

Comments and Response Report

Development of the Castle to Hydra Transmission Line near De Aar, Northern Cape Province
Public Comment period on draft Basic Assessment Report 2 June to 4 July 2022 (Last update 2022/08/15)

No.	Comment	From / Via / date	Response
1.	<p>Good afternoon,</p> <p>Please note that all development applications are processed via our online portal, the South African Heritage Resources Information System (SAHRIS) found at the following link: http://sahra.org.za/sahris/. We do not accept emailed, posted, hardcopy, faxed, website links or DropBox links as official submissions.</p> <p>Please create an application on SAHRIS and upload all documents pertaining to the Environmental Authorisation Application Process. As per section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA), an assessment of heritage resources must form part of the process and the assessment must comply with section 38(3) of the NHRA.</p> <p>Once all documents including all appendices are uploaded to the case applications, please ensure that the status of the case is changed from DRAFT to SUBMITTED. Please ensure that all documents produced as part of the EA process are submitted as part of the application.</p>	<p>Natasha Higgitt SAHRA Email 2022-06-01</p>	<p>Dear Natasha,</p> <p>Thanks for your response. All dBAR documents have been uploaded by the appointed heritage specialists, Jenna Levin of CTS.</p> <p>Please find the uploaded docs to SAHRIS here: https://sahris.sahra.org.za/cases/proposed-development-castle-hydra-ohl-near-de-aar marked as SUBMITTED.</p> <p>Kind regards</p> <p>Dirk</p>
2.	<p>Good day</p> <p>We are unable to open the link provided. Please with a cover letter and sketches must be in A3 and PDF format.</p> <p>Kind regards</p> <p>Chris Schutte Mvelaphande Trading</p>	<p>Chris Schutte Telkom Email 2022-06-02</p>	<p>Dear Chris,</p> <p>I have sent the files to you for download via WeTransfer to email WayleaCR@telkom.co.za. Also herewith download link. Download link https://we.tl/t-IYEZklp2sf</p> <p>Kind regards,</p>

No.	Comment	From / Via / date	Response
	<p>SchutCE5@telkom.co.za 078 741 5862</p> <p>Good day Telkom doesn't allow us to open it on the Telkom network. Kind regards Chris Schutte</p>	<p>Email 2022-06-02</p>	<p>Dear Chris, Please find attached herewith the compressed version of the report. I'm sending a follow up email with the Combined sensitivity map showing the proposed OHL (Overview) and relevant features. Please let me know if you require any additional information. Kind regards,</p> <p>Herewith the Combined sensitivity map showing the proposed OHL (Overview) and relevant features.</p>
3.	<p>Good morning Mr. Pretorius,</p> <p>I hope this email finds you well.</p> <p>DFFE Directorate: Biodiversity Conservation would like to register as the I&AP for the mentioned project. Kindly share the reports in a WeTransfer link, we don't have access to dropbox.</p> <p>Kind Regards, Biodiversity Conservation, Mainstreaming EIA (Admin) Link received, thank you.</p> <p>Kind Regards, Biodiversity Conservation, Mainstreaming EIA (Admin)</p> <p>DFFE Directorate: Biodiversity Conservation hereby acknowledge the receipt of the invitation to review and comment on the mentioned</p>	<p>Biodiversity Conservation, Mainstreaming EIA (Admin) Department of Forestry, Fisheries and the Environment Environment House Email 2022-06-02</p> <p>Email 2022-06-02</p>	<p>Dear BC, I have sent the files to you for download via WeTransfer to email badmin@dffe.gov.za. You have been registered as I&AP. Also herewith download link. Download link https://we.tl/t-IYEZklp2sf</p> <p>Kind regards, Dirk Pretorius Acknowledged.</p>

No.	Comment	From / Via / date	Response
	<p>project. Kindly note that the project has been assigned to officers: Ms. Mmatlala Rabothata and Ms. Tsholofelo Sekonko (both copied on this email).</p> <p>DFFE Directorate: Biodiversity Conservation hereby acknowledge the receipt of the invitation to review and comment on the mentioned project.</p> <p>Kindly note that the project has been assigned to officers: Ms. Mmatlala Rabothata and Ms. Tsholofelo Sekonko (both copied on this email).</p> <p>Dear Mr Pretorius</p> <p>Could you kindly send us the Wetransfer link.</p> <p>Much appreciated. Well received.</p>	<p>Email 2022-06-02</p> <p>TS Sekonko Email 2022-07-04</p> <p>TS Sekonko Email 2022-07-04</p>	<p>Acknowledged.</p> <p>Good morning,</p> <p>I have shared the link directly to your emails. Also find the link herewith.</p> <p>Download link https://we.tl/t-TYAwzpCXPn</p> <p>Kind regards,</p> <p>Dirk</p>
4.	<p>Good morning Dirk,</p> <p>Thank you for including Agri Northern Cape in the process. The documents are well received and comments will be circulated in due course.</p> <p>I have also included our Operational Officer as well as Mr Carlo Nolte in the mailing for your distribution list.</p> <p>Best regards</p>	<p>Ben Anthonissen Omgewingsake / Environmental Affairs Agri Northern Cape Email 2022-06-02</p>	<p>Thank you Eben,</p> <p>Kind regards,</p> <p>Dirk</p>

