WSP - PPOffice <PP@wsp.com>
Subject: Reply: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

Good day.my name is Huseyin Kartal. I am [REDACTED] KARTAL mining Pty LMT. this time I can't answer your request. reason still I am busy to finishing my project. It will takes another two months. After two months I will give you answer.

Cell: [REDACTED]

Email: [REDACTED]

Regards

Sent from Vodacom smartphone

Dear Stakeholder,

NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

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 of the applications for environmental authorisations (EA) in respect of activities identified in terms of GNR 983, GNR 984 and GNR 985 (as amended)

DESCRIPTION AND LOCATION

The proponent outlined in the table below proposes to establish a Wind Energy Facility (WEF), application for environmental authorisation, near Heidelberg and Balfour in the Gauteng and Mpumalanga Provinces. The proposed authorisation includes the following Scoping and Environmental Impact Reporting (S&EIR) process:

Proponent	Project	Technology	Process
ABO Uvemvane Wind Energy Facility 1 (Pty) Ltd	Up to 170MWac WEF including associated infrastructure	Wind	S&EIR
Farm Names			

Proponent	Project	Technology	Process
<ul style="list-style-type: none"> The Remaining Extent of Portion 2 of the Farm Lagerspoort Number 406 Portion 17 (a Portion of Portion 3) of the Farm Lagerspoort Nr 406 Remaining Extent of Portion 4 of the Farm De Hoek 411 Portion 45 of the Farm Lagerspoort 406 Portion 7 of the Farm Lagerspoort Number 406 Portion 19 of the Farm De Hoek No 411 Remaining Extent of Portion 2 of the Farm Modderfontein 410 	<ul style="list-style-type: none"> The Farm Orion No 413 Remaining Extent of Portion 5 of the Farm Lagerspoort 406 Portion 7 of the Farm Driefontein 405 Remaining Extent of Portion 9 of the Farm Malanskraal No 407 Remaining Extent of Portion 2 of the Farm Malanskraal 407 Portion 12 (a Portion of Portion 2) of the Farm Malanskraal 407 Remaining Extent of Portion 2 of the Farm Driefontein 405 Remaining Extent of the Farm Driefontein 405 	<ul style="list-style-type: none"> Remainder of Portion 6 (Kingsmead) of the Farm Malanskraal 407 Portion 17 (a Portion of Portion 8) of the Farm Malanskraal No 407 Farm Bothas Spruit Nr. 404 Portion 16 (a Portion of Portion 4) of the Farm Malanskraal No 407 Remaining Extent of Portion 13 (a Portion of Portion 2) of the Farm Malanskraal 407 Remainder of Portion 18 (a Portion of Portion 3) of the Farm Malanskraal 407 Portion 1 of the Farm Weltevreden Nr. 449 	

ENVIRONMENTAL APPLICATIONS

The proposed project triggers several listed activities contained in the Environmental Impact Assessment (EIA) Regulations Listing Notice 1 (GNR983), Listing Notice 2 (GNR984) and Listing Notice 3 (GNR985), as amended, and therefore, authorisation to undertake the listed activities must be sought via a S&EIR process. The anticipated listed activity numbers associated with the proposed project are reflected in the table below. Should you wish to obtain a complete copy of these listed activities, please contact the Environmental Assessment Practitioner (EAP), details provided below.

Project Name	Listing Notice	Applicable Triggers							
Scoping EIA for: <ul style="list-style-type: none"> ABO Uvemvane WEF 1 	GNR 983	11(i)	12(ii) (a)(c)	14	19	24 (ii)	28(ii)	48 (i) (a) (c)	56 (ii)
	GNR 984	1	15						
	GNR 985	4	10	12	14(ii) (a)(c)	18	23(ii) (a)(c)		
MPRDA	Section 53	Surface use in terms of Section 53 of the Mineral and Petroleum Resources Development Act (no. 28 of 2002)							
NHRA	Section 38(8)	Review of an Impact Assessment related to an application for Environmental Authorisation							

REGISTRATION

WSP Group Africa (Pty) Ltd (WSP) has been appointed as the EAP by ABO Energy South Africa (Pty) Ltd, on behalf of ABO Uvemvane Wind Energy Facility 1 (Pty) Ltd, to manage the S&EIR process. Parties wishing to formally register as stakeholders in order to offer their comment on the Proposed Project 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 process.

DRAFT EIA REPORT REVIEW PERIOD

Due to an unforeseen delay, the Draft Environmental Impact Assessment Report (DEIAR) will be available for public comment from **25 August 2026 to 28 September 2026**.

Please see the attached letter for more information.

Kind regards,

Public Participation Office

T +27 11 [254 4800](tel:2544800)

T +27 11 [361 1300](tel:3611300)

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Mathulwe, Tumelo

From: Fundiswa Zanele Ndaba <[REDACTED]>
Sent: Thursday, 27 August 2026 08:10
To: ZA - WSP - PPOffice
Subject: Fw: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

Good morning

Kindly note that this is a last reminder from our office regarding the deeds searches that we require from you so that we can proceed with your request. We are unable to assist you if you don't provide us with the required information, because it is difficult to search for it from our database without it.

Kindly note that the turnaround time of 14 working days will start counting from the day we receive the required information from you.

Regards✍



F [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: Fundiswa Zanele Ndaba <[REDACTED]>
Sent: Tuesday, August 25, 2026 2:10 PM
To: ZA - WSP - PPOffice <PP@wsp.com>
Cc: [REDACTED]
[REDACTED]
Subject: Re: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

Good day

Kindly note that we are still waiting for deeds office searches or registration divisions and municipality of the properties you were enquiring about so that we could be able to assist you.

Regards✍



[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: Fundiswa Zanele Ndaba
Sent: Tuesday, August 25, 2026 9:13 AM
To: ZA - WSP - PPOffice <PP@wsp.com>
Subject: RE: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

Good day

Please note that the properties in question are not captured according to deeds information, there are no registration divisions on the properties and the municipalities they are based at. I will not be able to assist you with such limited information. Kindly provide the registration divisions (example: IR, IQ, JR) and the municipalities for each one of them.

Regards✍



[Redacted signature block]

From: ZA - WSP - PPOffice <PP@wsp.com>
Sent: Monday, August 24, 2026 3:57 PM
Subject: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

Some people who received this message don't often get email from pp@wsp.com. [Learn why this is important](#)

Dear Stakeholder,

NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

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Farm Names			

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ENVIRONMENTAL APPLICATIONS

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MPRDA	Section 53	Surface use in terms of Section 53 of the Mineral and Petroleum Resources Development Act (no. 28 of 2002)							
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DRAFT EIA REPORT REVIEW PERIOD

Due to an unforeseen delay, the Draft Environmental Impact Assessment Report (DEIAR) will be available for public comment from **25 August 2026 to 28 September 2026**.

Please see the attached letter for more information.

Kind regards,

Public Participation Office

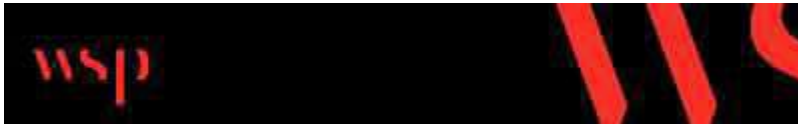
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T +27 11 361 1300

WSP

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1685 South Africa

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Registered Number: 1999/008928/07 South Africa

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Mathulwe, Tumelo

From: Gopolang Moeketsane (GS) <[REDACTED]>
Sent: Monday, 21 September 2026 10:10
To: ZA - WSP - PPOffice
Subject: FW: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)
Attachments: DEIA_Layout_version2.kmz

Good morning

Application has been rejected due to Company /Contract cover letter

For both renewal and new application ,you are required to submit documents as stated below not the link

- **Cover letter with letter head, company registration number** and Locality map in PDF Format ,KMZ file, Google Maps showing Road/street/Farm names, ERF number, clearly indicating your area /scope of work.

Kind regards

Gopolang Moeketsane
[REDACTED]
[REDACTED]

From: ZA - WSP - PPOffice <PP@wsp.com>
Sent: Friday, 18 September 2026 11:10
To: Wind Farm <w[REDACTED]>; North Zone Wayleaves [REDACTED]
Cc: Radio Frequency Spectrum Man <[REDACTED]> ZA - WSP - PPOffice <PP@wsp.com>
Subject: RE: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

EXTERNAL EMAIL: Do not click any links or open any attachments, unless you trust the sender and know that the content is safe.

Good day,

Please see the kmz attached.

Kind regards,

Public Participation Office

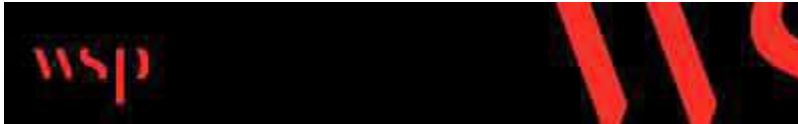
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Registered Number: 1999/008928/07 South Africa

From: Wind Farm <[REDACTED]@za>

Sent: Wednesday, 02 September 2026 11:36

To: North Zone Wayleaves <[REDACTED]>

Cc: Wind Farm <[REDACTED]> A - WSP - PPOffice <PP@wsp.com>

Subject: Re: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

Greetings ,

Can we kindly, please request that all submissions should include KMZ file(s) for the proposed facilities, together with a document detailing the relevant coordinates or a link to access such material.

As part of the formal workflow, submissions are first sent to the Wayleave Departments.

Please note ,the provided link does not include the KMZ/KML files.

Kindly , could you please ensure that the required supporting documents such as the **KMZ/KML files and coordinates information**, are included with the submissions before it is forwarded for our assessments.

This will help ensure that the submission can be processed through without unnecessary delays.

Kind Regards

RFSM

Office Address : 61 Oak Avenue, Highveld,
Techno Park, Centurion 0157
Private Bag X881, Pretoria, Gauteng, 0001



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From: North Zone Wayleaves <[REDACTED]>
Sent: Monday, August 31, 2026 8:21 AM
To: Wind Farm <[REDACTED]>
Subject: FW: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

Hi

FYA

Thanks & Regards 

[REDACTED]
Wayleaves North Zone, Openserve

Tell: +[REDACTED]
Cell: [REDACTED]

[REDACTED]
Address: City Deep ETE 2 Bonsmara Street 2049



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From: ZA - WSP - PPOffice <PP@wsp.com>
Sent: Monday, 24 August 2026 15:57
Subject: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

EXTERNAL EMAIL: Do not click any links or open any attachments, unless you trust the sender and know that the content is safe.

Dear Stakeholder,

NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

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 of the applications for environmental authorisations (EA) in respect of activities identified in terms of GNR 983, GNR 984 and GNR 985 (as amended)

DESCRIPTION AND LOCATION

The proponent outlined in the table below proposes to establish a Wind Energy Facility (WEF), application for environmental authorisation, near Heidelberg and Balfour in the Gauteng and Mpumalanga Provinces. The proposed authorisation includes the following Scoping and Environmental Impact Reporting (S&EIR) process:

Proponent	Project	Technology	Process
ABO Uvemvane Wind Energy Facility 1 (Pty) Ltd	Up to 170MWac WEF including associated infrastructure	Wind	S&EIR
Farm Names			
<ul style="list-style-type: none"> The Remaining Extent of Portion 2 of the Farm Lagerspoort Number 406 Portion 17 (a Portion of Portion 3) of the Farm Lagerspoort Nr 406 Remaining Extent of Portion 4 of the Farm De Hoek 411 Portion 45 of the Farm Lagerspoort 406 Portion 7 of the Farm Lagerspoort Number 406 Portion 19 of the Farm De Hoek No 411 Remaining Extent of Portion 2 of the Farm Modderfontein 410 	<ul style="list-style-type: none"> The Farm Orion No 413 Remaining Extent of Portion 5 of the Farm Lagerspoort 406 Portion 7 of the Farm Driefontein 405 Remaining Extent of Portion 9 of the Farm Malanskraal No 407 Remaining Extent of Portion 2 of the Farm Malanskraal 407 Portion 12 (a Portion of Portion 2) of the Farm Malanskraal 407 Remaining Extent of Portion 2 of the Farm Driefontein 405 Remaining Extent of the Farm Driefontein 405 	<ul style="list-style-type: none"> Remainder of Portion 6 (Kingsmead) of the Farm Malanskraal 407 Portion 17 (a Portion of Portion 8) of the Farm Malanskraal No 407 Farm Bothas Spruit Nr. 404 Portion 16 (a Portion of Portion 4) of the Farm Malanskraal No 407 Remaining Extent of Portion 13 (a Portion of Portion 2) of the Farm Malanskraal 407 Remainder of Portion 18 (a Portion of Portion 3) of the Farm Malanskraal 407 Portion 1 of the Farm Weltevreden Nr. 449 	

ENVIRONMENTAL APPLICATIONS

The proposed project triggers several listed activities contained in the Environmental Impact Assessment (EIA) Regulations Listing Notice 1 (GNR983), Listing Notice 2 (GNR984) and Listing Notice 3 (GNR985), as amended, and therefore, authorisation to undertake the listed activities must be sought via a S&EIR process. The anticipated listed activity numbers associated with the proposed project are reflected in the table below. Should you wish to obtain a complete copy of these listed activities, please contact the Environmental Assessment Practitioner (EAP), details provided below.

Project Name	Listing Notice	Applicable Triggers							
Scoping EIA for: <ul style="list-style-type: none"> ABO Uvemvane WEF 1 	GNR 983	11(i)	12(ii) (a)(c)	14	19	24 (ii)	28(ii)	48 (i) (a) (c)	56 (ii)
	GNR 984	1	15						
	GNR 985	4	10	12	14(ii) (a)(c)	18	23(ii) (a)(c)		

MPRDA	Section 53	Surface use in terms of Section 53 of the Mineral and Petroleum Resources Development Act (no. 28 of 2002)
NHRA	Section 38(8)	Review of an Impact Assessment related to an application for Environmental Authorisation

REGISTRATION

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DRAFT EIA REPORT REVIEW PERIOD

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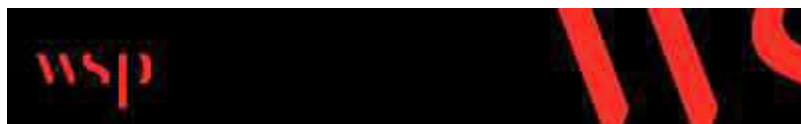
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forestry, fisheries & the environment

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

Private Bag X 447 · PRETORIA · 0001 · Environment House · 473 Steve Biko Road, Arcadia, · PRETORIA

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

Enquiries: Ms Thulisile Nyalunga

Telephone: [REDACTED] -mail: T [REDACTED]

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

Telephone Number: [REDACTED]

Email Address: [REDACTED]

PER MAIL / E-MAIL

Dear Ms Strong

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT 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 PROVINCES

The Application for Environmental Authorisation and Draft Environmental Impact Assessment Report (EIAR) received by the Department on 28 August 2026 refer.

This letter serves to inform you that the following information must be included in the final EIAR:

a) Biodiversity Offset Strategy

- (i) It is noted that the proposed development is not expected to trigger a biodiversity offset in terms of the National Biodiversity Offset Guideline, based on the current project layout and the findings of the specialist assessments.
- (ii) The Department requires that the final layout, development footprint, associated infrastructure and proposed construction methods remain consistent with those assessed by the relevant specialists and do not introduce additional or significant residual impacts on terrestrial biodiversity, botanical features, fauna, aquatic ecosystems or species of conservation concern.
- (iii) Please ensure that no additional infrastructure, construction areas, access roads, laydown areas, services or other associated activities that may materially increase the assessed biodiversity impacts may be introduced without appropriate assessment and consideration by the Department.



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 ditlhapi le Tikologo • Lefapha la Dikgwa, Ditlhapi le Tikologo • Litiko Letemahlatsi, Tinhlanti Netendzawo • Muhasho wa zwa Vhusima-magaka, Vhureakhovhe na Mupo • Ndzawulo 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.

- (iv) The Department requires that all applicable mitigation measures, recommendations and management requirements contained in the specialist assessments be incorporated into the Environmental Management Programme (EMPr) and implemented throughout the construction and operational phases of the proposed development.

b) Specific Comments

- (i) You are required to adequately assess all impacts identified by the avifaunal specialists, including displacement through disturbance and habitat loss, mortality resulting from collisions with turbines and powerlines, mortality resulting from electrocution on electrical infrastructure, and cumulative impacts. The assessment must clearly describe the nature, extent, duration, intensity, likelihood and significance of each impact, both before and after the implementation of mitigation measures. The assessment must be informed by the findings of the relevant specialist studies and must consider the sensitivity and conservation importance of the affected species and habitats.
- (ii) You are required to provide adequate and site-specific mitigation and management measures to avoid and minimise identified impacts and, where avoidance is not possible, to manage residual impacts. The effectiveness and feasibility of the proposed mitigation measures must be demonstrated, and any residual impacts remaining after mitigation must be clearly identified and assessed.
- (iii) The final Biodiversity Management/Action Plan (BMP/BAP) must be consistent with the findings and recommendations of all relevant specialist assessments and must incorporate the applicable mitigation, monitoring and management measures identified during the EIA process. The BMP/BAP must be incorporated into the Environmental Management Programme (EMPr) to ensure that the identified biodiversity management measures are implemented and monitored throughout the relevant phases of the proposed development.

c) Public Participation Process

- (i) The final EIAR must comply with all conditions of the acceptance of the scoping report dated 22 June 2026. Please ensure that the Department's comments are addressed in the report as well as in the comments and response table.
- (ii) Please ensure that the final EIAR includes proof that the key stakeholders received written notification of the proposed activity, and the draft EIAR. Comments made by interested and affected parties (I&APs) must be comprehensively captured and responded to clearly and fully in the comments and response report.

d) Cumulative Assessment

- (i) You are required to assess each identified potentially significant impact and risk, including—
 - cumulative impacts;
 - the nature, significance and consequences of the impact and risk;
 - the extent and duration of the impact and risk;
 - the probability of the impact and risk occurring;
 - the degree to which the impact and risk can be reversed;
 - the degree to which the impact and risk may cause irreplaceable loss of resources; and
 - the degree to which the impact and risk can be mitigated;
- (ii) If there are other similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:
 - Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land.
 - Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.

- The cumulative impacts significance rating must also inform the need and desirability of the proposed development.
- A cumulative impact environmental statement on whether the proposed development must proceed.

e) Specialist Assessments

- (i) It is brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on 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, **except where the applicant provides proof to the competent authority that the specialist assessment affected by these protocols had been commissioned before the date on which the protocols came into effect, in which case Appendix 6 of the Environmental impact Assessment Regulations, 2014, as amended, will apply.** Please indicate in the EIAR whether or not the protocols were applied or provide the necessary proof where the exception applies. Please note further that the protocols, if applicable, require certain specialists to be SACNASP registered.
- (ii) For ease of reference, please provide a table in the EIAR, indicating the studies required by the Department’s screening tool, a column indicating whether these studies were undertaken or not, a column with the requisite motivation if a study was not undertaken (confirmed by a site sensitivity verification, where the protocols are applicable and require such); a column(s) indicating whether the protocols are applicable and if they were complied with for the relevant study.

f) 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 WEF. 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 WEF.
- (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 WEF are also incorporated into the EMPr for the WEF. 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.

g) Undertaking of an Oath

- (i) Please ensure that the final EIAR includes an undertaking under oath or affirmation by the EAP (**administered by a Commissioner of Oaths**) as per Appendix 3 of the NEMA EIA Regulations, 2014, as amended.

