



14 April 2014

Dear Danie

RE: Bat Specialist Study Verification and Input for the Continuous Disposal for Ash at the TUTUKA Power Station

BACKGROUND

A Specialist Bat Impact Assessment was conducted by the EWT for the abovementioned project, during which three possible site alternatives were assessed. The sites were assessed in terms of the envisaged continuation of dry ash disposal over Eskom owned land which was purchased prior to the commencement of environmental laws such as the Environment Conservation Act.

Subsequently, the EWT has been approached to conduct a desktop assessment of an additional area or extension of Alternative A (see Figure 1).

Physical Address: Building K2, Ardeer Road, Pinelands Office Park,
Modderfontein 1609, Gauteng, South Africa

Postal Address: Private Bag X 11, Modderfontein 1645, Gauteng, South Africa

Tel: +27 (0) 11 372 3600 **Fax:** +27 (0) 11 608 4682 **E-mail:** ewt@ewt.org.za **Web:** www.ewt.org.za

The Endangered Wildlife Trust is a non-profit, public benefit organisation dedicated to conserving species and ecosystems in southern Africa to the benefit of all people.

NPO Number: 015-502, **PBO number:** 930 001 777, **Member of IUCN** - The International Union for Conservation of Nature
The Endangered Wildlife Trust is US 501(c)(3) compliant under **US IRS Registration number:** EMP98-0586801.



Figure 1 – Proposed extension of Alternative A, Tutuka power station

COMMENT:

Bats

It should be noted that site alternative C was preferred for development despite no fatal flaws being identified in terms of bats, and that the proposed ash disposal facility could be built on any of the three alternatives, provided that the various mitigation measured recommended by the EWT were implemented.

Site alternative A is located immediately south and east of the existing ash disposal facility and approximately 3.5km north-east of the Tutuka power station. The total area identified is roughly 756.89 ha in size. This site is comprised of parts of portions R, 1 and 2 of the farm Spioenkop 375 IS, portions 1, 4, 6 and 10 of the farm Mooimeisiesfontein 376 IS, portions 1, 2, 4, 5, 22 and 25 of the farm Rouxland 348 IS and portions 3 and 6 of the farm Dwars-in-de-Weg 350 IS.

The amended layout of site alternative A will see almost all of portion 2 of the farm Rouxland 348 IS being included in the site (points G to L of Figure 1). Reduced portions of portion 2 of the farm

Spioenkop 375 IS (points Q to R of Figure 1), portion 2 and 9 of Dwars-in-de-Weg 350 IS, and portions 2, 4 and 5 of Rouxland 348 IS.

The additional areas now included in site alternative A were included in assessment of bats likely to be present in the broader area but were not included in the transects covered for call analysis.

The focal species for the study remains as follows:

Species	Common Name	Habitat	Conservation Status	Likelihood of occurrence
Cleotis percivali	Percival's Short-eared Trident Bat	Woodland	V	High
Hipposideros gigas	Giant Leaf-nosed Bat	Forest/savanna	NT	Moderate
Miniopterus natalensis	Natal Long-fingered Bat	Savanna/grassland	NT	High
Rhinolophus blasii	Blasius's Horseshoe Bat	Savanna/woodland	NT	High
Rhinolophus swinnyi	Swinny's Horseshoe Bat	Forest/savanna woodland	NT	High
Neoromicia capensis	Cape Serotine	Wide tolerance	LC	High
Tadarida aegyptiaca	Egyptian Free-tailed Bat	Wide tolerance	LC	High

In general the study area is sensitive in terms of bats, based on the occurrence of a number of listed species in the study area, as well as the various micro-habitats available to bats. The sensitive zones are mapped below:

