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T/A African Rhino Conservation Collaboration

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To Whom It May Concern,

Re : Objection to Albany Wind Energy Facilities (WEF)(EIR 2)

ARCC is a registered trust, NPO and SARS registered PBO, in operation since January 2017. ARCC is located in the Eastern Cape of South Africa and operates a holistic conservation programme bringing together protection, awareness, wildlife management, community participation and law enforcement in a coordinated collaboration of individuals, rural communities, organisations and government to ensure the future of rhino and other wildlife in the wild.

We received notification of the second draft EIR published 28 July 2021for the WEF (DFFE Ref. No.: 14/12/16/3/3/2/1131).

The submission below should be taken as preliminary and incomplete with outstanding comments still required following the completion of relevent studies for which significant gaps still exsist.

To start, we would like to draw your attention to the submissions made by Marchelle Terblanche in the "Socio-Economic Impact Assessment Report" listing amongst others: Gaps, Assumptions & Limitations-

- "Information required to aid significance ratings of certain impacts are unkown"
- "given the competitive nature of the environment the Independent power Producer ("IPP") operates in, revealing key confidential information in the public domain would be detrimental to the Project's success. Where detailed information was not available, data of similar projects in the Eastern Cape was used as baseline to determine the significance of the socio-economic impacts"
- "Impacts associated with the decommissioning phase are briefly discussed, but are not subject to detail assessment"

- "Some of the SIA "soft" impacts, such as 'sense of place', are largely framed by people's perceptions. It is a personal experience, not easily measurable and as such is based on the specialist's opinion after scrutinizing information obtained from stakeholders and the Visual Impact Assessment."
- "At the time of compilation of the SIA report no published literature of the impact of wind turbines and WEFs on the South African tourism market was available. The consultant makes reference to international studies, did interviews and extrapolated information from questionnaires to draw reasonable conclusions".

These comments highlight the significant lack of data pertaining directly to this proposed WEF and therefore the gamble that the government would be taking by replacing the existing and future socio-economic benefits of nature-based tourism with the perceived and largely unquantified benefits of this WEF.

Under these circumstances the process and concluding statement " From a socio-economic perspective no issues have been observed or identified that would stop the Project from being implemented,"(SIA Report Page xi) is, in our opinion, prejudiced.

Nevertheless, the trustees of ARCC would like to express our objection to the proposed Wind Energy Facility (WEF) above for the reasons provided in the statements below and linked to the pertaining relevant literature.

Specific reference needs to be made to the document, " A REVIEW OF LITERATURE ON THE IMPACT OF WIND ENERGY FACILITIES ON NATURE BASED TOURISM AND EMPLOYMENT: SOME POLICY KNOWLEDGE GAPS" written by Dr Juniours Marire (PhD) of the Rhodes University Department of Economics and Economic History".

1. **The emergent consensus in literature suggests that the optimal location of WEFs ought to be between 10km and 56 km away from landscapes of high wilderness and tourism value**[i]

The proposed Albany WEF is sited directly adjacent to landscapes of high wilderness and tourism value of which a significant area is already formally protected. These landscapes and protected areas that lie within 20-25km of the proposed wind energy developments and turbine locations and would have dire consequences for the existing ecotourism economy and jobs in this area based in that the sense of place of a very large area will be substantially transformed into an energy landscape. These landscapes and their wilderness character forms the basis of biodiversity stewardship based protected area establishment and management.

2. **Depending on landscape specificities, the optimal siting of WEFs might require focusing on already degraded landscapes or landscapes that are not restorable.**[ii]

The proposed Albany WEF is sited on landscapes which are biodiversity rich, and where degraded, are for a large part in process of restoration, and in many areas are fully restorable, and they lie within the strategic footprint of the proposed Albany Mega Reserve and Albany Biodiversity Corridor (also referred to as Addo to Great Fish Corridor as set out in below figures). In fact, the eastern half of this WEF overlaps with one of the "core biodoversity nodes" as identified in the Albany Biodiversity Corridor Network.