No.	Comment	From / Via / date	Response
5.	<p>Eben Anthonissen Dear Dirk</p> <p>14/12/16/3/3/1/2557</p> <p>ACKNOWLEDGEMENT OF RECEIPT OF THE APPLICATION AND DRAFT BASIC ASSESSMENT REPORT FOR ENVIRONMENTAL AUTHORISATION FOLLOWING A BASIC ASSESSMENT PROCESS FOR PROCESS FOR THE PROPOSED DEVELOPMENT OF THE CASTLE TO HYDRA TRANSMISSION LINE NEAR DE AAR, IN THE NORTHERN CAPE PROVINCE.</p> <p>The Department confirms having received the Application and Draft Basic Assessment Report for Environmental Authorisation for the abovementioned project on 01 June 2022. You have submitted these documents to comply with the Environmental Impact Assessment (EIA) Regulations, 2014, as amended.</p> <p>Kindly note that your application for Environmental Authorisation falls within the ambit of an application applied for in terms of Part 2 of Chapter 4 of the EIA Regulations, 2014, as amended. You are therefore referred to Regulation 19 of the EIA Regulations, 2014 as amended.</p> <p>Please take note of Regulation 40(3) of the EIA Regulations, 2014, as amended, which states that potential Interested & Affected Parties, including the Competent Authority, may be provided with an opportunity to comment on reports and plans contemplated in Regulation 40(1) of the EIA Regulations, 2014, as amended, prior to the submission of an application but must be provided an opportunity to comment on such reports once an application has been submitted to the Competent Authority.</p> <p>Note that in terms of Regulation 45 of the EIA Regulations, 2014, as amended, this application will lapse if the applicant fails to meet any of the time-frames prescribed in terms of these Regulations, unless an</p>	<p>Ephron Maradwa EIA Applications Email 2022-06-02</p>	<p>Acknowledged.</p>

No.	Comment	From / Via / date	Response
	<p>extension has been granted by the Department in terms of Regulation 3(7) of the EIA Regulations, 2014, as amended.</p> <p>You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.</p> <p>Kindly quote the abovementioned reference number in any future correspondence in respect of the application.</p>		
6.	<p>Please send me a KMZ file of the proposed grid connection. Please find attached Eskom general requirements for work at or near Eskom infrastructure and servitudes.</p> <p>Kind regards</p> <p>John Geeringh (Pr Sci Nat) Reg. EAP (EAPASA) Senior Consultant Environmental Management Grid Planning: Land and Rights Eskom Transmission Division</p>	<p>John Geeringh Senior Consultant Environmental Management Email 2022-06-02</p>	<p>Dear John,</p> <p>Please find attached herewith the .kmz of the grid infrastructure being applied for. The yellow 300m corridor is the area being assessed and applied for as part of the Basic Assessment. The indicated transmission lines are the preliminary routing within this corridor.</p> <p>Please let me know if you required any additional information.</p> <p>Kind regards, Dirk Pretorius</p>
7.	<p>Dear Mr Pretorius,</p> <p>Please kindly register me as an I&AP for the abovementioned project and use this email address as my preferred form of communication (in English).</p> <p>Many thanks and regards,</p> <p>Tilly</p>	<p>Tilly Watermyer Holland& Associates Email 2022-06-10</p>	<p>Dear Tilly,</p> <p>You have been registered as I&AP and will receive all further communication on the project.</p> <p>Kind regards,</p>
8.	<p>Good day Mr Pretorius,</p>	<p>Lloyd Barnes</p>	<p>Dear Mr Barnes, Thanks for you call earlier this morning.</p>

No.	Comment	From / Via / date	Response
	<p>Thank you for your time over the phone, as requested, may you please register myself as an I&AP on behalf of Mulilo Renewable Project developments. May you also please provide the proposed transmission line route proposed. Kind regards Lloyd Barnes</p> <p>1) We refer to the aforementioned and advise as follows:</p> <ol style="list-style-type: none"> a. Mulilo De Aar 2 South Pty (Ltd) received Environmental Authorisation (DFFE Ref. 14/12/16/3/3/1/2330) on the 10th of August 2021 for the development of the up to 400kV De Aar 2 South transmission line and switching station, within the Emthanjeni Local Municipality, Northern Cape Province. A copy of the EA, which is valid for 10 years until 10 August 2031, is attached to this letter. The approved transmission line route connects the approved De Aar 2 South Wind Energy Facility (DA2S WEF) (DFFE ref. 12/12/20/2463/1) to the existing Eskom Hydra Main Transmission Substation (MTS). b. The DA2S WEF lies adjacent to the proposed Castle WEF. As shown below, the authorised up to 400kV transmission is planned to traverse the following properties: c. Portion 3 of the Farm Wagt en Bittje No. 5. d. Portion 1 of the Farm Wagt en Bittje No. 5. 	<p>Junior Permitting and Environmental Manager. Email 2022-06-13</p> <p>Mulilo De Aar 2 South (Pty) Ltd Mr L Barns (CC Mr C Hatzilambros) 2022-07-04</p>	<p>Note that you have been added as I&AP on the project (along with Mr G. McNamara and Mr P. du Toit of Mulilo). As requested, please find attached herewith the .kmz of the proposed route. As quick reference the yellow polygon provides an indication of the assessment corridor, the turquoise the main proposed route (nominal centreline of the corridor) and the yellow line is a proposed alternative due to congestion towards the Hydra substation and the short pink section is part of the preferred alternative to provide the applicant with an additional option to connect to the grid. Please feel free to contact me if you require any additional information or have any further queries. Kind regards, Good morning Lloyd, Thanks for the attached comments, all dually noted. I have forwarded it to the proponent ACED to discuss with the applicant Eskom and will provide feedback to and /or engage further with Mulilo on the matter. Kind regards, Dirk</p> <p>Dear Lloyd & Constantin</p> <p>1) Points a, b and c are noted hence the inclusion of Mulilo (Mulilo De Aar 2 South Pty (Ltd)) as I&AP on the Castle OHL Basic Assessment.</p>

