

## KOTULO TSATSI ENERGY PV3, NEAR KENHARDT, NORTHERN CAPE PROVINCE

(DEA Ref.no.: 14/12/16/3/3/2/2223)

### COMMENTS AND RESPONSES REPORT

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The Kotulo Tsatsi Energy PV3 application for Environmental Authorisation was announced on Monday, 17 October 2022. The Background Information Document (BID), distributed on Friday, 17 October 2022, served to invite Interested and Affected Parties (I&APs) to register their interest in the project and to submit any comments/queries regarding the proposed project. A notification letter accompanied the BID, announced the availability of the Scoping Report for review and comment. All written comments received from the commencement of the Scoping phase to date have been included in this Comments and Responses Report (C&RR).

The Scoping Report has been made available for a 30-day review and comment period from **Tuesday, 18 October 2022** to **Thursday, 17 November 2022** and the Environmental Impact Assess (EIA) Report is being made available from **Tuesday, 04 April 2023** to **Tuesday, 09 May 2023**. All written comments received on the Scoping Report have been included in this Comments and Responses Report (C&RR) and those received on the EIA Report will be included in this C&RR. The C&RR will be submitted with the final EIA Report to the Department of Forestry, Fisheries and the Environment (DFFE) for their informed decision-making.

**NOTE:**

In terms of Regulation 44(1) of the EIA Regulations 2014, as amended, please note that the comments raised and responses provided at the various virtual Meetings held during the 30-day review period of the EIA Report will be attached as **Appendix C7** of the final EIA Report.

**LIST OF ABBREVIATIONS / ACRONYMS**

AES	Agricultural Extension Services	EIAR	Environmental Impact Assessment Report
BC	Biodiversity Conservation	ESA	Environmental Sensitive Area
BESS	Battery Energy Storage System	EMPr	Environmental Management Programme
CBA	Critical Biodiversity Area	GN	Government Notice
CMA	Catchment Management Agency	I&AP	Interested and Affected Party
C&R	Comments and Response	KTE	Kotulo Tsatsi Energy
DEFF	Department of Environment, Forestry and Fisheries	MEC	Member of the Executive Council
EA	Environmental Authorisation	PoSEIA	Plan of Study for Environmental Impact Assessment
EAP	Environmental Assessment Practitioner	PV	Photo Voltaic
EIA	Environmental Impact Assessment	SACNASP	South African Council for Natural Scientific Professions

## 1. COMMENTS RECEIVED ON THE SCOPING REPORT

### 1.1. Organs of State

NO.	COMMENT	RAISED BY	RESPONSE
1.	<p>Based on the information provided in the report, most of the site is considered to be of low sensitivity due to the lower abundance of protected species and dominance of vegetation which is generally an indicator of poor veld condition. However, it has been noted that during the study site assessment, the northern portion of the development area has been demarcated as Critical Biodiversity Area:1, and several species of concern have been recorded for both floral, fauna, and protected forest. It is recommended that these areas must be treated as No-go areas.</p> <p>Furthermore, to minimize possible loss to biodiversity the following recommendation amongst others must be adhered to: Vegetation clearing prior and during construction must be limited to the footprint of the proposed development</p>	<p>Portia Makitla &amp; Mashudu Mudau Case Officers DFFE: BC</p> <p>Letter: 01 December 2022</p>	<p>Refer to the sensitivity map (<b>Appendix O</b>) for the project. It is clearly indicated where the no-go areas are and what is avoided. The optimised layout map has avoided all no-go sensitive areas.</p>
	<p>A map combining the final layout map superimposed (overlain) on the environmental sensitivity map. This map must reflect the proposed infrastructure's location (e.g., BESS).</p>		<p>Please refer to the layout and sensitivity map in <b>Appendix O</b> of the EIA report.</p>
	<p>The 'no-go' areas of the development property must be clearly demarcated and must be excluded from the final layout plan.</p>		<p>The final optimised layout plan for the PV facility is indicated in <b>Appendix O</b>. This map avoids the no go areas.</p>
	<p>Where possible proposed infrastructure must be aligned to the existing development i.e., roads.</p>		<p>Please refer to the layout map for the development (<b>Appendix O</b>).</p>

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	<p>Anti-collision devices such as bird flappers must be installed where power lines cross avifaunal corridors (e.g., grasslands, rivers, wetlands, and dams).</p> <p>A Search and Rescue Plan to remove and relocate Species of Conservation Concern identified within the study area must be developed by a professional and qualified ecologist.</p> <p>Permit from relevant authorities must be obtained prior commencement of any construction activities for the disturbance or removal of any nationally or provincially protected species.</p> <p>Erosion Management Plan, Maintenance Plan and Rehabilitation Plan of natural vegetation must be developed to mitigate on habitat degradation and consider all phases of the development.</p> <p>Rehabilitation Plan must include the ongoing monitoring and maintenance of the surrounding natural vegetation.</p> <p>Alien Invasive Plant Species Management and Rehabilitation Plans must be developed and submitted as part of the final report to mitigate on habitat degradation due to erosion and alien plant invasion.</p> <p>In addition, please note that the Directorate Biodiversity Conservation does not support any development within a very highly sensitive area that will result with significant negative residual impacts after mitigation.</p> <p>In conclusion, the Public Participation Process documents related to Biodiversity EIA for review and queries should be submitted to the Directorate: Biodiversity Conservation at Email; BCAdmin@dffe.gov.za for the attention of Mr. Seoka Lekota.</p>		<p>The avifaunal impact assessment has been prepared for the site with specific mitigation measures (refer to <b>Appendix E</b>).</p> <p>A search and rescue plan are included in the facility EMPr for the project (refer to <b>Appendix L</b>).</p> <p>An Erosion Management Plan, Maintenance Plan and Rehabilitation Plan are included in the facility EMPr (<b>Appendix L</b>).</p> <p>The optimised layout map provided by the Applicant has taken into account all areas of high sensitivity and has avoided all these areas.</p> <p>It is confirmed that the Public Participation Process documents are submitted to <a href="mailto:BCAdmin@dffe.gov.za">BCAdmin@dffe.gov.za</a>.</p>
2.	You may proceed with the environmental impact assessment process in accordance with the tasks	Azrah Essop Case Officer	The EIA report provides an assessment of impacts and mitigation measures for each listed activity. Refer to Table 6.1 of the EIA Report.

