

Comments Received

DEFF



environment, forestry & fisheries

Department:
Environment, Forestry and Fisheries
REPUBLIC OF SOUTH AFRICA

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

DEFF Reference: 14/12/16/3/3/1/2237

Enquiries: Mathodi Mogorosi

Telephone: (012) 399 9388 E-mail: MMogorosi@environment.gov.za

Ms Jo-Anne Thomas
Savannah Environmental (Pty) Ltd
PO Box 148
SUNNINGHILL
2191

Telephone Number: (011) 656 3237
Email Address: joanne@savannahsa.com

PER MAIL / E-MAIL

Dear Ms Thomas

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED BATTERY STORAGE SYSTEM (BESS) AND ASSOCIATED INFRASTRUCTURE AT GREAT KAROO WIND ENERGY FACILITY, WITHIN THE KAROO HOOGLAND LOCAL MUNICIPALITY IN THE NORTHERN CAPE PROVINCE

The draft Basic Assessment Report (BAR) dated October 2020 and application for environmental authorisation received by this Department on 16 October 2020, refer.

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

Listed Activities

- (a) Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure as described in the project description. Only activities applicable to the development must be applied for and assessed. In this regard, please note installations, facilities or infrastructure related to the development (or expansion) of a battery energy storage system will not trigger any of the activities related to the development and related operation of facilities or infrastructure, for the storage, or storage and handling of a dangerous good, unless the battery is not fully assembled and the electrolyte (or substances making up such electrolyte) intended for such battery, may potentially be stored on site, in a container (e.g. tanks), prior to filling. In light of this, please clarify the applicability of the applied for activities 14 of Listing Notice 1 and 10(g)(ii)(ee) of Listing Notice 3.
- (b) If the activities applied for in the application form differ from those mentioned in the final BAR, 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 <https://www.environment.gov.za/documents/forms>.
- (c) Please ensure that the written consent of the landowner is attached to the application, where the proponent is not the owner or person in control of the land on which the activity is to be undertaken.
- (d) It is imperative that the relevant authorities are continuously involved throughout the basic assessment process as the development property possibly falls within geographically designated areas in terms of GN R. 985 Activities. Written comments, or proof of the attempt to obtain comments, from the relevant authorities must be submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided.

Layout & Sensitivity Maps

- (e) Please ensure that the final BAR includes a layout map which indicates the following:
 - (i) The location of the battery storage system in relation to the authorised Great Karoo Wind Energy Facility, with associated infrastructure;
 - (ii) All supporting onsite infrastructure e.g. roads (existing/authorised and proposed);
 - (iii) The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected by the BESS; and
 - (iv) Buffer areas; and, all "no-go" areas.
- (f) The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments; and existing grid infrastructure.
- (g) Google maps will not be accepted.

Alternatives

- (h) Please note that you are required to provide a full description of the process followed to reach the proposed preferred technology alternative within the site, in terms of Appendix 1(3)(1)(h) of the EIA Regulations 2014, as amended, including details of all the technology alternatives considered (particularly the Lithium-ion and Redox-flow, and the advantages and disadvantages associated with each).
- (i) Please provide written proof of an investigation and motivation, if no reasonable or feasible alternatives exist in terms of Appendix 1.

Coordinates

- (j) Kindly ensure that coordinates of the BESS with associated infrastructure are provided in the format: degrees, minutes and seconds.

Specialist Assessments

- (k) Specialist studies to be conducted must provide a detailed description of their methodology, as well as all other associated infrastructures that they have assessed and are recommending for the authorisation.
- (l) 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.
- (m) 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 expert advice.
- (n) Please ensure that declaration forms are attached for all specialist studies conducted. Some of the attached specialist assessments refer to the Gunstfontein BESS.

Public Participation Process

- (o) The following information must be submitted with the final BAR:
 - (i) A list of registered interested and affected parties as per Regulation 42 of the NEMA EIA Regulations, 2014, as amended;
 - (ii) Copies of all comments received during the draft BAR comment period; and
 - (iii) A comment and response report which contains all comments received and responses provided to all comments and issues raised during the public participation process for the draft BAR. Please note that comments received from this Department must also form part of the comment and response report.
- (p) Please ensure that all issues raised and comments received during the circulation of the draft BAR from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section) in respect of the proposed activity are adequately addressed in the final BAR.
- (q) Proof of correspondence with the various stakeholders must be included in the final BAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.