General

Where the proposed activity does not include operational aspects, please also ensure that the final EIAR includes the period for which the environmental authorisation is required and the date on which the activity will be concluded and the post construction monitoring requirements finalised, as per Appendix 3 of the NEMA EIA Regulations, 2014, as amended.

You are reminded that the final EIA to be submitted to this Department must comply with Regulation 23 of the NEMA EIA Regulations, 2014, as amended. The EIA must contain all information set out into the Regulations or comply with a protocol or minimum information requirements relevant to the application as identified and gazetted by the Minister in a government notice.

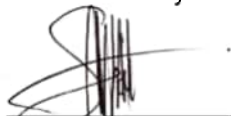
Regulation 23(1)(a) of the NEMA EIA Regulations, 2014, as amended, states that: *“The applicant must within 106 days of the acceptance of the scoping report submit to the competent authority -(a) an environmental impact assessment report inclusive of any specialist reports, and an EMP, which must have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority.”*

Should there be significant changes or new information that has been added to the EIA's or EMP which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 23(1)(b) of the NEMA EIA Regulations, 2014, as amended, which states: *“The applicant must within 106 days of the acceptance of the scoping report submit to the competent authority – (b) a notification in writing that the reports, and an EMP, will be submitted within 156 days of acceptance of the scoping report by the competent authority, or where regulation 21(2) applies, within 156 days of receipt of application by the competent authority, as significant changes have been made or significant new information has been added to the environmental impact assessment report or EMP, which changes or information was not contained in the reports or plans consulted on during the initial public participation process contemplated in subregulation (1)(a) and that the revised environmental impact assessment report or EMP will be subjected to another public participation process of at least 30 days.*

Should you fail to meet any of the timeframes stipulated in Regulation 23 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.

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 sincerely



[Redacted signature block]

Date: 22 September 2026

cc:	Kelli Ross	ABO Umemvane Wind Energy Facility 1 (Pty) Ltd	Email: [Redacted]
-----	------------	---	-------------------

Mathulwe, Tumelo

From: Wind Farm <[REDACTED]>
Sent: Wednesday, 23 September 2026 09:27
To: North Zone Wayleaves
Cc: Radio Frequency Spectrum Man; ZA - WSP - PPOffice
Subject: Re: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UMEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)
Attachments: Approval ABO Umemvane Wind Energy Facility 1 (Pty) Ltd by WSP Group Africa (Pty) Ltd (WSP).pdf

Greetings ,

Please find the attached.

Kind Regards

[REDACTED]
Office Address : 61 Oak Avenue, Highveld,
Techno Park, Centurion 0157
Private Bag X881, Pretoria, Gauteng, 0001



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From: ZA - WSP - PPOffice <PP@wsp.com>
Sent: Friday, September 18, 2026 11:10 AM
To: Wind Farm <[REDACTED]>
[REDACTED]; ZA - WSP - PPOffice <PP@wsp.com>
Subject: RE: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UMEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

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Good day,

Please see the kmz attached.

Kind regards,

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Registered Number: 1999/008928/07 South Africa

From: Wind Farm [REDACTED]

Sent: Wednesday, 02 September 2026 11:36

To: North Zone Wayleaves <[REDACTED]>

[REDACTED] ZA - WSP -
PPOffice <PP@wsp.com>

Subject: Re: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY
1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number:
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From: North Zone Wayleaves <[REDACTED]>
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Hi

FYA

Thanks & Regards 

[REDACTED]
Wayleaves North Zone, Openserve

Tell: [REDACTED]
Cell: [REDACTED]

[REDACTED]
Address: City Deep ETE 2 Bonsmara Street 2049



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From: ZA - WSP - PPOffice <PP@wsp.com>
Sent: Monday, 24 August 2026 15:57
Subject: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

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Dear Stakeholder,

NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

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 of the applications for environmental authorisations (EA) in respect of activities identified in terms of GNR 983, GNR 984 and GNR 985 (as amended)

DESCRIPTION AND LOCATION

The proponent outlined in the table below proposes to establish a Wind Energy Facility (WEF), application for environmental authorisation, near Heidelberg and Balfour in the Gauteng and Mpumalanga Provinces. The proposed authorisation includes the following Scoping and Environmental Impact Reporting (S&EIR) process:

Proponent	Project	Technology	Process
ABO Uvemvane Wind Energy Facility 1 (Pty) Ltd	Up to 170MWac WEF including associated infrastructure	Wind	S&EIR
Farm Names			
<ul style="list-style-type: none"> The Remaining Extent of Portion 2 of the Farm Lagerspoort Number 406 Portion 17 (a Portion of Portion 3) of the Farm Lagerspoort Nr 406 Remaining Extent of Portion 4 of the Farm De Hoek 411 Portion 45 of the Farm Lagerspoort 406 Portion 7 of the Farm Lagerspoort Number 406 Portion 19 of the Farm De Hoek No 411 Remaining Extent of Portion 2 of the Farm Modderfontein 410 	<ul style="list-style-type: none"> The Farm Orion No 413 Remaining Extent of Portion 5 of the Farm Lagerspoort 406 Portion 7 of the Farm Driefontein 405 Remaining Extent of Portion 9 of the Farm Malanskraal No 407 Remaining Extent of Portion 2 of the Farm Malanskraal 407 Portion 12 (a Portion of Portion 2) of the Farm Malanskraal 407 Remaining Extent of Portion 2 of the Farm Driefontein 405 Remaining Extent of the Farm Driefontein 405 	<ul style="list-style-type: none"> Remainder of Portion 6 (Kingsmead) of the Farm Malanskraal 407 Portion 17 (a Portion of Portion 8) of the Farm Malanskraal No 407 Farm Bothas Spruit Nr. 404 Portion 16 (a Portion of Portion 4) of the Farm Malanskraal No 407 Remaining Extent of Portion 13 (a Portion of Portion 2) of the Farm Malanskraal 407 Remainder of Portion 18 (a Portion of Portion 3) of the Farm Malanskraal 407 Portion 1 of the Farm Weltevreden Nr. 449 	

ENVIRONMENTAL APPLICATIONS

The proposed project triggers several listed activities contained in the Environmental Impact Assessment (EIA) Regulations Listing Notice 1 (GNR983), Listing Notice 2 (GNR984) and Listing Notice 3 (GNR985), as amended, and therefore, authorisation to undertake the listed activities must be sought via a S&EIR process. The anticipated listed activity numbers associated with the proposed project are reflected in the table below. Should you wish to obtain a complete copy of these listed activities, please contact the Environmental Assessment Practitioner (EAP), details provided below.

Project Name	Listing Notice	Applicable Triggers								
Scoping EIA for:	GNR 983	11(i)	12(ii)	14	19	24	28(ii)	48	56	

• ABO Uvemvane WEF 1			(a)(c)			(ii)		(i) (a) (c)	(ii)
	GNR 984	1	15						
	GNR 985	4	10	12	14(ii) (a)(c)	18	23(ii) (a)(c)		
MPRDA	Section 53	Surface use in terms of Section 53 of the Mineral and Petroleum Resources Development Act (no. 28 of 2002)							
NHRA	Section 38(8)	Review of an Impact Assessment related to an application for Environmental Authorisation							

REGISTRATION

WSP Group Africa (Pty) Ltd (WSP) has been appointed as the EAP by ABO Energy South Africa (Pty) Ltd, on behalf of ABO Uvemvane Wind Energy Facility 1 (Pty) Ltd, to manage the S&EIR process. Parties wishing to formally register as stakeholders in order to offer their comment on the Proposed Project 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 process.

DRAFT EIA REPORT REVIEW PERIOD

Due to an unforeseen delay, the Draft Environmental Impact Assessment Report (DEIAR) will be available for public comment from **25 August 2026 to 28 September 2026**.

Please see the attached letter for more information.

Kind regards,

Public Participation Office

T +27 11 254 4800
T +27 11 361 1300

WSP

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

wsp.com



WSP is a proud Level 1 B-BBEE contributor and is internationally certified for ISO 9001, 14001 & 45001

Confidential

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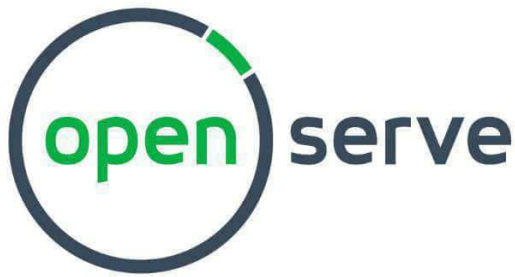
WSP Group Africa (Pty) Ltd, Registered Office: Building 1, Maxwell Office Park, Magwa Crescent West, Waterfall City, Midrand, Gauteng, 1685, South Africa
Registered Number: 1999/008928/07 South Africa

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61 Oak Avenue, Highveld
Techno Park, Centurion 0157,
Private Bag X881, Pretoria,
Gauteng, 0001

23 September 2026

WSP Group Africa (Pty) Ltd (WSP)
Building 1
Maxwell Office Park
Magwa Crescent West
Waterfall City
Midrand
1685

RESPONSE TO SECTION 29 OF THE ELECTRONIC COMMUNICATIONS ACT 36 OF 2005 NOTICE

Dear Sir/ Madam

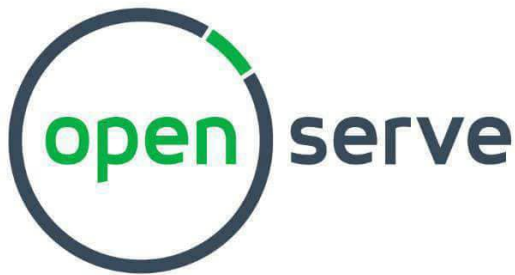
Your notice received on 24 August 2026 refers.

We thank you for notifying us of your planned activities as required under section 29 of the ECA.

ELECTRICAL / POWER SERVICES CONDITIONS

Openserve has analysed the information provided by WSP Group Africa (Pty) Ltd (WSP) in accordance with the provisions of Section 29(1)(c) of the ECA, and specifically the location of the site. Openserve has the following terms and conditions or requirements for the construction of ABO Uvemvane Wind Energy Facility 1 project at the site:

- Take note that the findings made by Openserve are based on simulation and calculated on a theoretical model, using available data and assumptions where no data was provided. Therefore, such findings may change at any time should any further information be made available to or come to our attention.
- At any time after this notice, and during construction of the project, should any radio transmissions be affected by construction activities, Openserve will give you 30 (thirty) days' written notice to minimise or reduce and/or remove the cause of the interference. Under no circumstances will Openserve be liable to you or any other third party for any damages, of any nature whatsoever, suffered as a consequence of the mentioned request.
- Construction activities underneath, along, across or within close proximity to Openserve infrastructure must comply with the applicable Openserve guidelines relating to clearances between equipment and the proposed construction activity. Furthermore, you must strictly adhere to and all installations must be fully compliant with the Occupational Health and Safety Act, 1993 (Act 85 of 1993).

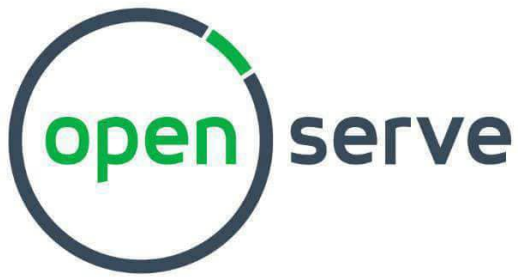


- This notice is further subject to the boundaries or structures listed in annexure 1 below, the materials used as well as the size and positioning of structures declared in your notice. If any radio system is compromised by a deviation of this submission and the deviation cannot be reversed, you shall be liable for the cost to re-establish or relocate the service and under no circumstances will Openserve be liable to you or any other third party for any damages, of any nature whatsoever, suffered as a consequence.
- This notice is valid and applicable to and between Openserve and WSP Group Africa (Pty) Ltd (WSP). It excludes any other electronic communication operators that have a co-sharing agreement for use on Openserve radio masts.
- This notice is valid for a period of 12 (twelve) months.
- Any additions, amendments, additional structures to be built or change to the energy farm boundaries will require a fresh notice to Openserve.
- This notice does not imply any right of access to Openserve property or use of Openserve's access roads for construction or maintenance of the design project. Permission must be obtained from Openserve in this regard. Furthermore, Openserve reserves the right to claim damages in terms of Section 108 of the Post Office Act No. 44 of 1958, for any loss sustained as a result of damage to our electronic communications infrastructure.
- WSP Group Africa (Pty) Ltd (WSP) shall, in the carrying out of any work or project take all necessary precautions for the safety of Openserve's employees, contractors, representatives and its property including the radio links on or near the Site against damages as result of construction of ABO Uvemvane Wind Energy Facility 1 project. WSP Group Africa (Pty) Ltd (WSP) shall be liable for all and any direct and / or indirect, and / or consequential damages or injury that may be caused by ABO Uvemvane Wind Energy Facility 1, its contractors, subcontractors, employees or representatives to any employee, contractor, representative or property of Openserve including radio links or land which may have been disturbed.
- Any work in connection with the construction of your energy project shall be carried out by you in such a way as to avoid any possible loss or inconvenience to the Openserve, its customers or the public, and on completion of such work, any of our property including radio links or land which may have been disturbed shall be restored to the same condition which it was in before commencement of the construction of energy project.
- In no event will Openserve, its employees, contractors, subcontractors or representatives be liable to you or anyone else for special, collateral, exemplary, direct, indirect, incidental, consequential or any other damages (including without limitation, loss of goodwill, loss of profits or revenues, loss of savings, loss of use, interruptions of business, and your claims or injury) whether or not such damages or injury occurred prior or subsequent to, or are alleged as a result of any Openserve radio links approved and/or not approved in terms of this letter or as result of delict, even if Openserve has been advised of the possibility of such damages or injury.

At least 14 days prior to the commencement of any work, Openserve must be contacted to have the position of our electronic communications facilities or works identified.

In instances where damage has been inflicted upon Openserve's electronic communications facilities or works, in the carrying out of your planned activities as contemplated in your notice referenced above, we request the responsible person to immediately upon becoming aware of such occurrence inform Openserve so that damages to our electronic communications facilities or works can be limited to a minimum.

Please note that should the requirements set out above not be adhered to and damage is inflicted upon Openserve's electronic communications facilities or works in the carrying out of your planned activities as contemplated in your notice referenced above, you may be held liable for any damages suffered by Openserve as a result.

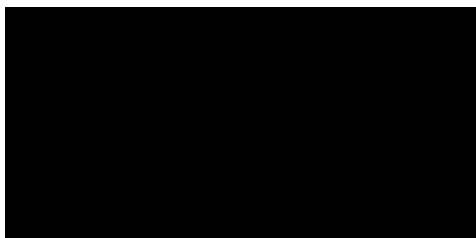


PLEASE CONTACT BELOW FOR KICK-OFF MEETINGS: OPENSERVE ELECTRONIC COMMUNICATIONS FACILITIES OR WORKS TO BE VERIFIED ON SITE AT LEAST 14 DAYS PRIOR TO COMMENCEMENT OF WORK.

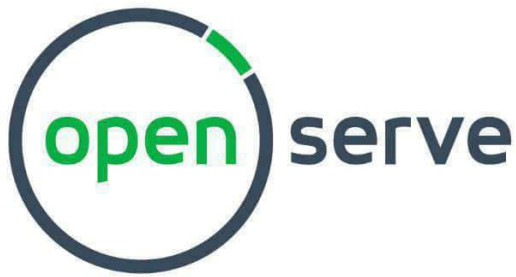
	Name	Contact Numbers	Email Address
Core Engineering and Build	Manager: Pieter Cronje		
Field Network Operations	Manager: Masello Mojela		
In case of damaging Openserve's electronic communications facilities or works, please contact the above Openserve employees.			

All Openserve rights remain reserved.

Yours Sincerely,



Radio Frequency Spectrum Management

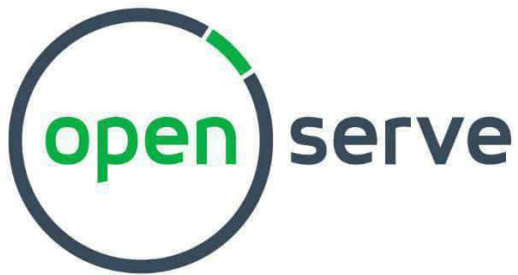


Annexure 1

The points below outline an area used to see if any radio links crossed over or nearby the energy farm. No Openserve radio links will be affected by the energy farm if constructed in the boundary below.

The points listed below are recorded in decimal degree on the WGS84 datum. If any dispute arises with respect to the position of these points, then the Chief Directorate National Geo-Spatial Information trigonometrical system will be used to verify them. The points below form an enclosed area if read in sequence, with the first and last points in the list enclosing the approved area.

Point	Latitude X	Longitude Y
1	26° 37' 44.224" S	28° 22' 57.294" E
2	26° 37' 17.033" S	28° 22' 42.838" E
3	26° 37' 13.725" S	28° 22' 51.187" E
4	26° 37' 17.588" S	28° 23' 14.534" E
5	26° 35' 38.555" S	28° 23' 13.563" E
6	26° 35' 37.929" S	28° 23' 21.923" E
7	26° 37' 30.108" S	28° 23' 20.577" E
8	26° 35' 34.005" S	28° 24' 14.316" E
9	26° 35' 59.110" S	28° 24' 15.569" E
10	26° 36' 36.603" S	28° 25' 18.574" E
11	26° 37' 10.063" S	28° 25' 22.311" E
12	26° 37' 30.485" S	28° 24' 48.989" E
13	26° 37' 53.750" S	28° 24' 58.591" E
14	26° 37' 51.069" S	28° 25' 10.558" E
15	26° 37' 48.267" S	28° 25' 58.226" E
16	26° 39' 16.195" S	28° 26' 17.780" E
17	26° 39' 15.949" S	28° 26' 37.715" E
18	26° 38' 21.012" S	28° 26' 35.160" E



19 26° 38' 17.447" S 28° 27' 18.823" E
20 26° 38' 34.612" S 28° 27' 25.476" E
21 26° 38' 47.167" S 28° 27' 11.329" E
22 26° 39' 26.343" S 28° 27' 11.875" E
23 26° 39' 32.674" S 28° 27' 42.287" E
24 26° 39' 14.498" S 28° 29' 8.089" E
25 26° 39' 24.844" S 28° 29' 24.578" E
26 26° 40' 0.813" S 28° 28' 49.637" E
27 26° 39' 40.473" S 28° 28' 11.716" E
28 26° 39' 53.203" S 28° 27' 55.377" E
29 26° 40' 30.277" S 28° 28' 11.942" E
30 26° 40' 49.838" S 28° 27' 29.039" E
31 26° 41' 20.844" S 28° 27' 31.865" E
32 26° 41' 48.863" S 28° 27' 58.340" E
33 26° 43' 27.835" S 28° 28' 25.629" E
34 26° 43' 10.000" S 28° 28' 3.991" E
35 26° 43' 5.928" S 28° 27' 28.785" E
36 26° 41' 59.395" S 28° 27' 25.085" E

End of list.