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	<p>contemplated in the PoSEIA as required in terms of the EIA Regulations, 2014, as amended.</p> <p>In addition, the following amendments and additional information are required for the Environmental Impact Assessment Report (EIAR)</p> <p><b>1. <u>Listed Activities</u></b></p> <p>a) The EIAR must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for.</p> <p>b) The listed activities represented in the EIAR and the application form must be the same and correct.</p> <p>c) The EIAR must assess the correct sub-listed activity for each listed activity applied for. The onus is on the EAP and applicant to ensure that no other activities are triggered, and the correct activities are applied for.</p> <p><b>2. <u>Public Participation</u></b></p> <p>a) Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAR.</p> <p>b) Please ensure that all issues raised and comments received during the circulation of the FSR and draft EIAR from registered I&amp;APs and organs of state which have jurisdiction in respect</p>	<p>DFFE</p> <p>Letter: 23 January 2023</p>	<p>The listed activities in the EIA report and application form correspond.</p> <p>All the listed activities that have been applied for have been correctly assessed in Table 6.1 of the EIA Report.</p> <p>All comments received from registered I&amp;APs and organs of state which have jurisdiction in respect of the application during the commencement of the EIA process and those received on the Scoping Report that was made available for a 30-day review and comment period have been included within this Comments and Responses Report, and have been responded to, as required.</p> <p>Copies of all written comments received from registered I&amp;APs and organs of state are included in <b>Appendix C6: Comments Received</b> of the EIA Report and those to be received during the EIA Report 30-day review and comment period will be included in the final EIA Report.</p> <p>All comments received from registered I&amp;APs and organs of state which have jurisdiction in respect of the application during the commencement of the EIA process and those received on the Scoping Report that was made available for</p>

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	<p>of the proposed activity are adequately addressed in the final EIAR. Proof of correspondence with the various stakeholders must be included in the final EIAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.</p>		<p>a 30-day review and comment period have been included within this Comments and Responses Report, and have been responded to, as required.</p> <p>Copies of all written comments received from registered I&amp;APs and organs of state since commencement of the EIA process and those submitted on the Scoping Report are included in <b>Appendix C6: Comments Received</b> of the EIA Report.</p> <p>Proof of correspondence with the various stakeholders and proof of attempts to obtain comments from the Organs of State are included in <b>Appendix C4: Organs of State Correspondence</b> and those received from stakeholders on the project database are included in <b>Appendix C5: Stakeholder Correspondence</b> of the EIA Report.</p> <p>Proof of notification of the availability of the EIA Report is included in <b>Appendix C4: Organs of State Correspondence</b> and <b>Appendix C5: Stakeholder Correspondence</b> of the EIA Report.</p>
	<p>c) A Comments and Response trail report (C&amp;R) must be submitted with the final EIAR. The C&amp;R report must incorporate all comments for this development. The C&amp;R report must be a separate document from the main report and the format must be in the table format as indicated in Appendix 1 of this comments letter in chronological order. Please refrain from summarising comments made by I&amp;APs. All comments from I&amp;APs must be copied verbatim and responded to clearly. Please note that a response such as "noted" is not regarded as an adequate response to I&amp;AP's comments.</p>		<p>All written comments received during the commencement of the EIA process and the 30-day review and comment period of the Scoping Report from I&amp;APs and organs of state are captured verbatim and not summarised and has been responded to as applicable and no response provided as "noted".</p> <p>The C&amp;RR has been updated with the comments received from the DFFE (competent authority) on the final Scoping Report.</p> <p>The C&amp;RR is included as a separate report to the EIA Report as <b>Appendix C8: Comments &amp; Responses Report</b>.</p> <p>It can be confirmed that the C&amp;RR is in the applicable table format.</p>

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	<p>d) Comments from I&amp;APs must not be split and arranged into categories. Comments from each submission must be responded to individually.</p> <p>e) The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 &amp; 44 of the EIA Regulations, 2014, as amended.</p>		<p>The comments received have not been split and have been captured in date order as received and have been responded to individually.</p> <p>The Public Participation Process has been conducted in terms of Regulation 39, 40, 41, 42, 43 &amp; 44 of the EIA Regulations 2014, as amended (GNR 326) as follows:</p> <p><b>Scoping Phase</b></p> <ul style="list-style-type: none"> <li>» Site notices were placed on the boundaries of the development site on 19 October 2022 (refer to <b>Appendix C2: Site Notices &amp; Newspaper Advertisements</b> of the EIA Report).</li> <li>» Process notices were placed at the Hantam Local Municipal Offices in Kenhardt on 19 October 2022 (refer to <b>Appendix C2: Site Notices &amp; Newspaper Advertisements</b> of the EIA Report).</li> <li>» The Background Information Document (BID), accompanied by a cover letter was submitted via email to those I&amp;APs identified and the relevant organs of state on 17 October 2022 (refer to <b>Appendix C4: Organs of State Correspondence</b> and <b>Appendix C5: Stakeholder Correspondence</b> of the EIA Report.)</li> <li>» An advertisement announcing the EIA process and availability of the Scoping Report for review and comment was placed in the Gemsbok newspaper on 14 October 2022 (word text as submitted to the newspaper and tearsheet are in <b>Appendix C2: Site Notices &amp; Newspaper Advertisements</b> of the EIA Report)</li> <li>» The availability of the Scoping Report for review and comment was announced by a notification letter, accompanied by the BID, sent to all registered I&amp;APs and organs of state on the project database (refer to <b>Appendix C4: Organs of State Correspondence</b> and <b>Appendix C5: Stakeholder Correspondence</b> of the EIA Report.)</li> </ul> <p>During the scoping phase, virtual Meetings were held with various stakeholder groups on 07 November 2022, and notes of the meetings are included in <b>Appendix C7: Minutes of Meetings</b> of the EIA Report.</p>

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			<p>The Scoping Report was made available for download on Savannah Environmental's website and could also be sent via other file transfer services i.e. We Transfer, Dropbox, etc. or on CD, on request (refer to <b>Appendix C4: Organs of State Correspondence</b> and <b>Appendix C5: Stakeholder Correspondence</b> of the EIA Report.)</p> <p><b>Impact Assessment Phase</b></p> <ul style="list-style-type: none"> <li>» An advertisement announcing the EIA process and availability of the EIA Report for review and comment was placed in the Volksblad newspaper on 04 April 2023 (word text as submitted to the newspaper is included in <b>Appendix C2: Site Notices &amp; Newspaper Advertisements</b> of the EIA Report). The tearsheet (proof of advertisement) will be included in the final EIA Report.</li> <li>» The availability of the EIA Report for review and comment was announced by a notification letter sent to all registered I&amp;APs and organs of state on the project database on 03 April 2023 (refer to <b>Appendix C4: Organs of State Correspondence</b> and <b>Appendix C5: Stakeholder Correspondence</b> of the EIA Report.)</li> </ul> <p>Virtual Meetings will be held with various stakeholder groups during the 30-day review and comment period of the EIA Report and notes of the meetings will be included in <b>Appendix C7: Minutes of Meetings</b> of the final EIA Report. Should in-person meetings be requested, these will be addressed as applicable.</p> <p>The EIA Report is made available for review and comment from <b>04 April 2023</b> to <b>09 May 2023</b> and is available for download on Savannah Environmental's website and could also be sent via other file transfer services i.e. We Transfer, Dropbox, etc. or on CD, on request (refer to <b>Appendix C4: Organs of State Correspondence</b> and <b>Appendix C5: Stakeholder Correspondence</b> of the EIA Report.)</p>