The development of this WEF would fatally compromise a proposed landscape corridor within the Albany Biodiversity Corridor. See map below showing the priority landscape corridors, using combined biodiversity informants relative biodoversity value. Special reference to core biodiversoty node # 5 and its linking corridor. (iv page 29)

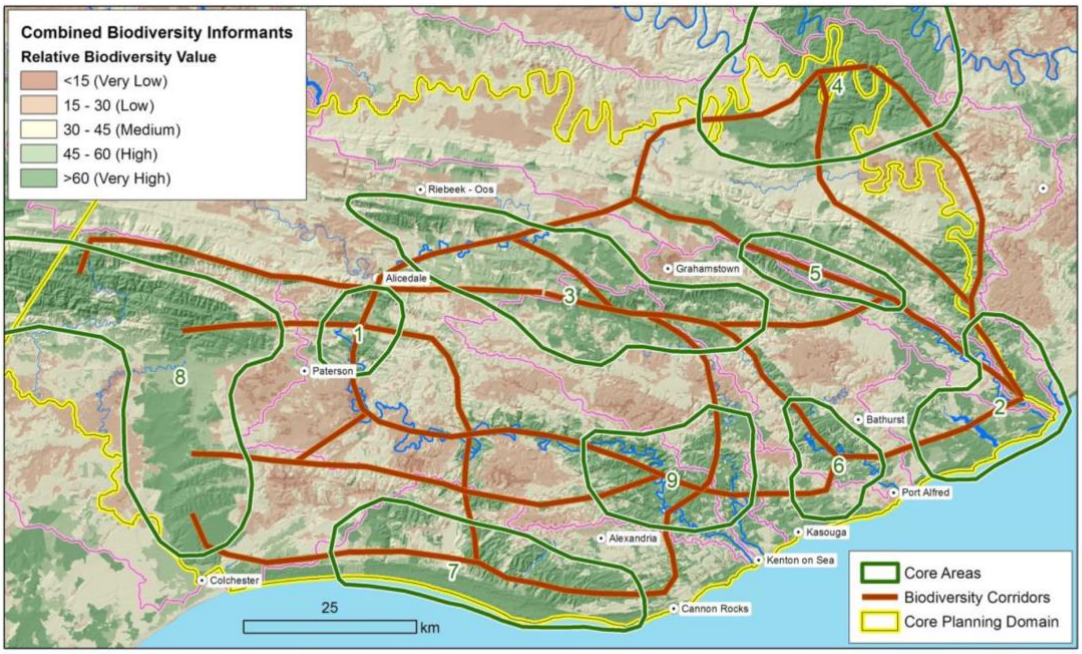

Figure 12. The general alignment of the Albany Biodiversity Corridor network indicating core biodiversity areas and landscape ecological corridor linkages.

3. **Although findings of studies relating to WEF and nature tourism are mixed, the majority of studies suggest that the economic effects of situating WEFs closer to landscapes of high aesthetic value include loss of ecotourism revenue, reduction in private funding for biodiversity conservation, and loss of current ecotourism jobs as well as future jobs in nature-based tourism and related enterprises.**[iii]

The proposed WEF is sited on properties directly adjacent to landscapes of high aesthetic value which will undoubtedly result in a loss of existing jobs as well as future sustainable job creation. The Visual Impact report leaves no doubt about the overwhelming amount of moderate to high assessment ratings as summarised below:

Visual Impact Assessment

Table 12.2: Summary of visual assessment ratings for protected areas and game reserves.

