From: Chane Pretorius <chane.pretorius@abs-africa.com>

Sent: 04 August 2021 01:25 PM

Govender, Dalian To:

Subject: [EXTERNAL] I&AP Registration

Categories: Orange Category

Hi Dalian

On behalf of Prieska Copper Zinc Mine, please register Mr. Birch (Marcus Birch <marcus.birch@orionminerals.com.au>) and I as I&APs for the BESS and associated infrastructure Basic Assessment Process at the Cuprum Power Station.

Regards Chané



Chané (Pretorius) Coetzee | Environmental Consultant | c: +27 74 797 3333 |

e: chane.pretorius@abs-africa.com

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From: Mabece Pamela <pamela.mabece@enel.com>

Sent: 04 June 2021 03:28 PM **To:** Govender, Dalian

Subject: [EXTERNAL] Request to register as Interested and Affected Party

Categories: Orange Category

Good Day Dalian

I would like to forward my name to be included in the register for interested and affected parties representing , Garob Wind Farm under Enel Green Power.

Regards

Pamela Mabece

Pr. Sci. Nat (Reg No: 125003)

Environment, Archaeology & Biodiversity

South Africa



102 Rivonia Road, Sandton 2196, Johannesburg W: +27 (010) 344 0217

W: +27 (010) 344 0217 M: +27 (0)64 757 8392

E: pamela.mabece@enel.com

From: Warren Morse <warren@mulilo.com>

Sent: 29 September 2021 09:01 PM

To: Govender, Dalian

Cc: Andrew Pearson; Ryan David-Andersen

Subject: [EXTERNAL] Prieska BESS IAP registration

Dear Dalian

Please could you register Mulilo as an IAP on the Prieska BESS project?

Regards Warren Morse



Warren Morse - Director: Solar & Energy Storage (MSc. Energy Engineering – UCT) (BSc. Electro-Mechanical Engineering – UCT)

Office Tel: +27216853240 Email: warren@mulilo.com Postal: PO Box 548 Howard Place Pinelands 7405

Physical: Mulilo Energy Holdings: Top Floor, Build.#4, Golf Park Estate, 44 Raapenberg Rd. Mowbray, Cape Town, ZA, 7405

From: Du Toit Malherbe <Du-Toit.Malherbe@abo-wind.com>

Sent: 27 August 2021 08:08 AM

To: Govender, Dalian

Subject: [EXTERNAL] RE: Eskom Prieska BESS Draft BAR and EMPr

Categories: Orange Category

Thank you Dalian,

Kind regards,

Du Toit Malherbe | ABO Wind renewable energies (Pty) Ltd

Mobile: +27 (0) 60 383 8058 | Phone: +27 (0) 21 276 3620 | Email: du-toit.malherbe@abo-wind.com

From: Govender, Dalian < Dalian.Govender@aecom.com >

Sent: Friday, August 27, 2021 08:07

To: Du Toit Malherbe <Du-Toit.Malherbe@abo-wind.com> **Subject:** RE: Eskom Prieska BESS Draft BAR and EMPr

Good day Du Toit,

Thank you for your email.

Kindly note that your details have been added to the I&AP database.

Please use the link below to access the draft basic assessment report:

https://aecom.com/eskom-prieska-bess/

If you have any comments you would like to submit, please send me a direct email. Thank you.

Should you require anything else, please do not hesitate to contact me.

Kind regards

Dalian Govender Reg. EAP (EAPASA), Pr.Sci.Nat

Junior Environmental Scientist, Africa, EMEA M +27 76 595 1489 dalian.govender@aecom.com

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From: Du Toit Malherbe < <u>Du-Toit.Malherbe@abo-wind.com</u>>

Sent: 25 August 2021 01:04 PM

To: Govender, Dalian < <u>Dalian.Govender@aecom.com</u>> **Subject:** [EXTERNAL] Eskom Prieska BESS Draft BAR and EMPr

Dear Dalian,

Could I please register as an I&AP for the proposed development of a Battery Energy Storage System (BESS) and associated infrastructure at the Cuprum Substation located within Copperton, near the town of Prieska, Northern Cape Province, if you'd be so kind to add me to the list?

Thank you and kind regards,

Du Toit Malherbe

Project Manager

ABO Wind renewable energies (Pty) Ltd. Unit B1, Mayfair Square Century Way, Century City 7441 South Africa

Visitor address: 5th Floor, Sunclare Building 21 Dreyer Street Claremont 7708 South Africa

Mobile: +27 (0) 60 383 8058 Phone: +27 (0) 21 276 3620 du-toit.malherbe@abo-wind.com

www.abo-wind.com



Company registration number 2018/062901/07 | Tax registration number 4370284061

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From: Shalot Sekonko <sekonkoshalot@gmail.com>

Sent: 05 August 2021 09:10 AM

To: Govender, Dalian

Cc: MMatlala Rabothata; Tsholofelo Shalot Sekonko

Subject: [EXTERNAL] 14/12/16/3/3/1/2372 - Eskom Prieska BESS Basic Assessment Process

30-day Public Review

Categories: Orange Category

Dear Sir/Madam

DFFE Directorate: Biodiversity Conservation hereby acknowledge receipt of the invitation to review and comment on the Eskom Prieska BESS Basic Assessment Process. Kindly note that the project has been allocated to Ms Rabothata (both copied on this email) and myself.

Please note: All Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries will be submitted to the Directorate: Biodiversity Conservation at

Email: <u>BCAdmin@environment.gov.za</u> for the attention of Mr Seoka Lekota.