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	<p><b>3. <u>Layout &amp; Sensitivity Maps</u></b></p> <p>a) The EIAR must provide the following:</p> <ul style="list-style-type: none"> <li>• Clear indication of the envisioned area for the solar PV facility, i.e., location of solar PV, Battery Energy Storage System (BESS); powerlines, supporting Infrastructure: main sub-station, operation and maintenance office, weather station, internal roads, parking, offices, staff ablutions and all associated infrastructure should be mapped at an appropriate scale.</li> </ul>		<p>The layout map and optimised layout map clearly indicate the infrastructure of the project.</p>
	<ul style="list-style-type: none"> <li>• Clear description of all associated infrastructure. This description must include, but is not limited to the following: <ul style="list-style-type: none"> <li>○ Powerlines;</li> <li>○ Internal roads infrastructure; and;</li> <li>○ All supporting onsite infrastructure such as laydown area, guard house and control room etc.</li> </ul> </li> </ul>		<p>The infrastructure is explained in the EIA report (refer to Chapter 2 of the EIA) as well as in the maps. It is clearly indicated where the infrastructure is located and their dimensions.</p>
	<p>b) An environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process.</p>		<p>All environmental sensitive areas and features are indicated in the sensitivity map.</p>
	<p>c) A map combining the final layout map superimposed (overlain) on the environmental sensitivity map.</p>		<p>An optimised layout overlaid with the environmental sensitivity map has been included in the report.</p>
	<p><b>4. <u>Specialist assessments</u></b></p> <p>a) The EAP must ensure that the terms of reference for all the identified specialist studies must include the following:</p> <ul style="list-style-type: none"> <li>• A detailed description of the study's methodology; indication of the locations and descriptions of the development footprint,</li> </ul>		<p>The specialist studies all adhere to the Specialist Assessment protocols.</p>

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	<p>and all other associated infrastructures that they have assessed and are recommending for authorisations.</p> <ul style="list-style-type: none"> <li>• Provide a detailed description of all limitations to the studies. All specialist studies must be conducted in the right season and providing that as a limitation will not be allowed.</li> <li>• Please note that the Department considers a 'no-go' area, as an area where no development of any infrastructure is allowed; therefore, no development of associated infrastructure including access roads is allowed in the 'no-go' areas.</li> <li>• Should the specialist definition of 'no-go' area differ from the Departments definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable.</li> <li>• 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.</li> <li>• Should a specialist recommend specific mitigation measures, these must be clearly indicated.</li> <li>• Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with</li> </ul>		

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	defendable reasons; and were necessary, include further expertise advice.		
	<p>b) It is further 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 note that specialist assessments must be conducted in accordance with these protocols.</p>		<p>The specialist studies is prepared in accordance with Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998 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.</p>
	<p>c) The screening tool output:</p> <ul style="list-style-type: none"> <li>• The screening tool and the gazetted protocols (GN R320 of 20 March 2020 and GN R 1150 of 30 October 2020) require a site sensitivity verification to be completed to either confirm or dispute the findings and sensitivity ratings of the screening tool.</li> </ul>		<p>The specialist studies include a sensitivity verification to confirm or dispute the screening report ratings. A sensitivity verification assessment has been included in the EIA as Appendix K</p>
	<ul style="list-style-type: none"> <li>• It is the responsibility of the EAP to confirm the list of specialist assessments and to motivate in the assessment report, the reason for not including any of the identified specialist studies including the provision of photographic evidence of the site situation. <u>The site sensitivity verification for each of the recommended studies, as per the protocols, must be compiled and attached.</u></li> </ul>		<p>All specialist studies identified by the DFFE Screening have been included in the EIA Report (refer to Appendix D – J). Furthermore, a site sensitivity verification assessment has been included in Appendix K of the EIA report.</p>

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	<p>d) Additionally, the protocols specify that an assessment must be prepared by a specialist who is an expert in the field and is SACNASP registered for e.g.an aquatic assessment must be prepared by a specialist registered with SACNASP, with expertise in the field of aquatics sciences.</p>		<p>The specialist studies have been conducted in accordance with Government Notice No. 320 of 20 March 2020 (i.e., "the protocols"), and Government Notice No. 1150 of 30 October 2020 (i.e., protocols for terrestrial plant and animal species). The report compilers/reviewers are registered with SACNASP.</p>
	<p>e) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expertise advice.</p>		<p>The appointed specialists do not specify contradicting recommendations.</p>
	<p>f) Please include a table that shows the proposed studies and the relevant specialists carrying out the study. In addition, a summary should be included of the specialist's recommendations in terms of the alternatives that are preferred based on the findings of their study.</p>		<p>A table that shows the proposed studies and the relevant specialists carrying out the study has been included in Section 6.6 of the EIA report.</p> <p>Specialist's recommendations have been included in Table 6.4.</p>
	<p><b>General</b> Kindly expand on the applicant's intention with the existing EA for Kotulo Tsatsi CPS 2 i.e. (DFFE Ref.: 14/12/16/3/3/2/694/2). The status of this EA must be taken into consideration and must be demonstrated to this Department whether the applicant intends to lapse this EA.</p>		<p>The Applicant intends on changing the previously authorised CSP project infrastructure to PV project infrastructure. However, previously authorised infrastructure will be retained for use for the planned PV facility:</p> <p>The infrastructure that will be retained will include other associated infrastructure such as the grid connection via a previously authorised grid connection solution, which consists of internal grid reticulation and the authorised 400kV substation.</p>
	<p>The applicant is hereby reminded to comply with the requirements of Regulation 45 of GN R982 of 04 December 2014, as amendment, regarding the time allowed for complying with the requirements of the Regulations</p>		<p>The Applicant was reminded to comply with the requirements of Regulation 45 of GN R982 of 04 December 2014, as amendment, and is aware this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).</p>
	<p>You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as</p>		<p>The Applicant is aware of the requirements of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended. No activity</p>

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	amended, that no activity may commence prior to an environmental authorisation being granted by the Department.		will commence prior to an Environmental Authorisation being granted by the Department.