Visual Receptors	Visibility – extent of turbine hubs visible to receptor	Visibility – extent of turbine blades visible to receptor	Visual exposure – distance of receptor	Landscape sensitivity – of receptor	Visual intrusion – on receptor daytime	Visual intrusion – on receptor night lighting	Visual sensitivity – of receptor	VAC – concealment potential	Overall severity of impact
Provincial and Municipal Nature Reserves									
Ecca Nature Reserve	MODERATE	HIGH	HIGH	HIGH	MODERATE	HIGH	HIGH	MODERATE/ LOW	HIGH
Waters Meeting Nature Reserve	LOW	LOW	MODERATE/ LOW	LOW	LOW	MODERATE	HIGH	MODERATE	LOW
Roundhill Oribi Local Authority Nature Reserve	MODERATE	HIGH	MODERATE/ LOW	LOW	LOW	MODERATE	HIGH	MODERATE	MODERATE
Kap River Nature Reserve	MODERATE	MODERATE	MODERATE	MODERATE/ LOW	MODERATE/ LOW	MODERATE	HIGH	MODERATE	MODERATE
Great Fish River Nature Reserve 13-20 km	HIGH	HIGH	LOW	MODERATE/ LOW	MODERATE	MODERATE	HIGH	MODERATE	MODERATE
Great Fish River Nature Reserve 20-50 km	LOW	LOW	LOW	LOW	LOW	MODERATE	HIGH	MODERATE	MODERATE/LOW
Beggars Bush State Forest	LOW	LOW	HIGH	VERY HIGH	LOW	LOW	HIGH	LOW	LOW
Private Protected Environment									
Kwandwe Private Game Reserve North (Indalo)	HIGH/ VERY HIGH	HIGH/ VERY HIGH	MODERATE/ LOW	MODERATE/ LOW	MODERATE /HIGH	MODERATE/ HIGH	HIGH	MODERATE	MODERATE to HIGH
Kwandwe West Indalo Protected Environment	HIGH western cluster	HIGH western cluster	MODERATE/ LOW	MODERATE	MODERATE	HIGH western cluster	HIGH	MODERATE	HIGH western cluster

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Visual Receptors	Visibility – extent of turbine hubs visible to receptor	Visibility – extent of turbine blades visible to receptor	Visual exposure – distance of receptor	Landscape sensitivity – of receptor	Visual intrusion – on receptor daytime	Visual intrusion – on receptor night lighting	Visual sensitivity – of receptor	VAC – concealment potential	Overall severity of impact
Buffalo Kloof Protected Environment	HIGH	HIGH	LOW	LOW	MODERATE	HIGH	HIGH	MODERATE	HIGH
Private reserves and game farms									
Kwandwe Private Game Reserve (non Indalo)	HIGH	VERY HIGH	VERY HIGH	MODERATE to HIGH	MODERATE/ HIGH western cluster	MODERATE/ HIGH western cluster	MODERATE	LOW	MODERATE to HIGH
Kudu Ridge Private Game Reserve	MODERATE	HIGH	MODERATE	LOW	MODERATE	MODERATE/ HIGH	MODERATE	MODERATE/ LOW	MODERATE
Bucklands Private Nature Reserve	HIGH	HIGH	LOW	LOW	LOW	MODERATE/ LOW	MODERATE	LOW	MODERATE
Salvatore Farms	HIGH	HIGH	LOW	LOW	LOW	MODERATE	MODERATE	MODERATE	MODERATE to LOW
Coleridge Private Game Reserve	LOW	LOW	MODERATE	LOW	LOW	MODERATE	MODERATE	LOW	MODERATE
Huntershoek Lodge	VERY LOW	LOW	LOW	LOW	LOW	LOW	MODERATE	LOW	LOW

In Desmet and Vromans (2020) "The Albany Biodiversity Corridor", Page 1 of the summary states "The analysis estimates that up to 150 000 ha of mapped biodiversity economy landscape will be visually impaired by the currently proposed WEF projects. The lost economic opportunity as a result of this WEF impact is estimated to be R955 million turnover per annum and 2535 full-time jobs. The nature-based tourism resource potential analysis illustrates the importance of the natural sense of place as a valuable economic resource that should be valued as a national asset and considered more prominently in land use planning."

4. **Evidence suggests that business-people in the ecotourism industry might disinvest in an area following an accepted proposal for, or actual development of a WEF.**[iv]

This statement is locally supported by personal communication with adjacent neighbours of the proposed WEF who have expressed intent to disinvest partially or completely should the proposed WEF be sanctioned. It should be noted that these property owners have already substantially invested in tourism infrastructure anad facilities.

