
EXTERNAL REVIEW AMENDED DRAFT ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REPORT

ALBANY WIND ENERGY FACILITY
DEA Reference Number: 14/12/16/3/3/2/1131

August 2021

Prepared by



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EXECUTIVE SUMMARY

Global Green Environmental Consultants in association with the Environmental Assessment Research Group (EARG) from the North West University (NWU - Potchefstroom campus) was appointed by Richard Summers Inc. to conduct an external review of the Draft Environmental Impact Assessment (EIA) Report for the Albany Wind Energy Facility (DEA Reference Number: 14/12/16/3/3/2/1131) during May 2020. This report contains a follow-up review of the 'Amended' version of the Draft EIA Report dated May 2021. Similar to the previous review it was conducted by two reviewers according to the NWU EIA Report Quality Review Package to determine the extent to which the report complies with minimum legal requirements and thereby serves to support reasonable decision making by the competent authority.

Overall the report achieved an 'D' rating which means parts are well attempted but must, as a whole, be considered unsatisfactory because of omissions or inadequacies. The content therefore does not support reasonable decision making (that is rational and proportional). The main reason for this is that report fails to deal with and mitigate what is the most significant potential impact of the WEF raised by I&APs, namely on surrounding eco-tourism enterprises. This remains a fatal flaw in the Amended Draft EIA Report for the following reasons:

- No comparable international literature exists on the impact of wind farms on the existing and future eco-tourism sector within the South African context. The international literature clearly differs on the extent to which wind energy facilities impact tourism, depending on the particular context (i.e. landscape and tourism product).
- The data gathering conducted as part of the EIA and SIA is highly questionable and would definitely not pass any scientific peer review process. This means that we still do not know what the impact on the eco-tourism industry might be, that presents an unacceptably high level of uncertainty for decision makers to make a reasonable decision.
- It is unclear why certain turbine locations have been avoided in the new 43 turbine layout but not others, that seem to present similar visual impacts to those excluded (also see the visual impact review report by Oberholzer 2021). Therefore, avoidance as a mitigation option has to our mind still not been fully considered.

We are of the opinion that until the impact of the wind energy facility on current and future eco-tourism in the area is determined through a robust scientific methodology, a reasonable decision cannot be made by the competent authority on this proposed development. The tourism industry is simply too important for future regional development to compromise its potential. We trust that you find the report in order and thank you for the opportunity to contribute. If there are any uncertainties or additional information required, please feel free to contact the undersigned.



Prof Francois Relief
Lead Reviewer: 28-08-2021



Me Charlotte Cilliers
2nd Reviewer: 28-08-2021

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DOCUMENT CONTROL			
Project	Albany Wind Energy Project – External Review		
GG reference ID	RS-28/08/2021	Client	Richard Summers Inc.
Lead reviewer	Prof Francois P Retief Tel: +27 83 639 2293	Client Contact	Mr Richard Summers Tel: +27 82 534 0328
2nd Reviewer	Me Charlotte Cilliers Tel: +27 72 573 8962	Documents Reviewed	Draft EIA Report <i>DEA Ref: 14/12/16/3/3/2/1131</i>
Date of the Review	22-28 August 2021	Reviewed against	NEMA, EIA Regulations 2014 (as amended 2017)

1. INTRODUCTION AND BRIEF

Global Green Environmental Consultants was appointed by Richard Summers Inc. as external reviewer for the Albany Wind Energy Facility (WEF) Draft EIA report dated March 2020. At the time the overall report achieved an 'E' rating which meant that as a whole the content was not considered satisfactory. In August 2021 Global Green was again appointed to review the 'Amended' version of the Draft EIA Report dated May 2021. Similar to the initial review it was again conducted in collaboration with the Environmental Assessment Research Group (EARG) of the North West University (NWU). We confirm that Global Green and NWU act independently and has no vested interest in the development project under review. External review and specifically report quality review is a particular focus of Global Green and the EARG. The lead reviewer has been co-author of various EIA review reports as well as subsequent peer reviewed papers that include report quality reviews between different South African EIA regimes (Retief et al, 2011; Sandham et al, 2012; Kidd et al, 2018); report quality related to specific industries such as mining (Sandham et al, 2008a) and manufacturing (Sandham et al, 2013), as well as report quality related to specific sectors such as water management (Sandham et al 2008b), biodiversity and conservation (Hallat et al, 2015; Swanepoel et al, 2019; Sandham et al, 2020; Alberts et al., 2021), biological control (Sandham et al, 2010), etc. A paper has also been published on the conceptualization of EIA quality internationally (Bond et al, 2018).

As an introduction to the review this section briefly introduces the agreed scope of work as well as the individual reviewers involved, namely: Prof Francois Retief and Me Charlotte Cilliers.

1.1 SCOPE OF WORK – REVIEW OF AMENDED DRAFT EIA REPORT

The overall scope of work is specified in a review proposal dated 14 August 2021, and requires the following:

Scope of work:

1. An independent external review will be conducted of the quality of the '**Amended Draft EIA Report' dated May 2021**, against relevant South African legal requirements.
2. As a point of departure the review will focus specifically on the weaknesses already identified for the previous version of the report, namely the '**Draft EIA Report' dated May 2020** (first round of review in 2020).

1.2 REVIEWERS

The following two independent reviewers conducted the external review (see Annexure A for CV summaries):

- Prof Francois Retief – NWU and Global Green
- Me Charlotte Cilliers – Global Green

2. EXTERNAL REVIEW METHODOLOGY

Various international packages and guidelines have been developed for EIA report quality review. The Lee-Colley package (Lee and Colley, 1992) is probably the most well-known and widely adapted and applied internationally. In terms of South Africa, significant progress has been made to adapt international report review packages to the local context. The review package used for this review is a version of the so-called 'NWU Report Quality Review Package' which has been adapted from the Lee-Colley package and is continually updated as local policy and legislation changes. The most recent version of the package reflects the 2014 EIA Regulations and subsequent 2017 amendments. Different versions of the 'NWU Report Quality Review Package' has been successfully applied to EIA quality review over the years – the results of which have been published in various reports and peer reviewed journals as highlighted in section 1.

The review criteria applied under section 3.2 and summarised in Table 3.2 deal specifically with South African legal requirements for the Draft EIA report. It is important to stress that these criteria should not be considered international best practice criteria. This review merely considers the report content against what the law requires in South Africa, also acknowledging that legal interpretation of some requirements might vary. Ultimately according to South African law and the principles of administrative justice the content of the EIA Report must support the relevant authority to make a 'reasonable' decision that is 'rational' and 'proportional' (see Retief et al., 2019; Alberts et al., 2021a)

2.1. CONTENT OF THE REVIEW PACKAGE

The NWU Report Quality Review Package is designed as a self-contained package with the following components:

- a list of criteria (grouped under Review Areas) to be used in each report review.
- an evaluation sheet/table on which to record the findings from applying the criteria.