## 2. COMMENTS RECEIVED DURING THE SCOPING PHASE AND SCOPING REPORT 30-DAY REVIEW PERIOD

### 1.2. *Organs of State*

NO.	COMMENT	RAISED BY	RESPONSE
1.	<p>With reference to your above- mentioned application, I hereby confirm that the proposed work installation is approved in terms of Section 29 of the Electronic Communications Act No. 36 of 2005 as amended.</p> <p>No infrastructure of our Client (Openserve) will be affected by this proposal. We did our utmost to ensure that we indicate our route as accurate as possible and should you discover any of our cables that is not on the sketch please stop and contact us immediately to arrange a site meeting. In the event that our cables are exposed and damaged/stolen by a third party the damages will be repaired at the customer's account. Please make use of pilot holes in order not too damage our infrastructure. Therefore any damages occurred during construction of work will be repaired at the customer's account.</p> <p>Although we are not affected by this proposal, Mr Vivian Groenewald must be contacted at telephone number 081 362 6738 from our Network Field Services. Two (2) weeks prior to commencement of proposed work.</p> <p>Approval of the proposed route is valid for six months. If construction has not yet commenced within this period, then the file must be resubmitted for approval.</p> <p>Any changes/deviations from the original planning during or prior to construction must immediately be communicated to this office.</p> <p>On completion of this project, please certify that all requirements as stipulated in this letter have been met.</p>	<p>Chris Schutte Mvelaphande Trading (Telkom SOC Ltd Service Provider)</p> <p>Letter: 26 October 2022</p>	<p>It is noted that no infrastructure of Openserve will be affected by this facility.</p> <p>The details as contained in the correspondence have been provided to the Applicant for further action, as may be required.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>Please note that should any of our Client (Openserve) infrastructure has to be relocated or altered as a result of your activities the cost for such alteration or relocation will be for your account in terms of section 25 of the Electronic Communication Act.</p> <p>Mr Vivian Groenewald must be contacted at telephone number 081 362 6738. Two (2) weeks prior to commencement of proposed work. It's important that all services are shown on site before construction starts.</p> <p>Approval of the proposed route is valid for six months. If construction has not yet commenced within this period, then the file must be resubmitted for approval. Any changes / deviations from the original planning during or prior to construction must immediately be communicated to this office.</p>		
2.	<p><u>This letter serves to inform you that the following information must be included in the final SR:</u></p> <p><b>5. <u>Competent Authority</u></b> Clarify the reason for this department being the competent authority in terms of S24C of NEMA. This must be expanded on and updated in the application form as well as the report.</p> <p><b>6. <u>Listed Activities</u></b></p> <p>a) It is noted that the proposed solar facility does not fall within any renewable energy development zones.</p> <p>b) Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure (including thresholds) as described in the project description. Only activities (and sub-activities) applicable to</p>	<p>Azrah Essop Case Officer DFFE</p> <p>Letter: 02 November 2022</p>	<p>The Minister of the Department of Forestry, Fisheries and the Environment (DFFE) has been determined to be the Competent Authority according to Government Notice No. 779 published in Government Gazette No. 40110 dated 01 July 2016. This was explained in Section 6.2.1. of the Scoping report. The reasons have also been included in Section 1.2 of the final Scoping Report, and the application form updated.</p> <p>Noted. The site does not fall within a REDZ.</p> <p>All relevant activities applied for in the application for Environmental Authorisation and included in the Scoping Report are specific to the Kotulo Tsatsi PV3 Facility and can be linked to the development activity or infrastructure in the project description.</p>

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	the development must be applied for and assessed.		
	c) Please include the capacity of the proposed onsite substation and powerline(s) in the project description under Activity 11 LN1		Table 6.1 of the final Scoping Report has been updated to include the capacity of the proposed on-site substation and power line in the project description under Activity 11 LN1. The capacity has also been added in the application form.
	d) It is imperative that the relevant authorities are continuously involved throughout the environmental impact assessment process, as the development property possibly falls within geographically designated areas in terms of Listing Notice 3 Activities. Written comments must be obtained from the relevant authorities (or proof of consultation if no comments were received) and submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided.		<p>All relevant authorities will be continuously involved throughout the Scoping and EIA Phases. Comments and/or proof of consultation will also be included in the Draft EIAR.</p> <p>A map indicating the development area within the respective geographical areas as per Listing Notice 3 has been included as Figure 8.1, Figure 9.1 and Appendix D of the FSR.</p>
	e) If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link <a href="https://www.dffe.gov.za/documents/forms">https://www.dffe.gov.za/documents/forms</a> .		Activities applied for in the application form do not differ from those mentioned in the final Scoping Report.
	<p><b>7. <u>Layout &amp; Sensitivity Maps</u></b></p> <p>a) Please provide a layout map which indicates the following:</p> <ul style="list-style-type: none"> <li>• the PV development area;</li> <li>• Position of all infrastructure e.g. panels, BESS, substations, grid connection etc.;</li> <li>• Permanent laydown area footprint;</li> </ul>		Within the identified development area, a facility layout will be defined for assessment in the EIA phase. The layout map and the sensitivity map will be prepared in accordance with this requirement.



NO.	COMMENT	RAISED BY	RESPONSE
	<ul style="list-style-type: none"> <li>• All supporting onsite infrastructure e.g. roads (existing and proposed);</li> <li>• Substation(s) and/or transformer(s) sites including their entire footprint;</li> <li>• Connection routes (including pylon positions) to the distribution/transmission network; and</li> <li>• All existing infrastructure on the site.</li> <li>• The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected;</li> <li>• Buffer areas; and,</li> <li>• All "no-go" areas.</li> </ul>		
	<p>b) The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments and existing grid infrastructure. All available biodiversity information must be used in the finalisation of the map and infrastructure must not encroach on highly sensitive areas as far as possible.</p>		<p>The facility layout that will be defined for assessment in the EIA phase will be overlain with a sensitivity map and a cumulative map, in accordance with this requirement.</p>
	<p>c) Ensure that similar colours are not used to differentiate between infrastructure. i.e. items must be easily distinguishable in the Legend.</p>		<p>All maps and legends clearly indicate different infrastructure and features and have been included in Appendix O of the final Scoping Report.</p>
	<p>d) Google maps will not be accepted for decision-making purposes.</p>		<p>All Google Earth maps have been replaced in the final Scoping Report.</p>
	<p><b>8. Project Overview:</b></p> <p>a) It is mentioned on page 4, that 'The development area was previously authorised for the development of Concentrated Solar Power (CSP) technology (DEFF Ref: 14/12/16/3/3/2/694/2), known as Kotulo Tsatsi Concentrated Solar Plant</p>		<p>Further information on the development areas that was previously authorised for CSP infrastructure has been provided in Section 1.1. of the final Scoping Report.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>2. However, this project is no longer being considered for the site as the development of CSP no longer forms part of the energy mix of the Country as indicated in the IRP.' The proposed development lies within an area previously authorised for CSP project infrastructure, kindly provide further information where possible in this regard.</p>		
	<p>b) Kindly clarify whether the grid connection is part of this application or whether existing infrastructure will be utilised. Section 8.2. states that the grid will not be reassessed, however, it is included in project infrastructure and the listed activities.</p>		<p>The grid connection infrastructure forms part of this application and will be assessed in the EIA process. Section 8.2 has been updated, and the incorrect sentence removed.</p>
	<p><b>9. Public Participation Process</b></p> <p>a) Please ensure that all issues raised and comments received on the draft SR from registered I&amp;APs and organs of state which have jurisdiction (including this Department's Biodiversity Section: <a href="mailto:BCAdmin@dfpe.gov.za">BCAdmin@dfpe.gov.za</a>), in respect of the proposed activity are adequately addressed in the final SR. Proof of correspondence with the various stakeholders must be included in the final SR. 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 &amp; 44 of the EIA Regulations 2014, as amended.</p>		<p>All comments received from registered I&amp;APs and organs of state which have jurisdiction in respect of the application during the commencement of the EIA process and those received on the Scoping Report that was made available for a 30-day review and comment period have been included within this Comments and Responses Report, and have been responded to, as required.</p> <p>Copies of all written comments received from registered I&amp;APs and organs of state are included in <b>Appendix C6: Comments Received</b> of the final Scoping Report.</p> <p>Proof of correspondence with the various stakeholders and proof of attempts to obtain comments from the stakeholders on the project database are included in <b>Appendix C5: Stakeholder Correspondence</b> of the final Scoping Report.</p> <p>Proof of correspondence with organs of state and proof of attempts to obtain comments are included in <b>Appendix C4: Organs of State Correspondence</b> of the final Scoping Report.</p>