13 De Jager Street, Ermelo, 2350, Private Bag X 2777, Ermelo, 2350

Tel: [REDACTED]

LitikoLetekulima, Kutfutukiswa
KwetindzawoTasemakhaya, Temhlaba
Netesimondzawo

Departement van Landbou,
LandelikeOntwikkeling,
GrondenOngewing Sake

umNyangoweZelimo
UkuThuthukiswakweeNdawozemaKhaya,
iNarhaneeNdabazeBhoduluko

Enquiries : R. Luyt / S. Mbuyane / T. Makamu
Reference : 1/3/1/16/5G-60

Ms Ashlea Strong
WSP Group Africa (Pty) Ltd
Email: [REDACTED]

Dear Madam,

DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT: ACTIVITIES ASSOCIATED WITH THE UVMVANE WIND ENERGY FACILITY (WEF) 1 NEAR BALFOUR AND HEIDELBERG IN MPUMALANGA AND GAUTENG

The draft environmental impact assessment report (DEIAR) which was submitted by you in respect of the abovementioned application and received by the Department on 28 August 2026 has reference. The Department has considered the content of the report, and has the following comments:

1. We acknowledge that the layout has been refined, and that significant effort has been applied to avoid areas of highest ecological sensitivity, with the removal of seven turbines (WTG 25-31) and the relocation of WTG 5 and 14. This proactive approach is commended. However, our primary concern remains that the residual impact for avifaunal collisions has been assessed as medium. Based on the evidence, this conclusion is not supported.
2. While the DEIR assesses the residual impact of "Mortality from collisions with turbines" as Moderate post-mitigation, a detailed examination of the underlying Collision Risk Model (CRM) indicates that the predicted effectiveness of the proposed mitigation suite has been overstated.
 - 2.1. The Band (2024) CRM applies a flat 72% risk reduction discount across all 20 turbines and all priority species based on the inclusion of blade patterning, spatial layout optimisation, and habitat management.
 - 2.2. Blade patterning is supported, and, as per our comments on the draft Scoping Report, DARDLEA requires it as a mandatory precautionary measure in Mpumalanga. However its effectiveness relies on visual perception during daylight hours. Applying this 72% fatality reduction factor across the board to crepuscular and nocturnal waterbirds, e.g, Flamingo, which are known to commute at night - is ecologically unsupported.
 - 2.3. The additional 5-day winter survey conducted in June 2026 recorded no flamingos across on-site wetlands. This should have been expected, as flamingos are highly nomadic and migratory waterbirds that typically vacate regional Highveld waterbodies during dry winter periods.
 - 2.4. The CRM extrapolates passage rates based on a standard 12-hour daylight window. The avifaunal specialist assessment explicitly acknowledges that this assumption "may underestimate or overestimate exposure for species capable of nocturnal or crepuscular movement (such as Greater Flamingo)". Relying on winter dry-season, or daylight VP observations, leads to an underestimation of potential collision risk for species moving across the site at night.
 - 2.5. The avifaunal report explicitly concedes, in relation to the CRM, that "confidence in these numbers is relatively low due to the high number of assumptions and estimates required and the lack of local, peer-reviewed, species-specific data to validate the applied model". This acknowledged uncertainty directly aligns with the comments provided by Mpumalanga

Tourism and Parks Agency (MTPA) on the draft scoping Report, wherein it was emphasized that extending pre-construction avifaunal monitoring to a minimum of two years would have been appropriate “Given the number of priority species recorded and the complexity of flight activity identified at this site....to ensure the robustness of modelling inputs”.

- 2.6. Without an expanded multi-year dataset to resolve these baseline uncertainties, relying on the current CRM outputs to defer key mitigations, specifically Shut-Down-On-Demand (SDoD) introduces unquantified ecological risk.
3. Furthermore, the recorded flight activity of Verreaux’s Eagle demonstrates sustained and significant use of the site, with extended durations at risk height. For a low-density species, such levels of activity indicate that collision risk is persistent and cannot be reliably characterised from a single year of pre-construction monitoring. Patterns of movement, seasonal variation, and site fidelity are unlikely to be captured in a limited dataset. This reinforces our position that mitigation cannot be deferred. Shut-down-on-Demand (SDoD) must be incorporated into the operational framework from the onset of turbine turning, calibrated to respond to all priority species recorded. To postpone SDoD as an adaptive measure overstates the effectiveness of mitigation and does not address the collision risk demonstrated for Verreaux’s Eagle and other high-risk species.
4. The DEIR currently categorizes SDoD as an adaptive, reactive measure to be evaluated only if post-construction carcass monitoring demonstrates that mortality thresholds have been exceeded. Because the baseline CRM depresses predicted fatalities through layered, optimistic discounts, the true operational risk is likely higher than modeled. Consequently, relying on post-construction threshold breaches before deploying SDoD is insufficient to conclude that residual impacts will be “Moderate”, and is not supported.
 - 4.1. SDoD must therefore be integrated into a revised impact analysis *and* the Environmental Management Programme (EMPr) as an operational mitigation measure from the onset of turbines turning.
 - 4.2. A robust SDoD framework must account for the distinct flight behaviours of the priority species recorded on site, which must form part of the impact analysis, and must consider that:
 - Observer-led SDoD is ineffective for night-flying species or during low-visibility conditions (fog or heavy mist). Automated detection technology—such as 3D radar or camera-based tracking systems - is better suited for detecting nocturnal passage and triggering automated turbine shutdowns.
 - Trained human spotters remain valuable during daylight hours to monitor ground-dwelling and low-flying priority species, such as the Endangered Secretarybird, which may utilize surrounding grassland foraging habitat.
 - To address the full spectrum of avifaunal risks present on site, the impact assessment should evaluate a combined, hybrid SDoD approach that integrates automated detection technology with trained visual observers.
 - Implementing SDoD at this site as soon as turbines start turning, provides an immediate, risk-averse baseline. Continuous post-construction monitoring throughout the operational life of the facility will provide empirical carcass and flight-path data. These data can subsequently be used to inform whether SDoD protocols can be safely refined or relaxed during specific low-risk seasons or time windows, or confirm whether secondary operational mitigations - such as targeted turbine curtailment during specific weather conditions or peak migratory periods - are necessary to prevent unacceptable cumulative mortality.
5. Avoidance of steep slopes, scarps, and ridges must be explicit. Statements in the Avifaunal Report and the DEIR suggesting turbine placement in these areas with mitigation, are not supported.
6. It is noted that a high sensitivity is reported in relation to visual aspects in the Landscape (Wind) Theme and Flicker Theme. How will this be addressed if steep slopes, scarps, and ridges are not avoided.

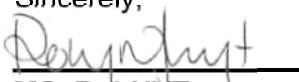


7. The assessment should not be limited to aquatic features within the project boundary; potential downstream impacts must also be adequately assessed, particularly where roads, watercourse crossings, drainage infrastructure and construction activities may increase sediment loads, surface runoff, erosion or pollution, alter natural flow patterns, or obstruct aquatic connectivity. This is of particular concern given that the specialist identifies the watercourses as important corridors for the movement of water and aquatic biota. The EIAR must demonstrate that appropriate measures are in place to prevent or minimise downstream impacts and maintain the ecological functioning and connectivity of the broader aquatic system.
8. The EIAR must clearly distinguish between temporary and permanent infrastructure and quantify the disturbance footprint associated with each component.
9. Cumulative Impact Assessment:
 - 9.1. Although Section 10 (Cumulative Impact Assessment) notes that “While a broader regional context (up to 100 km) was identified in the DSR, individual specialist assessments for the EIA phase focused on smaller areas (i.e. 30–50 km) based on standard methods and data availability. Therefore, the spatial extent of the CIA has been defined per specialist discipline,” and further records that “In line with accepted methodology for environmental impact assessment and as per the radius applied by the DFFE Screening tool, the application of a 30 km radius for the cumulative impact assessment for all specialist themes apart from Agriculture,” we remain concerned that this approach is biologically inadequate. In a region characterised by sensitive, high-elevation habitats that are demonstrably used by threatened avifauna, a fixed 30 km radius does not capture the ecological reality. We strongly contend that a wider spatial frame is required for cumulative impact assessment, particularly in relation to avifauna, to ensure that the full extent of species’ ranges and ecological processes is meaningfully considered.
 - 9.2. Not all the facilities that we alerted you to in our comments in the draft Scoping process have been addressed in the cumulative impact assessment. The definition of cumulative impacts as per the EIA Regulations (GN R.982 of 04 December 2014) is “the past, current and reasonably foreseeable future impact of an activity, considered together with the impact of activities associated with that activity, that in itself may not be significant, but may be significant when added to the existing and reasonably foreseeable impacts eventuating from similar or diverse activities”. Such a comparative assessment of the impacts of this proposed facility, in relation to and in conjunction with, all adjacent and surrounding renewable energy facilities, has not been undertaken as part of this EIA, as per the requirements of the EIA Regulations.

In summary, while the overall layout optimisation and reduction in turbine numbers are acknowledged, the current impact analysis overstates mitigation effectiveness, and must be revised to ensure that residual collision impacts are accurately reflected and managed.

Please do not hesitate to contact this office if there are any enquiries.

Sincerely,


MS. R. LUYT

DATE: 23-09-2026

CC: 



**Comments on the Draft Environmental Impact Assessment Report: PROPOSED
DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL
AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG
DFFE Reference Number: 14/12/16/3/3/2/2803**

Dear Jashmika,

Please find below my concerns regarding the effect this development could have on the area's heritage, rural character, farming activities, wildlife, and the safety of people living and working nearby. Please include these comments in the comments and responses report.

Heritage

The area has a strong heritage, including Anglo-Boer War structures and Iron Age sites. The draft EIA itself identifies heritage resources in and around the study area. I ask that the final construction footprint be checked against all identified heritage sites, including their settings and views, before it is approved. Please explain how heritage sites will be protected from construction traffic, vibration, excavation and unauthorised access, and what will happen if previously unidentified remains/sites are found.

Visibility of turbines

The turbines, new roads, electrical infrastructure and lighting could significantly change the appearance of this farming area, and I'm concerned about what that would mean for people living here. Please provide visualisations showing what the development would look like from nearby properties.

Roads, farming, and security

The report proposes up to 31 km of internal roads, including the widening of approximately 18 km of existing roads. I am concerned that this network, together with construction compounds and other infrastructure, will change the character of an agricultural and game-farming area and make it feel more industrial/commercialised. Please show which roads will be new, which will be widened, who will be able to use them during operation, and how unnecessary roads and temporary work areas will be rehabilitated.

Please also assess how construction traffic, road closures or damage, dust, noise, fencing and altered access will affect farming, livestock and game-farming operations. Please provide a clear commitment on road maintenance, repairs and access arrangements with affected landowners.

Additional access routes and a larger workforce could create security concerns for neighbouring farms, including trespassing and poaching. I would like this risk to be assessed and managed. Please provide further details regarding site access controls, rules prohibiting poaching, trapping, poisoning or harming animals, and a process for reporting and investigating incidents. The plan should address access to neighbouring properties as well as the project site.



Birds and Bats

I am concerned about bird collisions with turbines and associated electrical infrastructure, and about bat mortality rates. How will this be monitored during operation, and will the results of any studies/monitoring programmes of the mortality results be made public? What mitigation measures are in place? Are these species-specific?

Habitat disruption

Roads, fencing, vegetation clearance and increased human activity may fragment habitat and disrupt the movement of wild animals between farms, specifically feline species and small mammals. Please assess the routes used by game and other mammals, including small species and wild cats, and explain how movement will be maintained. How will the prevention of poisoning of wildlife by workers or contractors be enforced?

Site Clearance

Please identify the full extent of site clearance, including trees and natural vegetation to be removed for roads, turbine foundations, cabling and temporary areas. Clearance should be kept to the minimum needed, sensitive habitat avoided, and disturbed areas rehabilitated and monitored. Which well established and indigenous trees will be removed? Is there a tree removals plan which can be provided? How will affected areas be revegetated? Specifically, will revegetation be with indigenous species? I am concerned that areas with site clearance will be prone to erosion due to lack of ground cover.

How will any valuable topsoil in the area be maintained for use again during operational stage, rather than importing new soil? Will stockpiles be seeded or covered with geotextiles?

Stockpiles

In areas where stockpiling of materials will be present, will there be silt fencing mandatory for use to prevent any streams/waterways/spruits from excessive pollutants?

Materials Handling

Will there be a materials storage and handling plan to avoid unnecessary spillage in the area which could contaminate the soil? Will all fuels and liquid chemicals be stored safely with limited access in a bunded area (capable of holding 110% of the liquid)? Will it be mandatory to use bunds or plant nappies when using chemicals or when refuelling?

Embodied Carbon

For the materials used during construction, will there be an opportunity to make use of materials with lower embodied carbon? For example, will it be enforceable to make use of concrete that has a percentage of its cement content replaced with supplementary cementation materials (SCMs), such as Fly Ash or Ground-Granulated Blast-furnace slag (GGBS)? Thus, significantly lowering the embodied carbon emissions and overall global warming potential of the site. However, I urge this to be built into the construction schedule as SCMs have slower setting times than standard concrete. Additionally, steel or aluminium with higher percentages of recycled content are beneficial. Will a Whole Lifecycle Assessment be carried out for the project?



Noise and Lighting

I am concerned about construction noise, traffic noise and the continuous sound of operating turbines, particularly at night and at nearby homes. Please provide the predicted levels at affected residences and commit to post-construction measurements and mitigation measures if they are higher than expected. Noise issues can have adverse effects on not only animals but human health as well.

Please assess the combined effects of security lights, building lights, vehicle headlights and any lighting mast. Lighting should be limited to what is necessary for safety, directed downwards and shielded to prevent backlight, uplight and glare toward homes and habitat, thereby limiting light pollution. Excessive or poorly directed lighting could cause glare at nearby homes and roads, increase the visual impact of the facility in a rural landscape, and disturb nocturnal wildlife, including bats, insects, and small mammals and amphibians.

Wildfires

I am also concerned about wildfire risk. Please assess and mitigate to whatever extent possible any ignition risks from construction activities, workers, electrical faults and the battery energy storage system, and provide an emergency response plan coordinated with landowners and local fire services. I am concerned as to whether the winds from the turbines or altered local airflow could affect the behaviour of a veld fire.

Stormwater Drainage Systems

Please provide detailed stormwater and erosion-control plans for new and widened roads, hardstands, excavations and drainage crossings. I am concerned that concentrated runoff or sediment could affect neighbouring farmland, wetlands and watercourses. The plans should show discharge points, maintenance responsibilities and how damage to neighbouring land will be remedied. How will stormwater drains within the vicinity of the site be protected from litter and excessive sediment build up? Will inlet gullies be protected (either using sediment-trapping meshes or sandbags surrounding the inlets to prevent sediment ingress)?

Pollution and waste

Construction waste, litter, fuel, concrete washout and other hazardous materials must be contained and removed appropriately. Please specify the inspection, incident-reporting and clean-up measures that will apply throughout construction and operation. Will waste arising from the site be landfilled or recycled? Which recycling facility will be used and how will it be ensured that the materials are recycled and that the sites are kept clean and free from litter?

Construction programme

The draft EIA records an *assumed maximum construction period of 24 months*. I have not found a detailed programme showing when work will occur or how long each affected area will experience disturbance. Please provide a Gantt chart or equivalent programme showing site clearance, road works, foundation excavations, concrete works, electrical works, turbine deliveries and erection, commissioning and rehabilitation. It should identify the expected workforce and peak traffic periods, as well as any proposed night or weekend work.

Romana Bulger (Nee Katrakilis)
On behalf of Four Way Farming & Safari's



Future Development

Finally, please explain whether the roads, electrical infrastructure or site layout are intended to accommodate future expansion. Any reasonably foreseeable expansion or connected development should be clearly disclosed and considered in the cumulative impact assessment. I ask that authorisation for this project be limited to the infrastructure and footprint actually assessed.

I look forward to the responses to the above.

Kind regards,

Romana Bulger

Romana Bulger (Nee Katrakilis)
BEng (Civil Engineering), MSc Eng (Civil & Sustainability Engineering), & LEED AP

Mathulwe, Tumelo

From: Celia de Waal [REDACTED]
Sent: Monday, 28 September 2026 15:38
To: Strong, Ashlea; Maharaj, Jashmika; ZA - WSP - PPOffice
Cc: Mervyn Lotter; khumbelo.malele; Thabile Mnisi
Subject: MTPA's comments: Our ref: LUA 26/4471(2) ABO Uvemvane Wind Energy Facility near Heidelberg - DFFE
Attachments: LUA26-4471(2) ABO Uvemvane DEIA WEF.pdf



Dear Ms. Strong

Kindly receive the attached comments from the MTPA regarding a Draft EIA for the proposed ABO Uvemvane Wind Energy Facility 1 near Heidelberg.

DFFE ref: **14/12/16/3/3/2/ 2803**

Project: **41106304**

MTPA's ref: **LUA 26/4471(2)**

Kind regards

Celia de Waal



Cecilia de Waal

[REDACTED]

Biodiversity Conservation: Scientific Services

Cell: [REDACTED]

[REDACTED]

Physical Address:

MTPA Office Building (Lydenburg)
End of Morgan street
1120 Lydenburg

Disclaimer:

All views or opinions expressed in this electronic message and its attachments are the views of the sender and do not necessarily reflect the views and opinions of the Mpumalanga Tourism and Parks Agency. No employee of Mpumalanga Tourism and Parks Agency is entitled to conclude a binding contract on behalf of the Mpumalanga Tourism and Parks Agency unless he/she is an Accounting Officer of the Mpumalanga Tourism and Parks Agency, or his or her authorized representative. The information contained in this message and its attachments may be confidential or privileged and is for the use of the named recipient only, except where the sender specifically states otherwise. If you are not the intended recipient you may not copy or deliver this message to anyone.