The criteria should reflect the South African EIA System legal requirements and, as far as possible, satisfy the following requirements:

- each should be well defined and unambiguous;
- each should be capable of reasonably consistent and objective application;
- each should serve a distinct purpose different from the purposes of other criteria;
- each should be considered sufficiently important to merit influencing the ultimate assessment of report quality;
- the number of criteria should be as few as possible, consistent with covering all topics identified as essential (judged, in this instance, by reference to the South African legislative minimum requirements).

2.2 APPLYING THE REVIEW PACKAGE

EIA reports should be reviewed independently by at least two reviewers and any differences in the review results should be systematically examined by them to see whether they can be resolved. As already indicated in section 1.2, two reviewers took part in this particular review. The evaluation resulting from applying each criterion is recorded by the reviewers on the evaluation table using a standard list of assessment symbols as described in Table 2.1. ‘Letters’ rather than ‘numbers’ are used as symbols to discourage reviewers from crude aggregation. The evaluation table should not only be used to record the chosen assessment symbols, but also to record, in a brief summary, the principal justification for the evaluation score. This discourages ‘over-mechanical’ reviews.

Table 2.1. List of evaluation symbols

Symbol	Explanation	Implications for decision making
A	Relevant tasks well-performed, no important tasks left incomplete.	These ratings (A-C) mean that the quality of the report content complies with minimum legal requirements and is sufficient to allow the competent authority to make a reasonable decision (that is rational and proportional) in line with the requirements of the Promotion of Administrative Justice Act (PAJA – Act 3 of 2000).
B	Generally satisfactory and complete, only minor omissions and inadequacies.	
C	Can be considered just satisfactory despite omissions and/or inadequacies.	
D	Parts are well attempted but must, as a whole, be considered just unsatisfactory because of omissions or inadequacies.	These ratings (D-F) mean that the quality of the report content does not comply with minimum legal requirements and is insufficient to allow the competent authority to make a reasonable decision (that is rational and proportional) in line with the requirements of the Promotion of Administrative Justice Act (PAJA – Act 3 of 2000).
E	Not satisfactory, significant omissions or inadequacies.	
F	Very unsatisfactory, important task(s) poorly done or not attempted.	
NA	Not applicable. The Review Topic is not applicable, or it is irrelevant in the context of this Statement.	

The current version of NWU Report Quality Review Package has been extensively tested. The results show a meaningful level of agreement in the assessments made by different reviewers of the same report. The Amended Draft EIA report was evaluated against review areas and criteria derived from GNR 982 and specifically Regulation 23 as well as Appendix 3, which describes the purpose and content requirements. The ultimate aim of the review was to determine to what extent the report provide sufficient information for decision making and if the report complies with minimum legal requirements.

3. REVIEW RESULTS

This section deals with results of the external review for the Albany WEF Amended Draft EIA Report dated May 2021. In line with the methodology described in the previous section the results are presented as ‘main results’ in relation to the different Review Areas (section 3.1) and ‘detailed results’ in terms of the different Review Criteria (section 3.2).

3.1 MAIN RESULTS

Table 3.1 provides a summary of the main review results per Review Area. Based on the results it is concluded that the overall report achieves an **‘D’ rating which means parts are well attempted but must, as a whole, be considered unsatisfactory because of omissions or inadequacies.** Moreover, it means that the content cannot support reasonable decision making (that is rational and proportional) by the competent authority as required by the relevant legislation.

Table 3.1: Summary of main review results for the Amended Draft EIA Report (May 2021)

SUMMARY OF REVIEW AREAS		A	B	C	D	E	F
1	General Aspects				X		
2	Conformance to the Plan of Study					X	
3	Determining Significance				X		
4	Public Participation		X				
5	Dealing with Mitigation				X		
FINAL RATING							

3.1.1 Review Area 1: General Aspects

The review results for Review Area 1: General Aspects produced an overall 'D' rating (*"Parts are well attempted but must, as a whole, be considered just unsatisfactory because of omissions or inadequacies"*). We base this rating on the following findings:

- **Consideration of Guidelines:**

- May 2020 review: EIAs must have regard for any guideline published in terms of section 24J of NEMA and any minimum information requirements. This includes the updated 2017 *Need and Desirability Guideline* which has seemingly not been consulted. The Guideline sets out a list of questions which should be addressed when considering need and desirability of a proposed development. These are divided into questions that relate to ecological sustainability and justifiable economic and social development. None of those questions has been directly and expressly addressed. When considering how the development may affect or promote justifiable economic and social development, the relevant spatial plans must be considered, including local municipal IDPs and SDFs which has not been done in the EIR. The failure to address correctly the enquiry into need and desirability is a particular weakness of the EIA Report.
- August 2021 review: **The updated 2017 *Need and Desirability Guideline* has been more explicitly considered in the amended version of the report. However, the reflection on the local strategic context through incorporation of the IDP and SDF is still lacking. The overemphasis on the energy sector without successfully incorporating need and desirability perspectives from an eco-tourism perspective remains a significant flaw in the overall report.**

- **Scope of the assessment:**

- May 2020 review: The Draft EIA Report excludes the substations and transmission line from the project description and project footprint calculation. We could not determine from the report exactly why this is, except for reference to the fact that Eskom will provide this infrastructure and therefore are responsible for these authorisations. However, irrespective of who is responsible for the infrastructure, the assessment of the WEF is incomplete without including the substations and transmission line. The reason for this is because whatever is approved in terms of the WEF will essentially predetermine and lock in the location of the substations and delineation of the transmission line. The specialist studies did seem to include the substations and transmission line in their project descriptions and therefore it is

assumed in their assessment as well. We did find that the avifauna assessments did indeed consider the transmission line while other specialist studies such as the visual assessment did not. So there is inconsistency in the scope of the assessment and the project descriptions between different reports. The implication of this inconsistency in the project scope is that the outcome of the assessment as a whole could be questioned.

- *August 2021 review:* **We are of the opinion that the above comments have not been adequately addressed in the amended version of the report.**

- **Inconsistency in project description:**

- *May 2020 review:* The project description changed from the BID to the Scoping Report to the EIA Report. It is not clear if these changes are the result of the outcome of the assessment or what the rationale for these changes is. As already mentioned certain infrastructure, i.e. substations and transmission lines are excluded from the EIA Report. The turbine capacity changed from 4,5MW in the BID to 6MW in the Scoping Report, and between 4 and 8 MW in certain specialist reports, etc. Moreover, reference is made to a 90 turbine layout in the EIA Report which is not provided anywhere in the report itself.
- *August 2021 review:* **The Amended Draft EIA Report has now clearly described the development around 43 proposed turbines (down from 66). However, the project scope has clearly kept on changing between the first ‘Draft EIA Report’ and now the ‘Amended Draft EIA Report’. Procedurally this seems strange to have a ‘draft’ and then an ‘amended draft’ report in the same process. We do however think that there is now more clarity on what exactly the development will entail. A major flaw to our mind still remains, which is the exclusion of certain related infrastructure from the assessment - as indicated under the ‘Scope of the assessment’ bullet point above.**

3.1.2 Review Area 2: Conformance to the Plan of Study

The review results for Review Area 2: Conformance to Plan of Study suggest an overall ‘E’ rating (“*Not satisfactory, significant omissions or inadequacies*”). Based on a comparison of the Plan of Study with the Amended Draft EIA Report we highlight the following:

- **Alternatives to be assessed:**

- *May 2020 review:* No indication is given in the Plan of Study of which alternatives (or project description) will be assessed in the EIA or by the specialists. Page 96 of

the Draft EIA Report refers to a 90 turbine layout provided to the specialists to be assessed. Yet looking at the specialist reports they only considered the 66 turbine preferred alternative. So overall it was difficult to follow the logic how the EIA and specialist assessments considered the 90 turbine alternative (or any alternative for that matter) and then came up with the 66 turbine alternative. At the moment it seems as if the 66 turbine alternative was first decided and then the specialists merely assessed the already preferred alternative which does not make sense – because this might infer that the outcome was predetermined and therefore the EIA does not comply with Section 24O of NEMA.

