“Mind the gap!”
The disconnect between IA and Construction of large scale renewable energy projects in South Africa

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What are these “gaps”, and can they be avoided in future projects?

1. What are the gaps?
2. What are the risks?
3. Can the gaps be bridged or avoided?
4. Conclusion and way forward
Why are these Gaps there?

- Lack of understanding of construction
- Lack of shared information
- Different people involved in projects at different stages
- Law
• **Turbine Bases & Hardstands/PV Arrays!**
  • Contractor arrives on site says it can’t be built where it is shown. Has the base and hardstand been ground truthed?
  • Bases and hardstands change, they get flipped, they shift several metres, they get dropped and new ones added

• **Site camps and labour camps**
• **Laydown areas, stockpile areas and crushing areas.**
• **Batch plants**
Substations and overhead lines/underground cables

Overhead

Underground
Access Roads

- Often mentioned in EIA as requiring maintenance during construction phase.
- Usually, a public road.
- More than the main access road gets used, especially if parts of it require construction or repair.
- None of these roads are considered in the EIA, neither the access road or the alternatives.
- Results in disgruntled landowners, public and often non-compliances with environmental legislation.
Water use licenses and borrow pits

Boreholes

Water sources

Water crossings
Landowners, Developers and contractors

- False promises.
- Potential Illegal activities.
Legal Technical Detail

• No one wants to break the law.
  • The law is an ass is a derisive expression said when the rigid application of the letter of the law is seen to be contrary to common sense.

The technical requirements of the environmental law can trip a project up in construction phase.

Minor changes may lead to significant delays as long-winded processes need to be followed to make any change to the EA and EMPr.
4. Conclusion and Way Forward

- “make the circle bigger”
- Include everything related to construction
- Better understanding of construction requirements
- Give the ECO more discretion (with checks)
- Amend legislation to be more flexible
Let’s continue the conversation!
Post questions and comments in the IAIA24 app.

Thank you!

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