



GA Environment

Att: Nkhensani Khandlela

environment@gaenvironment.com

nkhensanik@gaenvironment.com

03 September 2023

COMMENTS TO THE DRAFT SCOPING REPORT

OBJECTION TO THE PROPOSED CONSTRUCTION OF ±131KM ESKOM FOSKOR-MERENSKY 400KV POWERLINE AND ASSOCIATED SUBSTATION WORKS, MOPANI AND SEKHUKHUNE DISTRICT MUNICIPALITIES

The *Wildlife Animal Protection Forum South Africa* ([WAPFSA](#)) is a community of twenty-eight diverse South African-based organisations that share certain values, knowledge, principles and objectives and that collectively comprise a body of expertise from different sectors including but not limited to scientific, environmental, legal, welfare, rights, social justice, climate, indigenous and public advocacy backgrounds.

WAPFSA has registered as an interested and affected party (I&AP) in relation to the proposed construction.

As an alliance of environmental experts and concerned stakeholders, WAPFSA strongly objects to the proposed construction of the ±131KM 400kv Powerline and associated substation works on the grounds that the project would have disastrous consequences for conservation in what is a critically important wildlife corridor and biodiversity area.

The proposed powerline project (as it is framed in the DSR), stands in stark contrast with the principles and goals enshrined in the recently approved [White Paper on Conservation and Sustainable Use of South Africa's Biodiversity](#) (the "White Paper"). The White Paper places a collective *duty of care* on all persons, organisations and organs of state to conserve and avoid loss of biodiversity, anticipate and *prevent irreversible loss of biodiversity*, and adopt a cautious approach in taking decisions affecting biodiversity. As will be illustrated below, the proposed powerline project would have significant impacts on biodiversity, and as such it is concerning that the DSR makes no mention of this important policy consideration.

The DSR incorrectly states in paragraph 5.4 that:

“Although located in a rural setting, the study area is not considered to have intact or outstanding rural landscape qualities. The receiving environment is not an area of important tourism or recreation value and has no protection status such as national parks, nature reserves, heritage reserves or scenic routes.”

Critical Biodiversity corridors

The DSR fails to recognise that numerous wildlife properties affected by the proposed powerline project (both the proposed and the alternative routes) support extensive critical biodiversity areas, and form part of a protected area network in Great Limpopo Transfrontier Conservation Area and the UNESCO Kruger to Canyons Biosphere Region. These properties create crucial biodiversity corridors, offering critical connectivity and protected area expansion between protected areas and within the Great Limpopo Transfrontier Conservation Area (GLTFCA) and the Kruger to Canyons Biosphere Region, thus increasing conservation estate of landscape-scale biodiversity protection implementation tools.

Sustained negative impacts

The undersigned members of WAPFSA are particularly concerned with the DSR's complete lack of consideration of the sustained negative impacts that the proposed powerline project would have on the biodiversity of this area, including:

1) Impacts on avifauna:

The proposed powerline project would impact the following species of vultures: the Hooded Vulture (**critically endangered**), the White-backed Vulture (**critically endangered**), the White-headed Vulture (**critically endangered**), the Lappet-faced Vulture (**endangered**), and the Cape Vulture (**vulnerable**).

The threats posed to vultures by powerline infrastructure are well-researched, and the absence of this consideration in the DSR is conspicuous. Not only are vulture species directly at higher risks of death and injury as a result of electrocution and other physical engagements with the infrastructure, but the construction of powerlines also negatively impacts their foraging and nesting habitats, indirectly contributing to their mortality rates.

2) Impacts on vegetation and fauna:

The proposed powerline project would require extensive bush-clearing in a critically important wildlife corridor. Such clearing would not only directly negatively impact the flora species in that area, it would also fracture the habitat and result in significant loss of food and cover base for numerous species of herbivores.

Notably, the powerline route would create a “barrier effect,” discouraging natural migration patterns. It is also well-established that powerlines increase the risk of wildfires as a result of short-circuits.

Again, the DSR failed to recognise that the proposed route(s) would run directly through a critically important biodiversity area and wildlife corridor, making these negative impacts particularly relevant.

3) Indirect and cumulative effects:

Our species has created a climate crisis and should be making every effort to reduce biodiversity loss – recognising that all members of an ecosystem are interconnected and interdependent. Loss of biodiversity has extensive impacts on human life – both directly and indirectly. For example, the reduction in population (or loss) of vulture species such as those mentioned above would have knock-on effects with respect to the management, health and restoration of biodiversity areas, as well as for the promotion of human health in preventing the spread of zoonotic diseases.

The fact that both routes proposed in the DSR run through a critically important biodiversity area of the UNESCO Kruger to Canyons Region illustrates a complete oversight in the scoping process. Had the significance of this area been recognised during the scoping process, then appropriate alternative routes would necessarily have been identified.

