



Cape EAPrac

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Our Ref: DIT724/24

Your Ref: 2022-01-0009

Attention: **Department of Forestry, Fisheries and the Environment**
EIA Applications
Environment House
473 Steve Biko Road
Arcadia
PRETORIA
0001

VIA: File upload system.

CONFIRMATION OF APPLICABILITY OF GN 2313 OF 27 JULY 2022 TO THE PROPOSED HOUTHAALBOOMEN NORTH GRID CONNECTION INFRASTRUCTURE.

An application and Draft Basic Assessment Report for the proposed Houthaalboomen North Grid Connection infrastructure was submitted to the Department on 21 September 2022. The Department responded to this submission to confirm that the submission did not consider the applicability of GN2313 and as such the submission was removed from the system. This letter serves to outline the applicability of GN2313 to the proposed Houthaalboomen North Grid Connection Infrastructure.

On the 27th of July 2022, Minister Creecy adopted the standard for the development and expansion of power lines and substations within identified geographical areas and the exclusion of this infrastructure from the requirement to obtain an environmental authorisation.

The adoption of this standard allows for the exclusion from the requirement to obtain environmental authorisation for powerline and substation infrastructure in areas identified by the national web based environmental screening tool as being of medium or low environmental sensitivity and confirmed to be such for identified environmental themes, within the strategic transmission corridors.

The proposed Houthaalboomen North Grid Connection Infrastructure falls within the Northern Strategic Transmission line corridor, and as such the applicability of GN 2313 and the standard for the development and expansion of powerlines and substations

within identified geographical areas needs to be confirmed, prior to the submission of an application.

The applicability of the scope of the EGI standard (Revision 2) is discussed in the Table below.

Scope of the Standard	Applicability of the proposed Houthaalboomen North Grid Connection Infrastructure.
Within the strategic transmission corridors as identified in Government Notice No. 113 in Government Gazette No. 41445 of 16 February 2018 and Government Notice No. 1637 in Government Gazette No. 45690 of 24 December 2021;	Applicable – The Houthaalboomen North Grid Connection Infrastructure is situate entirely within the Northern Corridor.
In areas identified by the national web based screening tool5 (screening tool) as being of medium or low environmental sensitivity and confirmed to be such by the EAP or the relevant specialist for the identified environmental theme; and	Not Applicable – As outlined in the tables below, the screening tool does include themes of High and Very High Sensitivity. One of the themes, Animal Species was confirmed to be high by the specialists Site Sensitivity Verification.
For the following activities, including the associated activities necessary for the realisation of the infrastructure, as identified in the EIA Regulations: <ul style="list-style-type: none"> - Listing Notice 1: Activity 11 and 47; and - Listing Notice 2: Activity 9; 	Applicable – Listing notice 1: Activity 11 is being triggered by the proposed Houthaalboomen North Grid Connection Infrastructure.

As outlined in Revision 2 of the EGI Standards, the Standard and exclusions do not apply in the following instances:

Exclusion from application of the Standards.	Applicability of the proposed Houthaalboomen North Grid Connection Infrastructure.
Where any part of the infrastructure occurs on an area for which the environmental sensitivity for a relevant environmental theme is identified as being very high or high by the screening tool and confirmed to be such by the EAP or the relevant specialist for the identified environmental theme;	The avifaunal specialist has confirmed the High Sensitivity of the animal species theme to be high for portions of the proposed powerline. The application of the standards will therefore not apply.
Where the site verification for a specific theme identifies that the low or medium sensitivity rating of the screening tool is in fact high or very high; or	No such confirmations have been provided by the specialists.
Where the greater part of the proposed infrastructure fall outside of any strategic transmission corridor.	The proposed Infrastructure falls entirely within the Northern Strategic Corridor.

The screening tool for the Houthaalboomen North Grid Connection Infrastructure identified the following theme sensitivities.

Theme	Sensitivity per screening tool
Agriculture Theme	High
Animal Species Theme	High
Aquatic Biodiversity Theme	Very High
Archaeological and Cultural Heritage	Low
Civil Aviation	High
Defence	Low
Palaeontology	Very High
Plant Species	Medium
Terrestrial Biodiversity	Very High

As can be seen in the table above, the Houthaalboomen North Grid connection infrastructure occurs in areas containing both **high sensitivity** and **very high sensitivity** areas for a number of the Environmental themes.

