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21 May 2020

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

Dear Caroline

We would like to register our concern about statements made in the EIA report for the Albany WEF. The statement reads as follows: "No evidence could be found to demonstrate or support the assertion that any wind farm development overseas has resulted in any adverse impact on tourism." It further stated that Dale Howard (Pumba Private Game Reserve) on 29 January 2020 was consulted.

Firstly, they could not even spell my name correctly.

I take exception to this statement as I was never consulted or made any statement of this nature. We now insist that you correct this statement and that this correction be brought to the Department's attention as the way the report is written is highly misleading.

For the record we as Pumba Private Game Reserve led the opposition to the original Waainek Wind Farm application proposed for 27 Turbines. After great support from the surrounding interested and affected parties, and substantial legal costs, and presentations and hearing at Provincial Government level had the application reduced to 8 Turbines. The Department is very well aware of the role I played in opposing this development.

Please acknowledge receipt of this email.

**Yours faithfully**

Dale Howarth

Director



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To whom it may concern,

13 July 2020

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

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

## 1 HISTORY / BACKGROUND

Since opening in 2004, Pumba Private Game Reserve has not only grown as a nature reserve and nature and wildlife tourism business, but has also in supporting the surrounding community and over its 15-year long existence Pumba has played a significant role in the socioeconomic development of the area as one of the main employers of the Seven Fountains area.

Since its launching in 2004, Pumba Private Game Reserve is been committed to responsible nature-based tourism, conservation, education, as well as community and social upliftment. The initial focus on conservation programs has steadily grown to support projects specifically designed to bring cooperation and support to the entire area.

Like the other Indalo reserves (and many others in South Africa and in Africa in general); Pumba focusses on nature and wildlife tourism that relies on the wilderness character of the reserve and surrounding area. Legacy land management failures large areas of Makana overrun with alien vegetation, such as black wattle, blue gum (eucalyptus) and various others. Pumba has persistently worked to remove of these species amongst others with the local community and Working for Water. For almost 15 years, this partnership has cleared large swathes of land throughout the reserve and continues to play an important role in maintaining the environment to its natural state.

Pumba has made a substantial contribution to the conservation of rhino and lion, and more specifically white rhino and white lion. Pumba has worked with Indalo and other partners including the Wilderness Foundation and others to ensure the survival of the black rhino. Ever since the devastating loss of 6 white rhino to poaching in 2014 Pumba is not making public disclosures about its black rhino which along with other Indalo members it is working to protect with ever increasing cost and effort. In 2007, the white lion project was started in association with the Global White Lion Protection Trust (based in the Timbavati area), we have played a key role in ensuring the survival of white lions in the wild (lions that carry the leucistic, gene) whilst maintaining healthy genetic diversity of a very small population of these rare animals. Today Pumba is home to the second known free-ranging, self-sustainable population of White Lions in Southern Africa.

Pumba along with other Indalo reserves SANParks (Addo National Park) and Eastern Cape Parks and Tourism Agency (Great Fish and other provincial nature reserves) are looking to expand its area under management and is working actively to link up with neighbouring Lalibela to the east to form part of a larger proposed Addo to Great Fish protected areas corridor (also referred to as Albany Corridor).

The protection of landscapes of ecological importance along with contributions to numerous other objectives as set out in the Indalo Protected Area Management Plan. The plan requires each reserve to secure the required financial resources to ensure achievement of the protected area management objectives. Pumba is accordingly protected and managed so as to offer a natural scenic setting.

Resources required for management of reserves are derived from nature and wildlife tourism which is reliant on wilderness setting largely free from the structures and signs of modern civilisation (often from which they come to get away).

## 2 TOURISM SERVICES

Pumba offers an visitors African safari experience that over and above the wildlife experience includes wilderness walking trails, birding safaris, nocturnal game drives, stargazing and planet watching activities within a wilderness setting characterised as by a diversity of natural landscapes.

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T.A. Pumba Private Game Reserve and Safari Lodge

Directors: T.R. Lombard(Man)/D.H. Howarth

We offer accommodation in three lodges each in a scenic namely Water Lodge, Bush Lodge and Gameston Wildlife Retreat.

