

Comments and Responses Report

Proposed Amendment of the Environmental Authorisation for AEP Bloemsmond 1, AEP Bloemsmond 2, Bloemsmond 3, Bloemsmond 4 and Bloemsmond 5 PV Developments on portions 5 and 14 of the farm Bloemsmond 455.

<u>DEFF Reference No Bloemsmond 1:</u>	:	14/12/16/3/2/815
<u>DEFF Reference No Bloemsmond 2:</u>	:	14/12/16/3/2/816
<u>DEFF Reference No Bloemsmond 3:</u>	:	14/12/16/3/3/1/2042
<u>DEFF Reference No Bloemsmond 4:</u>	:	14/12/16/3/3/1/2043
<u>DEFF Reference No Bloemsmond 5:</u>	:	14/12/16/3/3/1/2044
<u>Comment Period</u>	:	07 September 2020 – 08 October 2020

The comments and responses reflected in the table below are applicable to all 5 of the abovementioned projects unless otherwise specified in the title line.

Date / Person / Organisation	Comment	Response
John Geeringh – Eskom (comment for all 5 projects)		
08 September 2020, Mr John Geeringh, Eskom.	I have no specific comments on this one, but keep me informed along the way with all documentation and decisions.	Comment noted. Confirmation provided that Mr Geeringh will remain registered and informed of the outcome of the amendment process.
Mr Seoka Lekota – DEFF Biodiversity Directorate (comment for Bloemsmond 1)		

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01 October 2020, Mr Seoka Lekota DEFF Biodiversity Directorate.	The Directorate Biodiversity Conservation has reviewed the Amendment Assessment Report. According to the different specialist updates, the proposed Battery Energy Storage System will not result in any additional impacts. Therefore, the Directorate Biodiversity Conservation does not have any objection to the proposed amendment provided that the original recommendations and mitigation measures will be complied with.	Comment noted confirmed that the DEFF Biodiversity Directorate will be notified once the decision on the application is taken.
Mr Seoka Lekota – DEFF Biodiversity Directorate (comment for Bloemsmond 2)		
01 October 2020, Mr Seoka Lekota DEFF Biodiversity Directorate.	The Directorate Biodiversity Conservation has reviewed the Amendment Assessment Report. According to the different specialist updates, the proposed Battery Energy Storage System will not result in any additional impacts. Therefore, the Directorate Biodiversity Conservation does not have any objection to the proposed amendment provided that the original recommendations and mitigation measures will be complied with.	Comment noted confirmed that the DEFF Biodiversity Directorate will be notified once the decision on the application is taken.
Mr Seoka Lekota – DEFF Biodiversity Directorate (comment for Bloemsmond 3)		
01 October 2020, Mr Seoka Lekota DEFF Biodiversity Directorate.	The Directorate Biodiversity Conservation has reviewed the Amendment Assessment Report. According to the different specialist updates, the proposed Battery Energy Storage System will not result in any additional impacts. Therefore, the Directorate Biodiversity Conservation does not have any objection to the proposed amendment provided that the original recommendations and mitigation measures will be complied with.	Comment noted confirmed that the DEFF Biodiversity Directorate will be notified once the decision on the application is taken.
Mr Seoka Lekota – DEFF Biodiversity Directorate (comment for Bloemsmond 4)		
01 October 2020, Mr Seoka Lekota DEFF	The Directorate Biodiversity Conservation has reviewed the Amendment Assessment Report. According to the different specialist updates, the proposed Battery Energy Storage System will not result in any additional impacts. Therefore, the	Comment noted confirmed that the DEFF Biodiversity Directorate will be notified once the decision on the application is taken.