- **August 2021 review: The newly proposed 43 turbines seemed to have evolved from the I&AP comments. We support the reduction in turbines in an attempt to avoid certain impacts. It is however unclear why the turbines were not reduced in the first version of the Draft EIA Report because the I&AP comments and specialist information and sensitivity mapping seems to be essentially the same.**

- **Key issues not addressed:**

- May 2020 review: The conformance of the specialist studies with the TOR described in the Plan of Study was not reviewed in detail. We rather focussed on the key issues raised by IAPs and to what extent they were addressed. The following are examples of important key issue not addressed in the Draft EIA Report:
 - The visual and socio-economic impact of the proposed WEF on sensitive visual receptors (game farms and nature reserves) and tourism in the area. The commitment was made in the Scoping Report to various IAPs that the visual and socio-economic impacts of the WEF on each affected landowner will be assessed. We could not find evidence that this was done – the outcome of the Draft EIA Report on this issue is inconclusive and speculative at best (also see Review Area 3). Therefore, the issue is unresolved.
 - The impact of the WEF on land values was also explicitly raised by IAPs. In response, the socio-economic study acknowledged this issue but considered it outside of its scope – and rather recommended that it should be investigated and rated separately by a Land Valuer / Economist. This was not done.
 - Social impacts related to the decommissioning phase was not addressed. The environmental authority surely needs to have a clear understanding of the socio-economic impacts should the facility be decommissioned. This is a

critical consideration in the context of need and desirability which is not addressed.

- **August 2021 review: We consider the above comments to be unresolved in the Amended Draft EIA Report.**

3.1.3 Review Area 3: Determining Significance

The review results suggest an overall 'D' rating (*"Parts are well attempted but must, as a whole, be considered just unsatisfactory because of omissions or inadequacies"*) for Review Area 3: Determining Significance. Significance determination lies at the heart of EIA and relies on a clear methodological description and consistency in the application of the method and line of argumentation. We highlight the following key weaknesses of the Draft EIA report:

- **Weak methodological design and description:**

- **May 2020 review:** The Final Scoping and/or Draft EIA Report do not explain how significance will be determined – it merely defines different criteria with no explanation of how the criteria relate or how they should be weighed towards a significance rating. This is important because significance is in many instances a subjective value judgement which relies on a systematic and clearly described method. However, subjective does not mean arbitrary. This lack of a clear and systematic method manifests in inconsistencies in argumentation. Examples, from Appendix C1 are:
 - Direct impacts from dust nuisance is rated *localised, short term, probable, moderate = low significance (before mitigation)* while water quality direct impacts with exactly the same ratings = *moderate significance*.
 - The cumulative impacts for dust nuisance (before mitigation) rates *localised, short term, possible, moderate = moderate significance* while cumulative impacts related to infilling of a water course with exactly the same ratings = *low significance*.
- **August 2021 review: The above comments have not been addressed in the Amended Draft EIA Report.**

- **Inconsistencies in the application of significance criteria:**

- **May 2020 review:** The evaluation criteria presented in Table 10.1 in the Final Scoping Report is inconsistently applied in section 9 and Appendix C of the EIA Report. This brings into question the rationale as well as accuracy of the significance ratings. For example:
 - Table 10.1 refers to 'consequence' which is not dealt with in Appendix C;

- The ranking terminology differs between Table 10.1 and Appendix C, i.e. extent uses *localized*, *moderate* and *extensive* while Appendix C refers to *localised*, *regional*, *national*;
 - Mitigation refers to *low*, *moderate*, *high*, *very high* while Annex C merely refers to *easy*.
- August 2021 review: **The above comments have not been addressed in the Amended Draft EIA Report.**

- **Incoherent argumentation:**

- May 2020 review: It was at times difficult to follow the rationale underpinning the significance ratings. For brevity sake we only use the example of what is probably the most significant issue raised during the scoping phase, namely the socio-economic impacts of the WEF on eco-tourism in the area.
 - The results of the socio-economic specialist report translated into the significance ratings in the EIA Report suggest that the WEF will have a “*low significance*” positive impact in terms of both ‘new employment’ as well as ‘impact on local economy’ - while a “*moderate significance*” negative impact in terms of ‘loss of existing employment’ and ‘local economic impact’. So why would the competent authority support a development that will seemingly have a “low” economic benefit and a “moderate” negative economic impact? It makes no sense. Such a development should on the face of it not be supported.
 - The visual impact assessment concluded a “*high significance*” impact on visual sensitive receptors (direct and cumulative impacts) and “*moderate significance*” rating for impact of night lights before and after mitigation. However, it seems that the mitigation hierarchy was not applied because if avoidance would be considered the impact after mitigation could be low. However, no indication could be found that avoidance was considered. It further stems to reason that with a minimum of 35 turbines required to make the development viable, ample scope exists to apply avoidance as a mitigation option to the 66 turbine preferred alternative. Moreover, it is explicitly stated in the Draft EIA Report (p110 and 186) that as far as possible turbines should not be erected in direct view of lodges and strategic viewpoints at the game reserves – if this avoidance option is applied then the “*high significant*” impact on visual sensitive receptors after mitigation would reasonably be reduced to “*low significance*”.

- August 2021 review: **The first bullet above has not been addressed in the revised report. However, in relation to the second bullet the Amended Draft EIA Report does show evidence where the avoidance mitigation option has been applied to reduce the visual impact. This is a mayor improvement in the design of the project. However, as stated previously, the mitigation options have not been exhausted. For example, the review done by Oberholzer indicates that a further 27 turbines could be considered for avoidance from a visual impact assessment perspective. The mitigation options for night light pollution also need more concrete mitigation options and proposals.**

- **False and unsubstantiated claims:**

- May 2020 review: The content of any EIA Report is rarely 100% conclusive and EAPs and specialists work with information that is reasonably available and obtainable within the resources and time available. Therefore, we fully recognise these limitations and are careful not to be unreasonable in our expectations. However, in this case we did identify what we consider to be false and unsubstantiated claims in relation to certain key issues and impacts, in particular in relation to the impact of the WEF on the eco-tourism industry. The conclusions reached and described in both the socio-economic specialist report as well as in the EIA Report is highly questionable. Because of the high level of importance that this particular issue enjoys in relation to this WEF (raised by numerous IAPs during the Scoping Phase) we consider it necessary to elaborate. We refer in particular to the following concluding statements (p110):

- *“Tourism in the study area is associated with the “Africa and bush experience” and the tourism landscape thus differs from studies done in Europe, UK and USA. Parallels can however still be drawn and it is the opinion of the SIA Specialist that research results can safely be used for this study”.* It is not clear what ‘safely’ refers to but it is correct that international studies on the impact of WEF on tourism could and should be considered. However, it is imperative that these international studies be considered in context and with utmost circumspection. Context is critical and generalizability of results should be viewed with extreme caution in an EIA for obvious reasons, not least because of differences in tourism product, differences in tourism market, distance from turbines, design of turbines, etc. The truth is that we don’t know what the impacts of WEFs are on nature based or eco-tourism facilities and no attempt was made in the Draft EIA Report to deal with this issue in any meaningful and scientifically valid way.