No.	Comment	From / Via / date	Response
	<p>e. Remainder of the Farm Wagt En Bittje No. 5. f. Portion 3 of the Farm Carolus Poort No. 3. g. Portion 4 of the Farm Carolus Poort No. 3. h. Portion 2 of the Farm Carolus Poort No. 3. i. Remainder of the Farm Slingers Hoek No. 2. j. Portion 2 of the Farm Slingers Hoek No. 2.</p> <p>2) As of December 2020, Mulilo De Aar 2 South (Pty) Ltd have entered into an agreement for the option to obtain and register a road and transmission service with the following properties (valid for 5 years):</p> <ul style="list-style-type: none"> <input type="checkbox"/> Remainder of the Farm Wagt En Bittje No. 5. <input type="checkbox"/> Portion 3 of the Farm Carolus Poort No. 3. <input type="checkbox"/> Portion 4 of the Farm Carolus Poort No. 3. <input type="checkbox"/> Portion 2 of the Farm Carolus Poort No. 3. <input type="checkbox"/> Remainder of the Farm Slingers Hoek No. 2. <input type="checkbox"/> Portion 2 of the Farm Slingers Hoek No. 2. <p>As part of the option to obtain and register a road and transmission service, the following were agreed to with landowners:</p> <p>3) "3. With regard to the Owner, the following particular restrictions will be placed on the use of the Property, namely - 3.1 no building or structure may be erected or erected above or below the surface of the ground within 30 meters of the center line of any power line or within 10 meters of any structure support mechanism; 3.4 no material which in the opinion of MULILO threatens the safety of any power line may be placed within 30 meters from the center line of the power line"</p> <p>4) As provided by EnviroAgri Environmental Consultants on the 13th of June 2022, and shown below, the proposed up to 400kV Transmission line from Castle WEF to Hydra ('The proposed Castle route'), follows an almost identical route to</p>		<p>2) It's noted that the Mulilo De Aar 2 South (Pty) Ltd entered an agreement for the option to obtain and register a road and transmission service with the following properties. Please note that Eskom, the applicant, has a pre-existing, proclaimed (registered) transmission line servitude over these properties which precedes the said landowner agreements between them and Mulilo De Aar 2 South.</p> <p>3) The restrictions placed on the landowners are noted.</p> <p>4) This is correct, the original proposed Castle WEF to Hydra transmission line follows an almost identical route to Mulilo De Aar 2 South's already authorised line route. As established in ensuing communication with</p>

No.	Comment	From / Via / date	Response
	<p>Mulilo De Aar 2 South's already authorised line route. The proposed Castle route traverses the following properties:</p> <ul style="list-style-type: none"> ☐ Portion 3 of the Farm Wagt en Bittje No. 5. ☐ Portion 1 of the Farm Wagt en Bittje No. 5. ☐ Remainder of the Farm Wagt En Bittje No. 5. ☐ Portion 3 of the Farm Carolus Poort No. 3. ☐ Portion 4 of the Farm Carolus Poort No. 3. ☐ Portion 2 of the Farm Carolus Poort No. 3. ☐ Remainder of the Farm Slingers Hoek No. 2. ☐ Portion 2 of the Farm Slingers Hoek No. 2. <p>5) The proposed Castle route (as well as the corridor assessed), for the majority of its length, either lies directly adjacent to, or overlaps with, the Mulilo De Aar 2 South approved route (and it's associated assessed corridor). The locality of the proposed up to 400kV Castle WEF to Hydra transmission line is in direct contravention with Section 3 of our landowner agreements for the option to obtain and register a road and transmission service. Furthermore, it is our understanding that environmental Authorisation (EA), for essentially the same infrastructure at the same location, can't be obtained by separate entities in separate EAs.</p> <p>6) Therefore Mulilo De Aar 2 South (Pty) Ltd objects to the proposed project (in its current form).</p> <p>7) It is noted that the proposed Castle Route consists of three sections, as stated on page 1 of the draft BAR, "The new alternative includes in part a new OHL (Section A) and in part the upgrading of an existing OHL (Section B) as well as a small section that could potentially feed into the planned (authorised but not built) De Aar South WEF substation (Section C)". Mulilo De Aar 2 South does not object to Section</p>		<p>Mulilo the revised Castle OHL route that is applied for will connect to Mulilo's authorised De Aar 2 South OHL on Portion 2 of Farm 2 Slingers Hoek where the applicant has written consent from the landowner and confirmation that a route has been pre-negotiated.</p> <p>5) As indicated above, the proposed Castle OHL route has been revised, i.e. no longer spanning the properties where Mulilo has landowner agreements and thus resolving the issue of applying for EA for similar activities on the same properties. In terms of the proposed activities on Portion 2 of Farm 2 Slingers Hoek i Mulilo De Aar 2 South (Pty) Ltd and Castle Wind Farm (Pty) Ltd have engaged and agreed that the Castle OHL will connect to the De Aar 2 South OHL. Hence, only the portion of the Castle OHL from the Castle substation up until where it connects with the De Aar 2 South OHL will be built. The Castle OHL route that is being applied for has accordingly been updated in the final BAR.</p> <p>6) As noted above this objection was based on the original full extent of the Castle OHL. The Parties have subsequently engaged and agreed that the Castle OHL will connect to the authorised De Aar 2 South OHL, and the</p>