OFFICE OF BIODIVERSITY CONSERVATION

Ref: LUA 26 /4471(2)
Unit: LUA/SS
Enquiries: M.C. Lötter / K. Malele
E-Mail: [REDACTED]

Ms. Ashlea Strong
WSP Group (Pty) Ltd

Email: [REDACTED]

Dear Ms. Strong

MTPA'S COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED ABO UVMVANE WIND ENERGY FACILITY 1, NEAR HEIDELBERG AND BALFOUR, MPUMALANGA AND GAUTENG PROVINCES (DFFE REF NO.: 14/12/16/3/3/2/2803; WSP PROJECT NO.: 41106304).

The Mpumalanga Tourism and Parks Agency (MTPA) hereby submits its formal comments on the Draft Environmental Impact Assessment Report (DEIR) for the proposed ABO Uvemvane Wind Energy Facility 1 (WEF 1) located near Balfour.

The MTPA acknowledges and commends the Applicant and the Environmental Assessment Practitioner (EAP) for the significant layout optimizations undertaken since the pre-application phase. Specifically, we note the reduction of the facility layout from 66 to 20 turbines and the avoidance of critical avifaunal, aquatic, Critical Biodiversity Area (CBA), and bat no-go constraint zones.

The following sections outline the MTPA's technical evaluation, key areas of concern, and the specific conditions required to be incorporated into the Final Environmental Impact Report (FEIR).

AVIFAUNAL RISK AND SITE SENSITIVITY

The proposed ABO Uvemvane WEF 1 footprint occurs in an avifaunally sensitive landscape that supports 18 endemic or near-endemic bird species and 26 priority species for wind energy developments. Pre-application monitoring confirmed high flight activity within the rotor-swept zone for species such as the Verreaux's Eagle (*Aquila verreauxii*, Regional Vulnerable) and Black-winged Kite (*Elanus caeruleus*).

The MTPA fully supports the avifaunal specialist's recommendation to exclude all turbines from steep slopes (> 1:4), scarps, ridges, and rocky outcrops to prevent collision risk for soaring raptors utilizing orographic lift.

Post-construction monitoring across operational South African wind farms demonstrates that Verreaux's Eagle fatalities often cluster near active Rock Hyrax (*Procavia capensis*) colonies. Eagles hunt by flying low and fast over rocky terrain

to surprise sun-basking hyraxes, bringing them into dangerous proximity to the turbine blades. A major risk identified in wind farm assessments is that construction activities, such as blasting, platform levelling, and foundation excavation, create rock piles. These rock dumps inadvertently form new, artificial hyrax habitats, drawing hyraxes and, subsequently, hunting eagles directly into high-risk turbine zones. To prevent luring eagles into the rotor-swept area, wind energy guidelines and the EMPr must explicitly require developers to promptly remove, smooth out, or rehabilitate all excavated rock piles during construction rather than leaving them near turbine bases.

To ensure alignment with the mitigation hierarchy and national best-practice standards (BirdLife South Africa, 2025), the MTPA requires that operational mitigation measures be strengthened:

- **Mandatory Automated / Observer-Led Shutdown-on-Demand (SDoD):** SDoD technology or dedicated vantage point observers must be integrated into the operational phase to trigger automated or manual turbine curtailment when Species of Conservation Concern (SCC), specifically Verreaux's Eagle and Endangered Secretarybird (*Sagittarius serpentarius*), are detected approaching the rotor-swept areas. This would ensure compliance with the zero-fatality threshold recommended by the avifaunal specialist.
- **Proactive Blade Patterning:** Proactive contrast painting of turbine blades (in accordance with SACAA approvals and national blade patterning guidelines) must be applied to all turbines.

HEIDELBERG COPPER BUTTERFLY - *CHRYSORITIS AUREUS*

The DEIR and terrestrial biodiversity specialist report state that “*MTPA observation records, which were not available at the time of this report, further indicate the known presence of the species at specific localities across the project area.*” The MTPA clarifies that official observation data was formally transmitted to the specialist, Mr Reinier Terblanche, via email on 10 June 2026. This distribution data must be fully integrated into the sensitivity mapping and impact discussion in the Final EIR.

The Heidelberg Copper (*Chrysoritis aureus*) is an Endangered, narrow-endemic species whose survival depends on open, rocky Highveld grassland ridges containing its specific larval host plant (*Clutia pulchella*) and host ant (*Crematogaster liengmei*). The Near Threatened Marsh Sylph (*Metisella meninx*) also occurs in adjacent wetland habitats.

Because habitat degradation, bush encroachment, and inappropriate fire regimes pose severe threats to this restricted butterfly population, the MTPA requires the compilation and implementation of a dedicated **Biodiversity Management Plan (BMP)** for the Heidelberg Copper butterfly and its associated grassland habitats as a strict condition of environmental authorisation:

- **Fire Management Plan:** The BMP must establish a controlled, mosaic burning regime designed to maintain open Highveld grassland structure, preventing both excessive fire frequency and woody shrub/bush encroachment.
- **Alien Invasive Plant (AIP) Control:** An active AIP eradication program must target invasive flora that threaten *Clutia pulchella* host plant stands and larval habitats.

- **Annual Operational Monitoring:** Annual or biennial population and habitat surveys must be conducted during the peak flight season (January–February) throughout the operational lifespan of the WEF to track population trends and evaluate BMP effectiveness.

SUMMARY OF MANDATORY MITIGATION CONDITIONS

The MTPA supports the progression of the 20-turbine layout to the Final EIR stage, subject to the inclusion of the following conditions in the final EMPr:

1. **Layout Integrity:** Strict adherence to all 200 m aquatic/wetland buffers, 200 m bat roost buffers, and avifaunal steep slope/ridge exclusion constraint zones. All buffer zone boundaries must be calculated from the outermost reach of the turbine blades (rotor-swept area overhang) rather than solely the turbine base or tower centre, ensuring no blade tip sweep encroaches into any no-go area.
2. **Rock Dump & Prey Habitat Management:** Mandatory removal, smoothing, or prompt rehabilitation of all excavated rock piles generated during blasting and foundation excavation to prevent creating artificial Rock Hyrax habitats close to the turbine footprint.
3. **Avifaunal Operational Safeguards:** Integration of Shutdown-on-Demand (SDoD) technology, proactive blade patterning, and lifetime post-construction mortality monitoring enforcing zero-fatality thresholds for threatened bird species.
4. **Invertebrate BMP:** Formulation of a site-specific Biodiversity Management Plan (BMP) for the *Endangered* Heidelberg Copper butterfly (*Chrysoritis aureus*) prior to the commencement of construction.

CONCLUSION

In summary, the MTPA supports the proposed 20-turbine layout and infrastructure footprint, provided that avifaunal operational mitigations are strengthened to include SDoD, rock pile clearing is mandated, and a comprehensive BMP is developed and implemented for the Heidelberg Copper butterfly.

Kind Regards,



DATE: 28 September 2026

Mathulwe, Tumelo

From: Meagan Bromfield [REDACTED]
Sent: Monday, 28 September 2026 15:33
To: ZA - WSP - PPOffice; Maharaj, Jashmika; Strong, Ashlea
Cc: Kerri Wolter
Subject: Vulpro Comment: ABO UVEMVANE WIND ENERGY FACILITY 1 EIAR (14/12/16/3/3/2/2803)
Attachments: VulproABOUvemvaneWEFComment_Sep26.pdf

Dear Jashmika, Palisa and Ashlea,
WSP

Thank you for allowing Vulpro to comment on the ABO UVEMVANE WEF EIAR. Please find our comments attached to this email.

Please acknowledge receipt of our comments.

Thanks

Kind regards,



WSP
Building 1, Maxwell Office Park
Magwa Crescent West,
Waterfall City
Midrand,
1685
By email: PP@wsp.com, [REDACTED]

28 September 2026

Dear Jashmika Maharaj, Palisa Bhengu and Ashlea Strong,

**COMMENT: DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE ABO
UWEMVANE WIND ENERGY DEVELOPMENT (DFFE REF NO: 14/12/16/3/3/2/2803)**

Thank you for the opportunity to comment on the Draft Environmental Impact Assessment Report (EIAR) for the ABO Uvemvane Wind Energy Development and associated infrastructure near Heidelberg and Balfour in Gauteng and Mpumalanga. Vulpro submitted comments on the Scoping Report in April 2026, and these comments build on those submissions.

In response to Vulpro's Scoping comments, it was noted that all available measures to avoid, minimise and mitigate impacts on vultures would be considered and recommended during the EIA phase. Having reviewed the EIA Phase documentation, Vulpro notes that, of the specific measures recommended during Scoping, only blade patterning has been substantively incorporated in relation to turbine collision risk. The remaining measures have either been omitted or incorporated as materially weaker commitments. Vulpro therefore requests that the following matters be addressed in the EIAR, Avifaunal Assessment and Environmental Management Programme Reports (EMPRs).

1. Vulture Attractant Management – Water Reservoirs and Food Management
Vulpro's Scoping comments requested that anthropogenic water reservoirs be covered or relocated outside the rotor-swept area, or beneath proposed electrical grid infrastructure, and that a Vulture Food Management Programme be implemented. Neither measure has been incorporated into the EIAR or EMPRs.

These measures address potential attractants that may increase vulture activity within the turbine footprint and therefore contribute to collision risk. Managing such attractants provides



an opportunity to reduce exposure to turbines proactively, rather than relying solely on measures that respond once elevated vulture activity or fatalities have been demonstrated.

The Avifaunal Assessment itself acknowledges that “the artificial waterpoints in the PAOI are not considered to be irreplaceable, and any man-made open water structures could be removed or covered, which would lower the sensitivity”. This recognises that covering or relocating these water sources is a relatively straightforward intervention with the potential to reduce vulture and raptor attraction to the rotor-swept area. Vulpro therefore reiterates its request that covering or relocating all anthropogenic water sources be incorporated into Table 8-7 as a standing mitigation measure, to be implemented before commissioning, on the same basis as blade patterning and BFD installation.

Given the current level of vulture activity in the area, Vulpro accepts that implementation of the carcass removal component may be linked to the adaptive mitigation framework, rather than requiring immediate implementation. Vulpro recommends that this framework include agreements with landowners regarding livestock birthing, to prevent livestock from giving birth beneath or in close proximity to turbines. The carcass removal programme should therefore be incorporated into Table 8-7 as an adaptive mitigation measure and into Annexure F, with clear thresholds for implementation, defined roles and responsibilities, and procedures for the prompt removal of carrion following vulture fatalities. This would ensure that the programme forms part of the auditable adaptive mitigation framework and can be implemented promptly once the relevant trigger is reached.

2. Adaptive Mitigation Measures - Inadequate Provision in the EMPr

Vulpro recommends that Shutdown-on-Demand (SDOD) be included as a mitigation measure from the outset as a proactive measure to reduce collision risk, particularly given the inadequate implementation of such an adaptive mitigation measure at other WEFs after prescribed fatality thresholds have been exceeded (likely due to financial reasons). The EIAR instead provides for SDOD only as a reactive measure following post-construction fatality monitoring. Together with curtailment, it is identified as an adaptive measure for managing residual collision risk to vultures (and other birds); however, neither measure is adequately or sufficiently specifically reflected in the EMPr. There are three key concerns:

- First, while EMPr Part 1, Section 7.13 (Table 7-14) states that curtailment and SDOD “must be implemented” if fatality thresholds are exceeded, neither measure appears as an itemised action in Table 8-7, an EMPr table against which compliance will be assessed and audited. Table 8-7 provides specific, auditable actions for other measures, including blade patterning, BFD installation and anti-perching devices, each with a responsible person, timeframe and evidence of compliance. Curtailment



and SDOD receive no equivalent treatment; instead, they are addressed only through a reference to “The Post-Construction Monitoring Plan as per Annexure E of the EIA Phase Avifaunal Impact Assessment.”

- Second, this cross-reference is incorrect. In the EIA Phase Avifaunal Impact Assessment Report, Annexure E contains the list of cumulative renewable energy projects within a 35 km radius. The Post-Construction Monitoring Plan, including the fatality thresholds and adaptive mitigation triggers, is provided in Annexure F.
- Third, even when the correct Annexure F is considered, the adaptive mitigation framework leaves an important element of implementation undefined. While the fatality threshold for vultures, including both Critically Endangered and Vulnerable species, is correctly set at zero, no criteria are provided to determine when curtailment should be implemented versus SDOD. Nor is any approval or decision-making process specified to ensure that the appropriate measure is implemented promptly once the relevant trigger is reached.

Vulpro requests that the adaptive mitigation measures for avifauna, including the fatality thresholds, the criteria distinguishing curtailment from SDOD, and defined interim measures pending full implementation, be incorporated as itemised, auditable actions in Table 8-7 itself, correctly cross-referenced, rather than left to incorporation by reference to a misidentified annexure.

3. Electrical Infrastructure Mitigation Maintenance Schedule Outstanding

Vulpro welcomes that the power-line and electrical-infrastructure mitigation measures requested in its Scoping comments (items 5 and 6) have, in substance, been incorporated into the EIAR and EMPr. However, Vulpro’s request that power-line mitigation installations include a comprehensive maintenance schedule, given their susceptibility to weathering, corrosion and technical failure, has not been carried through with the same level of specificity.

Table 8-7 states only that BFDs “are to be installed and maintained”, without specifying an inspection frequency, responsible person, maintenance requirements, or evidence of compliance. This does not establish an auditable maintenance requirement or demonstrate how continued functionality will be ensured over the operational life of the infrastructure. Vulpro requests that Table 8-7 include a defined inspection and maintenance schedule for all power-line mitigation infrastructure, specifying the inspection frequency, responsible person, required maintenance actions and evidence of compliance, consistent with other auditable EMPr commitments.



4. Electrical Infrastructure EMPr Completion

Vulpro understands that the EA for the grid infrastructure will be applied for under a separate process. However, an EMPr for the substation has been prepared using Eskom's generic template. In the submitted EMPr, Part B, Section 1 appears incomplete and does not adequately demonstrate how the generic management actions will be implemented, monitored and verified for the proposed infrastructure. Vulpro requests that Part B, Section 1 be completed to clearly set out the project-specific implementation and monitoring requirements for the applicable management actions.

5. Vulture Incident Notification

Vulpro must be notified immediately of any vulture collision or electrocution incidents where rehabilitation or veterinary intervention may be required. This requirement must be incorporated into the relevant incident-reporting procedures. The EIAR and EMPr currently commit only to annual reporting to Vulpro if a vulture is impacted, which is insufficient to facilitate timely intervention where an injured bird requires assistance.

The Scoping-phase commitment to substantively consider identified concerns during the EIA phase should result in those concerns being meaningfully considered and addressed in the EIA documentation. An undertaking to engage at a later stage is not, in itself, meaningful engagement. Vulpro submits that the EIAR should not be regarded as adequate for decision-making purposes until the omitted or diluted comments identified above have been substantively addressed. This includes the need for proactive, rather than solely reactive mitigation measures. Where these measures are not adopted as requested, the EIAR should provide a reasoned response explaining why they are not considered necessary or appropriate.

Thank you for considering these comments

Yours sincerely

Meagan Bromfield



Reference: 15/5/3/1
Enquiries: Phiki Motshweneng

25 September 2026

WSP Group Africa (Pty) Ltd
PO Box 6001
Halfway House
2210

Subject: ACKNOWLEDGEMENT OF RECEIPT – DRAFT EIA REPORT FOR THE PROPOSED ABO UVEMVANE WIND ENERGY FACILITY 1_Temporary DFFE Reference Number: 2024-11-0018

Dear Sir/Madam,

Lesedi Local Municipality hereby acknowledges receipt of the Draft Environmental Impact Assessment (EIA) Report for the proposed ABO Uvemvane Wind Energy Facility 1, under Temporary DFFE Reference Number 2024-11-0018.

The Municipality appreciates the submission of the Draft EIA Report and the appropriate responses of the comments on the Draft Scoping report and the opportunity to participate in the environmental assessment and public participation process.

Lesedi Local Municipality values the project team's engagement and cooperation and looks forward to continued stakeholder engagement throughout the environmental assessment process.

Please accept this letter as formal acknowledgement of receipt of the Draft EIA Report and the Lesedi Local Municipality has no further comments.

Yours faithfully,

Prepared by:



PHIKI MOTSHWENENG

Approved by:



Mathulwe, Tumelo

From: Samista Rooplal <[REDACTED]>
Sent: Monday, 28 September 2026 16:34
To: ZA - WSP - PPOffice
Cc: Kish Chetty; Hennie de Beer; EWT EIA Applications
Subject: RE: RESPONSE TO THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG
Attachments: EWT Comments_ABO Uvemvane WEF 1_Draft EIAr.pdf

Good day WSP Team,

Attached, please find the Endangered Wildlife Trust's comments to the Draft EIA report for the **ABO Uvemvane Wind Energy Facility (WEF) 1**.

Kind regards,



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
The Endangered Wildlife Trust [USA](#) is recognized as a tax-exempt charitable organization under Section 501(c)(3) of the Internal Revenue Code (EIN: 33-2261884).

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

From: Samista Rooplal
Sent: Wednesday, April 15, 2026 11:08 AM
To: 'pp@wsp.com' <pp@wsp.com>
Cc: Kish Chetty <[REDACTED]>
Subject: RESPONSE TO THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG

Good day WSP Team,

Attached, please find the Endangered Wildlife Trust's comments to the proposed **ABO Uvemvane Wind Energy Facility (WEF) 1** (up to 170MWac), located in the Mpumalanga and Gauteng Province. We are open to discuss the comments should you require.

Kind regards,



Samista Rooplal



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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

The Endangered Wildlife Trust [USA](#) is recognized as a tax-exempt charitable organization under Section 501(c)(3) of the Internal Revenue Code (EIN: 33-2261884).

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



Private Bag X08
[REDACTED]

28 September 2026

Attention: WSP Team

Dear WSP Public Participation Office
pp@wsp.com, 011 254 4800

Re: Response to the proposed ABO Uvemvane Wind Energy Facility (WEF) 1 (up to 170MWac), located in the Mpumalanga and Gauteng Province (Project No: 41106304)

The Endangered Wildlife Trust (EWT) is a non-governmental, non-profit, conservation organisation, founded in 1973 and operating throughout southern Africa. The EWT conserves threatened species and ecosystems in southern Africa by implementing research and conservation action towards mitigating threats facing species diversity and supporting sustainable natural resource management. The EWT furthermore communicates the principles of sustainable living through awareness programmes to the broadest possible constituency for the benefit of the region. The EWT is driven by a team of passionate and dedicated conservationists working through 13 specialised programmes across southern and East Africa, each falling under one of our three key strategic pillars: [Saving species](#), [conserving habitats](#), and [benefitting people](#).

While the [EWT supports the just transition to renewable energy](#), these proposed developments are only considered feasible if they follow the mitigation hierarchy and the species environmental assessment guideline and avoid unnecessary and unsustainable environmental impacts. We further support solar energy but only where all possible options for avoiding, reducing, minimising, and offsetting of impacts (in that order) have been considered and implemented. Please refer to the links embedded in this paragraph for further insight into the EWT's perspectives, concerns, and considerations linked to renewable energy in general, and wind energy in particular.