- *“No evidence has transpired to demonstrate or support the assertion that any wind farm development overseas has resulted in any adverse impact on tourism”*. This is a false generalisation based on a rather dated report on the tourism impact of wind farms in Scotland (Aitchison, 2012). Much of the argumentation in the socio-economic study seems to be from this single source, which in itself is problematic. It would have been more accurate to acknowledge that internationally there is an ongoing debate on this issue with basically three camps (by the way - none of them argue ‘no’ tourism impact!), namely i) those who argue limited impact on tourism, ii) those who argue more meaningful impacts on tourism and iii) those who seem to present more circumspect results, pointing out the nuanced nature of the issue, to be carefully considered within context (see for example Etherington 2010; Jerpasen and Larsen, 2011; Munday et al., 2011; Aitchison, 2012; O’Keeffe and Haggett 2012; Jaber, 2013; Karydis, 2013; Westerberg, et al., 2013; Reddington et al 2014; Rudolph, 2014; De Sousa and Kastenholz, 2015; Silva and Delicado, 2017).
- *“None of the local private game farms that have been consulted and are visually affected by existing wind farms have experienced negative economic impacts”*. This is a highly questionable conclusion based on an unverifiable method and results. Important conclusions such as these should be based on robust verifiable and peer reviewed research. Where such research does not exist (as in this case) two options are open. The first option would be to acknowledge a high level of uncertainty and seek to apply ‘avoidance’ as a mitigation option. Best practice EIAs avoid potentially significant impacts with high levels of uncertainty. In this instance avoidance is a perfectly reasonable option. The second option will be to conduct the research required to answer the question. However, we suspect the time and resources it will take to address the question in a scientifically valid way will be too resource and time consuming considering the development timeframe, which guide us back to the first option of avoidance.
- *“It is however not prudent to claim that there would be no negative impact on tourism as aesthetic and visual impacts (proximity to turbines) are strong influences on individuals’ attitudes towards wind power projects”*. So this statement is true but somewhat confusing and contradictory to the second bullet statement above where reference is clearly made to *“ ... resulted in any adverse impact on tourism”*. There will indeed be an impact, but how significant that impact will

be is the question to be answered. As stated above, this issue is unresolved in the Draft EIA Report.

- *“Proximity to turbines and their localities (visual impacts on lodges and strategic viewpoints on the game farms) could be the determining factors for visitor satisfaction and impacts on visitor volumes”.* This again acknowledges that there could be impact, which we agree with. However, these impacts do not seem to be addressed or mitigated in any way in the Draft EIA Report.
- ***August 2020 review:* The failure to provide a valid assessment of the impact on eco-tourism remains the critical weakness of the Amended Draft EIA Report. We are of the opinion that, although the SIA have been revisited and additional information have been added – the conclusions seem unconvincing and the level of uncertainty does not allow for reasonable decision making. The eco-tourism industry is too important for the Eastern Cape region not to be taken seriously by wind farm developments. Moreover, the failure of the strategic planning guiding future renewable energy developments (in the form of the SEAs and REDZ) to exclude the impact on eco-tourism must be considered a major strategic flaw, that now results in significant uncertainty at project level decision making. This is a typical example where the precautionary principle should be explicitly applied to decision making.**

3.1.4 Review Area 4: Public Participation

It is difficult to evaluate the overall success of the public participation process by only reviewing report content. However, based purely on the content of the EIA Report the review results suggest an overall 'B' rating (“Generally satisfactory and complete, only minor omissions and inadequacies”). We raise the following important point as a particular weakness at this stage of the EIA process:

- **Omission of comments and response section in Draft EIA Report:**
 - *May 2020 review:* Clearly the development is viewed as controversial by various IAPs - as reflected in the extensive comments and response table included in the Final Scoping Report. It is however, highly questionable why an updated version of the comments and response table is not included in the Draft EIA Report – to explain to IAPs how the various comments were addressed. To expect the IAPs to wade through the Draft EIA Report to determine for themselves if their comments were addressed does not seem reasonable. So clearly as a minimum the updated comments and response table should have been included in the Draft EIA Report. We suspect the public will not take kindly to this omission.

- August 2021 review: The comments and response reports has now been incorporated that clearly records the comments made by I&APs. The extent to which I&APs will be satisfied with the responses and explanations is uncertain. However, at this point we would like to highlight that our May 2020 review reports was not explicitly responded to – and therefore it seems that many of the issues raised have therefore not been addressed. The response by Summers explicitly indicates that they should be read together with the May 2020 review reports, which it seems they were not.

3.1.5 Review Area 5: Dealing with Mitigation

The review results suggest an overall ‘D’ rating (“*Parts are well attempted but must, as a whole, be considered just unsatisfactory because of omissions or inadequacies*”) for Review Area 5: Dealing with Mitigation. We highlight the following key weaknesses:

- **Conflating reversibility and mitigation:**
 - May 2020 review: Conflating these two concepts is conceptually and methodologically flawed because reversibility deals with the lower tiers in the mitigation hierarchy together with restoration and rehabilitation considerations (see section 10 of the Final Scoping Report and Appendix C of the Draft EIA Report). So, to conclude that the same impacts are both easy to mitigate and reverse makes no sense. Mitigation needs to systematically consider first avoidance, then minimization, then restoration (reversibility could fit here) and then compensation / offsets - in this particular order (see next point).
 - August 2020 review: **The above comment has not been addressed in the Amended Draft EIA Report and there remains much potential to consider avoidance of especially visual impacts on sensitive receptors such as eco-tourism facilities.**
- **Failure to apply the mitigation hierarchy:**
 - May 2020 review: Mitigation options need to be systematically considered for each impact – i.e. to what extent can a particular impact be avoided, minimised, restored / reversed or compensated / offset? No proof could be found where the mitigation hierarchy was actually applied. For example:
 - No attempt seemed to have been made to ‘avoid’ impacts on sensitive viewpoints – either by relocating or reducing the number of turbines, even though this option is explicitly recommended by the socio-economic

specialist study and the Draft EIA Report (see page 110). The contradictory statement in the socio-economic specialist study that “*No mitigation is possible as turbines cannot be screened ...*” seems to suggest that avoidance is not considered a form of mitigation.