No.	Comment	From / Via / date	Response
	<p>C, and would welcome discussions with the applicant in this regard.</p> <p>8) The draft BAR for the proposed Castle Route states that “The proposed development site is located within the Electricity Grid Infrastructure Central Strategic Transmission Corridor as per Government Notice 113, National Environmental Management Act, 1998 (Act No. 107 of 1998), which allows the applicant to undertake a BA process (instead of full Scoping and Environmental Impact Assessment process) with expedited competent authority decision making timeframes.” We refer the applicant to item 5 in the schedule contained within Government Notice 113, which requires that routes that have been pre-negotiated with landowners must be submitted as part of such application (i.e. an application under GN 113) for EA. In the draft BAR and appendices, we could find no evidence of proof of a pre-negotiated route in relation to the proposed Castle route. This is despite the draft BAR stating on page 27, that “Landowners have been engaged by the Proponent as an agreement regarding their land is required”, and on page 3, “The access network would be negotiated with all respective landowners to ensure that servitude agreements are in place, and security measures (such as access gates) are agreed upon.” No evidence of these engagements or negotiations could be found in the draft BAR.</p> <p>9) Furthermore, we strongly disagree with and oppose the statement on page 41 of the draft BAR (in Table 4-3), that says “No. No juristic or person’s right will be adversely affected as land use agreements have been negotiated with the relevant landowners” in response to the question “Will any person’s rights be negatively affected by the proposed activity/ies? There is no evidence in the draft BAR that agreements have been negotiated between the applicant (Eskom) and the landowners, and as detailed earlier in this letter, the rights of Mulilo De Aar 2 South (Pty) Ltd, will be negatively affected by the proposed development.</p>		<p>Castle OHL routing has been revised accordingly in the final BAR. The revised reduced extent of the proposed Castle OHL will not impede any of Mulilo’s rights or agreements with the current landowners.</p> <p>7) It’s noted that Mulilo De Aar 2 South does not object to Section C. For the record, it’s noted that the parties involved have entered discussions pertaining Section C (Section B in the revised Layout) and have agreed that the Castle OHL will connect to the authorised De Aar 2 South OHL or if feasible the De Aar 2 South substation on Portion 2 of Slingers Hoek No. 2</p> <p>8) We concur with you reference of GN 113. Note that “submitted as part of such application (i.e. an application under GN 113) for EA”. The details of these agreements have been included in the application and I&APs have been notified that the application has been made in terms of GN 113. There is no requirement for the details/proof of these agreements to be made public as part of the BAR. The requirement is for the submission of the pre-negotiated routes to be part of the application submitted to the Competent Authority. Note that the proclaimed Eskom transmission line servitude serves as a pre-negotiated route since the servitude has been included in the title deeds of the properties in question.</p> <p>9) There is no requirement for the details of these agreements to be part of the draft BAR as “evidence”. The requirement is for the</p>

No.	Comment	From / Via / date	Response
9.	<p>10) In conclusion, Mulilo De Aar 2 South (Pty) Ltd objects to the proposed project, at least in its current form, but would welcome an opportunity to engage with the applicant to determine a mutually beneficial solution and way forward.</p> <p>Yours sincerely, Mr Constantin Hatzilambros (Duly authorised signatory, Mulilo De Aar 2 South (Pty) Ltd)</p> <p>Good morning Dirk,</p> <p>Thank you for your receipt, we look forward to your response.</p> <p>Kind regards</p> <p>Lloyd Barnes Junior Project Manager: Permitting and Environmental.</p>	<p>Mulilo De Aar 2 South (Pty) Ltd Mr L Barns (CC Mr C Hatzilambros) 2022-07-04</p>	<p>inclusion of these agreements in the application, which has been done. However, as detailed above this matter and Mulilo De Aar 2 South's concern that it will be negatively affected by the proposed development of the Castle OHL have been resolved by the revised Castle OHL routing as agreed between the parties and reflected in the final BAR..</p> <p>10) For the record this engagement has taken place and as detailed above the parties involved have to come to an agreement pertaining the issues detailed by Mulilo De Aar 2 South and the way forward in terms of the proposed grid connection infrastructure.</p>
10.	<p>(Phone record) Mr. Solomons saw the newspaper advert and inquired on when the construction phase of the proposed project will begin (did not request to be registered as I&AP, only wanted to get the background info).</p>	<p>P. Solomons Interested party Phone 2022-06-20</p>	<p>Mr. Pretorius conveyed to Mr. Solomons that the project construction phase is dependent on the authorisation of the proposed OHL as well as the commencement date of the Castle WEF. It's likely that the construction would commence within the next year or two.</p>
11.	<p>Good day Dirk,</p> <p>RE: Notice: Public Participation Process / Kennsigewing: Publieke deelname proses Castle to Hydra Transmission Line, De Aar</p>	<p>Simphiwe Masilela Inspector: Obstacles Procedure Design & Cartography</p>	<p>Dear Simphiwe, Thank you for your email. I have also shared it with the applicant. Kind regards,</p>