Regards Ms Sekonko

From: BC Admin <bcadmin@environment.gov.za>

Sent: 04 August 2021 03:38 PM

To: Govender, Dalian

Subject: [EXTERNAL] RE: 14/12/16/3/3/1/2372 - Eskom Prieska BESS Basic Assessment

Process 30-day Public Review (6 August 2021 - 6 September 2021)

Categories: Orange Category

Good day Sir/Madam

Hope you are well.

DFFE Directorate: Biodiversity conservation would like to register as the I&AP for the mentioned project. Kindly note that the link you shared cannot be found/accessed.

Kind Regards

Biodiversity Conservation Administration

Department of Forestry, Fisheries & the Environment

Email: bcadmin@environment.gov.za



From: Govender, Dalian [mailto:Dalian.Govender@aecom.com]

Sent: Wednesday, August 04, 2021 11:58 AM

Cc: Naicker, Alecia

Subject: 14/12/16/3/3/1/2372 - Eskom Prieska BESS Basic Assessment Process 30-day Public Review (6 August 2021

- 6 September 2021)

Dear Stakeholder,

Kindly be informed that Eskom Holdings SOC Limited (Eskom) is applying for environmental authorisation (EA) by way of Basic Assessment (BA) from the competent authority, the Department of Forestry, Fisheries and the Environment (DFFE), for proposed development of a Battery Energy Storage System (BESS) and associated infrastructure at the Cuprum Substation located within Copperton, near the town of Prieska, Northern Cape Province.

AECOM SA (Pty) Ltd (AECOM) has been appointed as the Independent Environmental Assessment Practitioner (EAP) to prepare the required BA Report in support of an EA in terms of the National Environmental Management Act (No. 107 of 1998), as amended (NEMA).

This e-mail thus serves to notify you of the proposed application for environmental authorisation for the above-mentioned project and of the 30-day public participation process which commences on the 6th August 2021 and ends on the 6th September 2021. This public participation period provides Interested and Affected Parties (I&APs) the opportunity to register and receive further information as the process progresses as well as provide any comments to AECOM on the Draft BA Report and Environmental Management Programme (EMPr). The Draft BAR and EMPr has been released for public review for a period of 30 days from the 6th August 2021 to the 6th September 2021.

The report has been made available at the following website: https://aecom.com/eskom_prieska_bess from the 6th August 2021. All comments on the Draft BAR and EMPr must be submitted to AECOM on or before the **6th September 2021**.

Please refer to the attached Notification Letter to obtain further details on the Draft BA Report and EMPr for public review.

Should you wish to access a summary on the proposed Project kindly refer to the attached Background Information Document (BID).

Kind regards

Dalian Govender, Pr.Sci.Nat
Junior Environmental Scientist, Environmental Management and Permitting
D +27 12 421 3594
M +27 76 595 1489
dalian.govender@aecom.com

AECOM

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From: Natasha Higgitt <nhiggitt@sahra.org.za>

Sent: 04 August 2021 01:55 PM

To: Govender, Dalian Cc: Naicker, Alecia

Subject: [EXTERNAL] RE: 14/12/16/3/3/1/2372 - Eskom Prieska BESS Basic Assessment

Process 30-day Public Review (6 August 2021 - 6 September 2021)

Importance: Low

Categories: Orange Category

Good afternoon,

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.

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.

Once all documents including all appendices are uploaded to the case applications, please ensure that the status of the cases 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.

From: Govender, Dalian < Dalian.Govender@aecom.com >

Sent: 04 August 2021 11:58

Cc: Naicker, Alecia <alecia.naicker@aecom.com>

Subject: 14/12/16/3/3/1/2372 - Eskom Prieska BESS Basic Assessment Process 30-day Public Review (6 August 2021

- 6 September 2021)

Dear Stakeholder,

Kindly be informed that Eskom Holdings SOC Limited (Eskom) is applying for environmental authorisation (EA) by way of Basic Assessment (BA) from the competent authority, the Department of Forestry, Fisheries and the Environment (DFFE), for proposed development of a Battery Energy Storage System (BESS) and associated infrastructure at the Cuprum Substation located within Copperton, near the town of Prieska, Northern Cape Province.

AECOM SA (Pty) Ltd (AECOM) has been appointed as the Independent Environmental Assessment Practitioner (EAP) to prepare the required BA Report in support of an EA in terms of the National Environmental Management Act (No. 107 of 1998), as amended (NEMA).

This e-mail thus serves to notify you of the proposed application for environmental authorisation for the above-mentioned project and of the 30-day public participation process which commences on the 6th August 2021 and ends on the 6th September 2021. This public participation period provides Interested and Affected Parties (I&APs) the opportunity to register and receive further information as the process progresses as well as provide any comments to AECOM on the Draft BA Report and Environmental Management Programme (EMPr). The Draft BAR and EMPr has been released for public review for a period of 30 days from the 6th August 2021 to the 6th September 2021.

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Please refer to the attached Notification Letter to obtain further details on the Draft BA Report and EMPr for public review.

Should you wish to access a summary on the proposed Project kindly refer to the attached Background Information Document (BID).