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Biodiversity Directorate.	Directorate Biodiversity Conservation does not have any objection to the proposed amendment provided that the original recommendations and mitigation measures will be complied with.	
Mr Seoka Lekota – DEFF Biodiversity Directorate (comment for Bloemsmond 5)		
01 October 2020, Mr Seoka Lekota DEFF Biodiversity Directorate.	The Directorate Biodiversity Conservation has reviewed the Amendment Assessment Report. According to the different specialist updates, the proposed Battery Energy Storage System will not result in any additional impacts. Therefore, the Directorate Biodiversity Conservation does not have any objection to the proposed amendment provided that the original recommendations and mitigation measures will be complied with.	Comment noted confirmed that the DEFF Biodiversity Directorate will be notified once the decision on the application is taken.
Zamalanga Langa – Department of Environment, Forestry and Fisheries (comment for all 5 projects) – note that separate comments were received per project, but the recommendations made in each comment have been applied to all 5 projects.		
01 October 2020, Ms Zamalanga Langa, DEFF	<p>(a) Alternatives</p> <p>Please provide the description of any identified alternatives for the proposed activity (battery Storage facility) that are feasible and reasonable, including the advantages and disadvantages that the proposed activity will have on the environment and on the community that may be affected by the activity as per the requirements of GNR.982 of 2014. Alternatively, you should submit written proof of an investigation and motivation. If no reasonable or feasible alternatives exist, the motivation for not considering such must be provided.</p>	<p>Lithium battery alternatives were identified as the preferred alternative in the Technical Document attached in Appendix E11. In this document, conventional storage systems like pumped hydro and other battery technologies (zinc hybrid cathode, sodium ion, sodium sulphur, lead acid and flow batteries) were considered by the applicant. Lithium technology batteries were considered to be the most feasible due to the following reasons (as detailed in Appendix E11):</p> <ol style="list-style-type: none"> 1. Flexible in terms of location and sizing (compared to conventional storage technologies such as pumped hydro); 2. High energy density (compared to other battery technologies); 3. Lightweight; and 4. Lower Environmental Risk than other battery technologies (most notably the very low risk of electrolyte leakage)

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		<p>For the reasons above, lithium battery technology was determined to be the most feasible storage technology identified and was assessed accordingly.</p> <p>The need and desirability for energy storage to be included in PV energy developments is discussed in section 3 of the Amendment Assessment Report.</p> <p>The general advantages and disadvantages of the proposed amendment are as follows:</p> <p><u>Advantages</u> Inclusion of BESS within the authorised footprint will allow for the PV facility to provide energy into the National Grid outside of sunlight hours and as such will be able to provide stored energy during peak times when traditional PV is not available. This will eliminate the need to construct additional non-renewable energy generation facilities to provide energy to the national grid during these peak times.</p> <p><u>Disadvantages</u> None envisioned. All of the participating specialists confirmed that the addition of the BESS within the authorised project footprint would not likely increase the level or nature of the impacts previously assessed in any meaningful way.</p>
	<p><u>(b) Public Participation Process</u> The following must be submitted with the Final Amendment Report:</p>	

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	<ul style="list-style-type: none"> - A List of Registered Interested and Affected Parties as per regulation 42 of the NEMA EIA Regulations, 2014 as amended; - Copies of comments received during the draft Amendment comment period; and - A comments and responses report and responses report which contains all comments received and responses provided to all comments and issues raised during the public participation process. Please note that the comments received from the Department must also form part of the comment and response report. - Please ensure that all issues raised and comments received during the circulation of the draft Amendment Report from registered I&AP's and organs of state which have jurisdiction (including the departments biodiversity sector) in respect of the proposed activity are adequately addressed. - Proof of correspondence of with the various stakeholders must be included in the final amendment report. Should you be unable to obtain comments, proof of the attempts that were made to obtain comments. The public participation must be conducted in terms of Regulation 39, 40, 41, 42, 43 and 44 of the EIA regulations 2014 as amended. 	<ul style="list-style-type: none"> - An I&AP register in compliance with Regulation 42 is attached in Appendix F1. - Copies of all comments received are attached in Appendix F5. - This comments and responses report is attached in Appendix F2 (i.e. this document, which includes the Departments comment) - All comments received from State Departments, including those received from the Departments Biodiversity directorate have been included and addressed. Please refer to Appendix F2 and F5. - The proof the attempts to obtain comments are included in Appendix F3. Kindly note that in terms of regulation 32(1)(aa), the public participation in respect of a part 2 amendment must be undertaken to a level as agreed upon with the competent authority. The mechanism for this was via the submission and approval of a public participation plan. The public participation for this application was therefore undertaken in compliance with the approved public participation plan & regulation 32(1)(aa) and not in compliance with regulation 39 – 44.
	<p>(c) Environmental Management Programme The Amended EMPr must include the following:</p> <ul style="list-style-type: none"> - All recommendations and mitigation measures recorded in the Amendment Report and the Specialist Studies conducted. 	<ul style="list-style-type: none"> - The recommendations and mitigations measures recorded in the amendment assessment report and specialist studies are summarised in section 13 of the Amended EMPr. - The participating specialists did not identify any additional sensitive features within the scope of the proposed amendments. The sensitive features identified