No.	Comment	From / Via / date	Response
	<p>Find attached information for Developments around aerodromes and prescribed SACAA Regulations, processes and procedures to follow towards Development where applicable for your comments.</p> <p>.</p> <p>The notices published on the website stipulate the procedures and processes obstacles.</p> <p>http://www.caa.co.za/Pages/Obstacles/Urgent-notices.aspx kindly read the notices for additional information that is required, as well as fees applicable (the are New Fees as from 01 November 2021).</p> <p>Kindly note As per Obstacle Notice 1/2021– Appointment of New Windfarm Obstacle Application Service Provider which applies to Solar Plants are now being processed by Air Traffic and Navigation Services.</p> <p>The process to be followed for all other obstacle applications:</p> <p>http://www.caa.co.za/Obstacles%20Forms/CA139-27.pdf application form: apply one centre point co-ordinate, to the said proposed site</p> <p>Kindly note that when the time for formal application comes, the client is required to provide the following together with the application:</p> <p>A kmz/kml (Google Earth) file reflecting the footprint to the proposed development site. Provide coordinates, Height and Elevation as per excel spreadsheet attached herein Also indicate the highest structure of the project & the Overhead electric power transmission line</p> <p>Should you require more information please contact the inspectorate at obstacles@caa.co.za</p>	<p>2022-07-04</p>	

No.	Comment	From / Via / date	Response
12.	<p>Regards</p> <p>Simphiwe Masilela Inspector: Obstacles Procedure Design & Cartography</p> <p>Dear Mr Pretorius, Please receive the attached comments from Directorate :Biodiversity Conservation for your attention and implementation. Trust that you find all in order. Regards, Ms M Rabothata</p> <p>COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF THE CASTLE TO HYDRA TRANSMISSION LINE NEAR DE AAR, IN THE NORTHERN CAPE PROVINCE The Directorate: Biodiversity Conservation reviewed and evaluated the draft report.</p> <p>Based on the information provided in the report, the proposed development overlaps within Critical Biodiversity Area (CBA1). Development within CBA's are not favorable. However, this CBA will consist of pylons and the development footprint will be small. Moreover, it will run on the existing Eskom servitude; thus, it will be regarded as an upgrade of an existing OverHeadLine.</p> <p>Therefore, it must be noted that developments within CBAs with high or very high impacts will not be permitted, provided that all the relevant recommendations highlighted on the generic EMPr by the specialists are adhered and implemented.</p> <p>In conclusion, please note that all Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries must be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@environment.gov.za for attention of Mr Seoka Lekota.</p>	<p>Biodiversity Conservation, Mainstreaming EIA (Admin) Department of Forestry, Fisheries and the Environment Environment House Email 2022-07-05</p>	<p>Good afternoon Ms Rabothata,</p> <p>Thanks for the attached comments, they are well received.</p> <p>The comment pertaining CBAs are dually noted, as is the requirement for recommendations in the generic EMPr and from specialist to be strictly adhered to.</p> <p>Kind regards,</p> <p><u>Note the revised layout will not impact on an CBAs.</u></p>