Kind regards

Dalian Govender, Pr.Sci.Nat
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Natasha Higgitt

Heritage Officer: Archaeology, Palaeontology and Meteorites Unit





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Western Cape, ZA www.sahra.org.za

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Private Bag X 447· PRETORIA · 0001· Environment House · 473 Steve Biko Road, Arcadia, · PRETORIA

DFFE Reference: 14/12/16/3/3/1/2372 Enquiries: Mr Kevin Mathebula

Telephone: (012) 399 9216 E-mail: KLMathebula@environment.gov.za

Ms Elisabeth Nortje AECOM SA (Pty) Ltd PO Box 3173 PRETORIA 0001

Telephone Number : 021 421 3500 **Cellphone Number** : 084 702 1353

Email Address : elisabeth.nortje@aecom.com

PER MAIL / E-MAIL

Dear Ms Nortje

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF A BATTERY ENERGY STORAGE SYSTEM (BESS) AND ASSOCIATED INFRASTRUCTURE AT THE CUPRUM SUBSTATION LOCATED WITHIN COPPERTON, NEAR THE TOWN OF PRIESKA, NORTHERN CAPE PROVINCE

The draft Basic Assessment Report (BAR) dated August 2021 and received by this Department on 10 August 2021, refers.

This letter serves to inform you that the following information must be included to the final BAR:

Application Form

- Ensure that the project description under section 5, on page 7 of 32 of the application form includes all the components of the proposed development.
- Under section 7, on page 13 of 32 of the application form as well as on page 32 of the draft BAR, activity 14 of Listing Notice 1 of NEMA EIA Regulations, 2014, as amended is applied for. On the final BAR indicate if the batteries are to be assembled on site or not and confirm whether the proposed project will trigger the activity 14 of Listing Notice 1 of the NEMA EIA Regulations, 2014 as amended. Please ensure that only listed activities triggered by the proposed development are applied for.
- Ensure that all relevant listed activities are applied for, are specific and can be linked to the development
 activity or infrastructure as described in the project description. In addition, the onus is on the applicant
 and the Environmental Assessment Practitioner (EAP) to ensure that all the applicable listed activities are
 included in the application. Failure to do so may result in unnecessary delays in the processing of the
 application.
- If the activities applied for in the application form differ from those mentioned in the final BAR, an amended application form must be submitted.

Alternatives

Please provide alternatives for the proposed powerline realignment route. Should there be no alternatives
considered, you are required to provide a motivation for not considering an alternative, as per Appendix
1(3)(1)(h)(x) of the NEMA EIA Regulations, 2014 as amended.

Technology

- On page 21 and 29 of the draft BAR, it is stated that the applicant cannot commit to a particular preferred technology due to commercial or procurement requirements, however in the final BAR it is required that you indicate the preferred type of technology and provide information on the installation process, and tp confirm whether the batteries will be assembled on site or not.
- The Department acknowledges Appendix D: Risk Assessment for all technologies, however in the final BAR please provide a risk assessment that has been undertaken for the preferred technology, with reference to the batteries being assembled on site or not.

Coordinates

- Please provide coordinates of the bend points of the perimeter of the proposed BESS area.
- Also provide coordinates for the bend points of the proposed powerline realignment route.

Layout and sensitivity Map

- The Department acknowledges Appendix A and figure 3-1 on page 16 of the draft BAR (locality map). Please provide a layout map which indicates the following:
 - All onsite infrastructure (existing and proposed), such as existing roads, new roads (if applicable), access points, route corridor, etc.;
 - The positions of the pylons;
 - Laydown area footprint or construction camp footprint;
 - The location of sensitive environmental features on site e.g. CBAs, ESAs, wetlands, drainage lines, heritage sites etc. that will be affected;
 - o Buffer areas; and
 - All "no-go" areas.
- The above map must be overlain with a sensitivity map.
- Please note that the Department considers a 'no-go' area, as an area where no development or any
 infrastructure is allowed; therefore, no development or associated infrastructure is allowed in the 'no-go'
 areas
- Please provide a locality map which indicates the following:
 - Closest town(s):
 - Road names or numbers of all major roads;
 - The location of the proposed project within the municipality and province;
 - A north arrow and clear legend.
- Please note, Google maps will not be accepted.

Specialist Assessments

- All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA.
- Each specialist must indicate a preferred alternative and motivation for the type of technology for the batteries and for the overhead powerline realignment route (if applicable).
- Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defendable reasons; and where necessary, include further expert advice

Environmental Management Programme (EMPr)

- The EMPr attached as Appendix G of the final BAR, must include recommendations and mitigation measures recorded in the BAR and the specialist studies conducted.
- Ensure that the EMPr complies with Appendix 4 of the EIA Regulations 2014 (as amended).
- The EMPr must not contain any ambiguity. Where applicable, statements containing the word "should" or "may" are to be amended to "must".
- The EMPr must distinguish between impact management actions and impact management outcomes.
- The proposed powerline realignment of the Cuprum/Karoo 66kV and Cuprum/Kronos 11kV overhead lines triggers Activity 11 of Listing Notice 1 of NEMA EIA Regulations, 2014, as amended. The following generic EMPr must be included as part of the EMPr attached as Appendix G in the final BAR:
 - Generic EMPr for the development and expansion for overhead electricity transmission and distribution infrastructure.
- This generic EMPr can be downloaded from the following link https://www.environment.gov.za/documents/forms.
- Part B: Section 2 of the generic EMPr must be completed, and a copy of an originally signed EMPr must be submitted with the final BAR. Please note that Point 7.1.1 in Part B: Section 2 needs to match the details of the applicant as contained in the application form.