5. **Evidence is mixed about the impact of WEFs on property prices in already degraded, inhabited or transformed landscapes**[v]**, but no study has examined the effect of property prices in landscapes of high wilderness value. Using evidence based on transformed landscapes in deciding to locate WEFs in untransformed landscapes is misleading.**

In addition, the EIR does not adequately reflect or consider the effect on property prices of WEF's in landscapes of high wilderness value where livelihoods are supported by wildlife and nature tourism, hunting and other nature activities. Until a proper tourism impact assessment is undertaken that includes impact on current reserves and hunting operations the true socio-economic impact cannot be defensibly estimated. The current socio-economic impact assessment is flawed, and cannot claim to assess the full impact of this propsed WEF development.

6. **The best evidence suggests that where there is a land use conflict, the precautionary principle would require that policymakers avoid siting WEFs in localities whose socio-economic lifeline is ecotourism and whose landscapes are relatively pristine. Tourists are very sensitive to presence of WEFs in landscapes they cherish for recreational activities and spiritual upliftment.**[vi]

There is a devaluation of wildlife and nature tourism offering if WEFs (or any other highly intrusive developments) are allowed to encroach and this will have a substantial impact on livelihoods. There is a known and expressed conflict of interest between the WEF's and the majority of game farms and protected areas and nature torusim operations within the viewshed of the proposed WEF. WEFs and wildlife and nature tourism are conflicting land uses and are mutually exclusive. Degradation of the environmental goods and services of reserves upon which nature and wildlife tourism product is based would imply a certain "disinvestment" in the nature and wildlife tourism sub-sector for the regions, the province and even on a national scale. Due consideration is to be afforded

to the biodiversity stewardship that nature and wildlife tourism affords the national protected area estate. Therefore, the precautionary principle should require the competent authority to reject this WEF application.

We strongly contest the statement in the conclusions listed in the "Synthesis of specialist impacts as extracted from the specialist report" (page 157) which states, "None of the local private game farms that have been consulted and are visually affected by exisiting wind farms have experienced negative economic impacts".

We can only conclude from this that a select and biased sample of local private gamne farms has been targeted in the formation of this conclusion. This statement is unfortuante and tarnishes the intergity of the report and EIR process as a whole.

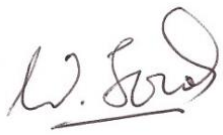
7. **Evidence also suggests that the benefits of WEFs accrue mostly to international and regional economic hubs, but negative effects of WEFs are borne locally, especially in rural economies that are ecotourism dependent.** [vii]

The proposed Albany WEF is stated to have little local benefit to permanent job creation and the local economy when compared to the biodiversity based economy that already exists let alone the growth trajectory pertaining to local employment and economic revenue which is evident in "A study of the conservation, economic and social activities of Indalo Private Game Reserves in the Eastern Cape" by Antrobus & Snowball (2019).

The comments made in this EIR do not adequately address the points made above and those made specifically pertaining to the socio-economic benefits promised by the proponent through a percentage of revenue pledged to communities, carry little weight amongst communities who have observed how local unrest and protests have been fueled through failure of operational WEF's to deliver on promises in the nearby Cookhouse and Bedford areas. Further to this there is no specific commitment to social percentage benefits so the proponent cannot be held accoountable to any social benefits at this stage.

Given the volume of science pleading against the proposed WEF, as well as the clear gaps in applicable data that exist in the understanding of the specific impact of these proposed WEF's, we strongly oppose the application for the development of this WEF for the reasons listed above; as well as for all those reasons pertaining to impacts known and currently unknown on local fauna and flora, and, therefore, the unique and globally valuable natural biodiversity of this area.

Signed for, and on behalf of, the Trustees of the African Rhino Conservation Collaboration on 30 August 2021 in Makana, Eastern Cape



Dr C.W. Fowlds BVSc

ARCC : Trustee

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