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Ref: PB/he/6768
20 November 2012

The Project Manager
SiVEST Environmental Division
PO Box 2921
RIVONIA
2128

Per e-mail: iafrica@icon.co.za and rebeccat@sivest.co.za

Dear Sir/Madam

ENVIRONMENTAL IMPACT ASSESSMENT: PROPOSED THYSPUNT TRANSMISSION LINES INTERGRATION PROJECT (TTLIP): ESKOM THYSPUNT TRANSMISSION LINES INTEGRATION PROJECT – NORTHERN CORRIDOR, REVISED DRAFT ENVIRONMENTAL IMPACT REPORT DEA REF: 12/12/20/1212; AND ESKOM THYSPUNT TRANSMISSION LINES INTEGRATION PROJECT – SOUTHERN CORRIDOR AND PORT ELIZABETH SUBSTATION, REVISED DRAFT ENVIRONMENTAL IMPACT REPORT DEA REF: 12/12/20/1211 AND 12/12/20/1213

Our meeting on 18 September 2012 in Port Elizabeth, also involving representatives from ESCOM and DAFF, refers.

Please find herewith our response to the Revised Draft Environmental Impact Report, DEA REF: 12/12/20/1212, dated 21 September 2012. We shall appreciate it if you could attach it to your formal correspondence the Department of Environmental Affairs.

CAPE PINE INVESTMENT HOLDINGS LTD
Directors: L L Xate (Chairman), G I Carrihill, S Erasmus, D C Reeves, D O Roberts, O C Sand (Norwegian),
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General

Cape Pine is unable to support the notion of corridor areas in the absence of a clearly defined routing for the proposed Thyspunt transmission lines. The two corridors, crossing Longmore State Forest to the south and north, effectively representing the EIA study area, take up significantly more land than just the power line servitudes alone. Without knowing exactly where the power-line servitudes will cross our plantation in detail (accepting minor variations due to micro site position during the final engineering design and construction phases of the project), we are unable to determine the impact it will have on our operations.

The proposal will result in the inevitable reduction of available forestry land. We believe it is incumbent on ESCOM, in collaboration with the Department, to find suitable alternative land to replace the areas that forestry in general and Cape Pine specifically, stands to lose. Of primary concern to Cape Pine, and one of the most important ways to help mitigate the negative impact of the proposed scheme, is to successfully recover the area that will be taken up by the proposed power line servitudes, from forestry land situated elsewhere (possibly by including it in existing lease agreement between Cape Pine and the State regarding forestry land). We would not consider agreeing to the recommendations in the EIA report, unless it addresses this very specifically and includes it in the recommendations to the Minister as part of the authorization that is required of her.

Assessment

The final draft EIA presented to us, proposes three alternative routing alignments for the northern corridor, as depicted in Figure 4 (Appendix 13) in the revised EIA report for the northern corridor and a single route for the southern corridor, depicted in Map 3 in the revised EIA report for the southern corridor.

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Northern servitude

We prefer the routing referred to as the technical alignment for the northern corridor, given the limited impact this would result in for productive plantation compartments. We reject the routing referred to as the *EIA Team preferred northern route*. One of the reasons given by the EAP for their recommendation about this route was the considerable weight afforded to the negative visual impact that the technical route alternative holds for surrounding visual receptors to the north of Longmore.

We disagree with some of the EAP's findings and conclusions, notably their opinion about the visual impact that the power lines will have on receptors stationed north and south of Longmore and the weight attributed to these impacts as opposed to the impact forestry will have to bear as a consequence of aligning the routing inside productive forestry areas and away from these receptors' view.

Having had an opportunity to consider the implications of the third alternative (referred to as the Revised EIA Team preferred route), we are of the opinion that it offers some compromise between the need to avoid productive compartments and to mitigate any of the visual implications arising from the power-line's routing along the north of Longmore. Hence our support for the third option, namely as the Revised EIA Team preferred route, as depicted, but subject to its final site-position.

Southern servitude

We agree with the proposed alignment referred to as the "EIA Team Preferred Southern Route Alignment (Option 1)" in the September 2012, revised EIA report for the southern corridor.