Public Participation Process (PPP)

- The Public Participation Process must be conducted in terms of Regulation 39, 40 41, 42, 43 & 44 of the NEMA EIA Regulations 2014, as amended.
- Please ensure that comments from all relevant stakeholders are submitted to the Department with the final BAR. This includes but not limited to the Northern Cape Department of Agriculture, Environmental Affairs, Land Reform and Rural Development; Siyathemba Local Municipality; Pixley ka Seme District Municipality; Department of Mineral Resources and Energy; and the South African Heritage Resources Agency (SAHRA).
- Comments must be obtained from this Department's Biodiversity and Conservation Section. Further to that, these comments must be addressed and incorporated in the final Basic Assessment Report. The contact details are as follows: BCAdmin@environment.gov.za.
- 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 in respect of the proposed activity are adequately addressed in the final BAR.
- Proof of correspondence with the various stakeholders must be included in the final BAR. This must
 indicate that this draft BAR has been subjected to 30 days public participation process, stating the start
 and end date of the PPP. Should you be unable to obtain comments, proof must be submitted to the
 Department of the attempts that were made to obtain comments.
- Copies of original comments received from I&APs and organs of state, which have jurisdiction in respect of the proposed activity are submitted to the Department with the final BAR.
- The Comments and Response Report (CRR) must be a separate document from the main report and the format must be in the table format as indicated in **Annexure 1** of this comments letter.
- Comments from I&APs must not be split and arranged into categories. Comments from each submission must be responded to individually.
- Please submit a full page of the newspaper(s) containing the advertisement, ensuring that the information in the advert is legible and that the name of the newspaper and date are visible.

Please also ensure that the final BAR includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 1(3)(1)(q) of the NEMA EIA Regulations, 2014, as amended.

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 report, inclusive of specialist reports, an EMPr, and where applicable a closure plan, 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."

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(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 basic assessment report, inclusive of specialist reports an EMPr, and where applicable, a closure plan, 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 basic assessment report or EMPr or, where applicable, a closure plan, which changes or information was not contained in the reports or plans consulted on during the initial public participation process contemplated in sub regulation 19(1)(a) and that the revised reports or, EMPr or, where applicable, a closure plan will be subjected to another public participation process of at least 30 days".

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.

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.

Yours sincerely

Mr Sabelo Malaza

Chief Director: Integrated Environmental Authorisations Department of Forestry, Fisheries and the Environment

Signed by: Ms. Masina Litsoane

Designation: Control Environmental Officer: National Infrastructure Projects

Date: 07/09/2021.

cc:	Ms Andrea van Gensen	Eskom Holdings SOC (Ltd)	vGenseAL@eskom.co.za
	Mr Bryan Fisher	Northern Cape (DENC)	bfisher@ncpg.gov.za
	Mr Isaac Willem Jimmy Stafhouer	Sivathemba Local Municipality	mm@sivathemba.gov.za

Annexure 1

Format for Comments and Response Report:

Date of comment, format of comment name of organisation/I&AP,	Comment	Response from EAP/Applicant/Specialist
27/03/2021 Email Department of Forestry, Fisheries and the Environment: National	Please record C&R trail report in this format	EAP: (Noted)The C&R trail report has been updated into the desired format, see Appendix K
Infrastructure Projects (Joe Soap)	Please update the contact details of the provincial environmental authority	EAP: Details of provincial authority have been updated, see page 16 of the Application form



Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 399 9000, Fax: +27 86 625 1042

Reference: 14/12/16/3/3/1/2372 Enquiries: Ms M Rabothata/Ms. T Sekonko

Telephone: (012) 399 9174 E-mail: MRabothata@environment.gov.za

Ms. Elisabeth Nortje AECOM SA (Pty) Ltd P.O. Box 3173 PRETORIA 0001

Telephone Number: (+ 27) 12 421 3500

Email Address: <u>elisabeth.nortje@aecom.com</u>

PER E-MAIL

Dear Ms. Nortje

COMMENTS ON DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF A BATTERY ENERGY STORAGE SYSTEM (BESS) AND ASSOCIATED INFRASTRUCTURE AT THE CUPRUM SUBSTATION LOCATED WITHIN COPPERTON NEAR THE TOWN OF PRIESKA, NORTHERN CAPE PROVINCE.

The Directorate: Biodiversity Conservation reviewed and evaluated the aforementioned draft report.

Based on the information provided in the report, the site does not occur within any Critical Biodiversity Areas (CBA) or Ecological Support Areas (ESA), and borders an area classified as Other Natural Areas (ONAs). Only the re-alignment of the two powerlines take place within areas marked as ONA. Thus, development within Other Natural Areas is suitable and accepted. Furthermore, most of the study area is transformed or degraded due to mining activities surrounding the proposed site.

Notwithstanding the above, the following recommendations must be considered in the final report:

- Preconstruction walk-through of the approved development footprint must be conducted to ensure that sensitive habitats and species are avoided where possible.
- Search and rescue plan must be developed for any TOPs or species of conservation concern that have the likelihood of occurring in the study area.
- Sensitive habitats in close proximity to the development footprint must be avoided or demarcated as No-Go area i.e. Bastersput-se-Leegte river.
- Erosion and Alien Invasive Plant Species Management Plan, and Rehabilitation Plan must be developed to mitigate on habitat degradation due to erosion and alien plant invasion and submitted as part of the final report.



COMMENTS ON DRAFT BASIC ASSESSMENT REPORT PROPOSED DEVELOPMENT OF A BATTERY ENERGY STORAGE SYSTEM (BESS) AND ASSOCIATED INFRASTRUCTURE AT THE CUPRUM SUBSTATION LOCATED WITHIN COPPERTON NEAR THE TOWN OF PRIESKA, NORTHERN CAPE PROVINCE.

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**.