- The sensitivity map provides the location of high sensitive / constraint zones with little thought seemingly to avoiding these sensitive locations – and where they can’t be avoided to consider other reasonable mitigation options. The impression is that the geographical sensitivity was mapped and then the location of the turbines ignored it.
- **August 2021 review: These issues have been addressed to some extent in the Amended Draft EIA Report by reducing the number of turbines (especially those on highly sensitive areas). Although we welcome this revised layout we argue that the number of turbines could have been reduced even more from an environmental sensitivity perspective and also a visual impact perspective.**

3.2 DETAILED REVIEW RESULTS

This section presents the detailed review results per Review Area and specific criteria. Table 3.2 summarises the results and provide brief justification for the review scores. The results reflect the combined views of the two reviewers.

Table 3.2: Detailed review results for the Albany WEF Amended Draft EIA report (May 2021)

Reference	Review Areas and Criteria	Evaluation Scores 2021 review							Review Comments and Justification (2020 Review)	Review Comments and Justification (2021 Review)
		A	B	C	D	E	F	N/A		
Review Area 1: General Aspects										
GNR 982 Appendix 3(3)(a)(i)(ii)	1.1 Were the details of the EAP who prepared the report; and the expertise of the EAP, including a curriculum vitae included?		X						See section 1.4 and Appendix B However, the report indicates Alan Carter as the EAP and the BID shows Caroline Evans as the EAP.	Not addressed in the comments and response report dated 2021
GNR 982 Appendix 3(3)(b)(i)(ii)(iii)	1.2 Was the location of the activity, including the 21 digit Surveyor General code of each cadastral land parcel included, and where available, the physical address and farm name?	X							See p.vii	See p.vii
GNR 982 Appendix 3(3)(c)(i)(ii)	1.3 Was a plan included which locates the proposed activity or activities applied for at an appropriate scale, or, if it is a linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken; or on land where the property has not been defined, the coordinates within which the activity is to be undertaken?	X							See p.x to xii	See p.x to xi
GNR 982 Appendix 3(3)(d)	1.4 Was a description of the scope of the proposed activity provided, including a description of all listed and specified activities triggered; and/or a description of the activities to be undertaken, including associated structures and infrastructure?				X				See section 2 - The project description changed from BID to the Scoping to the Draft EIA Report for example: the BID documents explicitly refers to 66 turbines to be reduced after the assessment while the Draft EIA Report talks about 90 turbines to be reduced to 66 – the location of the 90 turbine alternative (1) is nowhere provided in the report generation capacity per turbine changed from 4,5 MW in BID and Scoping Report to 6 MW in Draft EIA Report. - On p90 reference is made to a desktop screening that was done by and for the proponent for a 90 turbine development	See section 2 - The project scope and descriptions clearly evolved over time from 90 to 66 to now 43 turbines. - The process how this happened remains curious because commenting twice on a draft report (i.e. amended draft) is not in line with the prescribed EIA process. - The exclusion of certain related infrastructure from the assessment remains a weakness in the process.

								<p>option. However, this screening did not form part of the EIA process and the rationale behind the screening is not reflected in the content of the Draft EIA Report.</p> <ul style="list-style-type: none"> - On p96 of the Draft EIA it is clearly stated that the specialists were tasked to assess the 90 turbine option (layout alternative 1) – while the content of the specialist studies confirm that they only assessed the 66 turbine option? It is therefore not possible to understand the rationale behind the decision to go with the 66 turbine option – and therefore the content of the report does not satisfy the requirements of the EIA Regulations. - Power line and substations excluded from the Draft EIA Report and some specialist studies. 	
GNR 982 Appendix 3(3)(e)	1.5 Was a description provided of the policy and legislative context within which the development is proposed, and an explanation provided of how the proposed development complies with and responds to the legislation and policy context?				X			<p>See sections 3 and 4</p> <ul style="list-style-type: none"> - The Draft EIA Report discuss the national and provincial policy context at length. However, no reflection on the local development and policy context i.e. IDPs, SDFs, etc. is provided. Section 4.18 of the SIA mentions the SDF and IDP but there is no attempt to incorporate this into the Draft EIA Report. Also, there is no contemporaneous reference to the SDF being approved by the Municipality in Nov 2019. 	<p>See sections 3 and 4</p> <ul style="list-style-type: none"> - This issue has not been addressed

<p>GNR 982 Appendix 3(3)(f)</p>	<p>1.6 Was the need and desirability of the proposed activity motivated, including the need and desirability of the activity in the context of the preferred location?</p>			<p>X</p>		<p>See section 3</p> <ul style="list-style-type: none"> - EIAs must have regard for any guideline published in terms of section 24J of NEMA and any minimum information requirements. This includes the updated 2017 Need and Desirability Guideline which has clearly not been consulted by the EAP. If the EAP did consult the 2017 Guideline this is not in any way evident from the Draft EIA Report. The Guideline sets out a list of questions which should have been answered and addressed when considering need and desirability of a proposed development. These are divided into questions that relate to ecological sustainability and justifiable economic and social development. The questions that relate to ecological sustainability include how the development may impact ecosystems and biological diversity; pollution; and renewable and non-renewable resources. When considering how the development may affect or promote justifiable economic and social development, the relevant spatial plans must be considered, including Municipal IDPs and SDFs. As the SDF and IDP have not been analysed in the Draft EIA Report the policy / legislative assessment is incomplete. The result is that the need and desirability in the DEIR is heavily skewed towards 	<p>See section 3</p> <ul style="list-style-type: none"> - The need and desirability guidelines have been more explicitly incorporated – which is an improvement. However, some of the answers to the need and desirability questions remains unconvincing and the incorporation of the local strategic context is still lacking.
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											<p>favouring renewable energy above other relevant policy / societal considerations - there is no balanced consideration / evaluation of the various (other) factors that are relevant to a balanced / neutral assessment into need and desirability</p> <ul style="list-style-type: none"> - Section 3.2 emphasises the stimulation of new business opportunities and job creation as a main contribution of the Albany WEF, even though the outcome of the assessment shows this to be of low significance? We therefore conclude that the local economic benefits are overplayed and overemphasised in relation to need and desirability - and inconsistent with the actual outcome of the assessment itself. 	
GNR 982 Appendix 3(3)(s)	1.7 Is there evidence of an undertaking under oath or affirmation by the EAP in relation to: (i) the correctness of the information provided in the reports; (ii) the inclusion of comments and inputs from stakeholders and I&APs; (iii) the inclusion of inputs and recommendations from the specialist reports where relevant; and (iv) any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested or affected parties?	X									See section 1.4 and Appendix E	See section 1.4 and Appendix E
Review Area 2: Conformance to the Plan of Study												
GNR 982 Appendix 3(1)(1)	2.1 Was the environmental impact assessment process undertaken in line with the approved plan of study for environmental impact assessment?								X		See comments below.	See comments below
GNR 982 Appendix 2(2)(i)(i)	2.2 Is there conformance to the environmental impact assessment process described in the Plan of Study, including the consideration of alternatives to be								X		See section 10 of the Final Scoping Report	See section 10 of the Final Scoping Report