No.	Comment	From / Via / date	Response
13.	<p>Yours faithfully Mr. Seoka Lekota</p> <p>Your Draft Basic Assessment Report (Development of the Castle to Hydra Transmission Line near De Aar, Northern Cape Province) dated 1 June 2022 has reference.</p> <ol style="list-style-type: none"> 1. The biggest concern is the line section crossing the CBA1, CBA 2 areas (i.e. the proximity to the water feature) and the impacts on the avifauna in the area. It is recommended that the area be buffered sufficiently and the avifauna recommendations be implemented. 2. Please note that there will be impacts for lines running through aquatic features due to ESKOM maintenance roads under lines and fire breaks (there is specific sizes for specific line sizes). Please incorporate this in the aquatic assessment for updating the mitigations measures needed. This is also an arid landscape and temporary roads leave scars in the landscape for several years. 3. Re Figure 1.4. - It is not clear as to why the power line route deviates so much from the previously approved power line. The map is also not clear and you cannot distinguish the colours i.e. existing power lines and proposed power line routes. All the other existing power lines in the area are also not indicated. 4. Re Figure 7.1. - The combined sensitivities map is not clear and you cannot distinguish the sensitive features due to the neon colours used and the background colours for the vegetation map units. The sensitive birds nesting sites are also not visible on this map. 5. It is recommended that the power line be fitted with flight diverters as the line gets constructed. 6. Please check for consistency in the report (OHL section) as reference(s) are to turbines instead of pylons. 7. The cumulative impacts (Figure 1) are concerning due to high density of renewable energy (RE) projects and power lines in this area. It is recommended that all Environmental Authorisations for RE projects, as well as power lines, are revaluated if there are any changes in the way RE projects are approved. 	<p>Department of Agriculture, Environmental Affairs, Rural Development and Land Reform E Swart Email 2022-07-06</p>	<p>Dear E Swart,</p> <ol style="list-style-type: none"> 1. The concern pertaining the line section crossing the CBA1, CBA 2 areas (i.e. the proximity to the water feature) and the impacts on the avifauna in the area are noted and have been addressed by the terrestrial, aquatic and avifaunal specialist. The recommendation that the area be buffered sufficiently, and the avifauna recommendations be implemented is also noted. The section (B) crossing the CBA will be an upgrade of the existing 132kV OHL from the De Aar South WEF (existing maintenance roads) with a temporary bypass constructed adjacent to it using the same roads infrastructure as much as possible and will be restricted in the watercourse / CBA area. The upgrading of the section (B) is preferred over constructing of a new OHL on this section to minimise environmental impacts. Although the construction impacts of the temporary bypass will contribute to the overall impacts associated with the proposed project. <u>Note the revised layout will not impact on an CBAs.</u> 2. It's agreed that there will be impacts for lines running through aquatic features due to ESKOM maintenance roads under lines and fire breaks. These impacts have been considered by the specialist and EAP. Note that the section of transmission line passing through the main aquatic feature will be an upgrade of an existing 132kV OHL with existing maintenance roads and

No.	Comment	From / Via / date	Response
			<p>existing fire breaks. Yes, this is an arid landscape and temporary roads do leave scars in the landscape for several years. Hence, no driving outside the permitted construction roads will be permissible. Moreover, the contractor will have to provide a method statement to the ECO for each specific watercourse crossing once the allowable working areas are pegged. This method statement, coupled to a detailed pre-works photo record will form part of the ECO annexures and be audited to ensure strict control and enforcement in sensitive areas.</p> <p><u>Note the revised layout largely avoids the sensitive aquatic features.</u></p> <p>3. The deviation (Figure 1.4) is due to the congestion of existing and proposed (authorised) RE infrastructure which sees the previously authorised Castle OHL authorised (DEA ref: 14/12/16/3/3/1/1351) to become unfeasible. The new route is also shorter and allows for upgrading of section B which is preferable. The purpose of Figure 1-4 is to provide the Layout of the proposed Castle to Hydra MTS OHL. The other existing power lines in the area are indicated in Figure 6-40 (Regional map delineating the vegetation units, river systems and existing high voltage powerlines within the proposed Castle to Hydra MTS grid connection project PAOI) and Figure 6-42 (Renewable energy applications and existing high voltage powerlines within 30km of the proposed Castle to Hydra MTS grid connection project). We also refer you to Figures 7-2 to 7-4 of the draft BAR which provide a more detailed zoomed in look at the existing and proposed OHLs.</p>

No.	Comment	From / Via / date	Response
			<p><u>Note that all the maps have been updated to indicate the revised layout and an effort was made to make them as clear and legible as possible.</u></p> <p>4. These maps have been updated in the final BAR. Nest will be dealt with as part of pre-construction inspection (avifaunal walk-through) as soon as the powerline route alignment, together with its associated pole positions, have been approved to identify species of conservation concern (SCC) that may be breeding within the infrastructure footprints. If a nest is occupied, the avifaunal specialist will consult with the contractor to find ways of minimising the potential disturbance to the breeding birds during the construction period. This could include measures such as delaying some of the activities until after the breeding season or other measures deemed suitable and practical at the time.</p> <p>5. The entire length of powerline (and temporary bypass) will be marked with Eskom approved bird flight diverters (BFDs). The bird flight diverters will be installed on the full span length on the earthwire (according to Eskom guidelines - five metres apart). Light and dark colour devices will be alternated to provide contrast against both dark and light backgrounds respectively. These devices will be installed as soon as the conductors and earthwires are strung.</p> <p>6. The transcription error was corrected.</p> <p>7. The concern pertaining the cumulative impacts due to high density of renewable energy (RE) projects and power lines in this area is noted. As is the recommendation that all Environmental Authorisations for RE projects, as well as power</p>