Yours faithfully

Mr. Seoka Lekota

Control Biodiversity Grade B: Biodiversity Conservation Department of Forestry, Fisheries & the Environment

Date: 13/09/2021

Our Ref:



an agency of the Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za South African Heritage Resources Agency | 111 Harrington Street | Cape Town P.O. Box 4637 | Cape Town | 8001 www.sahra.org.za

Enquiries: Natasha Higgitt

Tel: 021 462 4502

Email: nhiggitt@sahra.org.za

CaseID: 16926

Date: Monday September 13, 2021

Page No: 1

Final Comment

In terms of Section 38(4), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Eskom - NOU

P O Box 3499 Polokwane 0700

Basic Assessment process for the proposed development of a Battery Energy Storage System (BESS) and associated infrastructure at the Cuprum Substation located within Copperton, near the town of Prieska, Northern Cape Province.

Aecom SA (Pty) Ltd has been appointed by Eskom SOC (Pty) Ltd to conduct an Environmental Authorisation (EA) Amendment Application for the proposed development of a Battery Energy Storage Facility (BESS) and associated infrastructure at the Cuprum Substation, Copperton, Northern Cape Province (DFFE Ref: 14/12/16/3/3/1/2372).

A draft Basic Assessment Report has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 NEMA EIA Regulations. The proposed developments include a BESS, realignment of the Cuprum/Karoo 66KV and Cuprum/Kronos 11kv lines, extension of the fence, extension of the existing road and rerouting of the water pipeline.

Sativa Travel and Environmental Consultants (Pty) Ltd were appointed to provide heritage specialist input as part of the EA process as required by section 24(4)b(iii) of NEMA, and in terms of section 38(3) of the National Heritage Resources Act, Act 25 of 1999 (NHRA) as required by section 38(8) of the NHRA.

Mlilo, T. 2021. Phase 1 Archaeological and Heritage Impact Assessment Report: The Proposed development of a Battery Energy Storage Facility (BESS) and associated infrastructure at the Cuprum Substation located within Copperton, near the town of Prieska, Northern Cape Province.

No heritage resources were identified within the proposed development area.

Eskom BESS Prieska - Northern Cape Province

Our Ref:



an agency of the Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za

South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001

www.sahra.org.za

Enquiries: Natasha Higgitt

Tel: 021 462 4502

Email: nhiggitt@sahra.org.za

CaseID: 16926

Recommendations provided in the report include the following:

• It is also advised that the Archaeology, Palaeontology and SAHRA Meteorites Unit is alerted when site work begins;

Page No: 2

Date: Monday September 13, 2021

• Strict and clear reporting procedures for chance findings must be followed by applicant and contractors throughout the whole period of construction.

In an Interim Comment issued on the 03/09/2021, SAHRA requested that a desktop Palaeontological Impact Assessment must be conducted as part of the EA process. Since the issuing of the comment, a Desktop PIA has been submitted for review (08/09/2021).

Durand, J. F. 2021 (May). The proposed development of a Battery Energy Storage System (BESS) and associated infrastructure at the Cuprum Substation located within Copperton, near the town of Prieska, Northern Cape Province.

The development area is underlain by aeolian sands of the Gordonia Formation that is not particularly fossiliferous, however fossils such as trace fossils, vertebrate remains, stromatolites and freshwater and terrestrial mollusc shells have been reported in the formation. A Chance Fossil Finds Procedure is recommended.

Final Comment

The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR and EMPr:

- 38(4)a The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed development;
- 38(4)b The recommendations of the specialists are supported and must be adhered to. No further additional specific conditions are provided for the development;
- 38(4)c(i) If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section

Our Ref:



an agency of the Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za South African Heritage Resources Agency | 111 Harrington Street | Cape Town P.O. Box 4637 | Cape Town | 8001 www.sahra.org.za

Date: Monday September 13, 2021 Enquiries: Natasha Higgitt

Tel: 021 462 4502 Page No: 3

CaseID: 16926

Email: nhiggitt@sahra.org.za

51(1)e of the NHRA and item 5 of the Schedule;

- 38(4)c(ii) If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d See section 51(1) of the NHRA for offenses;
- 38(4)e The following conditions apply with regards to the appointment of specialists:
- i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;
- The Final BAR and EMPr must be submitted to SAHRA for record purposes;
- The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Natasha Higgitt Heritage Officer

South African Heritage Resources Agency

Eskom BESS Prieska - Northern Cape Province

Our Ref:



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Date: Monday September 13, 2021

Page No: 4

Enquiries: Natasha Higgitt

Tel: 021 462 4502

Email: nhiggitt@sahra.org.za

CaseID: 16926

Phillip Hine

Manager: Archaeology, Palaeontology and Meteorites Unit

South African Heritage Resources Agency

ADMIN:

Direct URL to case: https://sahris.sahra.org.za/node/579642

Terms & Conditions:

- 1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
- 2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
- 3. SAHRA reserves the right to request additional information as required.

Caulfield, Sarah

From: Du Toit Malherbe <Du-Toit.Malherbe@abo-wind.com>

Sent: Thursday, 04 August 2022 13:45

To: Caulfield, Sarah

Subject: [EXTERNAL] RE: Notification of Re-Application: Proposed development of a Battery

Energy Storage System (BESS) at Cuprum Substation, Prieska

Hi Sarah,

Thank you for your email, much appreciated. If not already registered, kindly add me as an I&AP for the above-mentioned BESS development.

Could you also kindly explain in more detail why, or on which procedural grounds did DFFE refuse the EA application, conducted during 2021?