Our facilities are graded by the Tourism Grading Council of South Africa (TGCSA) which classifies Private Nature Reserves as part of "Game or Nature Lodges".

The accommodation is as follows:

Pumba Water Lodge, Pumba Bush Lodge, Gameston Wildlife Retreat

### 3. IMPACT OF WIND FARM DEVELOPMENT

Although Pumba lodges were sited so as to offer a scenic location with vistas devoid of intrusion by human-made structures and other disturbance, however the Waainek WEF has substantially impacted Gameston Wildlife Retreat as the lodge has a northern aspect (good building design) and whereas it previously had views of an unbroken skyline, it now faces Waainek turbines that mars the landscape across the valley.

You may not be aware but The Tourism Grading Council of South Africa (TGCSA) classifies Private Nature Reserves accommodation as part of "Game or Nature Lodges". The visual and scenic quality of the natural environment of the private game reserves (along with wildlife and hotel specifications), are part of the minimum requirements to be a Game or Nature Lodge. Specifically it should be noted that it is a requirement to provide a "*Scenic or natural vista (beyond that of the immediate garden area) e.g.: water view, rural outlook, mountain view or natural bush setting offering some Safari Activity such as Game Drives, Walking, Cycling, Horseback, Canoeing etc.*"<sup>1</sup>

The impact of the wind turbines of the Waainek WEF on Gameston was deemed excessive and we further had such a significant volume of complaints that a decision was made to remove the Gameston lodge from our Pumba Reserve offering and that along with a lodge upgrade aimed (in part aimed with the objective to rebalance its TGCSA grading) and to remarket the facility to a different market.

We note with utmost concern the statement in the SIA that "In addition to this Indalo, Amakhala and Pumba Game Reserves unsuccessfully appealed the Environmental Authorisation ("EA") of the Waainek Wind Farm in 2011. Now that the project has been operational for four years, Amakhala reported no effect on eco-tourism". For the record we would like to point out Pumba Private Game Reserve led the opposition to the original Waainek Wind Farm application proposed for 27 Turbines. After great support from the surrounding interested and affected parties, and substantial legal costs, and presentations and hearing at Provincial Government level had the application reduced to 8 Turbines.

We further are shocked with your finding that "Existing turbines do not affect any of the lodges at the game/hunting farms visually" and "No evidence could be found to demonstrate or support the assertion that any wind farm development overseas has resulted in any adverse impact on tourism" and we would like to put it to you that this can be confirmed as false at the hand of our experience at which you reference to interview with our Director Dale Howarth of 29 January 2020 which we dispute.

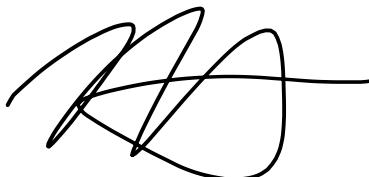
We take exception specifically to your assertion "Existing turbines do not affect any of the lodges at the game/hunting farms visually" and reference to our Director Dale Howarth and state for the record as he was never consulted or made any statement of this nature. We insist that you correct this statement failing which we will be reporting this as misrepresentation to the competent authority and attach hereto our letter of objection ass sent to you on 21 May already and which we haven't had the courtesy of a response.

We further need to make it clear that your statement "Amakhala reported no effect on eco-tourism" is misleading as it fails to qualify that Amakhala which is some 40km away from Waainek (as opposed to Lalibela -with visual impact at 20-25 km away and Pumba -with visual impact 7.5-10km away).

### 4 OBJECTION

We object to an EIR that is based on what appears to amount to a misrepresentation of facts to confirm a preconceived position and otherwise ignoring data that may contradict that position. We object to the fact that EIR for the Albany WEF and key specialist studies are deficient to the extent that these inadequacies are covering up grave flaws in the assessment and based on our first-hand experience of the impacts of wind energy development we request the competent authority to refuse the application as fatally flawed .

On behalf of Pumba Private Game Reserve,  
Neale Howarth  
Conservation Manager



<sup>1</sup> See the Minimum Requirements: Game Lodge / Nature Lodge Accommodation, 2014 p 1 at <https://www.tourismgrading.co.za/assets/Uploads/Game-NATURE-Lodge-Criteria.pdf>.