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	<ul style="list-style-type: none"> - An Environmental Sensitivity map indicating the environmental sensitive features identified during the assessment process. - Measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments and other environmentally sensitive areas from construction impacts including the direct or indirect spillage of pollutants - The amended EMPr must include a detailed fire management and protection plan. - In addition to the above, the amended EMPr must comply with Appendix 4 of the EIA regulations 2014, as amended. 	<p>in the previous EIA process and there proximity to the proposed BESS are shown in Appendix D of the amendment assessment report and Appendix A of the Amended EMPr.</p> <ul style="list-style-type: none"> - Measures to protect hydrological resources from potential pollutants are included in sections 5.11 of the Amended EMPr. - A fire management and protection plan is included in section 5.23 of the amended EMPr. - Please refer to the checklist on page 1-3 of the amended EMPr, where compliance appendix 4 of the EIA regulations 2014 is summarised.
	<p><u>(d) Specialist declarations and undertaking under oath.</u> The final amendment report must include the specialist declarations of interest of all specialists who were commissioned for the amendment process and these must be submitted in the departments template.</p>	<p>These specialists declarations on the Departments most recent template have been added to the Final Amendment Assessment Report in Appendix L.</p>
	<p><u>(e) EAP Declaration of Interest and undertaking under oath</u> The submitted amendment report has included the EAP's declaration which was taken from the application for amendment of environmental authorisations. Please note that for the submission of any report to the Department, there is a Departments template for Declaration of the EAP which is inclusive of an undertaking under oath. You are therefore requested to submit the EAP's declaration in the correct template and this template can be obtained from the departments website.</p>	<p>The EAPs declaration form dated 01 September 2018 as extracted from the Departments website on 09 October 2020 has been included in the Final Amendment Assessment Report in Appendix M.</p>

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	<p>(f) Coordinates. Please ensure that the final Amendment reports includes corner coordinates of the proposed battery storage facility.</p>	<p>The corner coordinates of the proposed BESS area have been tabulated on page ii of the Final Amendment Assessment report.</p>
	<p>(g) General</p> <ul style="list-style-type: none"> - Please ensure that all mitigation recommendations are in line with applicable and most recent guidelines. - The draft amended EMPr and Final Facility layout map must be updated to include and incorporate all mitigation measures recommended by the specialists. - The applicant is required to comply with Regulation 39 (1) of the EIA regulations 2014 and submit a written consent of the landowners for the amendment application. - The EAP is to ensure that all the amendments applied for do not trigger any listed activity as outlined in Regulation 31 of the EIA regulations, 2014 as amended. - The final motivation report must include specialist input into a risk assessment for the Battery Energy Storage System and updates to the EMPr to address these additional risks. 	<ul style="list-style-type: none"> - The mitigations included in the amendment assessment report and the amended EMPr are applicable to the scope of the proposed amendments only and are in line with the most recent guidelines. The mitigations applicable to the facility as a whole are included in the original EA and EMPr and remain applicable to the development of the facility as a whole (these have not been reiterated as part of this application for amendment). - The amended EMPr includes the specialist mitigation measures in section 13. The nature of the mitigations are such, that they cannot be spatially displayed. The only participating specialist that identified additional mitigations applicable to the BESS was the Freshwater Ecologist and this has been incorporated into the Assessment report, Risk assessment and the Amended EMPr. The remaining specialists confirmed that the mitigations detailed in the original studies remain in force. - A consent from the landowner, Mr Willie Snyman of MMWS Boerdery (Pty) Ltd is attached in Appendix 4 of the application form. It has also been appended to Appendix N of the Final Amendment Assessment Report. - It is confirmed that the proposed BESS does not trigger any new listed activities that were not previously assessed and authorised. The rational for this statement is included in section 2 of Appendix 11 (technical design report) - The risk assessment which includes any additional mitigation measures provided by the specialists is

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		attached in Appendix G of the Amendment Assessment Report as well as in Appendix D of the Amended EMPr.