	considered and assessed within the preferred site?									<ul style="list-style-type: none"> - No indication is given in the Plan of Study which alternatives (or project description) will be assessed. The only clue to this is provided on p96 of the Draft EIA Report – which suggest 90 turbines i.e. layout alternative 1 (however 90 turbine layout not provided nor assessed in the EIA phase). 	<ul style="list-style-type: none"> - These issues remain unresolved mainly because the Plan of Study and Scoping Report has not, and cannot, be amended at this stage of the process.
GNR 982 Appendix 2(2)(i)(ii)	2.3 Were the aspects to be assessed as indicted in the Plan of Study, ultimately addressed in the environmental impact assessment process?						X			<p>The conformance of the specialist studies with the TOR described in the Plan of Study was not reviewed in detail. We rather focussed on the key issues raised by IAPs and to what extent they were addressed. The following are examples of important key issue not addressed in the Draft EIA Report:</p> <ul style="list-style-type: none"> - The visual and socio-economic impact of the proposed WEF on sensitive visual receptors (game farms and nature reserves) and tourism in the area. The commitment was made in the Scoping Report to various IAPs that the visual and socio-economic impacts of the WEF on each affected landowner will be assessed. We could not find evidence that this was done – the outcome of the Draft EIA Report on this issue is inconclusive and speculative at best (also see Review Area 3). Therefore, the issue seems unresolved. - The impact of the WEF on 	<p>See section 10 of the Final Scoping Report</p> <ul style="list-style-type: none"> - These issues remain unresolved mainly because the Plan of Study and Scoping Report has not, and cannot, be amended at this stage of the process.

								land values was also explicitly raised by IAPs. In response, the socio-economic study acknowledged this issue but considered it outside of its scope – and rather recommended that it should be investigated and rated separately by a Land Valuer / Economist. This was not done.	
GNR 982 Appendix 2(2)(i)(iii)	2.4 Were all relevant aspects to be assessed by specialists included in the PS / TOR?				X			<p>See section 10.3 in the Final Scoping Report.</p> <ul style="list-style-type: none"> - Although the TOR for specialists is provided it fails to explain which alternative(s) should be assessed. - Not all the issues raised by IAPs have been addressed in the Draft EIA Report. For example, see issue raised on p.150 of the SR by Mr Mark Palmer of Indalo - where the commitment was made by the EAP that the impact of the WEF on each affected landowner will be assessed. This was not 	<p>See section 10.3 of the Final Scoping Report</p> <ul style="list-style-type: none"> - These issues remain unresolved mainly because the Plan of Study and Scoping Report has not and cannot be amended at this stage of the process.

									done – the outcome of the EIR on this issue is inconclusive and speculative at best.	
GNR 982 Appendix 2(2)(i)(iv)	2.5 Was the proposed method (described in the Plan of Study) of assessing the environmental aspects been used by specialists?						X		See section 10.2 of the Final Scoping Report. The following comments are made: <ul style="list-style-type: none"> - The very weak description of the method in the SR makes it difficult to follow the rationale behind the eventual ratings provided in the Draft EIA Report (more to be explained under Review Area 3 below). On p.158 the PS only define the variables (also called factors?) without any explanation of how they will be applied and how they relate to the eventual significance rating. Essentially, we are left with definitions and no method. This is the same for dealing with cumulative effects in the Draft EIA Report. If the methodology is unclear it is difficult to see how the competent authority can make a reasonable and rational decision. - Conflating these two concepts is conceptually and methodologically flawed because reversibility deals with the lower tiers in the mitigation hierarchy together with restoration and rehabilitation considerations (see section 10 of the Final 	See section 10.2 of the Final Scoping Report. The following comments are made: <ul style="list-style-type: none"> - These comments are difficult to address because they mainly relate to weaknesses in the POS and Scoping Report which has already been approved. However, it is evident that some of the weaknesses of the Draft and Amended Draft EIA Reports stem from these weaknesses.

								<p>Scoping Report and Appendix C of the Draft EIA Report). So, to conclude that the same impacts are both easy to mitigate and reverse makes no sense. Mitigation needs to systematically consider first avoidance, then minimization, then restoration (reversibility could fit here) and then compensation / offsets - in this particular order – this is not reflected in section 10.2 at all. More on this under Review Area 5 below.</p> <ul style="list-style-type: none"> - Methods to be used by specialists to deal with significance are not described? 	
GNR 982 Appendix 3(3)(u)	2.6 Was an indication provided of any deviation from the approved scoping report, including the plan of study, including- (i) any deviation from the methodology used in determining the significance of potential environmental impacts and risks; and (ii) a motivation for the deviation?					X		This was not clearly explained or discussed in the Draft EIA Report.	This comment has not been addressed.
Review Area 3: Determination of Significance									
Plan of Study: Sec 8.5 GNR 982 Appendix 2(2)(i)(v)	3.1 Was a description of the proposed method of assessing significance provided?					X		<p>See section 10 of the Final Scoping Report and section 9 of Draft EIA Report.</p> <p>The assessment methodology for dealing with significance is non-compliant for the following reasons:</p> <ul style="list-style-type: none"> - No method for combining the criteria towards a significance rating. Table 9-3 merely refers to a combination of criteria but no explanation of how they 	<p>See section 10 of the Final Scoping Report and section 9 of Amended Draft EIA Report.</p> <ul style="list-style-type: none"> - These issues have not been addressed.

									<p>were combined. The reason this is important is to avoid inconsistencies in rationale underpinning the significance ratings. There are obvious examples of this in Appendix C1: Direct impacts from dust nuisance is rated localised, short term, probable, moderate = low significance (before mitigation) while water quality direct impacts with exactly the same ratings = moderate significance; also The cumulative impacts for dust nuisance (before mitigation) rates localised, short term, possible, moderate = moderate significance while cumulative impacts related to infilling of a water course with exactly the same ratings = low significance. It is difficult to understand the rationale for these inconsistencies without a method description.</p> <ul style="list-style-type: none"> - Inconsistent use of evaluation criteria in Table 10.1 in the Final Scoping Report versus what is presented in section 9 and Appendix C in Draft EIA Report. For example, Table 10.1 refers to 'consequence' which is not dealt with in Appendix C; the ranking terminology differs between Table 10.1 and Appendix C, i.e. extent talks about localized moderate and 	
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GNR 982 Appendix 3(3)(i)(ii)	3.6 Was an assessment conducted of the significance of each issue and risk and an indication provided of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures?				X		See section 10 of the Final Scoping Report and section 9 of Draft EIA Report. The assessment did deal with significance of impacts pre and post mitigation. However, this review raises serious limitations in terms of how mitigation was dealt with - as discussed in more detail under review area 5 below.	See section 10 of the Final Scoping Report and section 9 of Amended Draft EIA Report. The serious limitations in terms of how mitigation was dealt with - as discussed in more detail under review area 5 below has not been dealt with.
GNR 982 Appendix 3(3)(j)(i)	3.7 Was an assessment conducted of each identified potentially significant impact and risk, including cumulative impacts?				X		See section 10 of the Final Scoping Report and section 9 of Draft EIA Report. In section 9.1 cumulative impacts are defined although no method is described on how to deal with the cumulative impacts and therefore difficult to understand the rationale behind the cumulative rankings.	See section 10 of the Final Scoping Report and section 9 of Amended Draft EIA Report. The method on how cumulative impacts were dealt with is still unclear.
GNR 982 Appendix 3(3)(j)(ii)	3.8 Was an assessment conducted of each identified potentially significant impact and risk, including the nature, significance and consequences of the impact and risk?				X		Consequence is included in the PS but not dealt with in the Draft EIA Report. Moreover, as already indicated under criterion 3.1 the methodology used for dealing with significance is non-compliant to the EIA Regulations.	This comment has not been addressed.
GNR 982 Appendix 3(3)(j)(iii)	3.9 Was an assessment conducted of each identified potentially significant impact and risk, including the extent and duration of the impact and risk?				X		Extent and duration is covered in the significance ratings but it is unclear how this relates to overall significance. Until this relation is clarified it will not be possible for the competent authority to make a rationale decision based on the overall significance ratings.	This comment has not been addressed.
GNR 982 Appendix 3(3)(j)(iv)	3.10 Was an assessment conducted of each identified potentially significant impact and risk, including the probability of the impact and risk occurring?				X		Probability is covered in the significance ratings but unclear how this relates to overall significance. Until this relation is clarified it will not be possible for the competent authority to make a rationale	This comment has not been addressed.