No.	Comment	From / Via / date	Response
14.	<p>COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF THE CASTLE TO HYDRA TRANSMISSION LINE NEAR DE AAR, IN THE NORTHERN CAPE PROVINCE</p> <p>The application form and Draft Basic Assessment Report (BAR) dated 01 June 2022, received by this Department on 01 June 2022 and acknowledged on the 02 June 2022, refer.</p> <p>This letter serves to inform you that the following information must be included to the final BAR:</p> <p>(a) Public Participation Process</p> <p>(i) The following information must be submitted with the final BAR:</p> <p>a) A list of registered interested and affected parties as per Regulation 42 of the NEMA EIA Regulations, 2014, as amended;</p> <p>b) Copies of all comments received during the DRAFT BAR comment period; and</p> <p>c) A comment and response report which contains all comments received and responses provided to all comments and issues raised during the public participation process for the DRAFT BAR. Please note that comments received from this Department must also form part of the comment and response report.</p> <p>(ii) Please ensure that all issues raised and comments received during the circulation of the DRAFT BAR from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section) in respect of the proposed activity are adequately addressed in the final BAR.</p> <p>(iii) Proof of correspondence with the various stakeholders must be included in the final BAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.</p> <p>(b) Validity period and auditing frequency</p>	<p>Department of Forestry, Fisheries and the Environment Ms M Solomons Acting Chief Director: Integrated Environmental Authorisations Signed by: Dr D Smit Designation: Deputy Director: National Infrastructure Projects Submitted by Case officer Ms J Mahlangu Email 2022-06-30</p>	<p>lines, are reevaluated if there are any changes in the way RE projects are approved.</p> <p>The list of information to be included in the final BAR is noted.</p> <p>(a) Public Participation Process</p> <p>(i) a) A list I&APs is included as part of the PPP report.</p> <p>b) Copies of all comments have been included i.e. screenshots of all emails and pdf versions of letters.</p> <p>c) This is the CRR and DFFE comments are addressed accordingly.</p> <p>(ii) All comments have been addressed in the CRR and changes made to the BAR where relevant.</p> <p>(iii) Proof of all communication with stakeholder have been attached as part of the PPP report.</p> <p>(b) Validity period and auditing frequency (i) Period for which the Environmental Authorisation (EA) is required: 5 years, project lifespan 25 years</p>

No.	Comment	From / Via / date	Response
	<p>(i) Please ensure that the final BAR includes the period for which the Environmental Authorisation (EA) is required, the date on which the activity will be concluded and the post construction monitoring requirements finalised, as per Appendix 1(3)(1)(q) of the NEMA EIA Regulations, 2014, as amended.</p> <p>(c) Specialist Assessments</p> <p>(i) Please ensure that specialist studies conducted provide a detailed description of their methodology, as well as all other associated infrastructures that they have assessed and are recommending for the authorisation.</p> <p>(ii) The specialist studies must also provide a detailed description of all limitations to their studies.</p> <p>(iii) If the specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expert advice.</p> <p>(iv) Please ensure that Specialist Declaration of Interest forms for all specialist conducted as well as for the Specialist statements obtained is attached to the final BAR.</p> <p>(v) It is brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. Please ensure that the specialist assessments conducted comply with these protocols.</p> <p>General</p> <p>You are further reminded to comply with Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: "Where basic assessment must be applied to an application, the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (a) a basic assessment</p>		<p>The date on which the activity will be concluded: Within 18 months from commencement of activities which are currently planned for 2023-2025.</p> <p>The post construction monitoring requirements finalised: These have been included in the EMPr and relate to among others Invasive Alien Plants (IAPs), aquatic features (erosion along watercourse and roads etc.). No operational phase monitoring is required by Avifauna.</p> <p>(c) Specialist Assessments</p> <p>(i) All specialist studies conducted provide a detailed description of their methodology, as well as all other associated infrastructures that they have assessed.</p> <p>(ii) Specialist studies provide a detailed description of all limitations to their studies</p> <p>(iii) No contradicting recommendations have been made.</p> <p>(iv) All specialist declaration of interest forms for all specialist conducted as well as for the Specialist statements have been attached to the relevant specialist reports.</p> <p>(v) All specialist assessments conducted comply with these protocols.</p> <p>General</p> <p>The requirements in terms of NEMA pertaining time frames, PPP, and changes to the BAR are noted and have been adhered to.</p>

No.	Comment	From / Via / date	Response
	<p>report, inclusive of any specialist reports, an EMPr, a closure plan in the case of a closure activity and where the application is a mining application, the plans, report and calculations contemplated in the Financial Provisioning Regulations, which have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority”.</p> <p>Should there be significant changes or new information that has been added to the BAR or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 19(1)(b) of the NEMA EIA Regulations, 2014, as amended, which states: “the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (b) a notification in writing that the documents contemplated in subregulation 1(a) will be submitted within 140 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the documents which changes or information was not contained in the original documents consulted on during the initial public participation process contemplated in subregulation (1)(a) and that the revised documents will be subjected to another public participation process of at least 30 days.”</p> <p>Should you fail to meet any of the timeframes stipulated in Regulation 19 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.</p> <p>You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.</p>		
15.	SUBMITTED FOR DRAFT BASIC ASSESSMENT REPORT: DEVELOPMENT OF THE CASTLE TO HYDRA TRASMISSION LINE NEAR DE AAR, LOCATED APPROXIMATELY 26 KILOMETRES EAST OF DE AAR NORTHERN CAPE PROVINCE.	Department of Water and Sanitation (Northern Cape Region, Lower Orange Management Area) N Kgabileng	