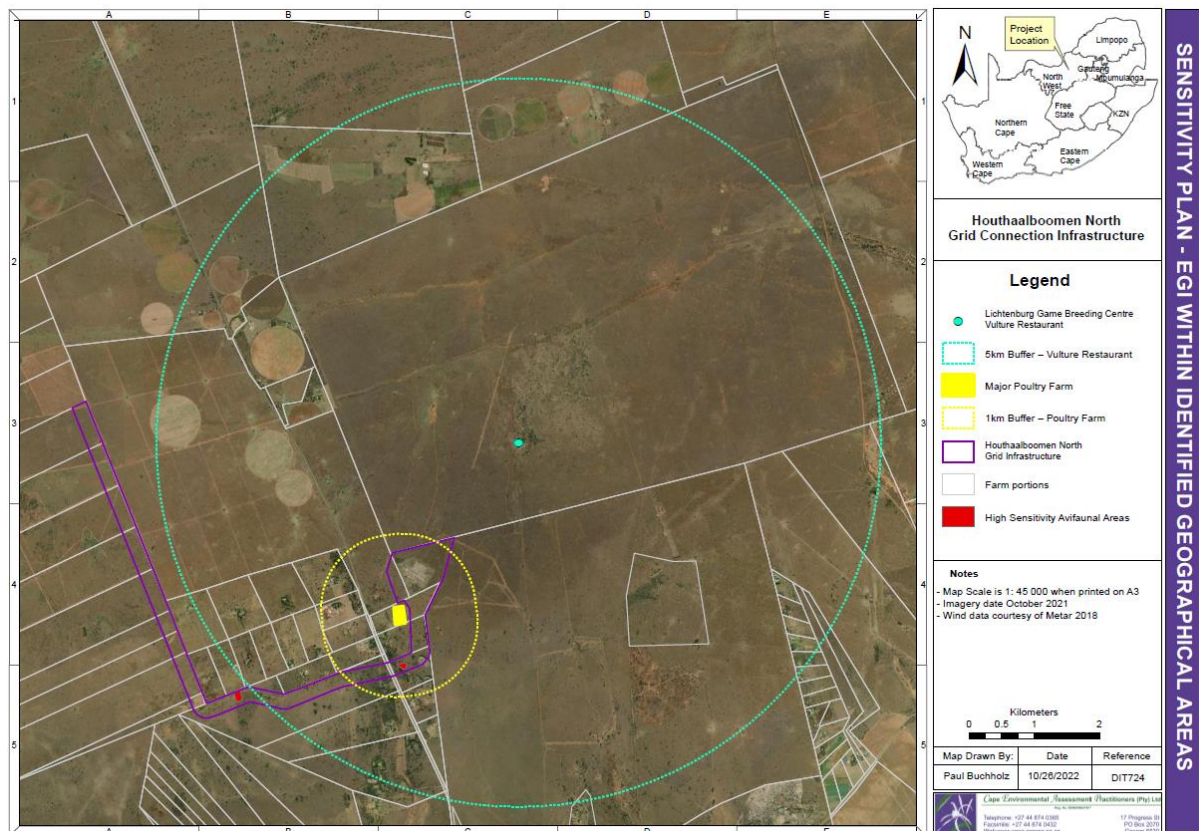
A number of specialists undertook site sensitivity verifications to confirm the sensitivities identified in the National Screening Tool.

Theme	Sensitivity confirmed by SSV
Agriculture	The agricultural specialist confirmed that the entire site has a Low agricultural sensitivity, except for the 3.4ha where deep Nkonkoni soils are present, that has been assigned Medium agricultural sensitivity
Animal Species	The Avifaunal specialist confirmed the majority of the route to be of medium sensitivity , but did identify some sections to have a high sensitivity . The Terrestrial Biodiversity specialist confirmed the Animal species theme to be medium sensitivity .
Aquatic Biodiversity	The Biodiversity specialist confirmed that the Very high Aquatic Biodiversity theme was as a result of the presence of an Aquatic ESA associated with groundwater recharge. Since the proposed grid connection infrastructure will not have any impact on groundwater recharge areas as well as the confirmation from the specialist that there are no wetlands or watercourses within the study site, the Aquatic Biodiversity theme is confirmed to be Low Sensitivity .
Archaeological and Cultural Heritage	The heritage specialist has confirmed this theme to be Low Sensitivity .
Palaeontology	The specialist assigned a low sensitivity to this theme as the site visit and walkthrough confirmed that there were no fossils within the project footprint.

Plant Species	The plant species specialist confirmed the Medium sensitivity as identified in the screening tool.
Terrestrial Biodiversity	The very high Terrestrial Biodiversity Sensitivity for the entire project area was disputed by the specialist, as a majority of the project area has a medium sensitivity due to the degraded state of the wooded grassland in the project area as well as certain areas have a low sensitivity due to the transformed areas

In addition, in terms of items 28 and 30 of Chapter 3 (General Environmental Principles) of the standards, portions of the proposed powerline are within 5km of a Vulture Restaurant and within 1km of a major poultry farm.

Please refer to the map below showing the proposed Houthaalboomen North Grid Connection in relation to the High Animal Species Themes and within the buffers from Major poultry Installations and Vulture Restaurant.



As can be seen in the table and images above, most of the verified site sensitivities have been confirmed to be medium or low. There are however some sections of the proposed grid connection infrastructure that have been verified to have a **high sensitivity** in terms of the **Animal Species Theme** (Avifauna) as well as sections within **1km of a Major Poultry Installation** and within **5km of a Vulture Restaurant**.

In terms of section 6 of GN2313, the standard and the exclusions do not apply in the following instance:

Where any part of the infrastructure occurs on an area for which the environmental sensitivity for any environmental theme is identified as being very high or high by the national web based environmental screening tool and confirmed to be such through the application of the procedures set out in the Standard;

It is therefore Cape EAPrac's considered opinion that the Standards outlined in GN2313 do not apply to the Houthaalboomen North Grid connection infrastructure and that a Basic Assessment process in terms of the 2014 EIA regulations is required.

Sincerely,

A handwritten signature in black ink, consisting of several overlapping loops and a horizontal line extending to the left.

Mr Dale Holder
Cape EAPrac
EAPASA Reg 2019/301