Environmental Management Programme

- (r) Please ensure that the content of the EMPr complies with the requirements of the Appendix 4 of the EIA Regulations 2014, as amended.
- (s) The EMPr must distinguish between impact management actions and impact management outcomes, per Appendix 4 of the EIA Regulations 2014, as amended.
- (t) The EMPr must include:
 - (i) A map at an appropriate scale, which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided (no-go areas), including buffers.
 - (ii) All recommendations and mitigation measures recorded in the BAR and the specialist studies conducted.
 - (iii) Measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments, and other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants.
- (u) Please ensure that the EMPr also includes:
 - (i) The method of monitoring the implementation of the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.
 - (ii) The frequency of monitoring the implementation of the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.
 - (iii) An indication of the persons who will be responsible for the implementation of the impact management actions.
 - (iv) The time periods within which the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended, must be implemented.
 - (v) The mechanism for monitoring compliance with the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.
 - (vi) A program for reporting on compliance, taking into account the requirements as prescribed by the Regulations.

General

- (v) Please ensure that the final BAR includes an undertaking under oath or affirmation by the EAP (administered by a Commissioner of Oaths) as per Appendix 1(3)(r) of the NEMA EIA Regulations, 2014, as amended, which states that the BAR must include:
 - (i) *"an undertaking under oath or affirmation by the EAP in relation to:*
 - (ii) *the correctness of the information provided in the reports;*
 - (iii) *the inclusion of comments and inputs from stakeholders and I&APs;*
 - (iv) *the inclusion of inputs and recommendations from the specialist reports where relevant; and*
 - (v) *any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties".*
- (w) Please also ensure that the final BAR includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 1(3)(1)(q) of the NEMA EIA Regulations, 2014, as amended.
- (x) You are reminded that the final BAR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of basic assessment reports and EMPr in accordance with Appendix 1, Appendix 4 and Regulation 19(1) (a) of the Environmental Impact Assessment Regulations (2014), as amended.
- (y) Please ensure that the risks associated with the Battery Energy Storage System technologies are assessed and included in the final BAR.

You are further reminded to comply with Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: *"Where basic assessment must be applied to an application, the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority - (a) a basic assessment report, inclusive of specialist reports, an EMPr, and where applicable a closure plan, which have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority."*

Should there be significant changes or new information that has been added to the BAR or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 19(b) of the NEMA EIA Regulations, 2014, as amended, which states: *"the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (b) a notification in writing that the basic assessment report, inclusive of specialist reports an EMPr, and where applicable, a closure plan, will be submitted within 140 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the basic assessment report or EMPr or, where applicable, a closure plan, which changes or information was not contained in the reports or plans consulted on during the initial public participation process contemplated in subregulation (1)(a) and that the revised reports or, EMPr or, where applicable, a closure plan will be subjected to another public participation process of at least 30 days"*.

Should you fail to meet any of the timeframes stipulated in Regulation 19 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.

Yours sincerely



Mr Sabelo Malaza

Chief Director: Integrated Environmental Authorisations

Department of Environment, Forestry and Fisheries

Signed by: Ms Sindiswa Dlomo

Designation: Deputy Director: National Infrastructure Projects

Date: 12/11/2020

cc:	Richard Gordon	Great Karoo Wind Farm (Pty) Ltd	E-mail: stephnie.kot@aced.co.za
	Bryan Fisher	NC: DENC	E-mail: Bfisher@ncppg.gov.za
	JJ Fortuin	Karoo Hoogland Local Municipality	E-mail: munman@karoohoogland.gov.za



environment, forestry & fisheries

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Reference: Great Karoo Wind Energy Facility BESS

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PER E-MAIL

Dear Ms. Thomas

COMMENTS ON DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED BATTERY ENERGY STORAGE SYSTEM (BESS) AND ASSOCIATED INFRASTRUCTURE AT GREAT KAROO WIND ENERGY FACILITY, NORTHERN CAPE PROVINCE

The Directorate: Biodiversity Conservation reviewed and evaluated the aforementioned draft report. Based on the information provided in the specialist report, the proposed development falls within the Komsberg Renewable Energy Development Zone (REDZ). Furthermore, BESS falls within CBA 1 and CBA 2 classified areas, development in these areas is generally not preferred. However, based on the preliminary layout provided for the Great Karoo BESS 500m assessment region, no environmental fatal flaws or "No-Go" areas were identified from the specialist studies conducted, provided it is located in areas of low ecological sensitivity within the 500m assessment area.

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

- Pre-construction walk-through to locate species of conservation concern that can be translocated or avoided must be undertaken.
- Search and rescue plan for the identified plant Species of Conservation Concern (SCC) must be developed.
- Permits from relevant authorities must be obtained for the removal or disturbance of any TOPs, Red Data listed or provincially protected species.

- Erosion and Alien Invasive plant species Management Plan and Rehabilitation Plan must be developed and submitted as part of the final report to mitigate on habitat degradation due to erosion and alien plant invasion.
- Sensitive areas in close proximity to the development footprint must be demarcated and regarded as No-Go area i.e. drainage features.