The demand for energy is increasing globally, and WEFs are considered a viable option for renewable energy production. There are, however, concerns over the impacts of wind farms on wildlife in three key aspects: the disturbance or displacement of species from their habitats due to the construction of the associated WEF infrastructure; bird and bat collisions with turbine blades; and collisions and electrocutions on energy infrastructure associated with WEFs. This concern is compounded by the potential cumulative impacts of ongoing wind energy developments posing a direct risk to collision-prone species across sensitive areas, and an amplified level of disturbance and loss of habitat for wildlife in areas that overlap with WEFs.

The EWT believes that some of the impacts of WEFs can be avoided and reduced using suitable remedial actions and mitigation measures. Accordingly, we recommend four priority measures that must

be considered and implemented to ensure minimum impact of wind energy on wildlife, for details of these four priority measures click [here](#).

In evaluating the Draft EIA reports, specifically the Avifaunal Impact Assessment (Appendix G.5, Holland & Associates, August 2026), we wish to highlight the following:

A. Scoping issues still not resolved

- **Outdated planning data.** The desktop study still uses Gauteng Conservation Plan (GCP) V3.3 (2012) and Mpumalanga Biodiversity Sector Plan (MBSP) (2014) (p. 20). GCP4 (2024) and the gazetted MBSP (2023) must replace them, and Critical Biodiversity Area (CBA) constraints must be re-mapped.
- **Developer interference.** ABO asked for VP1 and VP2 to be removed after Survey 2. They were only reinstated from Survey 4, so the autumn (April 2024) data for both points is missing. The report discloses this but does not assess what it does to the flight data or the Collision Risk Model (CRM).
- **Monitoring is still one year.** VE Guidelines (pp. 13, 20) require two years where turbines sit in topographic risk areas. The report says one turbine's rotor-swept area protrudes into a scarp/ridge buffer and calls this "acceptable" (pp. 36, 43). That is a direct trigger for two years.

B. Verreaux's Eagle

- **The nest has now been found, which confirms the Scoping comment.** The June 2026 survey found an active nest on a telecommunication tower about 12.5 km NW of the site (NE1, p. 32). Please confirm this is the Heidelberg tower nest you monitor. The distance is given inconsistently: "12 km" (p. 17), "~13 km" (p. 21) and "12.5 km" (p. 32). The spelling "Helderberg Kloof Estate" also needs checking.
- **A second nest's status is undetermined.** NE2 (Alpha Base) was "undetermined", and no distance is given. VE Guidelines (p. 20) say nests of unknown or inactive status must be mapped and mitigated as active.
- **VERA was not run.** VE Guidelines (p. 19) record medium-risk predictions up to 11.3 km from nests. NE1 at 12.5 km is at the margin, and NE2 is unresolved.
- **The source pair is unidentified.** There were 28 VE flights, 24 at risk height, mostly at VP7. The pair regularly using the site has not been linked to a nest. VE Guidelines (p. 20) require surveys to cover the likely territory of pairs regularly seen on site.

C. Collision risk modelling and impact ratings

- **Mitigation is applied before it is proven.** A 72% blade-patterning reduction is built into the predicted fatalities (p. 38). The report itself says site efficacy is only verifiable after construction.
- **The acceptability test contradicts the monitoring plan.** The CRM concludes impacts are acceptable because 0.64 VE fatalities over 20 years is below $0.1 \times \text{PBR}$ (p. 38). But Annexure F

sets a zero fatality threshold for VU/EN/CR species because it assumes their PBR is already exceeded. By the report's own logic, the predicted VE fatalities are not acceptable.

- **Site Ecological Importance may be underrated.** Ridges and grassland are rated Medium conservation importance (p. 32). The report's own Table 4 gives High where CR/EN/VU species are confirmed, and VE (VU) and Secretarybird (EN) are confirmed. Tsakane Clay Grassland is also an Endangered ecosystem.
- **Pylons are treated inconsistently.** Pylons are said to support Martial Eagle (EN) and VE (VU) (p. 31), yet "man-made structures" are rated Low.

D. Power lines: what they did and the gaps

- **The 33 kV north-south line is not assessed.** This ~8 km line is described as "overhead/underground" with two route alternatives (p. 8), but neither route is assessed or ranked. The DEIAr must state whether it will be buried, as VE Guidelines (p. 4) require "as far as possible". If not, it must say which route is preferred.
- **The grid connection is excluded.** The up to 132 kV connection is covered by a separate application (p. 8). Collision and electrocution risk from the largest overhead component is therefore not assessed. The ≤10% cumulative power line claim (p. 47) is given without supporting figures.
- **The electrocution rating is inconsistent.** It falls from High to Very Low, with "Reversible" and "Improbable" post-mitigation (Table 20, p. 46). Mortality is irreversible, and the collision table reflects that. VE Guidelines (p. 8) record 10 VE electrocutions at two WEFs on poorly designed lines.
- **Perching measures conflict.** The EMPr requires both anti-perching devices and installed bird perches on monopoles (pp. 45–46, Table 22) but does not specify where each applies.
- **The Eskom standard is not named.** Clearances and bird flight diverter spacing refer to "Eskom Technical Standards" without a document number or revision, so compliance cannot be audited.

E. Operational monitoring and cumulative impacts

- **VE nest monitoring is missing.** Nest monitoring is committed for Secretarybird only. There is no annual occupancy monitoring of NE1/NE2 as VE Guidelines (p. 4) require.
- **Fatality reporting is incomplete.** VE fatalities go to the specialist within 24 hours, but the guidelines do not require immediate reporting to BirdLife SA and the conservation authority (VE Guidelines, p. 4).
- **Other Uvemvane phases are left out.** The cumulative assessment covers only approved solar. Future Uvemvane phases are omitted, even though Annexure B says each will need its own EA.
- **Report errors to correct.** "May et al. 2020" is cited but missing from the reference list. Annexure B lists 27 turbines, while the main report lists 20.

The EWT appreciates the opportunity provided by the developer to comment and we look forward to the opportunity to participate in the process of informing the responsible placement of turbines. We would value the opportunity to provide our detailed landscape planning data and to assist through negotiation to inform decision making, but we cannot support high-risk options. We further request that the relevant competent authority and Department of Forestry, Fisheries, and the Environment (DFFE) take these concerns into consideration, including the associated powerlines and other infrastructure that will be required because of the proposed wind energy development.

The EWT reserves the right to revise initial comments presented here if additional information becomes available.

Regards,



[Redacted signature block]

Mathulwe, Tumelo

From: phiki motshweneng <[REDACTED]>
Sent: Monday, 28 September 2026 10:27
To: ZA - WSP - PPOffice; Strong, Ashlea; Maharaj, Jashmika
Cc: pheello ps. mollo; Lloyd Martin Machimana; Dineo Makuwa
Subject: Acknowledgement of receipt for the Draft EIA reports for ABO Uvemvane Wind Energy Facility 1
Attachments: Municipal Comments on the Proposed ABO Umvemvane Wind Energy Facility.pdf

Good morning

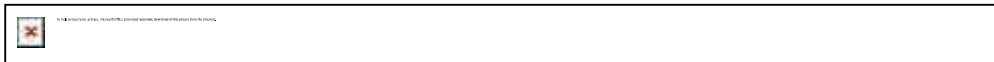
I hope this email finds you well.

Kindly find attached the acknowledgement of receipt for the draft EIA reports for the proposed ABO Uvemvane Wind Energy Facility 1. The Lesedi Local Municipality (Environmental department) does not have any comments on the draft EIA reports as the comments raised by the municipality on the draft scoping report and specialist's studies were well acknowledged and addressed.

The Lesedi Local Municipality values the project team's engagement and cooperation during the EIA process, and we look forward to continued stakeholder's engagements.

Thank You

Best regards



Reference: 15/5/3/1
Enquiries: Phiki Motshweneng

25 September 2026

WSP Group Africa (Pty) Ltd
PO Box 6001
Halfway House
2210

Subject: ACKNOWLEDGEMENT OF RECEIPT – DRAFT EIA REPORT FOR THE PROPOSED ABO UVEMVANE WIND ENERGY FACILITY 1_Temporary DFFE Reference Number: 2024-11-0018

Dear Sir/Madam,

Lesedi Local Municipality hereby acknowledges receipt of the Draft Environmental Impact Assessment (EIA) Report for the proposed ABO Uvemvane Wind Energy Facility 1, under Temporary DFFE Reference Number 2024-11-0018.

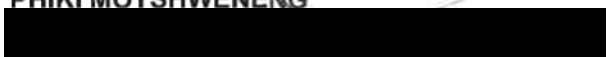
The Municipality appreciates the submission of the Draft EIA Report and the appropriate responses of the comments on the Draft Scoping report and the opportunity to participate in the environmental assessment and public participation process.

Lesedi Local Municipality values the project team's engagement and cooperation and looks forward to continued stakeholder engagement throughout the environmental assessment process.

Please accept this letter as formal acknowledgement of receipt of the Draft EIA Report and the Lesedi Local Municipality has no further comments.

Yours faithfully,

Prepared by:


PHIKI MOTSHWENENG


Approved by:




Mathulwe, Tumelo

From: John Pakwe <[REDACTED]>
Sent: Monday, 28 September 2026 09:43
To: ZA - WSP - PPOffice
Cc: Natasha Higgitt
Subject: RE: REMINDER: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

Good day,

Please note that all development applications are processed via our online portal, the South African Heritage Resources Information System (SAHRIS) found at the following link: <http://sahra.org.za/sahris/>. We do not accept emailed, posted, hardcopy, faxed, website links or DropBox links as official submissions.

Please create an application on SAHRIS for each EA application and upload all documents pertaining to the Environmental Authorisation Application Process. As per section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA), an assessment of heritage resources must form part of the process and the assessment must comply with section 38(3) of the NHRA. If a case already exists on SAHRIS regarding the development, please upload the documents to that case using the "Make an additional submission to an existing case" in the application selector wizard <https://sahris.org.za/form/application-selector>. Please ensure that all documents produced as part of the EA process are submitted as part of the application.

****PLEASE NOTE****

An application fee is now required for all section 38 applications. Please ensure that the SAHRIS application contains a proof of payment as per the notice at the following link: <https://www.sahris.org.za/node/383817>. Please make separate payments with the specific reference numbers. Applications that do not include a proof of payment will be considered incomplete and will not be processed until proof of payment is provided. Please make use of the auto generated payment reference that can be found within the application form. Please upload the PoP using the "Make an additional submission to an existing case" in the application selector wizard <https://sahris.org.za/form/application-selector>. The case officer assigned to your case will approve the submission and begin to process the case.

Kind regards,
John Pakwe

From: ZA - WSP - PPOffice <PP@wsp.com>
Sent: Wednesday, 23 September 2026 14:43
Subject: REMINDER: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

REMINDER

Dear Commenting Authority,

NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

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 of the applications for environmental authorisations (EA) in respect of activities identified in terms of GNR 983, GNR 984 and GNR 985 (as amended)

DESCRIPTION AND LOCATION

The proponent outlined in the table below proposes to establish a Wind Energy Facility (WEF), application for environmental authorisation, near Heidelberg and Balfour in the Gauteng and Mpumalanga Provinces. The proposed authorisation includes the following Scoping and Environmental Impact Reporting (S&EIR) process:

Proponent	Project	Technology	Process
ABO Uvemvane Wind Energy Facility 1 (Pty) Ltd	Up to 170MWac WEF including associated infrastructure	Wind	S&EIR
Farm Names			
<ul style="list-style-type: none"> The Remaining Extent of Portion 2 of the Farm Lagerspoort Number 406 Portion 17 (a Portion of Portion 3) of the Farm Lagerspoort Nr 406 Remaining Extent of Portion 4 of the Farm De Hoek 411 Portion 45 of the Farm Lagerspoort 406 Portion 7 of the Farm Lagerspoort Number 406 Portion 19 of the Farm De Hoek No 411 Remaining Extent of Portion 2 of the Farm Modderfontein 410 	<ul style="list-style-type: none"> The Farm Orion No 413 Remaining Extent of Portion 5 of the Farm Lagerspoort 406 Portion 7 of the Farm Driefontein 405 Remaining Extent of Portion 9 of the Farm Malanskraal No 407 Remaining Extent of Portion 2 of the Farm Malanskraal 407 Portion 12 (a Portion of Portion 2) of the Farm Malanskraal 407 Remaining Extent of Portion 2 of the Farm Driefontein 405 Remaining Extent of the Farm Driefontein 405 	<ul style="list-style-type: none"> Remainder of Portion 6 (Kingsmead) of the Farm Malanskraal 407 Portion 17 (a Portion of Portion 8) of the Farm Malanskraal No 407 Farm Bothas Spruit Nr. 404 Portion 16 (a Portion of Portion 4) of the Farm Malanskraal No 407 Remaining Extent of Portion 13 (a Portion of Portion 2) of the Farm Malanskraal 407 Remainder of Portion 18 (a Portion of Portion 3) of the Farm Malanskraal 407 Portion 1 of the Farm Weltevreden Nr. 449 	

ENVIRONMENTAL APPLICATIONS

The proposed project triggers several listed activities contained in the Environmental Impact Assessment (EIA) Regulations Listing Notice 1 (GNR983), Listing Notice 2 (GNR984) and Listing Notice 3 (GNR985), as amended, and therefore, authorisation to undertake the listed activities must be sought via a S&EIR process. The anticipated listed activity numbers associated with the proposed project are reflected in the table below. Should you wish to obtain a complete copy of these listed activities, please contact the Environmental Assessment Practitioner (EAP), details provided below.

Project Name	Listing Notice	Applicable Triggers							
Scoping EIA for: <ul style="list-style-type: none"> ABO Uvemvane WEF 1 	GNR 983	11(i)	12(ii) (a)(c)	14	19	24 (ii)	28(ii)	48 (i) (a) (c)	56 (ii)
	GNR 984	1	15						
	GNR 985	4	10	12	14(ii) (a)(c)	18	23(ii) (a)(c)		
MPRDA	Section 53	Surface use in terms of Section 53 of the Mineral and Petroleum Resources Development Act (no. 28 of 2002)							
NHRA	Section 38(8)	Review of an Impact Assessment related to an application for Environmental Authorisation							

REGISTRATION

WSP Group Africa (Pty) Ltd (WSP) has been appointed as the EAP by ABO Energy South Africa (Pty) Ltd, on behalf of ABO Uvemvane Wind Energy Facility 1 (Pty) Ltd, to manage the S&EIR process. Parties wishing to formally register as stakeholders in order to offer their comment on the Proposed Project 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 process.

DRAFT EIA REPORT REVIEW PERIOD

Due to an unforeseen delay, the Draft Environmental Impact Assessment Report (DEIAR) will be available for public comment from **25 August 2026 to 28 September 2026**.

Please see the attached letter for more information.

Kind regards,

Public Participation Office

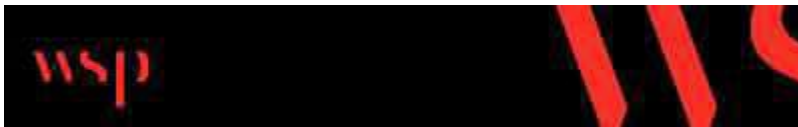
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T +27 11 361 1300

WSP

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

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WSP Group Africa (Pty) Ltd, Registered Office: Building 1, Maxwell Office Park, Magwa Crescent West, Waterfall City, Midrand, Gauteng, 1685, South Africa
Registered Number: 1999/008928/07 South Africa

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John Pakwe

Heritage Officer



E: [REDACTED]
A: [REDACTED] a Street,
[REDACTED] ng, ZA

www.sahra.org.za

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SAHRA FRAUD HOTLINE

Mathulwe, Tumelo

From: Celia de Waal <[REDACTED]>
Sent: Monday, 28 September 2026 09:04
To: ZA - WSP - PPOffice
Cc: Mervyn Lotter; khumbelo.malele
Subject: LUA 26/4471(2) RE: REMINDER: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)



Good morning

Thank you for the reminder of the deadline for comments for the ABO Uvemvane WEF 1. (Our ref: LUA 26/4471(2). Our scientists (copied in this e-mail) are currently busy with the comments, Once it is done, it will be reviewed, signed off and forward to you.

Your kind patience will be appreciated.

Kind regards

Celia de Waal

From: ZA - WSP - PPOffice <PP@wsp.com>
Sent: Wednesday, 23 September 2026 14:43
Subject: REMINDER: 41106304 - NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

REMINDER

Dear Stakeholder,

NOTICE OF THE PROPOSED DEVELOPMENT OF THE ABO UVEMVANE WIND ENERGY FACILITY 1, ENVIRONMENTAL AUTHORISATION PROCESS, MPUMALANGA AND GAUTENG (DFFE Reference Number: 14/12/16/3/3/2/2803)

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Proponent	Project	Technology	Process
Farm Names			
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ENVIRONMENTAL APPLICATIONS

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MPRDA	Section 53	Surface use in terms of Section 53 of the Mineral and Petroleum Resources Development Act (no. 28 of 2002)							
NHRA	Section 38(8)	Review of an Impact Assessment related to an application for Environmental Authorisation							

REGISTRATION

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DRAFT EIA REPORT REVIEW PERIOD

Due to an unforeseen delay, the Draft Environmental Impact Assessment Report (DEIAR) will be available for public comment from **25 August 2026 to 28 September 2026**.

Please see the attached letter for more information.

Kind regards,

Public Participation Office

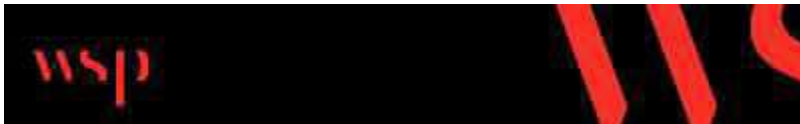
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Building 1, Maxwell Office Park, Magwa Crescent West, Waterfall City, Midrand
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WSP Group Africa (Pty) Ltd, Registered Office: Building 1, Maxwell Office Park, Magwa Crescent West, Waterfall City, Midrand, Gauteng, 1685, South Africa
Registered Number: 1999/008928/07 South Africa

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OFFICE OF BIODIVERSITY CONSERVATION

Ref: LUA 26 /4471(2)
Unit: LUA/SS
Enquiries: M.C. Lötter / K. Malele
E-Mail: [REDACTED]

Ms. Ashlea Strong
WSP Group (Pty) Ltd

Email: [REDACTED]

Dear Ms. Strong

MTPA'S COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED ABO UMEMVANE WIND ENERGY FACILITY 1, NEAR HEIDELBERG AND BALFOUR, MPUMALANGA AND GAUTENG PROVINCES (DFFE REF NO.: 14/12/16/3/3/2/2803; WSP PROJECT NO.: 41106304).

