

Appendix C6: Comments and Responses Report

GREAT KAROO BATTERY ENERGY STORAGE SYSTEM (BESS), NORTHERN CAPE PROVINCE

(DEFF Ref. No.: 14/12/16/3/3/1/2237)

COMMENTS AND RESPONSE REPORT

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The Great Karoo BESS Process was announced on Friday, 16 October 2020 with the announcement of the availability of the Basic Assessment (BA) Report. The BA Report was made available for a 30-day review and comment period from **Friday, 16 October 2020** to **Monday, 16 November 2020**. The Comments and Responses Report (C&RR) includes comments received during the review and comment period and is included in **Appendix C5** of the BA Report.

LIST OF ABBREVIATIONS / ACRONYMS

APM	Archaeology, Palaeontology and Meteorites	BA	Basic Assessment
BAR	Basic Assessment Report	BGG	Burial Grounds and Graves
DEFF	Department of Environment, Forestry and Fisheries	EMPr	Environmental Management Programme
I&APs	Interested and Affected Parties	NHRA	National Heritage Resources Act
SAHRIS	South African Heritage Resources Information System	POPI Act	Protection of Personal Information Act
SAHRA	South African Heritage Resources Agency		

1. COMMENTS RECEIVED AT THE COMMENCEMENT OF THE BASIC ASSESSMENT PROCESS AND DRAFT BASIC ASSESSMENT REPORT

1.1. Organs of State

NO.	COMMENT	RAISED BY	RESPONSE
1.	<p>This letter serves to inform you that the following information must be included to the final BAR:</p> <p>Listed Activities</p> <p>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.</p>	<p>Matlhodi Mogorosi Case Officer DEFF</p> <p>Letter: 12 November 2020</p>	<p>Depending on the Battery Technology selected for implementation, assembly on site may be required and electrolyte solution may be brought to site in storage totes and temporarily stored on site before being pumped into the battery system. The activities 14 of Listing Notice 1 and 10(g)(ii)(ee) of Listing Notice 3 are therefore considered applicable due to the assembly and temporary storage nature possible of potential electrolytes.</p> <p>The description of the applicability of these listed activities has been updated in the BAR, for clarity.</p> <p>Please note: a revised application form has been submitted as part of the BAR submission, which now reflects the minor updates made to the description of the activities. Please note, no activities have been removed or added.</p>
	<p>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.</p>		<p>As above, the activities 14 of Listing Notice 1 and 10(g)(ii)(ee) of Listing Notice 3 are therefore considered applicable due to the assembly and temporary storage nature possible of potential electrolytes. All listed activities in the BAR are aligned with those in the application form.</p> <p>Please note: a revised application form has been submitted as part of the BAR submission, which now reflects the minor updates made to the description of the activities. Please note, no activities have been removed or added.</p>

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	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.		Please refer to Appendix 3 of the revised application form submitted for the written consent of the one landowner applicable to this project – Eldri Marius Van Zyl.
	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.		Please refer to Appendix C of the BAR for a record of relevant authorities contacted for comments. Please also refer to the biodiversity directorate comments received from Mmatlala Rabothata included in this C&RR (and responses thereto), as well as the sensitivity map for the project showing the Critical Biodiversity Areas for the project. Refer to Figure 8.1 BAR as well as "Figure 5.10: Extract of the Northern Cape Critical Biodiversity Areas map for the broader study area around the Great Karoo BESS, showing that the BESS occurs within an area classified as CBA 1 and CBA 2" of the Basic Assessment report for a map depicting the Critical Biodiversity areas in relation to the 500m assessment zone of the proposed BESS.
	<u>Layout & Sensitivity Maps</u>		
	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;		Please refer to Figure 2.1 (Layout Map) of the Basic Assessment report for a layout map showing the location of the BESS within the 500m assessment region, along with all supporting infrastructure. Please also refer to Figure 8.1 for a layout map overlain on the environmental sensitivity map, containing the aspects requested.
	ii. All supporting onsite infrastructure e.g. roads (existing/authorised and proposed);		Please note, no heritage features were determined present within the 500m assessment zone of the Great Karoo BESS and therefore none are included in the sensitivity map.
	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		A cumulative map showing neighbouring renewable energy developments; and existing BESS infrastructure is included in Figure 7.1 of the BAR.
	iv. Buffer areas; and		
	v. 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.		No google maps were used