NO.	COMMENT	RAISED BY	RESPONSE
			<p>The Public Participation Process has been conducted in terms of Regulation 39, 40, 41, 42, 43 &amp; 44 of the EIA Regulations 2014, as amended (GNR 326) as follows:</p> <ul style="list-style-type: none"> <li>» Site notices were placed on the boundaries of the development site on 19 October 2022 (refer to <b>Appendix C2: Site Notices &amp; Newspaper Advertisements</b> of the final Scoping Report).</li> <li>» Process notices were placed at the Hantum Local Municipal Offices in Kenhardt on 19 October 2022 (refer to <b>Appendix C2: Site Notices &amp; Newspaper Advertisements</b> of the final Scoping Report).</li> <li>» The Background Information Document (BID), accompanied by a cover letter was submitted via email to those I&amp;APs identified and the relevant organs of state on 17 October 2022 (refer to <b>Appendix C4: Organs of State Correspondence</b> and <b>Appendix C5: Stakeholder Correspondence</b> of the final Scoping Report.)</li> <li>» An advertisement announcing the EIA process and availability of the Scoping Report for review and comment was placed in the Gemsbok newspaper on 14 October 2022 (word text as submitted to the newspaper and tearsheet are in <b>Appendix C2: Site Notices &amp; Newspaper Advertisements</b> of the final Scoping Report)</li> <li>» The availability of the Scoping Report for review and comment was announced by a notification letter, accompanied by the BID, sent to all registered I&amp;APs and organs of state on the project database (refer to <b>Appendix C4: Organs of State Correspondence</b> and <b>Appendix C5: Stakeholder Correspondence</b> of the final Scoping Report.)</li> </ul> <p>Virtual Meetings were held with various stakeholder groups on 07 November 2022, and notes of the meetings are included in <b>Appendix C7: Minutes of Meetings</b> of the final Scoping Report.</p> <p>The Scoping Report was made available for download on Savannah Environmental's website and could also be sent via other file transfer services i.e. We Transfer, Dropbox, etc. or on CD, on request (refer to <b>Appendix C4:</b></p>

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			<p><b>Organs of State Correspondence</b> and <b>Appendix C5: Stakeholder Correspondence</b> of the final Scoping Report.)</p>
	<p>b) A comments and response trail report (C&amp;R) must be submitted with the final SR. The C&amp;R report must incorporate all historical comments for this development. The C&amp;R report 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.</p>		<p>All written comments received during the commencement of the EIA process and the 30-day review and comment period of the Scoping Report from I&amp;APs and organs of state are captured in this C&amp;RR which is included as a separate report to the final Scoping Report (refer to <b>Appendix C8: Comments &amp; Responses Report</b> of the final Scoping Report).</p> <p>It can be confirmed that the C&amp;RR is in the applicable table format.</p>
	<p><b>10. Specialist Assessments to be conducted in the EIA Phase</b></p> <p>a) It is noted, under section 8.2. that the applicant intends to utilise previous specialist information conducted through the assessment for Kotulo Tsatsi CSP2. It is acceptable to use this information as a basis point for current specialist assessments, however, specialist assessments produced for Kotulo Tsatsi PV3 must be specific to the current project. Specialist studies must not be older than 5 years for you to use it for the current project.</p>		<p>Specialist reports from suitably qualified specialists will provide specialist EIA reports for inclusion in the EIAR.</p>
	<p>b) Specialist studies to be conducted must provide a detailed description of their methodology, as well as indicate the locations and descriptions of PV arrays, and all other associated infrastructures that they have assessed and are recommending for authorisations</p>		<p>Specialist studies will provide a detailed description of their methodology, locations and descriptions of PV arrays and all other associated infrastructures. These assessments will be included in the EIAR.</p>
	<p>c) The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.</p>		<p>Any limitations to the assessments will be indicated and included in the EIAR.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>d) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and were necessary, include further expertise advice.</p>		<p>Reasonable recommendations will be provided in the EIAR should there be any contradicting recommendations from the specialists.</p>
	<p>e) It is further 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. <b>Please note that specialist assessments must be conducted in accordance with these protocols.</b> Please note further that the protocols require the specialists' to be registered with SACNASP in their respective field.</p>		<p>Specialist studies will be undertaken by suitably qualified and registered specialists in accordance with the minimum standards of sections in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and in Government Notice No. 1150 of 30 October 2020.</p>
	<p>f) Additionally, the protocols specify that an assessment must be prepared by a specialist who is an expert in the field and is SACNASP registered for e.g.an aquatic assessment must be prepared by a specialist registered with SACNASP, with expertise in the field of aquatics sciences.</p>		<p>Assessments will be conducted by suitably qualified and registered specialists in line with protocols and minimum standards.</p>
	<p>g) The screening tool output:</p> <ul style="list-style-type: none"> <li>• The screening tool and the gazetted protocols (GN R320 of 20 March 2020 and GN R 1150 of 30 October 2020) require a site</li> </ul>		<p>A site verification will be undertaken to either confirm or dispute the findings of the DFFE screening tool. The site verification report will be included in the EIAR and/or specialist reports.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>sensitivity verification to be completed to either confirm or dispute the findings and sensitivity ratings of the screening tool.</p> <ul style="list-style-type: none"> <li>• Site sensitivity verifications for all the identified specialist studies (according to the screening tool) must be provided.</li> <li>• The screening tool (Application form) identifies thirteen (13) Specialist reports. It is the responsibility of the EAP to confirm this list and to motivate in the assessment report, the reason for not including any of the identified specialist study including the provision of photographic evidence of the site situation. <u>The site sensitivity verification for each of the recommended studies, as per the protocols, must be compiled and attached.</u> If the findings of the site verification differed from the screening tool and was found to be of a different sensitivity level, then a compliance statement would be acceptable.</li> <li>• 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. 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 the Protocols.</li> </ul>		<p>The DFFE screening has been used as a guide to determine the required specialist studies. A motivation will be included in EIAR should studies not be considered necessary.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>h) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expertise advice.</p>		<p>Reasonable recommendations will be provided in the EIA should there be any contradicting recommendations from the specialists.</p>
	<p><b>11. Cumulative Assessment</b></p>		
	<p>It is noted that the PV facility is planned adjacent to the authorised Kotulo Tsatsi Energy PV 1 and PV2 and occurs within an area previously authorised for CSP project infrastructure. Kindly ensure to expand on this in the scoping and EIA reports.</p>		<p>Further information the authorised PV1, PV2 and CSP projects has been included in Section 8.4 of the final Scoping Report.</p>
	<p><b>12. Environmental Management Programme</b> The EMP must include the following:</p> <ul style="list-style-type: none"> <li>It is drawn to your attention that for <u>substation and overhead electricity transmission and distribution infrastructure</u>, when such facilities trigger activity 11 or 47 of the Environmental Impact Assessment Regulations Listing Notice 1 of 2014, as amended, and any other listed and specified activities necessary for the realisation of such facilities, the Generic Environmental Management Programme, must be used and submitted with the final report over and above the EMP for the facility i.e. separate EMP for the substation, powerline and the facility.</li> </ul>		<p>A facility EMP will be completed and will comply with Appendix 4 of the of the EIA Regulations, 2014, as amended.</p> <p>The EMP for the substation and the EMP for the overhead power line will be compiled using the generic EMP template</p> <p>All three (3) EMPs will be included in the EIA.</p>
	<ul style="list-style-type: none"> <li>Further to the above, you are required to comply with the content of the EMP in terms of Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended.</li> </ul>		<p>The facility EMP will comply with Appendix 4 of the EIA Regulations, 2014, as amended and will be included in the EIA.</p>
	<p><b>General</b></p>		<p>The Scoping Report has been subjected to a 30-day review period and the final Scoping Report is submitted within the prescribed timeframe of the Regulations.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that: <i>S&amp;EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a scoping report which has 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'</i></p>		
	<p>You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of SRs in accordance with Appendix 2 and Regulation 21(1) of the EIA Regulations 2014, as amended.</p>		<p>The Final Scoping Report complies with the requirements of Appendix 2 and Regulation 21(1) of the EIA Regulations 2014.</p>
	<p>Further 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 timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).</p>		<p>The submission of the final Scoping Report complies with the prescribed timeframes of the EIA Regulations.</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>The Applicant acknowledges that no activity may commence prior to receipt of the Environmental Authorisation.</p>



