

Conservation Landscapes Institute

Non-Profit Company : Registration Number - 2021/353777/08

Non-Profit Organisation : Registration Number - 255-922

Public Benefit Organisation : Registration Number - 930071799

PostNet Suite 43, Private Bag X1672, Grahamstown, 6140, Eastern Cape
Thornycroft Centre . Lalibela Game Reserve . Makana Ward 14 . Eastern Cape . South Africa

30 August 2021

Caroline Evans

CES

67 African Street, Grahamstown

Email: c.evans@cesnet.co.za

Dr. Alan Carter

CES

67 African Street, Grahamstown

Email: a.carter@cesnet.co.za

To Whom It May Concern,

Re : Objection to Albany Wind Energy Facility Makhanda (EIR 2; DFFE: 14/12/16/3/3/2/1131)

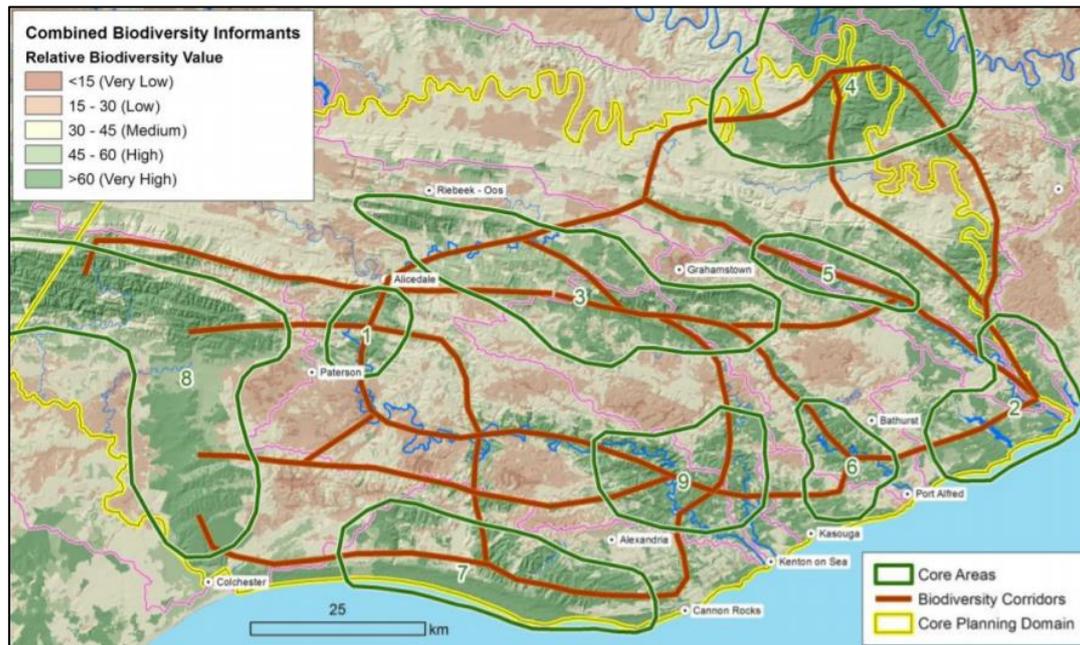
On behalf of the Directors and Partners of the Conservation Landscapes Institute NPC (CLI), I should like to lodge an objection to the location and construction of the Albany Wind Energy Facility Makhanda in the Albany Region of the Eastern Cape.

CLI is a registered Non-Profit Company, established with the support of the Eastern Cape Parks and Tourism Agency, the Indalo and Buffalo Kloof Protected Environments; the Wilderness Foundation Africa (WFA), the Wildlife Ranchers Association, local NGOs and rural communities, to provide a dedicated vehicle to facilitate the process of forming ecologically connected Conservation Landscapes, and implementing the range of ecological and socio-economic projects in the Albany Biosphere that will expand a Nature-Based Economy for the area by :

“supporting and facilitating the promotion and advancement of nature conservation, rural socio-economic development and the sustainable utilisation of renewable natural resources; and more particularly, the establishment of the Albany Biosphere, including Conservation Landscapes, in a manner that ensures environmental and biodiversity conservation at a landscape scale; climate change mitigation, and the optimisation of the socio-economic development and economic empowerment of the peoples of the Eastern Cape.”