The Mpumalanga Tourism and Parks Agency (MTPA) hereby submits its formal comments on the Draft Environmental Impact Assessment Report (DEIR) for the proposed ABO Umemvane Wind Energy Facility 1 (WEF 1) located near Balfour.

The MTPA acknowledges and commends the Applicant and the Environmental Assessment Practitioner (EAP) for the significant layout optimizations undertaken since the pre-application phase. Specifically, we note the reduction of the facility layout from 66 to 20 turbines and the avoidance of critical avifaunal, aquatic, Critical Biodiversity Area (CBA), and bat no-go constraint zones.

The following sections outline the MTPA's technical evaluation, key areas of concern, and the specific conditions required to be incorporated into the Final Environmental Impact Report (FEIR).

AVIFAUNAL RISK AND SITE SENSITIVITY

The proposed ABO Umemvane WEF 1 footprint occurs in an avifaunally sensitive landscape that supports 18 endemic or near-endemic bird species and 26 priority species for wind energy developments. Pre-application monitoring confirmed high flight activity within the rotor-swept zone for species such as the Verreaux's Eagle (*Aquila verreauxii*, Regional Vulnerable) and Black-winged Kite (*Elanus caeruleus*).

The MTPA fully supports the avifaunal specialist's recommendation to exclude all turbines from steep slopes (> 1:4), scarps, ridges, and rocky outcrops to prevent collision risk for soaring raptors utilizing orographic lift.

Post-construction monitoring across operational South African wind farms demonstrates that Verreaux's Eagle fatalities often cluster near active Rock Hyrax (*Procavia capensis*) colonies. Eagles hunt by flying low and fast over rocky terrain

to surprise sun-basking hyraxes, bringing them into dangerous proximity to the turbine blades. A major risk identified in wind farm assessments is that construction activities, such as blasting, platform levelling, and foundation excavation, create rock piles. These rock dumps inadvertently form new, artificial hyrax habitats, drawing hyraxes and, subsequently, hunting eagles directly into high-risk turbine zones. To prevent luring eagles into the rotor-swept area, wind energy guidelines and the EMPr must explicitly require developers to promptly remove, smooth out, or rehabilitate all excavated rock piles during construction rather than leaving them near turbine bases.

To ensure alignment with the mitigation hierarchy and national best-practice standards (BirdLife South Africa, 2025), the MTPA requires that operational mitigation measures be strengthened:

- **Mandatory Automated / Observer-Led Shutdown-on-Demand (SDoD):** SDoD technology or dedicated vantage point observers must be integrated into the operational phase to trigger automated or manual turbine curtailment when Species of Conservation Concern (SCC), specifically Verreaux's Eagle and Endangered Secretarybird (*Sagittarius serpentarius*), are detected approaching the rotor-swept areas. This would ensure compliance with the zero-fatality threshold recommended by the avifaunal specialist.
- **Proactive Blade Patterning:** Proactive contrast painting of turbine blades (in accordance with SACAA approvals and national blade patterning guidelines) must be applied to all turbines.

HEIDELBERG COPPER BUTTERFLY - *CHRYSORITIS AUREUS*

The DEIR and terrestrial biodiversity specialist report state that “*MTPA observation records, which were not available at the time of this report, further indicate the known presence of the species at specific localities across the project area.*” The MTPA clarifies that official observation data was formally transmitted to the specialist, Mr Reinier Terblanche, via email on 10 June 2026. This distribution data must be fully integrated into the sensitivity mapping and impact discussion in the Final EIR.

The Heidelberg Copper (*Chrysoritis aureus*) is an Endangered, narrow-endemic species whose survival depends on open, rocky Highveld grassland ridges containing its specific larval host plant (*Clutia pulchella*) and host ant (*Crematogaster liengmei*). The Near Threatened Marsh Sylph (*Metisella meninx*) also occurs in adjacent wetland habitats.

Because habitat degradation, bush encroachment, and inappropriate fire regimes pose severe threats to this restricted butterfly population, the MTPA requires the compilation and implementation of a dedicated **Biodiversity Management Plan (BMP)** for the Heidelberg Copper butterfly and its associated grassland habitats as a strict condition of environmental authorisation:

- **Fire Management Plan:** The BMP must establish a controlled, mosaic burning regime designed to maintain open Highveld grassland structure, preventing both excessive fire frequency and woody shrub/bush encroachment.
- **Alien Invasive Plant (AIP) Control:** An active AIP eradication program must target invasive flora that threaten *Clutia pulchella* host plant stands and larval habitats.

- **Annual Operational Monitoring:** Annual or biennial population and habitat surveys must be conducted during the peak flight season (January–February) throughout the operational lifespan of the WEF to track population trends and evaluate BMP effectiveness.

SUMMARY OF MANDATORY MITIGATION CONDITIONS

The MTPA supports the progression of the 20-turbine layout to the Final EIR stage, subject to the inclusion of the following conditions in the final EMPr:

1. **Layout Integrity:** Strict adherence to all 200 m aquatic/wetland buffers, 200 m bat roost buffers, and avifaunal steep slope/ridge exclusion constraint zones. All buffer zone boundaries must be calculated from the outermost reach of the turbine blades (rotor-swept area overhang) rather than solely the turbine base or tower centre, ensuring no blade tip sweep encroaches into any no-go area.
2. **Rock Dump & Prey Habitat Management:** Mandatory removal, smoothing, or prompt rehabilitation of all excavated rock piles generated during blasting and foundation excavation to prevent creating artificial Rock Hyrax habitats close to the turbine footprint.
3. **Avifaunal Operational Safeguards:** Integration of Shutdown-on-Demand (SDoD) technology, proactive blade patterning, and lifetime post-construction mortality monitoring enforcing zero-fatality thresholds for threatened bird species.
4. **Invertebrate BMP:** Formulation of a site-specific Biodiversity Management Plan (BMP) for the *Endangered* Heidelberg Copper butterfly (*Chrysoritis aureus*) prior to the commencement of construction.

CONCLUSION

In summary, the MTPA supports the proposed 20-turbine layout and infrastructure footprint, provided that avifaunal operational mitigations are strengthened to include SDoD, rock pile clearing is mandated, and a comprehensive BMP is developed and implemented for the Heidelberg Copper butterfly.

Kind Regards,



Dr. M.C. LOTTER

DATE: 28 September 2026

Mathulwe, Tumelo

From: Werner Van Der Merwe [REDACTED] >
Sent: Saturday, 26 September 2026 19:38
To: ZA - WSP - PPOffice
Cc: [REDACTED]
Subject: Objection – ABO Uvemvane WEF 1 DEIR – DFFE Ref 14/12/16/3/3/2/2803 – WSP Ref 41106304 – Portion 15 Wildebeestfontein 559 IR
Attachments: Second Objection – ABO Uvemvane WEF 1 (DEIR)_Final.pdf; Annexure A - Uvemvane_Comprehensive_Objection_Report.pdf; Annexure B - 41106304_20260824_ABO Uvemvane_Stakeholder Notification Letter_signed (1).pdf

Dear WSP Public Participation Office,

Please find attached our written objection to the Draft Environmental Impact Assessment Report for the proposed ABO Uvemvane Wind Energy Facility 1 (DFFE Ref: 14/12/16/3/3/2/2803; WSP Ref: 41106304), submitted on behalf of the owner of Portion 15 of the Farm Wildebeestfontein 559 IR, Heidelberg, Gauteng, together with Annexures A and B.

We are registered Interested and Affected Parties and request written confirmation of receipt, and confirmation that this submission will be recorded in full and responded to in the Final Stakeholder Engagement Report submitted to the DFFE.

Kind regards,

[REDACTED]

Second Objection – ABO Uvemvane WEF 1 (DEIR)

Sep 26, 2026

Submission details

To: WSP Public Participation Office, WSP Group Africa (Pty) Ltd — pp@wsp.com

Copy: Ms Thulisile Nyalunga, Case Officer, Integrated Environmental Authorisations, Department of Forestry, Fisheries and the Environment (DFFE) — t [REDACTED]

Subject: Second written objection and statement of non-support — Draft Environmental Impact Assessment Report, ABO Uvemvane Wind Energy Facility 1

Item	Detail
Project	ABO Uvemvane Wind Energy Facility 1 (up to 170 MWac, up to 20 turbines)
Applicant	ABO Uvemvane Wind Energy Facility 1 (Pty) Ltd
DFFE reference	14/12/16/3/3/2/2803
WSP reference	41106304
Document commented on	Draft Environmental Impact Assessment Report (DEIR), August 2026, and Appendices A to K
Comment period (per WSP notice of 24 August 2026)	25 August 2026 to 28 September 2026
Submitted by	Werner van der Merwe, on behalf of the owner of Portion 15 of the Farm Wildebeestfontein 559 IR, Heidelberg, Gauteng
Status	Registered Interested and Affected Party; scoping-phase objection submitted 15 April 2026
Position	Objection. We do not support this project in any form.

We request written acknowledgement of receipt of this submission, and confirmation that it will be recorded in full and responded to individually in the Final Stakeholder Engagement Report submitted to the DFFE.

1. Introduction and statement of non-support

We object to the proposed ABO Uvemvane Wind Energy Facility 1 and ask the DFFE to refuse environmental authorisation. Our farm, Portion 15 of the Farm Wildebeestfontein 559 IR, Heidelberg,

lies adjacent to the project area. Our home, our workers' homes, our farming operations, and the people who live and work on this land, will live with this facility for decades.

On 15 April 2026 we submitted a detailed objection on the Draft Scoping Report (Annexure A). We maintain every point in that objection and incorporate it into this submission by reference. None of the concerns it raised has been resolved by the DEIR. Several have become more serious now that the specialist findings are available.

Our objection is not against renewable energy. It is against this particular development, of this scale, in this particular landscape. "Green" energy is not automatically environmentally harmless, and not every landscape is suitable for industrial development. Some landscapes should simply be left alone. The DEIR's own specialist studies confirm that the site is highly sensitive for heritage, birds, bats, biodiversity, visual character and noise. In our view, a site with this many overlapping sensitivities cannot be made acceptable through mitigation, and the no-go alternative is the correct outcome.

2. Summary of grounds

1. **Our own property is directly affected.** Our farm lies adjacent to the project area. We grow export garlic and flowers, rotation crops and vegetables, produce premium beef and lamb, run flower-farm open days with a growing agritourism business, and irrigate from the Suikerbosrand River; as far as we can determine, the DEIR does not assess the impacts on these operations.
2. **The public participation process is defective.** The comment period is stated inconsistently, Sesotho notices were only issued in the EIA phase, and our scoping objection has not been visibly answered.
3. **The project is a moving target.** The layout has gone from 66 to 33, 31, 27 and now 20 turbines, while the maximum turbine size stays the same and key decisions are deferred to after authorisation.
4. **Need and desirability are not shown for this location.** The site is outside any Renewable Energy Development Zone, and the grid connection is excluded from this assessment.
5. **The biodiversity value is high,** including Critical Biodiversity Areas, a Key Biodiversity Area, protected-area expansion priorities, rocky ridges and threatened species. The applicant has already appended a Biodiversity Offset Strategy.
6. **Bird risk is high and the mitigation is unproven.** Twelve bird species of conservation concern are affected, and the collision model assumes a 72% mitigation effect that can only be tested after construction.
7. **Bat risk is high,** with turbines proposed in a landscape of rivers, wetlands, ridges and woodland.
8. **Water resources,** including the Suikerbosrand River and its wetlands, are protected by narrow buffers without a long-term baseline.
9. **The heritage sensitivity is very high,** with dozens of Iron Age sites, cemeteries and historical werfs, and cultural-landscape impacts that cannot be mitigated.
10. **The visual impact is severe.** Turbines with a tip height of up to 280 m will dominate a rural tourism and wedding-venue landscape.
11. **The noise baseline is flawed.** A rural farming area has been reclassified as "suburban", relaxing the night-time noise limit by 5 dBA, with 11 noise-sensitive receptors within 1 km of turbines.

12. **Further unresolved risks** include battery fire and toxic-gas hazards, undermined ground, impacts on neighbouring farming and firefighting, cumulative impacts, no decommissioning guarantee, and numerous errors in the DEIR itself.

3. The project as now described in the DEIR

The DEIR describes a smaller turbine count but the same generation capacity and the same maximum turbine size. Each turbine would stand up to 280 m to the blade tip, taller than Johannesburg's Hillbrow Tower. The visual specialist modelled visibility at 300 m.

Parameter	DEIR maximum (Table 1-1)
Export capacity	Up to 170 MWac
Number of turbines	Up to 20 (up to 10 MW each)
Hub height	Up to 180 m
Rotor diameter / blade length	Up to 200 m / 100 m
Tip height (hub + blade)	Up to 280 m
Foundations and hardstands	Up to 1 ha per turbine
Roads	Up to 31 km (about 18 km of existing roads to be widened); 12 m construction corridor
Electrical hub incl. substation and BESS	Up to 7 ha; three locations applied for, one to be chosen at pre-construction stage
Laydown and batching areas	4 areas, up to 15 ha in total
Other	33 kV line linking north and south, O&M and security buildings, 32 m communications tower, 25 m lighting mast
Study area / assessed area	About 8,200 ha / about 6,000 ha
Grid connection	Excluded; to be assessed separately

The DEIR presents the permanent footprint as 67.2 ha, or about 1.12% of the affected properties. That figure measures concrete and gravel, not impact. The zone of influence of 20 structures of this height covers tens of thousands of hectares, including our farm.

4. Detailed grounds of objection

4.1 Our property is directly affected

Portion 15 of the Farm Wildebeestfontein 559 IR lies adjacent to the project area. Portion 15 is a working farm:

Operation	Scale and use
Garlic	3 to 5 ha planted each year; exported to international markets
Dahlias and peonies	2 ha, with planned expansion; export and local markets, including neighbouring wedding venues and their guests
Agritourism	Flower-farm open days already running; busiest in the flowering season from November to April, on weekdays and weekends; a destination garden and farm experience.
Pumpkins and other vegetables	Grown in rotation; pumpkins supplied to the local market
Maize, soya and green pastures	Rotation crops on garlic lands; pastures feed our animals
Sheep and cattle	Pasture-raised; sold as premium, deli-quality beef and lamb

Garlic cannot be planted on the same land every year, so all our arable lands form part of one rotation system. We irrigate from the Suikerbosrand River under our irrigation rights. Our homesteads, our workers' homes and our animals all depend on borehole water. Section 4.13 sets out how the project would affect these operations.

4.2 The public participation process is defective

1. **Inconsistent comment period.** Section 2.3.1.6 of the DEIR states the review period as 24 August to 25 September 2026. WSP's notice and its reminder of 23 September state 25 August to 28 September 2026. Interested and affected parties cannot be certain which period applies.
2. **Unverifiable notification.** The DEIR says DEIR notification "will be issued" and that proof will only appear in the final EIA report. We therefore cannot verify who was notified, or when.
3. **Sesotho-speaking communities excluded from scoping.** The DFFE asked for Sesotho advertising during the scoping phase. The Sesotho advertisement only appeared on 19 August 2026 and Sesotho site notices only from 24 August 2026. By the DEIR's own figures, Sesotho is the first language of about 35% of Midvaal, 26% of Dipaleseng and 24% of Lesedi residents. The scoping report was accepted on 22 June 2026 on the basis of participation that did not reach them.
4. **Unrealistic review burden.** The DEIR runs to 540 pages, with a 15-part site sensitivity report and 15 specialist appendices. A 30-odd-day window for lay landowners to review this is not meaningful participation.
5. **Our scoping objection has not been visibly answered.** Regulation 44 of the EIA Regulations, 2014 requires that I&AP comments be recorded and responded to. We ask WSP to identify exactly where each point of our 15 April 2026 objection is responded to in Appendix E.

6. **Pre-judged specialist scope.** Section 3.5.1 records an assumption that the competent authority "would not require additional specialist input". That assumption cannot be made before I&APs have commented.

4.3 The project is a moving target

The project has shrunk on paper at every stage while its worst-case turbine has stayed the same:

Stage	Turbines	Capacity	Assessed area
Preliminary cluster (WEF 1 and WEF 2)	66	—	—
Site sensitivity verification	33	240 MWac	—
Pre-scoping optimised layout	31	—	—
Scoping	27	170 MWac	about 7,700 ha
DEIR	20	170 MWac	about 6,000 ha

Fewer turbines at the same capacity means bigger individual turbines, not smaller impacts. Meanwhile, decisions that determine real-world impacts are deferred beyond public scrutiny:

- The turbine model has not been selected; all studies rely on maximum dimensions.
- Three hub and battery locations are applied for, with the choice left to the "pre-construction stage".
- The traffic specialist records that the client's preferred number of access points is "currently unknown", and road upgrades are left to detailed design.
- The agricultural specialist was appointed in October 2025 to assess 27 turbine hardstands. It is not clear that every specialist has assessed the 20-turbine layout now before the public.
- Appendix 3 item (u) of the DEIR states there is no deviation from the approved scoping report, despite the changed layout and assessed area.

I&APs and the DFFE are being asked to accept an envelope, not a project.

4.4 Need and desirability have not been shown for this location

The bat specialist confirms that the site is not in a Renewable Energy Development Zone. REDZs are the areas where government has strategically assessed wind energy as suitable. Outside a REDZ, the applicant carries a heavier burden to show why this particular site is desirable.

The DEIR's need case rests on national electricity demand and historical load-shedding data. That data no longer reflects the current position:

- South Africa has had no load shedding since 16 May 2025, a run of more than 490 consecutive days ([Businessfront](#)).
- Eskom met demand through the entire 2026 winter without load shedding, as its Winter Outlook predicted ([SAnews](#)).

- Eskom reports holding 6,220 MW in cold reserve because of excess capacity ([The Citizen](#)).

The emergency that framed the need case has passed, and the demand picture has changed with it. The applicant must show, on current data, that this particular facility is still needed and justified, rather than relying on a crisis that no longer exists. Even if future generation capacity is needed, that shows a need for generation somewhere; it does not show that it must be here. The Constitutional Court in *Fuel Retailers Association v Director-General, Mpumalanga* [2007] ZACC 13 held that environmental authorities must themselves assess need, desirability and sustainability in relation to the specific site.

Section 24(4)(b)(i) of NEMA requires investigation of alternatives. We ask the DFFE to test whether genuine alternative sites, including sites within REDZs, were ever considered, or whether only this site was assessed.

The benefits also fall unevenly. The scoping screening rated "improvement in financial security of the farm" as a high positive, but only for host landowners. Neighbours such as us carry the visual, noise, heritage and property-value costs with no benefit.

Finally, the grid connection is excluded and "will be subject to separate environmental impact assessments". The DFFE cannot assess the full impact of a project whose power lines have not yet been assessed. Splitting the project in this way understates its impact.