Yours faithfully



Mr. Seoka Lekota
Control Biodiversity Officer Grade B: Biodiversity Conservation
Department of Environment, Forestry & Fisheries
Date: 16/11/2020

SAHRA

Our Ref:



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Enquiries: Natasha Higgitt
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Email: nhiggitt@sahra.org.za
CaseID: 15615

Date: Thursday November 12, 2020
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Final Comment

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

Attention: Savannah Environmental (Pty) Ltd

PO Box 148
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2157

Great Karoo Wind Farm would like to provide for the installation of a Battery Energy Storage System (BESS) at the authorised Great Karoo WEF (DEA Ref 12/12/20/2370/3) in the Northern Cape. The BESS is proposed to be located near to the facility substation, and will be approximately 3-4ha in total extent. Medium Voltage below ground or overhead cabling (33kV or less) will connect the BESS to the substation and an access road to the BESS will branch off the WEF roads. An area of ~500m around the boundary of the facility substation is to be assessed, to allow for the optimization of the placement of the BESS. The BESS is envisaged to become an integral component of the authorised WEF. The full extent of the 500m assessment zone has been assessed in this report.

Savannah Environmental (Pty) Ltd has been appointed by Great Karoo Wind Farm (Pty) Ltd to conduct an Environmental Authorisation (EA) Amendment Application process for the authorised Great Karoo Wind Farm, south of Sutherland, Northern Cape Province (DEA Ref 12/12/20/2370/3).

A draft Basic Assessment Report (DBAR) has been submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. The proposed amendment will include the installation of a battery energy storage system (BESS) and associated infrastructure such as fencing around the BESS, possible fire break around the BESS, MV cabling, laydown area and access road (not longer than 500 m) within the authorised footprint covering less than 4 ha.

A previous SAHRIS Case ID 218 has reference (<https://sahris.sahra.org.za/cases/hidden-valley-wind-farm-soetwater-karusa-great-karoo>). In a Comment issued on the 09/5/2012, SAHRA noted no objections to the original Hidden Valley Wind Farm. The development was subsequently split into three separate developments with their own unique Environmental Authorisation reference numbers. In an Interim Comment issued on the 21/10/2016, SAHRA noted that there would be no further need for a palaeontological field assessment as the desktop study was sufficient, but that

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a map of the identified palaeontological resources relative to the proposed layout of the development be provided to SAHRA. SAHRA has also requested that an archaeological walk-down for the Great Karoo Wind Energy Facility be conducted prior to the construction phase.

CTS Heritage has been appointed to provide heritage specialist input as part of the EA Amendment application report as required by section 24(4)b(iii) of NEMA and section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Lavin, J. 2020. Heritage Screening Assessment for Basic Assessment Process for the Great Karoo Battery Energy Storage System, Northern Cape Province.

No heritage resources were previously identified within the development footprint where the BESS is proposed to be situated.

Recommendations provided in the report include the following:

- A walk-down of the proposed BESS area is required prior to construction. This must be conducted by a qualified archaeologist to ensure that no heritage resources are to be impacted by the development. If heritage resources are identified at or near any proposed infrastructure, an assessment of the significance of the heritage resources and the impact to the identified heritage resource must be completed. A report detailing the results of the survey must be submitted to SAHRA before construction commences;
- If concentrations of archaeological heritage material and human remains are uncovered during construction, all work must cease immediately and be reported to the Albany Museum (046 622 2312) and/or the South African Heritage Resources Agency (SAHRA) (021 642 4502) so that systematic and professional investigation/ excavation can be undertaken;
- Construction managers/foremen should be informed before construction starts on the possible types of heritage sites and cultural material they may encounter and the procedures to follow when they find sites;
- A map of the identified palaeontological resources relative to the layout of the proposed development must be emailed to the case officer and the ECO must monitor all excavations associated with the BESS.

Final Comment

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

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed amendment to the authorised development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. Further additional specific conditions are provided for the development as follows;
- The conditions in the comment issued on the 21/10/2016 (<https://sahris.sahra.org.za/node/374021>) are still valid and must be adhered to;
- Reports of the monitoring by the ECO must be submitted to SAHRA upon completion of the construction phase;
- 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
 - i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;
- The Final BAR and EMPr must be submitted to SAHRA for record purposes;
- The decision regarding the EA Amendment Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.

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

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CaseID: 15615

Date: Thursday November 12, 2020
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Yours faithfully

Natasha Higgitt
Heritage Officer
South African Heritage Resources Agency

Phillip Hine
Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/541730>

Terms & Conditions:

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