In partnership with the above organisations, local and international academic institutions, and rural communities, the process of amalgamating the private game reserves, game ranches, State Protected Areas and community land into Conservation Landscapes that are of a scale that they can be managed as functional ecosystems, is well under way. Although the various forms of wildlife protected areas already contribute substantially to the conservation of what is a uniquely diverse ecosystem, and to a significant Nature-Based Economy, the Albany Biosphere, with its Conservation Landscapes, is, and will be, an internationally significant contribution to the global effort to avert climate change, biodiversity loss and alleviate poverty.

The construction of the Albany WEF, however, will have a substantial negative influence on one of the most significant economic drivers in the area, namely nature-based tourism and the sustainable utilisation of renewable, wild natural resources. The map below depicts the main core biodiversity nodes in the planning domain linking Addo ENP with the Great Fish River Reserve. It should be noted that a portion of the proposed area for the WEF falls within one of the landscapes designated as a core zone of biodiversity importance (Zone 5), and that the proposed land for WEF development clearly shows relative biodiversity values of High and Very High. Furthermore, the proposed WEF area that does not fall within this zone is prioritized to serve as a corridor landscape for connection of core biodiversity areas in order to maintain population and ecosystem health. The presence of a wind farm would severely jeopardize and entirely prevent this outcome, and we would again emphasize that this landscape should be protected rather than degraded further through WEF implementation. (Reference: Albany Biodiversity Corridor. Desmet & Vromans 2020)



In its impact on tourism, and the potential resulting conversion of land to large scale agriculture, which is particularly destructive of the unique biodiversity of the Albany Region, the WEF will also negatively impact on the growing international interest in investment into ecosystem and biodiversity conservation, carbon sequestration and the attendant mitigation of climate change, that is being generated by the awareness of the state of the global environment, and recurring pandemics.

The loss, or diversion, of foreign and local business investment that will result from the withdrawal of existing investment¹ will also have a devastating effect on the opportunities created by a Nature-Based Economy to alleviate poverty through employment and entrepreneurial opportunity - opportunities that a wind farm most definitely does not create.

With regards to the reduction of proposed wind turbines from 66 to 43, although necessary, reduction in WEF quantity doesn't solve the problem posed by their presence in this specific location. The issue is in their presence and visibility, regardless of density, making the reduction in WEF numbers a step in the right direction but not a quantifiable improvement to the parties at stake.

Renewable energy is central to the philosophy and efforts of CLI, but large scale WEFs, such as this, need to be located well away from sites where the option exists for environmentally sensitive and long-term sustainable alternatives. In this case, this is a location where the introduction of WEFs will have a destructive effect on a Nature-Based Economy that is already established and progressing rapidly to a level that will benefit both the local region, the country and the Planet - environmentally and economically.

Locations such as the Albany Biosphere, which are uniquely biodiverse and a critical cog in the global plan to avoid the damaging effects of climate change and biodiversity loss, also lend themselves to an innovative application of renewable energy that will make an important contribution to the South Africa's energy supply security. The rural development and land use structure demanded by a Nature-Based Economy, offers the option to create numerous small to medium scale hubs of renewable energy with negligible environmental footprints - independent of, and relieving demand on, the national grid.

These sort of options, we would submit, are alternatives to this WEF proposal that will certainly have a major negative impact on a large rural area that is currently creating a model of socio-economic development that is sustainable; which contributes significantly to the global environmental and economic effort to build resilient systems, and which will attract considerable foreign investment that takes much of its "return on investment" in ecosystem services and biodiversity restoration.

It is also our contention, therefore, that inadequate consideration has been given to the direct impacts on the environment of the construction of large wind turbines of this design. The construction of the components is off-shore and energy intensive; the transport of these components is dependent on large quantities of fossil fuels and the materials of many of the very large components are not reusable nor biodegradable. These are factors which should come into consideration when the implementation of the WEF of the scale proposed and the location selected, have viable alternatives.

¹ As currently contemplated by two international investors in private game reserves should the wind farms be approved and developed

I should like to reiterate the opposition of the Conservation Landscapes Institute to this particular WEF in the strongest possible terms. I also wish to express the hope that common sense prevails, and that the optimum land use and socio-economic development model provided by the Nature-Based Economy existing, and currently under innovative expansion, within and around the area proposed for this WEF, prevails.

Signed for and on behalf of the Directors of Conservation Landscapes Institute NPC at Makhanda, Eastern Cape on 30th Aug 2021

A handwritten signature in black ink, appearing to read 'Peddie', with a long, sweeping underline that extends to the right.

David Peddie, FRGS
BSc (Agricultural Economics), MSc (Tropical Resource Ecology)
davidpeddie@me.com