									decision based on the overall significance ratings.	
GNR 982 Appendix 3(3)(j)(v)	3.11 Was an assessment conducted of each identified potentially significant impact and risk, including the degree to which the impact and risk can be reversed?							X	<p>The reversibility is covered in the significance ratings but unclear how this relates to overall significance. Until this relation is clarified it will not be possible for the competent authority to make a rationale decision based on the overall significance ratings. For this type of development reversibility is particularly important to be considered in view of potential decommissioning of the facility in 25 years.</p> <p>Combining reversibility with mitigation results is a fundamentally flawed assessment approach and methodology.</p>	This comment has not been addressed.
GNR 982 Appendix 3(3)(j)(vi)	3.12 Was an assessment conducted of each identified potentially significant impact and risk, including the degree to which the impact and risk may cause irreplaceable loss of resources?							X	Irreplaceability is not dealt with in the context of the significance methodology – see for example Appendix C.	This comment has not been addressed.
GNR 982 Appendix 3(3)(j)(vii)	3.13 Was an assessment conducted of each identified potentially significant impact and risk, including the degree to which the impact and risk can be mitigated?				X				<p>See section 10 of the Final Scoping Report and section 9 of Draft EIA Report.</p> <p>Mitigation options need to be systematically considered for each impact – i.e. to what extent can a particular impact be avoided, minimised, restored / reversed or compensated / offset? No proof could be found where the mitigation hierarchy was actually applied. For example:</p> <ul style="list-style-type: none"> - No attempt has been made to ‘avoid’ impacts on sensitive viewpoints – either by relocating or reducing the number of 	Mitigation options have been dealt with in relation to avoidance which resulted in a reduction of the number of turbines from 66 to 43. This has been a major improvement in the overall report quality.

										<p>turbines, even though this option is explicitly recommended by the socio-economic specialist study and the Draft EIA Report (see page 110). The contradictory statement in the socio-economic specialist study that <i>“No mitigation is possible as turbines cannot be screened ...”</i> seems to suggest that avoidance is not considered a form of mitigation.</p> <ul style="list-style-type: none"> - The sensitivity map provides the location of high sensitive / constraint zones with little thought seemingly on avoiding these sensitive locations – and where they can't be avoided to consider other reasonable mitigation options. The impression is that the geographical sensitivity was mapped and then the location of the turbines plainly ignored it. 	
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Review Area 4: Public Participation

GNR 982 Appendix 2(2)(i)(vi)	4.1 Was an indication provided of the stages at which the competent authority were consulted?		X						See section 11	See section 11
GNR 982 Appendix 2(2)(i)(vii) GNR 982 Appendix 3(1)(h)(ii)	4.2 Were particulars of the public participation process conducted during the environmental impact assessment process provided?		X						See section 11 The public participation process is clearly described. However, a procedural issue might be the project description and EAP details which were provided in the initial	See section 11 This issue has not been addressed.

									BID, and which have since changed. Not sure if this might be a procedural non-compliance from a public participation perspective?	
GNR 982 Appendix 3(1)(h)(iii)	4.3 Was a summary of the issues raised by interested and affected parties provided as well as an indication of the manner in which the issues were incorporated / addressed?		X						See section 11 It is highly problematic that the issues raised by the public have not been incorporated into the Draft EIA Report because the EAP made various commitments during the PPP to address issues in the Draft EIA Report – but then failed to include this in the report? IAPs have the right and expectation to understand how the issues they already raised were addressed in the EIR. The failure to clearly explain how the issues raised during scoping have been dealt with by the EAP and incorporated in the Draft EIR Report is a very serious defect.	This comment has been addressed in the Amended Draft EIA Report
Review Area 5: Dealing with Mitigation										
GNR 982 Appendix 3(1)(2)	5.1 Were the environmental impacts, mitigation and closure outcomes as well as the residual risks of the proposed activity set out in the environmental impact assessment report?		X						See sections 8 to 12 – and Appendix C The mitigation failures constitute a fatal flaw for the EIA at this point. This view is based on the following: <ul style="list-style-type: none"> - Conflating reversibility and mitigation is flawed EIA methodology. - The mitigation hierarchy was not systematically and explicitly applied. For example, the failure to seriously consider avoidance of what seems to be the most significant potential impact of the WEF on eco-based tourism is inexplicable. In view of the high level of 	The consideration of mitigation has been a particular improvement in the Amended Draft EIA Report – especially in relation to avoidance.