### 1.3. Interested and Affected Parties

NO.	COMMENT	RAISED BY	RESPONSE
1.	<p><b>Navrae oor: Solar Voltaic scoping report for facility includes linear infrastructure, PV1, PV2 &amp; PV3, SW Kenhardt, vir Kotula Tstatsi Energy (Pty)</b></p> <p>With respect to the above application(s) to apply for access to, inspect the farms; Styn's Vley 280, ect. for suitable grazing camps, in the Hantam &amp; Namakwa district municipalities (as advertised in the Gemsbok koerant 14 Oct' 22). AES is an affected party (that provides services to farms in the area, requests the following information as part of Environmental and Human Rights. Would you reply accurately to these questions so they become public knowledge, some require data from Kotula Tstatsi Energy (KTE) personnel;</p> <p><u>Water usage</u></p> <p>A. Who is the adjudicator in the application for a water use license for PV1, PV2 &amp; PV3 plus facilities? Can you provide contact details of the Dept Water affairs and or CMA.</p> <p>How much water are the combined projects of PV1, PV2 &amp; PV3 planning to use from;</p> <ol style="list-style-type: none"> <li>1) Underground reserves</li> <li>2) The Gariep River (possibly by the municipal pipeline</li> </ol> <p>What is the minimum amount of potable water, that PV1, PV2 &amp; PV3 (are combined), utilize a year,</p>	<p>Mark Caplan EAP Agricultural Extension Services (AES)</p> <p>Letter: 21 November 2022</p>	<p>Reference to the Kotulo Tsatsi PV1 and PV2 projects are not applicable to this project. The Kotulo Tsatsi PV1 and PV2 applications received EAs in July 2021 and October 2017 respectively.</p> <p>The Department of Water and Sanitation will be the responsible authority for the Water Use License Application. The contact details can be obtained from the DWS site <a href="https://www.dws.gov.za/">https://www.dws.gov.za/</a></p> <p>Approximately 10 000m<sup>3</sup> of water per year may be required over a 12 to 18-month period during construction, and approximately 50 000m<sup>3</sup> of water per year may be required per year over the 25-year operational lifespan of the project.</p> <p>Due to the location of the site, it is proposed that the project will utilise and develop its own water provision services based on the fact that these services</p>

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	<p>during part of the project construction &amp; maintenance activities?</p>		<p>do not reach the project site. Accordingly, construction water may need to be sourced from a local municipal supply.</p>
	<p>2.51. <u>Project Footprint</u> The size, extent and location of the footprint is part of a process, that should be re-evaluated given the ecological and social impacts of other solar arrays construction projects, in the Northern Cape, that have become unsustainable. For the negative effects on social dynamics &amp; ecological integrity outweigh so called benefit of industrialization.</p>		<p>During the EIA Phase a development footprint will be defined within the larger development area. This will be based on sensitivity data from various specialist that will be undertaken assessments of the development areas according to the Minimum Standards as required by the DFFE.</p> <p>All the specialist assessments will consider the cumulative impacts of the development by considering authorised Solar PV projects with the area.</p>
	<p>2.5.7 <u>Recycling of waste &amp; broken infrastructure pg 20</u> The dorps of Keimoes, Kenhardt and Brandvlei, do not yet have sufficient solid waste recycling facilities. Where are metals containing toxic elements such as, aluminum, cadmium, lead, mercury &amp; others, to be removed to (Bloemfontein? or the SW Cape?) for recycling?</p> <p>Are depots for recycling, ferrous metals, plastics (of all types), glass, used engine oil, hazardous chemicals, to be set up in any of the local towns? Explain where.</p> <ul style="list-style-type: none"> <li>How much does KTE budget for various phases (construction, maintenance &amp; decommissioning) for preventing &amp; cleaning up oil &amp; hydraulic leaks from drilling and other combustion machinery on site?</li> </ul>		<p>Investigations into waste management during the construction, maintenance and operational phases are currently underway. The findings will determine the type of waste management required for the project as well as the budget. Based on this, a waste management plan, which will form part of the EMPr will be compiled and will be included in the EIAR.</p>
	<p><u>Wastewater treatment</u> An alternative to chemical toilets should be considered as petrol &amp; diesel costs, are costly. Also fewer motors on the roads results in fewer incidences with itinerant wildlife and fewer accidents with other vehicles and birds.</p>		<p>Wastewater treatment will be required to meet DWS standards. Based on the pros and cons of different on-site facility sanitation systems as well as experience from previous projects, the use of chemical toilets is a preferred alternative. This will be indicated in the EMPr.</p>

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	<p>3.2.1 <u>Fundamentally different alternatives</u></p> <p>The need for solar generated electricity is primarily in urban areas and hence alternatives to PV1,PV2 &amp; PV3 need to be found in those urban areas, where the demand is. For these reasons;</p> <p>The impacts on the biodiversity have proven to be highly negative in terms of species abilities to navigate, adverse affects around human habitation and linear infrastructure such as road &amp; train networks. Currently many birds, mammals, reptiles, and amphibian species are not able to cross over roads with the amount of traffic. The construction phases of the solar array projects have brought more vehicle, faster drivers, stubborn, reckless fast moving drivers from outside the Noord Kaap province. The impact on abundance and distributions of many small mammals particularly the stripped pole cat (<i>Actonyx striatus</i>), Black footed cat (vulnerable), Serval (near threatened), Honey Badger (near threatened<sup>1</sup>).</p> <p>Rehabilitation costs to restore biodiversity levels are need to be calculated carefully, in the feasibility analysis of any venture. For instance, plant assemblages are require viable seed, nutrient specific micro sites for germination &amp; establishment, the climatic conditions also need to be favourable. If the facility is closed during a drought, restoration of the vegetation communities may take as long as 30-50 years. While animals who are important for moving nutrients and dispersing seeds many be in very</p>		<p>Alternatives have been assessed during the Scoping Phase and have been included in Chapter 3 of the final Scoping Report. Any additional alternatives based on the need and desirability of the project as well as specialist findings from their assessments will be included in the EIAR.</p>

<sup>1</sup> The statutes of these animals and many others has not be accurately assessed since 2020