Kind regards,

Du Toit Malherbe | ABO Wind renewable energies (Pty) Ltd

Mobile: +27 (0) 60 383 8058 | Phone: +27 (0) 21 276 3620 | Email: du-toit.malherbe@abo-wind.com

From: Caulfield, Sarah <Sarah.Caulfield@aecom.com>

Sent: Wednesday, August 3, 2022 11:35

Subject: Notification of Re-Application: Proposed development of a Battery Energy Storage System (BESS) at Cuprum

Substation, Prieska

Dear Stakeholder,

Kindly be advised that Eskom Holdings SOC Limited (Eskom) is re-applying for Environmental Authorisation (EA), by way of a Basic Assessment (BA) process, from the Competent Authority, the Department of Forestry Fisheries and the Environment (DFFE) for the proposed development of a Battery Energy Storage System (BESS) and associated infrastructure at the Cuprum Substation located within Copperton, near Prieska, Northern Cape Province.

AECOM SA (Pty) Ltd (AECOM) has been appointed as the independent Environmental Assessment Practitioner (EAP) to prepare the required BA Reports in support of the re-application for EA, as required in terms of the National Environmental Management Act, 1998 (Act 107 of 1998) (NEMA).

Please find attached a Notification Letter and Background Information Document providing more detail on the proposed development.

Please note, this application constitutes a RE-APPLICATION process, following a decision by the DFFE to refuse the original application for EA on procedural grounds.

As you were identified / registered as an Interested and Affected Party (I&AP) on the previous application process, you are hereby invited to participate in this re-application process.

We look forward to engaging with you on this project. Please feel free to contact the undersigned should you require anything further in this regard.

Thank you.

Kind regards, Sarah

Sarah Caulfield Reg. EAP (EAPASA), Pr.Sci.Nat (SACNASP)

Senior Environmental Scientist, Environment, Africa D +27 82 385 9881 sarah.caulfield@aecom.com

AECOM

Ridgeview Building, 01 Nokwe Avenue Ridgeside, Umhlanga Ridge 4319, South Africa

aecom.com

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Caulfield, Sarah

From: Bianca de Jager

Spianca.de.jager@abs-africa.com>

Sent: Thursday, 18 August 2022 14:22

To: Caulfield, Sarah

Cc: Paul Furniss; Marcus Birch

Subject: [EXTERNAL] Eskom Prieska BESS_Draft Basic Assessment Report: Comments

Good day Ms Sarah Caulfield

Thank you for the notification of the availability of the Draft BAR for the proposed development of the BESS at Copperton.

On behalf of Prieska Copper Zinc Mine (PCZM) (Pty) Ltd and Vardocube (Pty) Ltd (subsidiary companies of Orion Minerals), please note the following comments on the development as described in the DBAR:

- 1. The current mining right holder of the historical PCM is now Prieska Copper Zinc Mine (Pty) Ltd (PCZM)
- 2. We noted that the proposed powerlines traverse two of the Orion mining right properties namely Vogelstruis Bult Farm 104 Portion 25 (PCZM Mining Right Area) as well as Vogelstruis Bult Farm 104 Portion 1 (Vardocube Mining Right Area). The last-mentioned property is not indicated in the DBAR.
- 3. It is requested that Eskom and their appointed contractor/s contact PCZM well ahead of the works commencing to discuss aspects like mine access protocol, required working areas, services connections such as water, opportunities for shared infrastructure and mining area safety risks including mine safety induction as well as sensitive sites and no-go areas to take note off on the PCZM and Vardocube properties.

Thank you and kind regards
Bianca de Jager
(On behalf of PCZM and Vardocube)



Bianca de Jager | Environmental consultant | t: +27 11 805 0061 | e : bianca@abs-africa.com

Block C Suite 2, Carlswald Close Office Park, c/o New & 7th Roads, Carlswald, 1685, JHB South Africa

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Enquiries: Natasha Higgitt Date: Tuesday September 06, 2022

Tel: 021 462 4502 Page No: 1

Email: nhiggitt@sahra.org.za

CaseID: 16926

Final Comment

In terms of Section 38(4), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Eskom - NOU

P O Box 3499 Polokwane 0700

Re-application for Environmental Authorisation (EA), subject to a Basic Assessment process, for the proposed development of a Battery Energy Storage System (BESS) and associated infrastructure at the Cuprum Substation located within Copperton, near the town of Prieska, Northern Cape Province.

Aecom SA (Pty) Ltd has been appointed by Eskom SOC (Pty) Ltd to conduct an Environmental Authorisation (EA) Amendment Application for the proposed development of a Battery Energy Storage Facility (BESS) and associated infrastructure at the Cuprum Substation, Copperton, Northern Cape Province (DFFE Ref: 14/12/16/3/3/1/2372).

In a Final Comment issued on the 13/09/2021, SAHRA noted no objections to the proposed development and provided conditions (https://sahris.sahra.org.za/node/582558). Since the issuing of the Final Comment, the EA was refused on procedural grounds, and has now been re-submitted.

A draft Basic Assessment Report has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 NEMA EIA Regulations. The proposed development activities have not changed since the original EA process. The same heritage reports used previously are referenced and will not be discussed again.