It is clear that the DSR wholly failed to recognise the conservation impacts generally (as the region forms part of the GLTFCA), and also more specifically, in regard to numerous endangered species. Given the proposed project's proximity to the Kruger National Park and other established nature reserves, the validity of the whole DSR should be brought into question.

Of serious concern is the DSR's failure to give fair consideration to alternatives to the proposed powerline. The option of underground powerlines has been dismissed by the DSR (in the context of the consideration of activity alternatives) due to cost considerations, yet the DSR fails to consider the significant environmental costs of the above-ground powerlines. It is entirely inappropriate to burden the environment itself (as well as the human communities that rely on this biodiversity area) with these significant costs in order to mitigate Eskom's project-related costs. This illustrates the DSR's failure to perform a legitimate cost-benefit analysis.

Alternative routes

It must be noted that all of the comments above are applicable to both the original and the alternative proposed routes. However, the original proposed route would be following an existing powerline, where a level of biodiversity loss has already occurred, whilst the alternative proposed route would be fracturing an otherwise pristine ecosystem and compromising critically important wildlife corridors. Both the original route and the alternative route for the proposed powerlines would have long-standing deleterious effects on the environment. However, the alternative route recently proposed would have much more serious consequences, as this would disturb a pristine undisturbed area, unlike the historical disturbance from the current line across wildlife estates.

Greater Transparency

The motivation provided for the need and desirability of the project (addressed in 1.6 of the DSR) is extremely vague about the actual need for electricity supply in the region and does not provide any transparency regarding the economic growth, which is intended to be stimulated by the proposed project. It is of serious concern that this project is in fact intended to upgrade supply for the mines in Phalaborwa (rather than to

“meet the basic needs for socio-economic development and upliftment in the area” as is suggested in the DSR). In the circumstances, the DSR should provide greater transparency regarding who will benefit from the proposed powerline project, as well as the funding thereof.

Climate mitigation

Finally, given the seriousness of the climate crisis that humanity is facing, as well as the crisis facing Eskom itself, it would have been appropriate for the DSR to give consideration to renewable energy solutions. The DSR’s complete failure to consider such options is, once again, a significant oversight.

In light of the above, the undersigned members of WAPFSA are of the view that the DSR requires significant revision, including consultation with environmental experts, before the process can be allowed to continue.

Kindly acknowledge receipt of this correspondence,

Regards,



Stefania Falcon
WAPFSA Coordinator
stefania@wapfsa.org
Mobile: +27 (0)73 3012107
<http://wapfsa.org/>



**WILDLIFE ANIMAL PROTECTION
FORUM SOUTH AFRICA**

SIGNED BY THE FOLLOWING MEMBERS OF THE WILDLIFE ANIMAL PROTECTION FORUM SOUTH AFRICA

African Climate Alliance	Climate Dep	Sairusha Govindsamy
AllRise	CEO Founder	Attorney Kirsten Youens
Animal Talk Africa	Founder	Wynter Worsthorne
Ban Animal Trading	Director	Smaragda Louw
Beauty Without Cruelty South Africa	Chairperson	Toni Brockhoven

Betty's Bay Baboon Action Group	Co-Founders	Renee Bish and Peter Oxford
Centre for Animal Rehabilitation and Education	Director	Stephen Munro
Community Led Animal Welfare	Founder	Cora Bailey
Co-Operative and Policy Alternative Center	Co-Founder and Board Chair	Prof Vishwas Satgar
Dzomo La Mupo	Founder-Director	Mphatheleni Makaulule
EMS Foundation	Executive Director	Michele Pickover
Four Paws South Africa	Director	Fiona Miles
Future 4 Wildlife	Co-Founder	Stefania Falcon
Gifted for Good	Founder	Jabu Myeni
Global White Lion Protection Trust	CEO Founder	Linda Tucker
Institute for Critical Animal Studies (Africa)	Director	Les Mitchell
Kogelberg Villages Environmental Trustees	Chairperson	Liezl Smith
Monkey Helpline	Co-Founder	Steve Smit
Panthera Africa Big Cat Sanctuary	Co-Founders	Liz Cornwall and Catherine Nyquist
Parliament for the People	Founder	Vivien Law
Rhinos in Africa	Founder	Megan Carr
South Peninsula Khoi Council	Senior Chief	Stephen Fritz
Southern African Fight for Rhinos	Director	Lex Abnett
Vervet Monkey Foundation	Founder	Dave Du Toit
Wild Africa Fund	Director	Guy Jennings
Wild Law Institute	Director	Cormac Cullinan
Youth Climate Group	Climate Justice	Sera Farista