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We maintain our position that an alignment within the bounds of Longmore Plantation will have a more negative impact on forestry than what the impact will be on surrounding activities. The decrease in forestry area as a result of the installation will add to the cumulative negative impact already in progress as a result of an ongoing reduction of plantation forestry land throughout the eastern and western Cape. The total area lost to forestry in the mentioned regions, together with the proposed power line servitude on the table, amounts to 44 360 ha¹. The forestry sector as a whole and Cape Pine specifically, cannot afford to lose a single hectare more of productive forestry land, regardless of its location.

During the meeting on 18 September, the EAP made it clear to us that the NEMA process for this project cannot result in specific and detailed recommendations with regards to a precise alignment for the power lines. The authority sought from the Minister pertain to a broad corridor area, leaving it up to the Applicant (ESCOM) and the current land user (Cape Pine) and land owner (the State) to negotiate the final alignment. The weight that the Minister's authorization will afford the Applicant during negotiations about the final demarcation of the routing and the "flexibility" inherently contained in the process as a result of the scale of the corridors, in our opinion provides for too much uncertainty and unpredictability about the outcome of process that can at this stage be accommodated from a forestry management perspective. We therefore simply cannot agree to support the notion of corridors, unless it is tied to specific routing alignments.

¹ 43000 ha Exit area, 500 ha at Longmore, 750 ha as a result of Koukamma SDF, 110 ha at Kruisfontein



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Recommendation

Based on the above assessment therefore then the following as a way, in our opinion, of taking the process forward:

1. Cape Pine accepts the northern and southern corridors only in relation to the specific alignment presented by the Revised EIA Team preferred route for the northern servitude and the EIA Team Preferred Southern Route Alignment (Option 1) and only in so far as what the corridor areas defines a general spatial demarcation for the alignments described by the routings we support.
2. We completely reject *EIA Team preferred northern route* on account of the negative impact it will have on ongoing forestry operations at Longmore specifically and on decreasing the extent of available forestry areas in general;
3. We support the Revised EIA Team preferred route for the northern servitude and the EIA Team Preferred Southern Route Alignment (Option 1) based on the least amount of impact the alignment will have on forestry operations in general and specifically at Longmore. We maintain though that the proposed alignments will still result in a reduction of plantation land areas and would require the State to mitigate the impact of this reduction by making alternative forestry land available to Cape Pine; and
4. In the finalization of the alignments for the power line routings and further implementation of the outcome thereof, provision will have to be made for:
 - a. Determining and costing the current and future losses of any productive forestry area that will have to be cleared and taken out of production and an agreement by ESCOM for compensating Cape Pine for its current standing loss as well as future losses, including any costs incurred in calculating these losses;
 - b. Determining and costing any negative financial implication that may arise from installing the power lines, including additional operational measures to be taken by Cape Pine elsewhere at Longmore to absorb the impact of the installations, additional insurance premiums etc. and an agreement by ESCOM for compensating Cape Pine for these additional costs;

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- c. Detailing and concluding an agreement between ESCOM and Cape Pine with regards to ESCOM's obligations towards the ongoing management of the cleared areas underneath the power lines, including the standards to which such maintenance is to be undertaken in compliance with FSC accreditation and NVFFA requirements;
- d. Detailing and concluding an agreement between ESCOM and Cape Pine with regards to a standing protocol affective during incidents of fire and fire-fighting procedures, and in particular with regards to the de-activation of the power line for the duration of the incident; and
- e. Detailing and concluding a licensing agreement incorporating the above set of agreements in compliance with the provisions of sections 23 and 24 of the NFA, subject to the payment of an annual licensing fee in accordance with prescribed tariff scales².

I trust that you will find the above in order. It concludes our input on the matter and records our position during further stages of the process towards finally implementing and installing the proposed Thyspunt power lines.

² R9 725.00 / ha/ yr – DAFF tariff schedule dated 19 December 2011, File BR. 4.5.1.3 (12/13)



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We reserve our right to submit further comments, objections and or petitions, appeals or to commence any legal proceedings in respect of the NEMA process and or its outcome, as provided for in the relevant legislation, should we be of the opinion that our inputs and position have not been accommodated to our satisfaction.

Yours faithfully

PATCH BONKEMEYER
GROUP CEO

Copy to: Gwendoline Sgwabe, Department of Agriculture, Forestry and Fisheries
(per e-mail: GwendolineS@nda.agric.za)
Cyril Ndou, Department of Agriculture, Forestry and Fisheries (per e-mail:
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