No.	Comment	From / Via / date	Response
	<p>Reference is made to the above-mentioned report with the Draft Basic Assessment dated 1 June 2022, submitted to Department of Water and Sanitation.</p> <p>The applicant proposes to construct an OHL required to connect the Castle WEF to the national Eskom Electricity grid at the Hydra MTS. The proponent proposes to develop the OHL under a Self -Build agreement with Eskom. This Department has no objection of the above-mentioned application and wish to comment as follows:</p> <ol style="list-style-type: none"> 1. Water will be used for construction purposes, and drinking water is required for the construction workers. Water will be sourced from an onsite borehole. An application should be launched with the Department of Water and Sanitation for abstraction and storage for construction and operations of both Castle WEF and Castle to Hydra OHL is underway according to the Report. 2. The applicant must note that no activities are allowed within 100m of a water resource or within 1:100-year flood line (whichever is the greatest), if the proposed amendments fall within these criteria, the applicant need to apply for water use license to ensure that the riparian ecological status of the water resource will not be negatively impacted. 3. This Department must be notified of any existence of wetlands within this area. Section 21 (c) & Section 21(i) water uses are respectively defined as "impeding or diverting the flow of water in a watercourse" and "altering the bed, banks, course or characteristics of watercourse under the NWA. 4. Please note that any development within 500m from the boundary of any wetland requires a water use licence according to National Water Act (NWA) 1998 (Act No.36 of 1998). 5. Waste needs to be collected and disposed of at a registered municipal site during and after construction, and written agreement should be provided to this department. 6. Storm water must be managed in such a manner as to disperse runoff and to prevent the concentration of storm water flow. 	<p>Email 2022-07-15</p>	<ol style="list-style-type: none"> 1. Correct. An application with the Department of Water and Sanitation for abstraction and storage for construction and operations of both Castle WEF and Castle to Hydra OHL is underway. 2. The applicant will apply for water use license if activities are within 100m of a water resource or within 1:100-year flood line to ensure that the riparian ecological status of the water resource will not be negatively impacted. 3. Section 21 (c) & Section 21(i) application will be lodged if/where applicable. 4. The requirement in terms of development within 500m of a wetland is noted. 5. Waste will be collected and disposed of at a registered municipal site during and after construction. Written agreement will be provided to DWS by the respective contractors which will be responsible for on-site waste management. 6. Storm water will be managed in such a manner as to disperse runoff and to prevent the concentration of storm water flow. This is particularly noted in the case of existing and proposed roads.

No.	Comment	From / Via / date	Response
	<p>7. No surface, ground or storm water may be polluted as a result of any activities on the site.</p> <p>8. Please note that all requirements as stipulated in the national water Act (NWA) 1998 (Act no.36 of 1998) must be adhered to.</p>		<p>7. Pollution prevention measures will be in place to avoid surface, ground or storm water pollution as a result of activities on the site.</p> <p>8. The requirements as stipulated in the National Water Act (NWA) 1998 (Act no.36 of 1998) will be adhered to.</p>
16.	<p>This Department has no objection to the proposed amendments of the above-mentioned application and wish to comment as follows:</p> <p>1. It is noted that several drainage lines will be crossed by the proposed construction roads and transmission lines. Also, several pylon structures will be in or within 32m of watercourses. In this regard the applicant is advised to apply for section 21 (c) and (i) of the National Water Act. Section 21(c) & (i) water uses are respectively defined as 21 (c) impeding or diverting the flow of water in a watercourse; and 21 (i) — altering the bed, banks, course or characteristics of a watercourse.</p> <p>2. The applicant must ensure that all hazardous and domestic waste generated is disposed of at licensed landfill site. A signed copy of service agreement shall be submitted to this Department to demonstrate that indeed provision will be made to render such services.</p> <p>3. The Department recommends an appointment of a qualified Control Environmental Officer who will ensure that the activity does not lead to environmental degradation especially the water resources be it surface or underground.</p> <p>4. In case of leakages or spillages of hydrocarbons this department must be informed within 24 hours and immediate clean-up procedure must be conducted as stipulated in section 19 of the National Water Act; (Act 36 of 1998), any clean-up of the contaminants must be disposed of in a permitted hazardous landfill site and remediation report for the clean-up measures must be sent to the department for comments before implementation.</p>	<p>Department of Water and Sanitation (Northern Cape Region, Lower Orange Management Area) Makhura MJ Email 2022-07-20</p>	<p>1. The applicant notes activities in and within 32m of a watercourse will be require water uses applications in terms of section 21 (c) and (i) of the National Water Act.</p> <p>2. The applicant will ensure that all hazardous and domestic waste generated is disposed of at licensed landfill site. A signed copy of service agreement will be submitted to Department of Water and Sanitation (Northern Cape Region, Lower Orange Management Area) to demonstrate that the provision is made to render such services.</p> <p>3. A qualified Environmental Control Officer will be appointed (legal requirement).</p> <p>4. In the event of significant leakages or spillages of hydrocarbons the department will be informed within 24 hours and immediate clean-up procedure will be conducted as stipulated in section 19 of the National Water Act; (Act 36 of 1998), contaminants will be disposed of at a permitted hazardous landfill site. A remediation report of the clean-up measures will be sent to the department for comment.</p>

