



the denc

Department:  
Environment & Nature Conservation  
NORTHERN CAPE PROVINCE  
REPUBLIC OF SOUTH AFRICA

SASKO Building  
90 Long Street  
Private Bag X6102  
Kimberley  
8300

Tel. 053-8077300  
Fax: 053-8077328

Enquiries : T Wessels  
Dipatlisiso : B Botes  
Imbuzo :  
Navrae :  
Reference : EIA 12/12/20/720 (DEA ref.)  
Tshupelo :  
Isalathiso :  
Verwysing :

Date : 18 May 2017  
Lelha :  
Umhla :  
Datum :

**Willeen Olivier**  
**Biodiversity Officer Control: Biodiversity Planning**  
**Department of Environmental Affairs**  
**Pretoria**  
**0001**

Dear Mrs Olivier

**RE: COMPLIANCE WITH CONDITION 3.2.14 & 3.2.15 OF THE ENVIRONMENTAL  
AUTHORISATION ISSUED TO ESKOM, CONSTRUCTION OF THE 400kV TRANSMISSION LINE,  
KUDU INTEGRATION, EIA 12/12/20/720**

The following documentation and communications have relevance to the response herewith being provided from the DENC:

1. The RoD issued by DEA 6/11/2007
2. The Specialist report by Helme dated 12/11/2006
3. The Specialist Comment on the Biodiversity Offset dated 7/4/2017
4. The teleconference between DEA, DENC, SANParks and ESKOM dated 3/2/2017

#### BACKGROUND

The DENC was unaware of the EA prescribing an Offset until ESKOM applied for their biodiversity permits for vegetation clearing. Accordingly the relevant parties were contacted and discussions commenced regarding the Offset conditions placed in the authorisation.

In essence the authorisation stipulates the crossing of the Orange River mouth and National Parks triggers the offsets. However, ESKOM's analysis of feasible offset sites resulted in only one area being proposed as a biodiversity offset of 930 ha, eastern parts of Vyftienmyl se Berg. The proposed offset site was discussed among all parties 3/2/2017 where after the specialist, Mr Helme, provided an Offset Comment Report 7/4/2017.

#### RESPONSE TO OFFSET SITE PROPOSAL

The DENC acknowledge the effort and commitment of ESKOM to adhere and commit towards the offset requirement.

Even though the 'like-for-like' principle of offsets will not be addressed by the proposed offset site, east of Vyftienmyl se Berg/Oograbies, it does contribute to concretely to the conservation estate expansion within a biological hotspot area of significant biodiversity. Due to the significant higher plant diversity to be protected, it might even be argued that the offset borders as a 'trading-up' offset.

While the protection around the Ramsar site is of high conservation value the practical obstacles is, and would be, hindering the ability of ESKOM to deliver on their offset condition, construction deadlines and commitments. The main considerations from the DENC's perspective relates to the fact that there is a land claim on Grootderm and that there would be an 'Island' offset created as Grootderm and the Ramsar area is separated by about 4 km (which is not in accordance to the offset principles). Also, south of the Ramsar area is Alexander Bay and its associated infrastructures and mining activities which limits the options for offset sites around the Ramsar area towards this direction. Oograbies next to Vyftienmyl se Berg will be bordering the Richtersveld National Park, expanding an existing conservation area, which is in accordance to offset principles.

Accordingly, after deliberations and due consideration the proposed offset of Oograbies/Vyftienmyl se Berg is supported and the amendment to the environmental authorisation to such effect is also supported.

The DENC would like to be kept updated and informed on the progress of establishing this offset.

I trust you will find the above in order.

Yours sincerely



Mrs N van Olmen

Acting Head of Department: Environment and Nature Conservation (DENC)