4.5 Biodiversity: an ecologically important landscape

The DEIR maps the project area of influence against a remarkable number of conservation layers: Critical Biodiversity Areas and Ecological Support Areas under the Gauteng C-Plan (2024) and the Mpumalanga Biodiversity Sector Plan, Freshwater Ecosystem Priority Areas, a Key Biodiversity Area, Mpumalanga's climate change corridor network, priority focus areas under both the National and Mpumalanga Protected Area Expansion Strategies, intact grasslands, and Gauteng rocky ridges. Habitats include Mountain Bushveld, rocky shrubland with *Protea caffra*, closed-canopy mountain woodland, natural dry grassland and the Suikerbosrand River corridor.

In the valley below the ridges, the Suikerbosrand River meanders through some of the most beautiful and relatively untouched countryside in the area. African Fish Eagles and other wildlife live along it, and people have enjoyed this open Highveld landscape for generations. A wind farm is not simply a few turbines on a hill. It brings roads, substations, construction platforms, enormous concrete foundations and kilometres of power lines, which together fragment the grasslands, wetlands and river corridor into an industrial landscape. Anyone who has seen what wind development has done to the Highveld horizon near Bethal knows that such a landscape cannot be returned to what it was.

The specialist recorded Mountain Reedbuck (Endangered), Serval (Near Threatened) and Vlei Rat (Near Threatened) in the study area, alongside Sable Antelope (Vulnerable). Plants photographed on site include *Boophone disticha*, *Aloe verecunda* and *Crinum graminicola*.

Wind turbines are, by design, placed on high ground. In Gauteng, rocky ridges are recognised as sensitive features that should not be developed. Placing turbines, crane pads and access roads on these ridges is in direct conflict with that policy.

The survey effort does not match the sensitivity. Fieldwork comprised two five-day surveys, and the plant survey a single five-day visit in January 2025. The specialists themselves acknowledge that rare,

cryptic, migratory or low-detection species may have been missed, and that baseline descriptions are qualitative. The butterfly assessment is a "snapshot investigation", and its own mapping identifies potential conflict areas between butterfly habitat and the layout.

The Biodiversity Offset Strategy (Appendix K) is itself a concession. Section 3.3.2 of the DEIR explains that offsets are considered only if avoidance, minimisation and rehabilitation all fail to remedy high residual impacts. By appending an offset strategy, the applicant accepts that significant residual biodiversity loss will remain. The DEIR does not, as far as we can determine, identify which impacts are to be offset, a secured receiving site, who will manage it, or the DFFE's view on offsetting loss within Critical Biodiversity Areas.

4.6 Birds: high risk, unproven mitigation

The DFFE Screening Tool rated avifaunal sensitivity as Low. After 12 months of monitoring, the specialist found the site to be of **High** sensitivity for 12 species of conservation concern. At scoping, turbine collision mortality was rated **Very High** before mitigation. Vulture records (VulPro) exist within 50 km, and the National Vulture Task Force is a commenting authority under the Multi-species Biodiversity Management Plan for Vultures.

African Fish Eagles live along the Suikerbosrand River. Large soaring birds such as eagles are particularly vulnerable to turbine collisions. BirdLife South Africa's review of South Africa's first operational wind farms found that birds of prey made up about 36% of recorded fatalities, at an average of about 4 birds killed per turbine per year across all species, with threatened raptors such as Verreaux's Eagle, Martial Eagle and Black Harrier among those killed ([Daily Maverick](#)). At that national average, 20 turbines would kill around 80 birds a year, or roughly 2,000 over the life of the project.

The Highveld's grasslands and wetlands are also habitat for cranes, and a member of our family has personally seen Wattled Cranes in this area. The Wattled Crane is regionally Endangered, and BirdLife South Africa identifies collisions with wind turbines and new power lines, and habitat loss to renewable energy infrastructure, as an emerging threat, particularly in Mpumalanga ([BirdLife South Africa](#)). We ask the avifaunal specialist to state whether Wattled Cranes were recorded during monitoring, to assess their use of the Suikerbosrand wetlands and surrounding grasslands, and if they were not recorded, to explain how a regionally Endangered species seen locally could have been missed; and to name all 12 species of conservation concern identified. Because the separate grid connection will add further power lines, the collision risk assessed in this DEIR is incomplete.

The collision risk modelling rests on assumptions the specialist openly acknowledges:

- It assumes turbine placement plus blade patterning achieves a **72% reduction** in collisions, a figure recorded for blade patterning alone. The specialist states that actual efficacy "will only be verifiable through post-construction carcass monitoring".
- Avoidance rates of 95% to 98% are taken from international guidance, because avoidance estimates for South African birds do not yet exist.
- Inter-annual variation is not accounted for, as only one year of data was collected.
- The model assumes birds are evenly distributed and fly at constant speeds, which the specialist accepts is not true for soaring raptors.

A mitigation measure whose effect can only be discovered after 20 turbines are built and birds are killed is not a basis for authorisation. Section 2(4)(a)(vii) of NEMA requires a risk-averse and cautious approach where knowledge is limited. That principle points to refusal.

4.7 Bats

The Screening Tool rated the site as High sensitivity for bats, and the specialist could not refute this, citing the rivers, open water and numerous wetlands. At scoping, bat mortality was rated **Very High** before mitigation. The specialist prescribes 200 m buffers around water sources, and buffers around ridges and wooded areas. Bats are killed at turbines by both collision and barotrauma.

A buffer is only meaningful if it applies to the blade tip, not the tower base. With a 100 m blade, a turbine sited 150 m from a buffer edge sweeps into it. We ask for confirmation that no part of any rotor-swept area enters any bat buffer, and for the full 12-month monitoring dataset.

4.8 Water resources

The site contains the Suikerbosrand River and its tributaries, valley-bottom wetlands, and features mapped as Freshwater Ecosystem Priority Areas. The DEIR also maps the site against Strategic Water Source Areas. The aquatic specialist records that no long-term baseline monitoring was undertaken, that little existing information is available, and that areas not ground-truthed were extrapolated from aerial imagery.

The proposed buffers are only 50 m from watercourses and 100 m from wetlands. Against that sit up to 31 km of roads with a 12 m construction corridor, about 18 km of widened farm roads, concrete batching, hardstands and cable crossings. The specialist's view that road and powerline impacts "can be effectively mitigated" is an assertion, not an assessment. We irrigate export crops from the Suikerbosrand River under our irrigation rights, and neighbouring farms depend on the same water. We ask for a schedule of every watercourse and wetland crossing.

4.9 Heritage and the cultural landscape

Heritage sensitivity was rated **Very High** by the Screening Tool and confirmed as **Very High** by the specialist, who found significant Iron Age archaeology and intact cultural landscape resources. More than 100 heritage points are recorded, including:

- dozens of Iron Age stone-walled enclosures, some with cairn-marked graves;
- a stone-walled fort from the South African War on a koppie;
- numerous cemeteries, including the Jacobs (1908), Goosen (1890s), Gouws and Bekker, Modipa and Ntaopane family graves, and several farmworkers' burial grounds with up to 60 graves each;
- historical werfs at Laagerspoort, Steynskraal and Malanskraal (with Cape Revival gables);
- Klipplaat koppie, a prominent landmark the specialist says must be avoided entirely; and
- an historical gold-mining shaft.

The heritage specialist's site sensitivity report warns of a very high visual impact on a relatively intact and representative cultural landscape, with an extremely limited ability to screen turbines. It states that these impacts cannot be mitigated and cannot be rehabilitated once the project ends. Point buffers of 50 m to 500 m protect individual features from construction, but not the landscape they belong to. We

ask that no decision be taken before SAHRA has issued its final comment under section 38(8) of the NHRA.

4.10 Visual impact and sense of place

The visual specialist finds that visual exposure within 20 km will be "very high", and that within 5 km the facility would dominate the view, with a potentially high to very high visual impact. Receptors include numerous homesteads, tourist accommodation, the N3, R23 and R103, the Alice Glockner Nature Reserve (5.1 km) and, further out, the Suikerbosrand Nature Reserve (12.3 km). The DEIR notes that the area is "a known wedding venue and tourist destination", with guesthouses and lodges within 1 km, and the Tuin van Eden campsite inside the project area.

As far as we can determine, the DEIR does not name the two tourism businesses closest to us. Our direct neighbours are Stone Cellar, a wedding and events venue, and Mondoro Game Lodge. Stone Cellar is also one of our biggest clients for flowers. Both depend entirely on an unspoilt rural setting: couples choose Stone Cellar for its countryside backdrop, and guests come to Mondoro for the bushveld, wildlife and quiet. Neither business appears as a named receptor in the visual, noise or social assessments, and the impact on them does not appear to have been assessed. We ask that both be included as specific receptors, with photomontages, noise predictions and shadow-flicker assessments from each venue, and an assessment of the effect on their businesses.

The assessment understates this impact in three ways:

1. **Landscape quality is downgraded by label.** The study area is rated only "moderate" by calling it "urban edge". This contradicts the DEIR's own description of "wide open, predominately rural agricultural and undeveloped landscapes" of "moderate to high visual quality", and the heritage specialist's "relatively intact" cultural landscape.
2. **Receptors are removed.** Farmsteads not currently occupied are excluded as receptors. This ignores future occupation, workers' housing and our right to develop our own land.
3. **Night-time impact is not addressed.** Aviation obstruction lighting on 20 structures of this height will introduce flashing red lights to a dark rural night sky.

We ask for photomontages taken from our homestead, and shadow-flicker hours per year for each dwelling on our property.

For us, the view is part of the business. Our flower-farm open days, and the destination garden, and farm experience, depend on an unspoilt rural setting. Visitors come for flowers, open landscape and quiet, not for 280 m turbines on the skyline and the sound of rotors.

4.11 Noise

The Screening Tool rates noise sensitivity as Very High. The DEIR records **11 noise-sensitive receptors within 1,000 m** of turbines, and notes that turbine noise is likely audible up to 2,500 m at night. It also acknowledges that several turbines at 1 to 2 km can produce more noise at a dwelling than a single turbine at 500 m.

The baseline is flawed. Ambient sound was measured over about six nights in November 2024 only. The specialist records that the levels were driven by cattle, barking dogs, birds, insects (a peak at 4 to 6.3 kHz) and passing traffic. On that basis, this rural farming area was classified as a **suburban** noise district,

setting the night-time rating level at 40 dBA instead of the 35 dBA used for rural districts under SANS 10103:2008. A 5 dBA relaxation is a clearly noticeable difference. Mooing cattle and summer insects are exactly what rural quiet sounds like; they do not make a farm suburban.

The DEIR also does not show that amplitude modulation (the rhythmic "swish") and low-frequency noise were assessed, which are the main causes of complaints near wind farms. We ask for noise contours for the selected turbine model at every dwelling on our property, assessed against the rural limit.

4.12 Battery Energy Storage System (BESS)

The electrical hub of up to 7 ha includes a BESS whose technology and location are both undecided. The safety assessment assumes lithium-ion batteries and describes the hazards: thermal runaway, explosion, fire spreading between cells, and toxic gases including hydrogen fluoride and hydrogen cyanide. It also warns that firefighting can generate large volumes of contaminated runoff. Its own mapping shows occupied facilities and watercourses within 500 m of the hub options.

Rural emergency response capacity in this area is limited. The safety assessment also refers to "the Groothoek facilities", which suggests it was adapted from another project rather than written for this site. We ask for the selected hub location, battery chemistry, separation distances to dwellings and watercourses, and an emergency response plan agreed with the local fire services, before any decision.

4.13 Agriculture, our farming operations and fire

The Screening Tool rated agricultural sensitivity as Very High, citing pivot irrigation and land capability. The specialist disputed this because there is no pivot irrigation "directly in" the WEF 1 area, while acknowledging that it occurs in adjacent areas. Those adjacent areas are neighbouring farms. The specialist also confirmed high sensitivity for Category 1 soils.

Impacts on neighbouring farming are not captured by a 1.12% footprint figure:

- restrictions on crop-spraying aircraft near 280 m turbines;
- abnormal loads and heavy construction traffic on gravel farm roads such as the D1220, D1422 and P243/1;
- dust, gates left open, and security and stock-theft risk from construction influx;
- turbines as an ignition source (nacelle fires) during the Highveld winter fire season; and
- restrictions on aerial firefighting near turbines, precisely when fire spreads fastest.

We ask for a fire management plan agreed with the local Fire Protection Association, and an assessment of the effect on neighbouring property values.

Our own operations. The agricultural specialist assessed land capability inside the project area. As far as we can determine, the DEIR does not assess the effect on specialised farming operations next to it, such as ours:

- **Garlic, export markets and crop biosecurity.** Garlic is vulnerable to soil-borne diseases such as white rot, which can persist in soil for many years and spreads on soil carried by vehicles, machinery and footwear. Heavy construction traffic moving between farms, and soil moved during road building, create a real risk of bringing disease onto our lands. Our garlic is exported,

and export markets demand clean, disease-free produce. An infected field is lost to garlic for years, which breaks our rotation across the whole farm and puts our export business at risk.

- **Dust on high-value flowers.** Our dahlias and peonies are sold into export and local markets on the quality of their blooms, and dust and marking directly reduce their value. Construction dust from 31 km of new and widened gravel roads, four batching and laydown areas and heavy vehicles threatens this crop, and our planned expansion, for the whole construction period.
- **Irrigation water from the Suikerbosrand River.** We irrigate export crops from the Suikerbosrand River under our irrigation rights. The project places roads, watercourse crossings, batching plants and hardstands on and around the river and its tributaries. Sediment, cement washwater or fuel spills would affect the water we irrigate with, and any contamination can compromise export produce. The DEIR offers only 50 m buffers and no long-term baseline (see 4.8).
- **Borehole water for people and animals.** Our homesteads, workers' homes and livestock rely entirely on boreholes. Concrete foundations for 20 turbines, plus roads and batching, need large volumes of water. The DEIR does not say where this water will come from, or whether groundwater abstraction, blasting or foundation works could affect the boreholes we depend on.
- **Pollinators and beneficial insects.** Our farm benefits from healthy pollinator and beneficial-insect populations supported by the surrounding grassland, bushveld and wetlands. Clearing, fragmentation and ongoing disturbance of that habitat erode it, and the butterfly specialist has already identified conflict areas between insect habitat and the layout.
- **Sheep and cattle.** Blasting, piling, heavy machinery and night works can stress livestock, especially during lambing and calving. Our beef and lamb are sold as premium, deli-quality meat, which depends on calm, low-stress animals and clean pastures; stress and disrupted grazing directly affect that quality. Construction also brings damaged fences, gates left open, animals straying onto roads, and a higher risk of stock theft with more traffic and strangers in the area.
- **Animal-disease biosecurity.** Foot-and-mouth disease (FMD) is already a live threat in this specific area. In 2025, FMD was confirmed at the Karan Beef feedlot in Heidelberg, among the largest feedlots in the world, with further cases at its Nigel facility, as part of outbreaks across several provinces ([Daily Maverick](#); [EWN](#)). FMD spreads on vehicles, equipment, footwear and clothing. Years of construction traffic, contractors and workers moving between farms in an FMD-affected district would multiply the risk to our cattle and sheep. An outbreak on our farm would mean movement restrictions and the loss of our premium meat market. As far as we can determine, neither the DEIR nor the EMPr sets out enforceable animal-disease biosecurity measures.

These impacts fall on us, not on the host landowners. We ask that they be specifically assessed, and weighed by the DFFE, before any decision.

4.14 Undermined ground and geotechnical risk

At scoping, the geotechnical screening rated **subsidence as High** in the construction, operational and decommissioning phases, and cumulatively. The heritage survey recorded an historical gold-mining shaft on site, and the DEIR's geology includes the gold-bearing Central Rand and West Rand Groups. Foundations for 280 m turbines on potentially undermined ground are a real safety risk. Turbine-specific geotechnical investigations should be completed before a decision, not after.

4.15 Social impacts and tourism

The local economy around the site includes wedding venues, guesthouses, lodges and campsites that depend on a rural, scenic setting. Construction jobs are temporary, and the scoping screening rated the energy-generation benefit itself as only Low. The DEIR's own baseline reports high rates of burglary and assault at the nearest police stations, and no local gender-based-violence services, which a construction workforce influx will pressure further. The loss of tourism income and amenity for neighbours is not weighed against the modest local benefits.

Our own business is part of this tourism economy. We already host flower-farm open days, which run on weekdays and weekends throughout the flowering season from November to April. That is also peak wedding season, and construction dust, traffic and noise during these months would fall directly on our busiest trading period. Our flower farm is already a tourist destination in its own right, attracting visitors from across Gauteng to open days on weekdays and weekends throughout the flowering season from November to April. Neighbouring wedding venues, their brides and their guests are among our main clients, both for flowers and for activities. The facility threatens our clients' businesses and ours at the same time: brides do not choose venues under industrial turbines, and visitors do not travel for that view. The DEIR does not assess the loss of this existing and planned tourism income, or the investment it puts at risk.

4.16 Cumulative impacts

WEF 1 is one part of a cluster that also includes WEF 2, and its grid connection will be assessed separately. The DEIR identifies other renewable energy projects within 50 km, alongside existing 400 kV lines and the Grootvlei Power Station. The existing infrastructure is used to argue that the landscape can absorb change. In reality, it shows how far industrialisation of this area has already gone. Cumulative impacts on birds, bats, grassland habitat and landscape character must be assessed quantitatively and together with WEF 2 and the grid connection, before any decision on WEF 1.

4.17 Decommissioning and financial provision

Appendix 3 item (t) of the DEIR marks financial provision for rehabilitation, closure and post-decommissioning management as "N/A". Twenty turbines with foundations of up to 1 ha each, 31 km of roads and a battery facility will need to be removed at the end of the project's life. Without a binding, ring-fenced decommissioning guarantee, that burden could fall on landowners, neighbours or the state. And even full removal after an operating life of roughly 25 years would not return the landscape: road networks, cleared corridors, buried foundations and fragmented habitat would remain for generations.

4.18 The DEIR is not reliable enough to support a decision

The DEIR contains errors that go beyond typographical slips:

- the noise section says it is extracted from a report "compiled by LOGIS", although the noise specialist is Enviro-Acoustic Research;
- the safety section refers to "the Groothoek facilities";
- the Midvaal population is given as 6,572,721, with 1.8 million households;
- Mpumalanga is described as bordering "Swaziland";
- the comment period is stated differently in the DEIR and in WSP's notices; and

- numerous cross-references read "Error! Reference source not found", including in the table that tells readers where each specialist's findings appear.

The EAP has a duty under Regulation 13 of the EIA Regulations to ensure that the information provided is objective and accurate. A decision-maker cannot safely rely on a report with errors of this kind on a project of this scale.

