



Cape EAPrac

Cape Environmental Assessment Practitioners (Pty) Ltd

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PUBLIC PARTICIPATION PLAN

for

Dyasonsklip Solar Energy Facility 1 (Amendment of Environmental Authorisation)

on

Remainder of Farm Dyasonsklip 454

Date	:	29 July 2020
Reference	:	KAI655/04
Applicant	:	Dyasonsklip Solar Energy Facility 1 (Pty) Ltd
DEFF Reference	:	14/12/16/3/3/2/705
DEFF Case Officer	:	Ms Mmamohale Kabasa

This plan is submitted in compliance with regulation GNR660 published on 05 June 2020 in terms of the Disaster Management Act (57/2002) and titled: Directions Regarding Measures to Address, Prevent and Combat the Spread of COVID-19 Relating to National Environmental Management Permits and Licences. In compliance with section 5.1 and annexure 2 of these regulations, a public participation plan must be presented to the competent authority for approval prior to implementation. This plan is herewith submitted to DEFF for consideration.

This application is for a part 2 amendment of an existing EA and is submitted in terms of regulation 31. The public participation requirements for a part 2 amendment are contained in regulation 32(1)(aa), which requires that the report (i.e. amendment assessment report) be subjected to a public participation process, which had been agreed to by the competent authority, and which was appropriate to bring the proposed change to the attention of potential interested and registered interested and affected parties, including organs of state, which have jurisdiction in respect of the relevant activity and the competent authority.

Cape EAPrac's proposal to comply with regulation 32(11)aa of the NEMA EIA regulations and Regulation 660 in terms of the disaster management act is as follows:

An amendment assessment report will be compiled to assess the impact of the addition of a Battery Energy Storage System (BESS) within the footprint authorised for the project. This Amendment Assessment Report will include:

1. Statements from all participating specialists confirming whether or not the addition of the BESS will change the nature or impact of any of the impacts that were assessed as part of specialist studies.
2. Statements from all participating specialists to confirm whether or not the addition of a BESS within the assessed footprint will result in any additional impacts in respect of their particular specialist discipline.
3. Statements from participating specialists to confirm whether any additional management actions or mitigations are applicable to the addition of a BESS.
4. A BESS technical study.
5. A High-level BESS risk assessment.
6. An addendum to the existing EMPr (incorporating an application to amend the existing EMPr) to incorporate additional management outcomes and actions associated with the BESS.

Notification of the availability of the amendment assessment report (incorporating points 1-6 above) will be sent to the following parties:

- (a) the competent authority;
- (b) every State department that administers a law relating to a matter affecting the environment relevant to an application for the amendment of an environmental authorisation;
- (c) all organs of state which have jurisdiction in respect of the activity to which the application for amendment relates;
- (d) all I&AP's that were registered as part of the original EIA process;
- (e) all I&AP's that were registered on other EIA's that took place on the same properties; and
- (f) all neighbouring property owners.

The amendment assessment report will be accessible to the abovementioned parties via the following mechanisms;

1. The competent authority will be provided copies of the applications and assessment report via their file upload portal;
2. All State Departments and Organs of State who have online submission platforms (e.g. SAHRA via their SAHRIS system) will receive copies of the reports via these platforms.
3. The digital copy of the documentation that will be available on the Cape EAPrac website
4. A download link (via dropbox or sharepoint) will be provided to all I&APs.
5. All notification letters will include a copy of the executive summary of the Amendment Assessment Report.
6. The ward councillor will be approached for assistance to distribute notification letters along with the executive summaries via their communication channels (community WhatsApp groups, social media and physical communiques).
7. I&AP's that do not have access to digital platforms will be provided with printed hardcopies of the executive summary and any specialist reports that they may have interest in. Such copies will be provided by courier or postal service.
8. Potential and registered I&APs will be informed that copies of the documentation can be provided via postal or courier services.
9. All notifications sent out will include the details of all the mechanisms available to access the report, including those available to parties that cannot easily access digital platforms.

Due to the extensive consultation processes that have preceded the environmental application for this property in question (there has been at least 25 various opportunities to comment on the 5 projects and various amendments that have taken place on this property), Cape EAPrac is of the opinion that there is general awareness of the fact that the property has become a hub for PV development and particulars about the type of development on this property.

Stakeholder fatigue is a real challenge with projects that undergo this level of stakeholder engagement as part of different processes and should be considered when planning further stakeholder engagement as part of the environmental amendment application process.

We therefore do not propose to undertake pre-application stakeholder consultation as part of the environmental process.

AMENDMENTS TO THIS PLAN:

We submit that changes to this plan may be necessitated depending on COVID lockdown levels that are subject to change. Should there be a need to make use of the permissible 30-day period (per step in the amendment process) that may require amendments to this public participation plan, it will be done in consultation with the DEFF. At this stage, we do not intend to utilise these additional permissible periods and are able to comply with the timeframes as contained in the EIA Regulations.

Please contact the undersigned, should there be any queries regarding the implementation of this PP Plan.

Sincerely,

A handwritten signature in black ink, appearing to be 'Dale Holder', written over a horizontal line.

Dale Holder
Cape EAPrac.