

Amakhala GAME RESERVE

Amakhala Game Reserve (Pty) Ltd. 2017/211205/07
P.O. Box 625, Grahamstown, 6140

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Albany Wind Energy Facility, DEFF Ref: 14/12/16/3/3/2/1131

Dear Sir/Madam

1. It has come to our attention that the Environmental Impact Report for the Albany Wind Farm includes statements attributed to Amakhala Game Reserves that wind farms do not affect game reserves. We object in the strongest possible terms to the conclusions that are attributed to Amakhala Game Reserve.
2. The Report refers to a consultation with Dwain Strydom of Amakhala and records that "Amakhala reported no effect on eco-tourism and none of the game/hunting farms interviewed for this SIA reported that turbines/wind farms have in any way affected their tourism and businesses negatively." This is unscientific and is not based on any facts or evidence. To the best of our knowledge, the effects of this and other wind farms on eco-tourism has never been quantified during the EIA. One conversation with one individual is not a valid basis for claiming that there are no adverse impacts on eco-tourism.
3. Amakhala is also cited as a reference for the following statements in the Social Impact Assessment report:
 - Existing turbines do not affect any of the lodges at the game/hunting farms visually
 - The distances to the wind farms (approximately 8 km or more) does not result in major concerns for game farm owners, but should the turbines be closer visual (and even noise) impacts might spark greater concerns
 - None of the game/hunting farms interviewed have received complaints from guests regarding turbines and their visual impacts. It was stated that many of the overseas visitors are from Europe where they have become used to the sight of wind farms
 - The game/hunting farms interviewed reported that the turbines/wind farms have not in any way affected their tourism and businesses negatively.
4. We strongly object to these opinions being attributed to Amakhala. The suggestion that Amakhala Game Reserve does not have serious concerns about the impact of wind farms on the sustainable eco-tourism operations is completely incorrect.

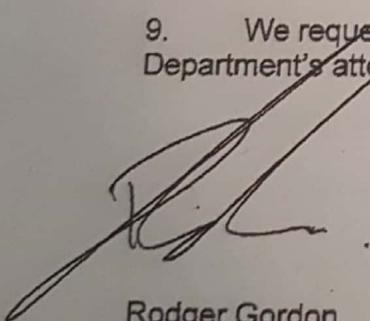
5. We support sustainable development and the green economy, but we are seriously concerned about the unsustainable impact of this project and similar developments on eco-tourism operations. As game reserve operators our concern is that the impacts of the Albany project on eco-tourism operations has never been quantified. Visual impacts are a very real concern to game reserves. Distance alone is ineffective as a measure of the impacts. Turbines are visible during the day and night over much larger distances than 8km.

6. It is misleading to claim that existing game farms have never received complaints from guests regarding the visual impacts of turbines! How was this assessed and verified? There are many wind farms proposed in the area. Which other game reserves were consulted? Why would guests complain about visual impacts of a project that is not yet built? Why is Amakhala listed as a source for suggesting that European clients are used to the visual impacts of wind farms? Unsubstantiated statements like this - attributed to Amakhala - are unprofessional, misleading, and unethical. The claims made in the report prove nothing. Amakhala did not intend to be cited as a source for these claims and we demand that the EIA be corrected to reflect this.

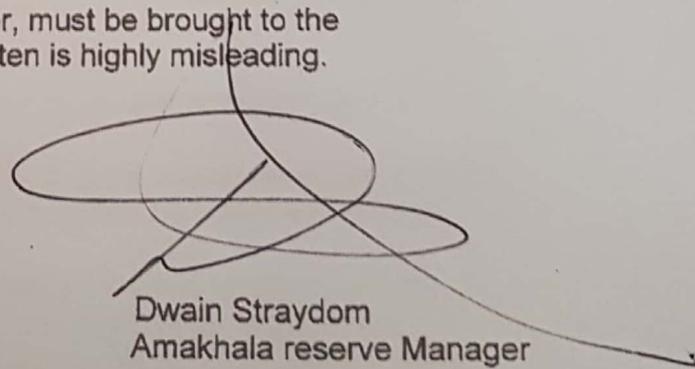
7. Positive attitudes towards green energy are irrelevant when it comes to the luxury safari experience and tourism market. This pristine experience of the African wilderness is the primary reason why a large volume of international tourists visits the region. Our clients are highly sensitive to developments that affect the sense of place of the landscape. The high visibility of this and other wind farms will affect the eco-tourism experience. This threatens our product and our marketability.

8. The value-added supply chain of the eco-tourism sector has much wider local socio-economic benefits that need to be recognised. Many of the game reserves in the area make contributions to community development projects e.g. the Amakhala Foundation. Those are real community benefits. If the eco-tourism market is threatened then the knock-on effect on those community benefits must be highlighted in the EIA.