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	<p>short supply, how is the ecosystem to self-replicate into the future?</p> <p><u>Chapter 4</u></p> <p>4.3 Pg 35. Table 4.1. SIP, bottom point on page, strictly speaking "green energy" is just from photosynthesis. This project used fossil fuels, to reach the location on many times. It is just a regular industrial energy project.</p> <p>Pg 36. In Table 4.1. Climate Change Bill 2018, last point, is incorrect, Cognisance, is required to understand that fossil fuels need to be phased out from all KTE project operations. The project has been planned using fossil fuels, the project needs to be built with other sources of energy, to keep with sustainable development objectives. Just collecting &amp; replacing the chemical treatment of water facilities &amp; and recycling solid waste on site is going to require a solar powered truck. All employees and contractors on the site would require solar powered vehicles for the last statement to be correct.</p> <p>Pg 37. Northern Cape, climate change policy, MEC's address correctly notes that the northern Cape's arid ecosystems are extremely vulnerable to climate change driven desertification. This project is going to accelerate desertification in the Kenhardt &amp; Brandvlei regions by altering key ecosystem processes (such as disturbance of nurse plants in areas, where plant establishment requires micro shaded and moist sites. Another scenario; less</p>		<p>Comments noted. Kotulo Tsatsi Energy PV3 will make use of renewable energy technology, and which will contribute positively towards reducing South Africa's GHG emissions and ensure compliance with all applicable legislation and permitting requirements. In addition, by making use of PV technology, Kotulo Tsatsi Energy PV3 would have reduced water requirements when compared with some other generation technologies.</p>

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	<p>rainfall would require more dependence on the Gariep river.</p> <p><u>Chapter 5</u> There may be a need from humans in the region for, cash (to buy food and pay for services), skill transfers. For example, Afrimat's management on another solar construction project, prefers foreign born Africans, to be the site foreman. Manager of construction crew is person needs to be found from the region, to allow a better skill transfer and less social friction.</p> <p>A. Leave their companies bakkies running at fuel stations while filling up with petrol. B. capture single women from local taverns &amp; intern them in construction camps as sex slaves. C. drive drunk, reckless driving at night, D. don't apply for fishing licenses for the Gariep river. E. are rude to local people, insensitive to cultural norms especially on the weekends. F. waste companies' money by over using bakkies and emitting unnecessary exhaust fumes when they could walk &amp; leave less of a disturbance.</p>		<p>A Social Impact Assessment will be undertaken as part of the EIA process and will look into the aspects of human capital, skills transfers and employment opportunities within the local communities.</p> <p>Issues such as safety and security and in-migration of workers will also be assessed. The comments are noted and will be directed to the specialist for consideration in the EIA phase.</p>
	<p><u>Regarding company's sustainable objective and environmental ethics</u> Has KTE installed photo-voltaic panels in their offices and homes? What are KTE's previous operating credentials? What percentage of heavy metals (from equipment), plastic and paper waste, is recycled at 1) head office? 2) Suppliers of all the equipment to be transported to site?</p>		<p>The developer's objective is to assist in the country's energy crisis by generating clean/renewable energy that will feed into the national grid and assist in the country's energy crisis.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>3) Logistic &amp; engineering firms that are proposed to have work on the development envelope?</p> <p>Where are the solar panels, inverters, batteries procured from? and what are the environmental standards of the various companies?</p> <p>What sorts current or past vegetation (&amp; aquatic ecosystems) restoration projects is KTE engaged in. Send evidence if they have restored land or polluted waterways or vleis.</p> <p><u>Chapter 6.</u> When are the public participation meetings to be held in Keimoes, Kenhardt &amp; Brandvlei? Send out notices at least a month in advance. Where villages &amp; farmers can hear about the indirect and direct cumulative impacts of unsustainable industrialization! Uneducated people need to hear about, water resource sharing and communal livestock opportunities, that have been offered in english only to certain politically correct cartels.</p> <p><u>Chapter 7.</u> 1. A map of the soils (Fig7.2) for CSP2 overlaid with the vegetation communities (Fig 7.3), Another map with the site plan for the panel arrays, ect.. overlaid over Fig 7.3 2. A map that shows the ESA's &amp; the CBA's overlaid with the site plan.</p>		<p>An Engineering, Procurement and Construction (EPC) Contractor will be appointed once Environmental Authorisation has been obtained. A reputable service provider that complies with environmental standards will be used for the procurement of the infrastructure.</p> <p>KTE has not been engaged in past vegetation and/or aquatic ecosystem restoration projects.</p> <p>Public participation meetings i.e. in person, will be held during the impact phase as detailed environmental, including social, assessments and mitigation measure, as and where applicable, will be shared with the community members in close proximity to the development site. The date/s, time and venue/s of these meetings will be advertised, and notification letters will be sent to the registered I&amp;APs, and through consultation with the Ward Councillors to ensure the information is shared and communicated as widely as possible.</p> <p>The project information and environmental findings may be presented in Afrikaans at these meetings.</p> <p>However, it needs to be noted that the report and appendices will be available only in English.</p> <p>Qualified and SACNASP registered specialists will undertake the Soil Potential Assessment, Terrestrial Biodiversity Assessment, and Avifaunal Assessment to determine the local and regional setting of the development area. Impacts will be identified, and the hierarchy of impacts mitigation will be applied. All Specialist studies to be undertaken will be included in the EIAR.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>3. As the KTE, PV project has impacts at the regional level, that translates into possible catchment level. Descriptions of the migration movements of birds and mammals in the larger Kenhardt district are required. Surveys must take into account, itinerant, indigenous birds &amp; animals of conservation importance, that may not reside in the area but that move back &amp; forth to at a particular season. Including what troops of Chacma baboons are currently foraging over all the selected farms, within 70-80km radius of the farm's boundaries. Particularly rare and endangered itinerant birds, need to be monitored that range from Preiska to the western side of Brandvlei and from Keimoes to the foot of the Hantam hills, in the south.</p>		<p>ESA and CBA areas are proposed to be avoided by the development envelope, as indicate din Figure 9.1. The facility layout map will be included in the EIAR.</p>
	<p>Pg. 101 Various Amphibian &amp; reptile species (9 of the former &amp; 25 of the later were potentially recorded for the locality) range over the regional area. Can Savannah Environmental determine the approximate populations in the region, that includes PV1, PV2 &amp; PV3. To avoid cumulative impacts on these species can the field zoologist. Look at an area 35-40km's radius from the centre of the PV's site?</p> <p>As mammals are also itinerant over a larger range than reptiles. What are their seasonal and yearly distribution patterns over a larger area, 70-80km's radius of the centre of the PV site? Pg 103 includes maps showing the ESA's and CBA's, these were overlain with other species movement data, to arrive at Fig 9.1. pg 137. How can the site plan (a.k.a development envelope minus a 35m buffer zone), be adjusted to incorporate biodiversity offsets. So that for instance, areas on adjacent farms that</p>		<p>The comment relates to flora and fauna. A Terrestrial Biodiversity Assessment (inclusive of flora and fauna) will be undertaken by a suitably qualified and registered Specialist. Potential impacts will be identified, and associated mitigation measures will be provided. The Assessment will be included in the EIAR.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>are of lesser biological importance can be traded for areas that have high conservation of biodiversity priority?</p> <p>The valley floor see Fig 7.3 should receive no impact!!</p> <p>Pg 120, The table of, nature of impacts, extent needs a number!!</p> <p>Also the cumulative loss of habitat has regional effects, that should be adjusted.</p> <p>The avifaunal consultant states that rare &amp; threatened Raptors and Bustards should receive higher priority to live. Sending a message to those people in the city wishing to recharge their cell phones, install photo-voltaic panels on their houses and offices.</p> <p><u>Cumulative Impacts</u> pg. 127 &amp; 128, have a table that indicates the areas that could be potentially lost to both, livestock agriculture, biodiversity conservation, and future sustainable use alternatives. That is a regional impact!!</p> <p>8.4.1 pg 131 An analysis of the embodied energy costs of such a project need to be calculated. To start what amount of fossil fuels are currently used to move KTE's employees motor vehicles &amp; aircraft around, Gauteng? To project sites?</p> <p>What is the anticipated diesel and petrol volumes to be used during the planning, construction, maintenance and decommissioning of PV1, PV2 &amp; PV3? As Climate change actions, requires reducing GHG emissions in the short term.</p>		<p>The methodology for the evaluation of Issues Identified through the Scoping Process is provided in Section 6.5.3.</p> <p>The methodology to be used in the EIA phase to determine the significance of impacts is detailed in section 10.6.</p> <p>The specialist studies that will be undertaken will consider cumulative impacts of the project and associated mitigation measures will be provided. The Assessment will be included in the EIAR.</p> <p>Comment noted.</p> <p>The embodied energy is the total amount of energy consumed for the construction of the project. The analysis of the project life cycle is outside of the scope of the EIA.</p> <p>Kotulo Tsatsi Energy PV3 will make use of renewable energy technology, and which will contribute positively towards reducing South Africa's GHG emissions and ensure compliance with all applicable legislation and permitting requirements.</p>