									<p>uncertainty around the latter impact avoidance of significant adverse impacts (and precautionary approach) seems to be the methodologically correct and reasonable option – although there is no indication that this was attempted by either the visual impact assessment or SIA – contradicting clear statements in both reports that this should be done i.e. <i>“It is however suggested that turbines, as far as possible, not be erected in direct view of lodges and strategic viewpoints at the Game Reserves”</i>. In this regard we agree that reasonable opportunity exists to reduce turbines between the proposed 66 turbine option and the 35 turbines required to make the project feasible. Those turbines with a high visual impact could be identified and avoided by either being excluded or relocated as part of the alternatives assessment.</p> <ul style="list-style-type: none"> - The sensitivity map provided in section 10 shows that many turbines will be placed in high sensitivity / constraint zones. It is not clear that the mitigation hierarchy was applied to the location impacts (direct and residual) in these areas. 	
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GNR 982 Appendix 2(2)(i)(ix)	5.2 Were suitable measures to avoid, reverse, mitigate or manage identified impacts identified and the extent of the residual risks that need to be managed and monitored determined?			X					See sections 8 to 12 – and Appendix C See previous point and the need to apply the mitigation hierarchy thinking to residual impacts and risks.	This comment has been addressed.
GNR 982 Appendix 3(3)(n)	5.3 Were the final proposed alternatives, which respond to the impact management measures, avoidance, and mitigation measures identified through the assessment?			X					See sections 8 to 12 – and Appendix C It is not clear how the mitigation hierarchy was applied to reach the preferred layout option – because avoidance (in terms of tourism impacts) and offsets (in relation to high sensitive locations) were seemingly not considered?	This comment has been addressed.
GNR 982 Appendix 3(3)(p)	5.4 Was a description provided of any assumptions, uncertainties and gaps in knowledge which relate to the assessment and mitigation measures?				X				See sections 8 to 12 (particular 12.3) – and Appendix C Uncertainties and gaps in knowledge are dealt with to varying degrees by the different specialists. It is difficult to comment in detail on every study and therefore we focus our review on uncertainties related to key issues and how they were dealt with. In particular, the assumptions, uncertainties and gaps in knowledge related to the SIA was not dealt with. We refer in particular to the following three statements and the failure to acknowledge and properly explain uncertainties: - <i>“Tourism in the study area is associated with the “Africa and bush experience” and the tourism landscape thus differs from studies done in Europe, UK and USA. Parallels can however still</i>	These comments have not been addressed and remain a major fatal flaw for the overall assessment. A reasonable decision cannot be made until the impact of the wind energy facilities on current and future eco-tourism is not better understood.

									<p><i>be drawn and it is the opinion of the SIA Specialist that research results can safely be used for this study". We are not sure what 'safely' refers to but it is correct that international studies on the impact of WEF on tourism could and should be considered. However, it is imperative that these international studies be considered in context and with utmost circumspection. Context is critical and generalizability of results should be viewed with extreme caution in an EIA for obvious reasons, not least because of differences in tourism product, differences in tourism market, distance from turbines, design of turbines, etc. The truth is that we don't know what the impacts of WEFs are on nature based or eco-tourism facilities and no attempt was made in the Draft EIA Report to deal with this issue in any meaningful and scientifically valid way.</i></p> <ul style="list-style-type: none"> - <i>"No evidence has transpired to demonstrate or support the assertion that any wind farm development overseas has resulted in any adverse impact on tourism". This is a false generalisation based on a rather dated report on the tourism impact of wind farms in Scotland</i> 	
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									<p>Important conclusions such as these should be based on robust verifiable and peer reviewed research. Where such research does not exist (as in this case) two options are open. The first option would be to acknowledge a high level of uncertainty and seek to apply 'avoidance' as a mitigation option. Best practice EIAs avoid potentially significant impacts with high levels of uncertainty. In this instance avoidance is a perfectly reasonable option. The second option will be to conduct the research required to answer the question. However, we suspect the time and resources it will take to address the question in a scientifically valid way will be too resource and time consuming considering the development timeframe, which guide us back to the first option.</p>	
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ANNEXURE A: CV SUMMARIES OF REVIEWERS

CURRICULUM VITAE



Personal Details:

Name: Prof Francois P Retief
Date of birth: 8 Nov 1974
Nationality: RSA
Experience: 20+ years

Position:

Professor in Environmental Management with specialisation in Environmental Assessment

Director: Global Green Environmental Consultants

Highest Academic Qualification:

PhD – University of Manchester, UK



NORTH-WEST UNIVERSITY[®]
YUNIBESITI YA BOKONE-BOPHIRIMA
NOORDWES-UNIVERSITEIT
POTCHEFSTROOM CAMPUS

Main Qualifications:

- **2005: Doctor of Philosophy (Ph.D), School of Environment and Development, University of Manchester, United Kingdom**
- 2001: Masters in Environmental Management (M.EM), University of the Free State (UFS), South Africa
- 1998: Masters in Town and Regional Planning (M.TRP), University of the Free State (UFS), South Africa
- 1996: Baccalaureus Artium, Geography and Economics, University of the Free State (UFS), South Africa

EXPERIENCE

Prof Retief completed his PhD at the University of Manchester on the quality and effectiveness of environmental assessment. He then joined the North West University as senior lecturer and was promoted to Associate Professor in 2008. Between 2009 and 2011 he served as Subject Chair for Geography and Environmental Management and between 2012 and 2015 as the first School Director of the newly established School of Geo and Spatial Sciences. In March 2015, he was promoted to Professor and took up a new position within the Research Unit for Environmental Science and Management responsible for managing taught master's programmes.

He has contributed numerous peer reviewed publications (>100), book chapters (25) and conference presentations (>80). Recently he co-authored the 2018 edition of the 'Environmental Management in South Africa' handbook. Prof Retief has a 'C1' research rating from the NRF and a Scopus *h-index* of 18. To date he has successfully supervised >50 Masters and PhDs. Prof Retief serves on the editorial boards of all three leading international environmental assessment journals (EIA Review, JEAPM and IAPA) and between 2009 and 2014 he also acted as co-editor of one of these journals namely, Impact Assessment and Project Appraisal (IAPA). He received both the '*Outstanding Service to IAIA Award*' in 2015 and the '*IAIA Individual Award*' in 2020 in recognition of his sustained contributions to the theory and practice of impact assessment at an international level. Overall, Prof Retief is acknowledged as a leading scholar and researcher in the field of environmental assessment.

In terms of EIA practice he has, as director of 'Global Green Environmental Consultants' conducted >100 EIAs under different South African EIA regimes since 1999. During this time, he has also externally reviewed numerous high profile EIAs against international best practice, minimum legal requirements and IFC and World Bank Standards. In 2018 he was appointed by the Department of Performance Management and Evaluation (DPME) and the then Department of Environmental Affairs (DEA) to lead the national EIA System evaluation.

CURRICULUM VITAE



Personal Details:

Name: Me Charlotte Cilliers
Date of birth: 14 Oct 1987
Nationality: RSA
Experience: 9 years

Position with Global Green:

Director

Highest Academic Qualification:

Masters in Environmental
Management – *cum laude*



GLOBAL GREEN
Environmental Consultants

P.O. Box 2629, Potchefstroom, 2520
Tel: 072 573 8962 - Fax: 086 402 2610

Main Qualifications:

- **2016: Masters in Environmental Management, North West University, Potchefstroom campus – *cum laude***
- 2012: BSc Town and Regional Planning, North West University, Potchefstroom campus

Professional Registrations:

- EAPASA (Reg. No.2019/1418)

EXPERIENCE

Me Cilliers started her professional career as a town and regional planner. She has been working in the field of environmental assessment since joining Global Green in 2012. Under the supervision of Prof Retief, she completed her Masters in Environmental Management (*cum laude*) at the North West University (NWU) focussing on the capacity of local government to deliver on their environmental management mandate.

Over the past five years she has been involved in a wide range of impact assessments in the following sectors:

- Housing,
- Agriculture,
- Energy,
- Bulk services infrastructure,
- Waste management,
- Tourism.

She has also been involved in EIA external review projects and therefore is experienced in EIA evaluation and review methodologies.