9. We request that our concerns, and this letter, must be brought to the Department's attention as the way the report is written is highly misleading.



Rodger Gordon
Chairman Amakhala Game reserve



Dwain Straydom
Amakhala reserve Manager



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We are commenting on the Albany Wind Energy Facility, DEFF Ref: 14/12/16/3/3/2/1131 as a concerned landowner, protected area manager and nature and wildlife tourism operator and member of the larger Indalo Protected Environment which has experienced impacts from wind energy development directly and indirectly.

Indalo is working to expand through further amalgamation of southern, central and northern nodes into large agglomerations of private reserves (>50 000Ha) in central area, and public private partnerships with Addo National Park and Great Fish Provincial Reserves in the south and north respectively with common traversing agreements and unified conservation management.

The environmental and economic benefits of this prospect are considerable, as larger consolidated areas will lead to improved marketability of the Eastern Cape as a safari destination, making it comparable to Kruger, Sabi Sands and Madikwe.

3.1 HISTORY / BACKGROUND

Amakhala Game Reserve has been operating as a game reserve from 1999 was formally declared part of the Indalo Protected Environment in terms of National Environmental Management Protected Area Act on 31 July 2019 and currently has a total land just over 9 733ha under formal conservation protection. Amakhala forms part of Indalo Private Game Reserve Association that represents 9 private game reserves which collectively protects 76 000ha under formal protection with an additional 250 ha to Amakhala that is being added, pending proclamation. Further, Indalo is working to increase its membership to include a wider network of private game reserves in the Eastern Cape.

Amakhala was formed by the amalgamation of land owners previously used for stock farming and substantial effort was made to remove human-made structures and to rehabilitate disturbed areas to return the landscape to a natural state.

Like the other Indalo reserves (and many others in South Africa and in Africa in general); Amakhala focusses on nature and wildlife tourism that relies on the wilderness character of the reserve and surrounding area. Amakhala is accordingly protected and managed so as to conserve its natural untrammelled state which forms the basis for visitors to experience the wilds with ecological, geological, and other features of scientific, and/ or historical value in a scenic setting.

Again, like other Indalo reserves Amakhala is looking to expand its area under management and is working actively to link up with neighbouring Shamwari and Lalibela reserves to form part of a larger proposed Addo to Great Fish corridor (also referred to as Albany Corridor). To this effect a formal protected area expansion strategy is under development by various stakeholders including Wilderness Foundation Africa, Eastern

Cape Parks and Tourism Agency, South African National Parks and Indalo Private Game Reserve Association.

Amakhala Game Reserve has made a substantial contribution to the conservation of white rhino and protection of landscapes of ecological importance along with contributions to numerous other objectives as set out in the Indalo Protected Area Management Plan. The plan requires each reserve to secure the required financial resources to ensure achievement of the protected area management objectives.

These resources are derived from nature and wildlife tourism which is dependent on a natural environment largely free from the structures and signs of modern civilisation (often from which they come to get away).

3.2 TOURISM SERVICES

3.2.1 SCOPE

Amakhala offers an African safari experience, and an increasingly rare wilderness experience of being in the bush and experiencing unspoilt scenery characterised by a diversity of landscapes within which to appreciate wildlife and unique vegetation of different biomes. We offer accommodation in three lodges each in a scenic setting with game drives and views on upland plains, ravines, over valleys, into kloofs, and with vistas looking over high ground and more distant mountains. Lodges have been sited so as to offer a scenic location with vistas devoid of intrusion by human-made structures and other disturbance. We have taken great effort to use natural materials sourced from the site in the lodge construction and to offer guest a glimpse of a part of South Africa's unspoilt beauty.

The accommodation at Amakhala varies from 3 star up to 5 star lodges

Our pre-Covid employment profile is as follows: Over 250 staff employed locally and from afar.

3.2.2 IMPACT OF WIND FARM DEVELOPMENT

An important component of an African safari is being in the bush and experiencing the wilderness and the absence of man-made structures such as buildings, telephone lines, electricity pylons, etc.

Wind turbines of the Waainek facility have significantly impacted Kichaka lodge where turbines now intrude the skyline and at night the pulsing aviation warning lights dominate a part of the landscape. Wind energy development will locally sterilise biodiversity stewardship based protected area expansion and otherwise degrade scenic aspects of land to the extent that potential for inclusion in protected area expansion planning will be substantially curtailed.

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3.3 OBJECTION

Although Indalo strongly supports all sustainable renewable energy development, we will object to any development that will prevent the greater Indalo to take its rightful place as a world class African nature and wildlife destination and curtail or intrude potential protected area expansion through partnership with Addo and Great Fish Provincial reserves.

Kind Regards

Dwain Strydom
Amakhala Reserve Manager

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