Final Comment

The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR and EMPr:

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Enquiries: Natasha Higgitt Date: Tuesday September 06, 2022

Tel: 021 462 4502 Page No: 2

Email: nhiggitt@sahra.org.za

CaseID: 16926

- 38(4)a The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed development;
- 38(4)b The recommendations of the specialists are supported and must be adhered to. No further additional specific conditions are provided for the development;
- 38(4)c(i) If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)c(ii) If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d See section 51(1) of the NHRA for offenses;
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- The Final BAR and EMPr must be submitted to SAHRA for record purposes;
- The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Eskom BESS Prieska - Northern Cape Province

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001

www.sahra.org.za

Date: Tuesday September 06, 2022

Page No: 3

Enquiries: Natasha Higgitt

Tel: 021 462 4502

Email: nhiggitt@sahra.org.za

CaseID: 16926

Natasha Higgitt Heritage Officer

South African Heritage Resources Agency

Phillip Hine

Manager: Archaeology, Palaeontology and Meteorites Unit

South African Heritage Resources Agency

ADMIN:

Direct URL to case: https://sahris.sahra.org.za/node/579642

(DFFE, Ref: Pending)

Terms & Conditions:

- 1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
- 2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
- 3. SAHRA reserves the right to request additional information as required.



Private Bag X 447 PRETORIA · 0001 · Environment House · 473 Steve Biko Road, Arcadia, · PRETORIA

DFFE Reference: 14/12/16/3/3/1/2601 Enquiries: Ms Bathandwa Ncube

Telephone: (012) 399 9368 E-mail: BNcube@dffe.gov.za

Ms Sarah Caulfield AECOM SA (Pty) Ltd Ridgeview Building 01 Nokwe Avenue Ridgeside UMHLANGA RIDGE 4319

Cellphone Number

: 082 385 9881

Email Address

: Sarah.caulfield@aecom.com

PER MAIL / E-MAIL

Dear Ms Caulfield

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF A BATTERY ENERGY STORAGE SYSTEM (BESS) AND ASSOCIATED INFRASTRUCTURE AT THE CUPRUM SUBSTATION NEAR THE TOWN OF PRIESKA, IN THE SIYATHEMBA LOCAL MUNICIPALITY, NORTHERN CAPE PROVINCE

The draft Basic Assessment Report (BAR) dated August 2022 and received by this Department on 10 August 2022, refers.

This letter serves to inform you that the following information must be included to the final BAR:

General

1. If the substation expansion and rerouting of the water pipeline require clearance of vegetation, please provide coordinates of the perimeter and amended route, respectively.

Technical details of the proposed facility and design alternative

The EIAr must provide the technical details for the proposed development in a table format as well as their description and/or dimensions. A sample of the table of technical details is listed in Annexure 1 of this letter.

Locality Map

- 3. Please provide a Locality map which indicates the following:
 - a. Closest town(s);
 - b. Road names or numbers of all major roads;
 - c. The location of the proposed project within the municipality and province;
 - d. A north arrow and clear legend.

Specialist Assessments

- 4. Please include a table in the report, summarising the specialist studies required by the Department's Screening Tool, a column indicating whether these studies were conducted or not, and a column with motivation for any studies not conducted. A sample of the table of specialist studies is listed in Annexure 1 of this letter.
- 5. Please note that if any of the specialists' studies and requirements/protocols recommended in the Department's Screening Tool are not commissioned, motivation for such must be provided in the report per the requirements of Government Notice No. 320 of 20 March 2020 and Government Notice No. 1150 of 30 October 2020 (i.e. "the Protocols"). Where motivation is given for not including a specialist study or compliance statement, evidence of the "insignificant" sensitivity verification must be provided as per section 2.3 of each protocol (e.g. photographs; comments from the relevant organ of state/organisation etc.)
- 6. The Agriculture Theme has a "Low sensitivity" rating, as per the outcome of the screening tool provided. According to the protocols, an Agricultural Compliance Statement must be included in the BAR. Should a compliance statement not be included in the BAR, a motivation for its exclusion must be provided.
- 7. The Civil Aviation Theme has a "High sensitivity" rating, as per the outcome of the screening tool provided. According to the protocols, a Civil Aviation Compliance Statement must be included in the BAR. Should a compliance statement not be included in the BAR, a motivation for its exclusion must be provided.
- 8. All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA.

Environmental Management Programme (EMPr)

- 9. The EMPr attached as Appendix G of the final BAR, must include recommendations and mitigation measures recorded in the BAR and the specialist studies conducted.
- 10. Ensure that the EMPr complies with Appendix 4 of the EIA Regulations 2014 (as amended).
- 11. The EMPr must not contain any ambiguity. Where applicable, statements containing the word "should" or "may" are to be amended to "must".
- 12. The EMPr must distinguish between impact management actions and impact management outcomes.

Public Participation

- 13. The Public Participation Process must be conducted in terms of Regulation 39, 40 41, 42, 43 & 44 of the NEMA EIA Regulations 2014, as amended.
- 14. Please ensure that all issues raised and comments received during the circulation of the draft BAR from registered Interested and Affected Parties (I&APs) and organs of state, as listed in your I&APs Database, and others that have jurisdiction in respect of the proposed activity are adequately addressed and included in the final BAR.
- 15. Comments must be obtained from this Department's Biodiversity and Conservation Section. Further to that, these comments must be addressed and incorporated in the final Basic Assessment Report. The contact details are as follows: BCAdmin@dffe.gov.za.
- 16. 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 in respect of the proposed activity are adequately addressed in the final BAR, including comments from this Department, and must be incorporated into Appendix E8: Comments and Response Report (CRR).
- 17. Proof of correspondence with the various stakeholders must be included in the final BAR. This must indicate that this draft BAR has been subjected to 30 days public participation process, stating the start and end date of the PPP. Should you be unable to obtain comments, proof must be submitted to the Department of the attempts that were made to obtain comments.