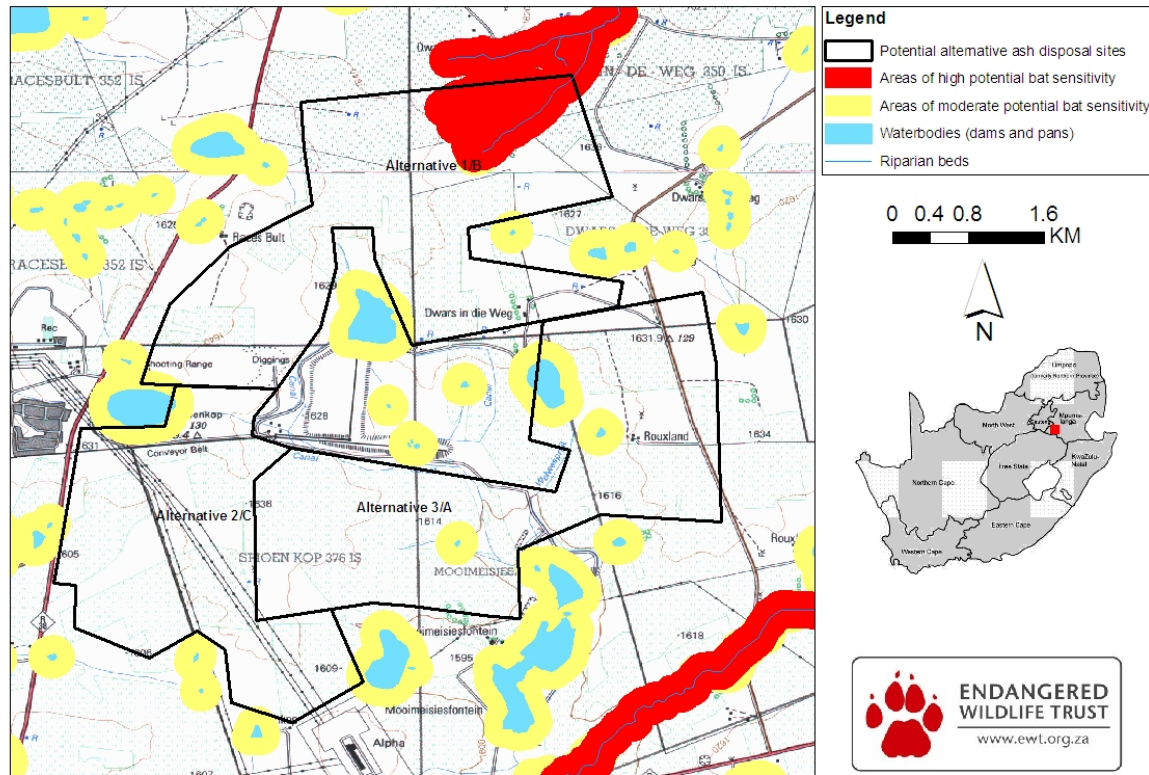


Figure 2 – Areas of bat sensitivity at Tutuka

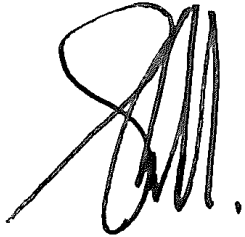
All dams, wetlands and riparian zones have been buffered by 200m – these buffered zones are regarded as sensitive and, if possible, should be avoided for construction activities. The remaining areas outside of the wetland buffers were designated as lower sensitivity during the original study.

However, the expansion into portion 2 of the farm Rouxland 248 IS would result in the dams in portion 10 of Mooimeisjesfontein 376 IS being bordered on three sides by the ash dump. The potential impact of leachate and/or fly ash contaminating water systems is thus considerably increased and may reduce both roosting sites of bats as well as possible food sources.

CONCLUSION:

The increased potential impact of the operational phase on the wetlands and riparian habitat occurring in Mooimeisjesfontein 376 IS, which would now be bordered on three sides by the ash dump, is considerable. As a result, the proposed amendments to site alternative A are **not supported** due the potential long-term negative impacts on a valuable natural resource.

Regards

A handwritten signature in black ink, consisting of a large, stylized 'S' followed by several vertical strokes and a small dot at the end.

Stephanie Aken

(EWT: Wildlife & Energy Programme - Manager)

A handwritten signature in black ink, consisting of a large, stylized 'C' followed by a vertical stroke and a small dot at the end.

Claire Patterson-Abrolat

(EWT: Bat Specialist)