5. Information we request before any decision

We ask WSP to provide the following to us, and to include it in the Final EIA Report, with a further opportunity to comment:

1. Coordinates of all 20 turbines, the three hub/BESS options, laydown areas and access roads, in a format we can open.
2. The distance from each turbine, road and hub option to every dwelling, workers' house, grave and heritage site on Portion 15 of the Farm Wildebeestfontein 559 IR.
3. Photomontages from our homestead, by day and at night with aviation lighting.
4. Predicted noise levels and shadow-flicker hours per year at each dwelling on our property, for the selected turbine model, assessed against the rural noise district limit.
5. Confirmation that every specialist assessed the 20-turbine DEIR layout, not an earlier layout.
6. The full collision risk model outputs and potential biological removal figures per bird species, and the full 12-month bat monitoring dataset.
7. Confirmation that no rotor-swept area enters any bat, wetland, watercourse or heritage buffer.
8. A schedule of every watercourse and wetland crossing.
9. Full details of the Biodiversity Offset Strategy: which residual impacts are to be offset, the receiving site, whether it is secured, and the DFFE's view.
10. Details of any consultation with descendants of those buried in the graves recorded on and around our farm, and SAHRA's final comment.
11. The selected BESS location and chemistry, and an emergency response and fire management plan.
12. Turbine-specific geotechnical and undermining investigations.
13. An assessment of the effect on neighbouring property values, tourism businesses and farming operations, including our garlic, cut-flower, premium livestock and agritourism enterprises; the water source and volumes for construction, and the effect on neighbouring boreholes; how water quality in the Suikerbosrand River will be protected and monitored; and proposed biosecurity and dust controls.
14. The alternative sites considered, including sites within REDZs, and why each was rejected.
15. A decommissioning plan and the proposed financial guarantee.
16. Where in Appendix E each point of our 15 April 2026 objection is responded to.
17. A security and stock-theft prevention plan for the construction and operational phases, including: access control and vetting of contractors and workers; how access to neighbouring farms will be restricted; fencing and gate management along all routes and work areas; security patrols and incident reporting; liaison with the local police and farm watch structures; and how affected landowners will be compensated for livestock losses, fence damage or theft linked to the project.

6. Requested outcome and reservation of rights

For the reasons above, we respectfully ask the Department of Forestry, Fisheries and the Environment to:

1. **refuse environmental authorisation** for the ABO Uvemvane Wind Energy Facility 1, on the basis that its significant adverse impacts on heritage, birds, bats, biodiversity, water resources, visual character, noise and neighbouring landowners cannot be avoided or reduced to acceptable levels, and that the no-go alternative is the best practicable environmental option;
2. in the alternative, and before any decision, require the applicant to provide the information listed in Section 5, correct the errors identified in Section 4.18, and re-issue a revised DEIR for a further public comment period of at least 30 days;
3. not take any decision before the grid connection for WEF 1 and the WEF 2 application can be assessed together with WEF 1 for cumulative impacts;
4. obtain and consider the final comments of SAHRA, the National Vulture Task Force, BirdLife South Africa, the Endangered Wildlife Trust, GDARD and the Mpumalanga DARDLEA before any decision; and
5. ensure that this submission and our scoping submission of 15 April 2026 are placed before the decision-maker in full, with individual responses.

We request written notification of the decision. We reserve all our rights, including the right to appeal any decision under section 43 of NEMA and the National Appeal Regulations, 2014, and to raise further grounds as more information becomes available. This submission is made without prejudice to those rights.

7. Signature

Submitted by: Werner van der Merwe

On behalf of the owner of: P [REDACTED]

[REDACTED]

Signature:  _____

Date: 28 September 2026

Annexures:

- Annexure A: Our scoping-phase objection, "Comprehensive Objection Report", dated 15 April 2026
- Annexure B: WSP stakeholder notification letter, reference 41106304, dated 24 August 2026

Sources include:

- [Draft EIA Report, August 2026 – Part 1](#)
- [Draft EIA Report, August 2026 – Part 2](#)
- [Appendix K – Biodiversity Offset Technical Memo](#)
- [Bat Site Sensitivity Verification Report \(REDZ status\)](#)
- [Site Sensitivity Verification – heritage \(33 turbines / 240 MWac; cultural landscape\)](#)
- [WSP Environmental Reports for Public Review](#)

COMPREHENSIVE OBJECTION REPORT

Proposed ABO Uvemvane Wind Energy Facility 1 near Heidelberg and Balfour

Draft submission framework for use during the Scoping Phase

Project	ABO Uvemvane Wind Energy Facility 1
DFFE Reference	2024-11-0018
Applicant	ABO Uvemvane Wind Energy Facility 1 (Pty) Ltd
Environmental Assessment Practitioner	WSP Group Africa (Pty) Ltd
Prepared for	Steynskraal 339IR; Driefontein 405 IR & Wildebeestfontein 559IR

1. Executive Summary

This report sets out a detailed objection to the proposed ABO Uvemvane Wind Energy Facility 1 (WEF 1) during the Scoping Phase of the S&EIR process. The objection is not directed against renewable energy in principle. It is directed at the siting, scale, residual impacts, and procedural adequacy of this particular proposal.

According to the Draft Scoping Report, the project contemplates up to 27 turbines of up to 180 m hub height with blades of up to 100 m and a rotor diameter of up to 200 m, together with a study area of about 8,200 ha, an affected area of about 7,700 ha, a likely footprint of about 110 ha, up to 28–35 km of roads, six laydown areas, overhead and underground electrical infrastructure, and a BESS/electrical hub footprint of up to 25 ha in the maximum development scenario.

The report itself identifies or references critical biodiversity areas, ecological support areas, freshwater ecosystem priority areas, wetlands, tributaries of the Suikerbosrand River, species of conservation concern, priority bird activity, vulture records, bat-sensitive features, protected-area proximity, visual sensitivity, numerous residential and homestead receptors, and cumulative renewable-energy development pressures in the broader region.

In these circumstances, the competent authority should not treat this as a routine wind-farm application. At minimum, the scoping submission should be rigorously interrogated for compliance with Appendix 2 of the EIA Regulations, for whether need and desirability have been demonstrated in relation to this location, and for whether the EIA phase can realistically cure the current information gaps. If not, the scoping report should not be accepted in its current form.

2. Project Summary from the Draft Scoping Report

Item	Scoping report description
Generation facility	Commercial wind facility of up to 170 MWac with up to 27 turbines.
Turbine envelope	Hub height up to 180 m; blade length up to 100 m; rotor diameter up to 200 m; turbine capacity up to 10 MW.
Project area	Preferred study area of approximately 8,200 ha, with approximately 7,700 ha assessed.
Likely footprint	Approximately 110 ha, including turbines, roads, laydown areas, and electrical infrastructure.
Roads	Up to 28 km of access/internal roads, and elsewhere the report references up to 35 km in the maximum development scenario.
Electrical/BESS hub	One on-site collector substation / electrical hub with alternatives; elsewhere the report references up to 7 ha and also up to 25 ha in the maximum development scenario, which should be clarified.
Ancillary works	Laydown areas, batching areas, overhead/underground line, O&M and auxiliary buildings, communication tower, lighting mast,

Item	Scoping report description
	fencing, and BESS.
Location	Near Balfour and Heidelberg across Gauteng and Mpumalanga, with numerous farm portions listed in the report.

3. Legal and Regulatory Framework

3.1 Constitution, section 24

The Constitution protects the right to an environment that is not harmful to health or well-being, and requires reasonable legislative and other measures to prevent pollution and ecological degradation, promote conservation, and secure ecologically sustainable development while promoting justifiable social and economic development.

3.2 NEMA section 2

NEMA requires sustainable development through consideration of all relevant factors, including avoidance or minimisation of ecosystem disturbance and biodiversity loss, avoidance or minimisation of pollution and landscape disturbance, a risk-averse and cautious approach, meaningful participation by interested and affected parties, and decisions that take into account the social, economic and environmental impacts of activities.

3.3 NEMA section 24

Potential consequences or impacts of listed activities must be considered, investigated, assessed and reported on to the competent authority, and the authority must make a lawful, rational and informed decision based on adequate information.

3.4 EIA Regulations, 2014 (as amended)

If S&EIR applies, the scoping report must substantially comply with Appendix 2. The competent authority may refuse environmental authorisation at the scoping stage where the scoping report does not substantially comply and the applicant is unwilling or unable to ensure compliance within the prescribed timeframe.

3.5 Fuel Retailers case

The Constitutional Court held that environmental authorities must integrate environmental, social and economic considerations and may not assume that another authority has already dealt with need and desirability or the broader sustainable-development enquiry.

4. Core Objection Themes

The objections below are framed on two levels. First, the report itself identifies a range of sensitivities and risks that make this site inherently contentious. Second, the scoping phase appears to leave too many material issues to be resolved later, despite the obligation to demonstrate at scoping stage that the proposed site, layout and activity can proceed to EIA on a properly informed basis.

4.1 Inadequate demonstration of need and desirability in relation to this site

The report correctly notes that scoping must motivate need and desirability of the proposed activity, including the preferred location. That requirement is not satisfied merely by pointing to national electricity demand or the general policy support for renewable energy. The relevant question is why this specific development should be authorised in this specific receiving environment.

A project may be desirable in principle yet undesirable in a location characterised by high ecological sensitivity, rural scenic character, agricultural value, residential receptors, wildlife use and cumulative development pressure. The objection is therefore that the report appears to conflate national energy need with site-specific desirability.

The Constitutional Court in *Fuel Retailers* makes clear that competent authorities must themselves undertake the integrated sustainable-development enquiry and cannot simply defer key location and desirability questions to other decision-makers.

4.2 Apparent underweighting of the no-go alternative

The report states that the no-go alternative would avoid the project's negative environmental impacts and allow continued agricultural use of the land, yet the discussion is brief and framed mainly in terms of lost renewable-energy opportunity and foregone socio-economic benefits. That is not a neutral comparative assessment.

For a site where the report itself flags very high biodiversity sensitivity, very high noise sensitivity, very high visual sensitivity from screening, species of conservation concern, wetlands, watercourses, bat-sensitive features and avifaunal constraints, the no-go alternative should be robustly analysed as a legitimate preferred outcome rather than a formality.

4.3 Site sensitivity is too high to be treated as an ordinary mitigation exercise

The report's site sensitivity verification confirms very high sensitivity for terrestrial biodiversity and noise, and reflects high to very high sensitivity for landscape/visual aspects and certain specialist triggers. Large areas of natural habitat are recognised as maintaining important ecosystem processes and supporting indigenous flora and fauna.

Once a site is already acknowledged to contain multiple overlapping sensitivities, the burden on the proponent becomes higher. The applicant must show not simply that impacts exist, but that the chosen site remains the best practicable environmental option. On the current scoping material, that is not yet demonstrated.

4.4 Biodiversity and habitat integrity concerns

The report references critical biodiversity areas under the Mpumalanga Biodiversity Sector Plan and the Gauteng C-Plan, freshwater ecosystem priority areas, wetlands, the Suikerbosrand River and tributaries, protected-area proximity, threatened ecosystem context, and species of conservation concern. It also notes that large areas of natural habitat remain on site.

The objection is not only to direct footprint loss. It is also to fragmentation, edge effects, disturbance from roads and laydown areas, ongoing maintenance traffic, noise, lights, fencing, invasive species pathways, and the degradation of ecological functioning over time.

Where a development footprint is dispersed across a broad rural landscape, the practical ecological footprint is often substantially larger than the nominal engineering footprint.

4.5 Avifauna risk is a central issue, not a peripheral one

The report contains extensive avifaunal material, including pre-application monitoring, priority species flight records, vulture records within 50 km and an avifaunal constraints map. It expressly lists turbine collision risk, collision/electrocution risk associated with power infrastructure, sensory disturbance, and effects on migratory and congregatory species as key EIA issues.

That alone indicates that avifaunal risk is potentially significant and not merely theoretical. For an onshore wind project, this is one of the most important potential fatal-flaw issues. The competent authority should require a transparent explanation of whether the revised 27-turbine layout materially reduces risk, or simply redistributes it.

4.6 Bat impacts remain potentially serious

The report references bats captured or collected near the project area, sensitive water sources with a 200 m buffer, ridges with required buffers, wooded areas with required buffers, and bat-sensitive areas generally. Bats are especially susceptible to both collision and barotrauma at wind facilities, and localised ecological damage can be difficult to detect and easy to underestimate.

A project that overlays turbines and associated infrastructure onto a mosaic of ridges, water-associated features and habitat edges requires exceptional caution. The objector should insist on a defensible avoidance-first approach, not a mitigation-first approach.

4.7 Watercourse and wetland concerns

The report identifies watercourses, wetlands, FEPA context, riparian systems, sedimentation risk, contamination risk, wetland habitat loss and changes in wetland functioning as matters for the EIA phase. Once roads, laydown areas, batching activities, hardstands and cable/line crossings are introduced into a working agricultural landscape, hydrological disturbance can become cumulative and persistent.

The issue is not limited to direct wetland encroachment. It includes altered drainage, compaction, erosion, sediment transport, contamination from construction activities and reduced ecological resilience.

4.8 Visual and landscape impacts are likely to be severe and long-term

The report describes the area as having a rural character interspersed with commercial agricultural activities and identifies visual sensitivity. The screening sensitivity table further records very high visual sensitivity at screening level and high sensitivity on specialist verification, including because the development lies on a topographical feature, close to numerous inhabited homesteads, hydrological features, mountains and tall hills.

Turbines of up to 180 m hub height and 200 m rotor diameter will become dominant visual structures over a very wide area. This is not merely a change in view. It is the industrialisation of a rural landscape and a permanent alteration of sense of place, visual amenity and rural character.

The VIA workplan itself recognises the need to assess scenic quality, visual absorption capacity, shadow flicker, cumulative visibility and photo simulations. That is a sign of the seriousness of the issue, not a sign that the issue is minor.

4.9 Noise and shadow flicker impacts on nearby receptors

The report identifies numerous permanent or temporary residential activities within the project area and confirms a very high noise sensitivity. It also notes identified social receptors and nearest noise-sensitive developments. This undermines any attempt to present the site as remote or receptor-poor.

Wind-farm noise assessment is inherently model-dependent and affected by turbine selection, topography and meteorology. At scoping stage, this uncertainty should weigh against acceptance where receptors are numerous and the development envelope is still broad. Shadow flicker is similarly acknowledged as requiring specialist assessment because inhabited residences and homesteads are close enough for the issue to arise.

4.10 Agricultural and rural-land-use impacts are understated if measured only by direct footprint

The report notes cultivated lands, pasture, grazing veld and ongoing agricultural use. It also relies heavily on the relatively small percentage of direct footprint as a reason why agricultural impacts may be acceptable.

That framing is too narrow. In practice, agricultural disruption can arise from abnormal-load access, widened roads, construction traffic, turning radii, drainage changes, security restrictions, fencing, interference with movement patterns, fire risk management, dust, and operational constraints near infrastructure. Fragmentation matters even when the literal hard footprint is modest.

4.11 Cumulative impacts appear especially important here

The report identifies other renewable-energy projects within 50 km and 100 km and expressly acknowledges concerns about cumulative habitat loss, fragmentation, disturbance, and impacts on flora and fauna species of conservation concern. It also notes broader regional construction and maintenance pressures.

Where the proponent's own cumulative section already recognises ecological concern, the competent authority should not accept generic assurances. Cumulative impact assessment must be spatially explicit, receptor-specific and honest about threshold effects, especially for birds, bats, visual character and broad-scale habitat integrity.

4.12 Internal inconsistencies and moving project parameters require clarification

The report presents differing figures in places, including references to an electrical infrastructure hub of up to 7 ha in some project-summary material and up to 25 ha in the maximum development scenario, and references to both 4 and 5 access points / up to 28 km versus up to 35 km of roads. Those differences may be explainable, but they matter.

Where a scoping report relies on a maximum development envelope, that envelope must be stated clearly and consistently so that interested and affected parties can understand the true worst-case scenario on which they are being asked to comment.

4.13 Public participation must remain meaningful and not premature

Meaningful participation depends on sufficiently stable project information and enough detail to allow affected parties to understand what is proposed, where, with what residual risks, and why this site remains justified after sensitivity screening. If too many decisive matters are deferred to EIA, participation at scoping stage becomes less meaningful than the regulations require.

The objector should therefore request access to turbine coordinates, distances to the nearest occupied homesteads, clear maps from the affected farm perspective, and the specialist appendices in a fully accessible form if not already provided.

4.14 The best practicable environmental option has not yet been shown

NEMA's integrated-decision framework requires pursuit of the best practicable environmental option. On the present record, it is not clear that the applicant has demonstrated that this site and this configuration are preferable to less sensitive locations, stronger setbacks, fewer turbines, greater exclusion zones, or the no-go alternative.

The objection is therefore not only that impacts exist, but that the scoping report does not yet persuade a reasonable decision-maker that the selected option is the least harmful viable option.

5. Procedural Requests to the Competent Authority

- The Competent Authority is requested not to accept the Draft Scoping Report in its current form unless it is satisfied that the report substantially complies with Appendix 2 and that all material location, layout, receptor and cumulative-impact questions have been properly framed and disclosed.
- Before acceptance of scoping, the applicant should be required to provide a clear and internally consistent maximum development envelope, finalised receptor mapping, property-specific distance schedules, and an explicit explanation of how the revised 27-turbine layout avoids or materially reduces the most sensitive areas and receptors.
- The EIA phase should be required to include a genuinely comparative assessment of the no-go alternative, stronger avoidance-led alternatives, wider setbacks to occupied dwellings and homesteads, and a transparent cumulative assessment for avifauna, bats, biodiversity, visual impacts and rural amenity.
- If those matters cannot be resolved adequately, the application should ultimately be refused.

6. Draft Prayer / Requested Outcome

For the reasons set out above, the objector respectfully requests that the Department of Forestry, Fisheries and the Environment:

- (a) decline to accept the Draft Scoping Report in its present form unless the deficiencies identified by interested and affected parties are cured to the Department's satisfaction;
- (b) require the applicant to address, with specificity, all biodiversity, avifauna, bat, wetland, visual, noise, shadow flicker, agricultural, social-receptor and cumulative-impact concerns identified in this objection;
- (c) require a genuine and evidence-based comparison between the proposed development and the no-go alternative, as well as stronger avoidance-led alternatives; and
- (d) if the EIA ultimately confirms that significant adverse impacts cannot be avoided or reduced to acceptable levels, refuse environmental authorisation for the proposed development.

7. Source Notes for This Draft

Draft Environmental Scoping Report: ABO Uvemvane Wind Energy Facility 1, March 2026, including project description, site sensitivity verification, cumulative-impact discussion, no-go discussion, and plan of study for EIA.

Constitution of the Republic of South Africa, 1996, section 24.

National Environmental Management Act 107 of 1998, especially section 2 and section 24.

EIA Regulations, 2014 (as amended), including the provisions governing submission and consideration of scoping reports and Appendix 2 requirements.

Fuel Retailers Association of Southern Africa v Director-General: Environmental Management, Department of Agriculture, Conservation and Environment, Mpumalanga Province and Others [2007] ZACC 13.

8. Draft Signature Block

Submitted by: Werner van der Merwe

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Date: 2026/04/15