DFFE Reference: 14/12/16/3/3/1/2601

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF A BESS AND ASSOCIATED INFRASTRUCTURE AT THE CUPRUM SUBSTATION LOCATED WITHIN COPPERTON, SIYATHEMBA LOCAL MUNICIPALITY, NORTHERN CAPE PROVINCE

- 18. Copies of original comments received from I&APs and organs of state, which have jurisdiction in respect of the proposed activity are submitted to the Department with the final BAR.
- 19. Comments from I&APs must not be split and arranged into categories. Comments from each submission must be responded to individually.

Please also ensure that the final BAR includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 1(3)(1)(q) of the NEMA EIA Regulations, 2014, as amended.

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 report, inclusive of specialist reports, an EMPr, and where applicable a closure plan, 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."

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 basic assessment report, inclusive of specialist reports an EMPr, and where applicable, a closure plan, 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 basic assessment report or EMPr or, where applicable, a closure plan, which changes or information was not contained in the reports or plans consulted on during the initial public participation process contemplated in sub regulation 19(1)(a) and that the revised reports or, EMPr or, where applicable, a closure plan will be subjected to another public participation process of at least 30 days".

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.

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.

Yours sincerely

Ms Milicent Solomons

Acting Chief Director: Integrated Environmental Authorisations

Department of Forestry, Fisheries and the Environment

Signed by: Mr. Vusi Skosana

Designation: Director: National Integrated Authorisations

Date: [M/09/2022 *

CC:	Ms Andrea van Gensen	Eskom Holdings SOC (Ltd)	vGenseAL@eskom.co.za	
	Mr Bryan Fisher	Northern Cape DAEALR&RD	bfisher@ncpg.gov.za	
	Mr Isaac Stafhouer	Siyathemba Local Municipality	mm@siyathemba.gov.za	

DFFE Reference: 14/12/16/3/3/1/2601

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF A BESS AND ASSOCIATED INFRASTRUCTURE AT THE CUPRUM SUBSTATION LOCATED WITHIN COPPERTON, SIYATHEMBA LOCAL MUNICIPALITY, NORTHERN CAPE PROVINCE

Annexure 1

1. Sample of technical details for the proposed development

Component	Description / dimensions	
BESS footprint		
BESS Capacity		
BESS Technologies		
Substation	Capacity, expansion footprint, height etc.	
Medium Voltage Cabling		
High Voltage Cabling		
Underground cabling depth		
Powerlines	Export capacity(ies), length, pylon height servitude	
Fencing	Type and height	
Laydown Area		
Internal access roads		
Water pipeline realignment		

2. Sample of specialist studies required as per the screening tool

Theme	Sensitivity Rating	Specialist studies conducted	Motivation for no specialist studies
Agriculture	Very high	Yes/No	
Animal species	High		
Avian	Medium		
Civil Aviation	Low		
Landscape	Etc.		
Palaeontology			
Plant species			
RFI			
Terrestrial Biodiversity			
Etc.			





Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 399 9000, Fax: + 27 86 625 1042

Reference: Eskom Cuprum BESS & Associated infrastructure

Enquiries: Ms M Rabothata

Telephone: (012) 399 9174 E-mail: MRabothata@environment.gov.za

Ms Sarah Caulfield AECOM SA (Pty) Ltd Ridgeview Building 01 Nokwe Avenue Ridgeside UMHLANGA RIDGE 4319

Telephone Number: (+ 27) 82 385 9881

Email Address: sarah.caulfield@aecom.com

PER E-MAIL

Dear Ms. Caulfield

COMMENTS ON DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF A BATTERY ENERGY STORAGE SYSTEM (BESS) AND ASSOCIATED INFRASTRUCTURE AT THE CUPRUM SUBSTATION LOCATED WITHIN COPPERTON, NEAR THE TOWN OF PRIESKA, NORTHERN CAPE PROVINCE

The Directorate: Biodiversity Conservation reviewed and evaluated the aforementioned draft report.

Based on the information provided in the report, the study area is devoid of vegetation and highly disturbed with no sensitive habitats. No Red data listed (RDL) or Orange data listed (ODL) floral species were observed within the study area (including protected species under the Northern Cape Nature Conservation Act, Act No. 9 of 2009). Additionally, the site does not occur within any Critical Biodiversity Areas (CBA) or Ecological Support Areas (ESA), and borders an area classified as Other Natural Areas (ONAs), with a few isolated patches of ONA falling within the site.

As a result, no environmental fatal flaws were identified in the detailed specialist studies conducted, and the impacts are therefore assigned a Low negative to Medium negative significance rating (premitigation) and a Very Low negative to Low negative significance rating with the implementation of the recommended mitigation measures. Therefore, the Directorate: Biodiversity Conservation does not have any objections on the proposed development provided mitigation measures are adhered to and implemented.



COMMENTS ON DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF A BATTERY ENERGY STORAGE SYSTEM (BESS) AND ASSOCIATED INFRASTRUCTURE AT THE CUPRUM SUBSTATION LOCATED WITHIN COPPERTON, NEAR THE TOWN OF PRIESKA, NORTHERN CAPE PROVINCE

Notwithstanding the above, the following recommendations must be considered in the final report:

- Preconstruction walk-though of the approved development footprint must be conducted to ensure that sensitive habitats and species are avoided where possible.
- Alien invasive Plant Species Management Plan and Rehabilitation Plan must be developed and submitted as part of the final report to mitigate on habitat degradation due to erosion and alien plant invasion.

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.**

Yours faithfully

Mr. Seoka Lekota

Control Biodiversity Officer Grade B: Biodiversity Conservation

Department of Forestry, Fisheries & the Environment

Date: 19/09/2022