NO.	COMMENT	RAISED BY	RESPONSE
	<p>Cleaner energy - The manufacturers of the PV equipment also need to use cleaner technologies, to prevent the emissions of toxic metals, such as aluminium, cadmium, lead, mercury out of the factories. As cleaner technology requires better filters inside the industrial processes that generated technological gadgets for industry, military and domestic uses Another pertinent question to the DME is what are the end users of the solar generated energy doing with the electricity. Industries both nationally and internationally need to be screened, evaluated and monitored to reduce their wastage of electricity!! Also Sending South African metallic ores to china and other countries that generate electricity from coal need to be halted, in order to cut CO<sub>2</sub> emissions.</p> <p>Climate change models do predict higher ambient temperatures for the region, this would result in creased wildfires if alien and or pioneer grasses were to be the dominant vegetation cover. Fires release carbon hence the revegetation planning after project decommissioning must be done by local vegetation restoration experts. At all costs fire temperatures must be kept low to avoid damage to the soil (and associated biological life), plants and animals.</p>		
	<p><u>9.4 Fatal flaws</u>                      The PV1,PV2 &amp; PV3 project is too large to not have many fatal flaws, in a area where, indigenous palatable, plant growth is very slow, hence vegetation restoration shall require over 10 years of consistent gardening. Many of the environmental flaws also occur off the site, such as processing of additional toxic waste that is an output</p>		<p>The Scoping Phase of the project has determined that the project is not a fatal flaw.</p> <p>The Developers objective is to assist in the country's energy crisis by generating clean/renewable energy that will feed into the national grid and assist in the country's energy crisis. Rooftop installations for a 480MW project would be</p>

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	<p>from the manufacturing process of solar panels. One of the flaws is that the company did not consider focusing on installing PV panels, on roofs in existing urban areas, such as Upington &amp; Kimberly (even retrofitting retailers in smaller towns such as the spar). Existing roofing provides adequate space for malls and offices (underneath) to host &amp; service PV facilities for powering the electricity demands of shoppers.</p>		<p>challenging. Rooftop installations should be pursued, however, this is not the scope of this project.</p>
	<p>10.4 <u>Consideration of Alternatives</u> KTE should rather concentrate on retrofitting existing buildings in urban areas. This reduces the transaction costs and transformation costs to an almost pristine environment!</p>		<p>Alternatives have been assessed during the Scoping Phase and have been included in Chapter 3 of the final Scoping Report. Any additional alternatives based on the need and desirability of the project as well as specialist findings from their assessments will be included in the EIAR.</p>
	<p><u>Additional Questions from AES</u></p> <ul style="list-style-type: none"> <li>• How much money and human resource budget is set aside (in a ethically managed Trust) for rehabilitation to allow successful farming after decommissioning of the photovoltaic arrays?</li> </ul>		<p>The Human Resource Budget will be determined and finalised once Environmental Authorisation has been issued.</p>
	<ul style="list-style-type: none"> <li>• How flexible is KTE in working out a proper sampling time scheduling? Given the critical seasons that birds and animals are mating and nesting, are too be quiet times. What is the highest decibel noise emitted from KTE's drilling and site engines? In this regard, how does Savannah environmental personnel, plan to prepare the Environmental Safety officers for the site, given that there may be cultural &amp; ethical differences between him/ her and the prospecting geologist and contractor teams?</li> </ul>		<p>An EMPr will be formulated with different roles and responsibilities for the construction, operational and maintenance personnel. The EMPr will also include any monitoring requirements as well as the frequency.</p>
	<ul style="list-style-type: none"> <li>• What sort of compensation is offered to villages &amp; farmers; for construction &amp; maintenance activities that hinder; farming operations, current and future</li> </ul>		<p>The designing and planning of the project aims at ensuring that not farming operations are hindered. Furthermore, measures will be implemented to ensure that water quality and wild, animal and bird breeding is not compromised.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>water quality, &amp; wild animal &amp; bird breeding successes?</p> <p>When are you holding the first the I&amp;AP meeting in Brandvlei en Kenhardt after the specialist studies are completed, stuur kennisgewings in Afrikaans.</p>		<p>Public participation meetings i.e. in person, will be held during the impact phase as detailed environmental, including social, assessments and mitigation measure, as and where applicable, will be shared with the community members in close proximity to the development site. The date/s, time and venue/s of these meetings will be advertised, and notification letters will be sent to the registered I&amp;APs, and through consultation with the Ward Councillors to ensure the information is shared and communicated as widely as possible.</p> <p>The project information and environmental findings may be presented in Afrikaans at these meetings. However, it needs to be noted that the report and appendices will be available only in English.</p>
2.	<p>We are very excited about the Kotulo Tsatsi Project in our vicinity.</p> <p>Hoërskool Martin Oosthuizen (Kakamas) is the closest High School and hostel for the learners of Kenhardt, Brandvlei, Keimoes and surrounding areas.</p> <p>If possible, please can you provide me with contact details of the HR department or the person that are responsible for the BEE-projects of the Kotulo Tsatsi Energy project?</p>	<p>Ilze Pieterse Teacher Martin Oosthuizen Highschool (Kakamas)</p> <p>E-mail: 03 November 2022</p>	<p>Support for the project is noted. The Developer has been informed of this request and will make contact for further engagement in this regard.</p>