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	<p><u>Alternatives</u></p> <p>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).</p>		<p>Please refer to Chapter 2.3 of the Basic Assessment report for a detailing of the alternatives considered for the project, in particular the technology alternatives for the BESS. In particular, please refer to 2.3.3 for a detailing of the advantages and disadvantages associated with the alternatives.</p>
	<p>i) Please provide written proof of an investigation and motivation, if no reasonable or feasible alternatives exist in terms of Appendix 1.</p>		<p>Please refer to Chapter 2.3 of the Basic Assessment report for a detailing of the alternatives considered for the project, in particular the technology alternatives.</p>
	<p><u>Coordinates</u></p> <p>j) Kindly ensure that coordinates of the BESS with associated infrastructure are provided in the format: degrees, minutes and seconds.</p>		<p>Please refer to Table 2.1 within the BAR for coordinates of the bounds of the proposed BESS in degrees, minutes and seconds format, as well as associated infrastructure (access road and MV cabling).</p>
	<p><u>Specialist Assessments</u></p> <p>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.</p>		<p>Please refer to Appendix D, E, F and G of the BAR for the specialist studies, each of which contains a description of the project and the methodology utilised in assessment.</p>
	<p>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.</p>		<p>Please refer to Appendix D, E, F and G of the BAR for the specialist studies, each of which contains a description of assumptions and limitations applicable to their respective study. All studies were conducted within a suitable season, where applicable.</p>
	<p>m) 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>No contradictions between the findings of the BAR and the specialist studies are applicable.</p>

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	n) Please ensure that declaration forms are attached for all specialist studies conducted. Some of the attached specialist assessments refer to the Gunstfontein BESS.		Please refer to Appendix J of the Basic Assessment report for specialist declarations.
	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;		The list of registered interested and affected parties (I&APs) is included in Appendix C1 of the BAR containing full contact details. As per the Protection of Personal Information Act (POPI Act), this information cannot and has not been made available to any third party during the public participation process for this application.
	ii. Copies of all comments received during the draft BAR comment period; and		Comments received during the legislated 30-day review and comment period is included in Appendix C6 of the BAR.
	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.		All comments received during the commencement of the BA process and those received on the BAR that was made available for legislated 30-day review and comment period have been included within this C&RR and included as a separate document to the BAR as Appendix C6 . All comments received have been adequately responded to.
	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.		Comments received from the DEFF and the Department's Biodiversity Conservation Directorate are captured in this C&RR and the letter included in Appendix C5 of the 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.		Proof of correspondence with the various stakeholders and proof of attempts to obtain comments from the stakeholders on the project database are included in Appendix C4 of the BAR. Proof of correspondence with organs of state and proof of attempts to obtain comments are included in Appendix C3 of the BAR. The Public Participation Process has been conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended (GNR 326), as

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			<p>well as in accordance with the approved Public Participation Plan (Appendix C7).</p> <p>I&APs and organs of state were notified of the commencement of the BA process as follows:</p> <ul style="list-style-type: none"> ➤ The commencement of the BA process was announced via email to those I&APs identified and the relevant organs of state on 16 October 2020 (refer to Appendices C3 & C4 of the BAR.) ➤ I&APs and organs of state were notified of the availability of the BAR in the BA process announcement letter dated 16 October 2020. ➤ An advertisement was placed in Die Noordwester newspaper on 16 October 2020 (tearsheet included in Appendix C2 of the BAR) <p>The BAR was made available for the legislated 30-day review and comment period from, Friday, 16 October 2020 until Monday, 16 November 2020 and the availability of the report was announced through the means below. Opportunity for consultation was also provided during the 30-day review and comment period.</p> <ul style="list-style-type: none"> ➤ The details of the availability of the report were included in the advertisement placed in Die Noordwester newspaper on 16 October 2020 (tearsheet included in Appendix C2 of the BAR). ➤ A notification letter was sent to all registered I&APs and Organs of State on the project database (Appendix C1 of the BAR) informing them of the availability of the BAR for review and comment and the details of where the report could be accessed for review. <p>The BAR was also made available for download from 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.</p> <p>Site notices were placed at the proposed development site on 07 August 2020 and proof of the placement of the site notices are included in Appendix C2</p>

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			of the BAR. Process notices were also placed at various public places within the town of Sutherland and is included in Appendix C2 of the BAR.
	<p><u>Environmental Management Programme</u></p> <p>r) Please ensure that the content of the EMPr complies with the requirements of the Appendix 4 of the EIA Regulations 2014, as amended.</p>		Please refer to Table 4.1 of the EMPr where the requirements of Appendix 4 of the EIA regulations 2014, as amended, and the location within the EMPr where such information has been addressed have been indicated.
	s) The EMPr must distinguish between impact management actions and impact management outcomes, per Appendix 4 of the EIA Regulations 2014, as amended.		The EMPr provides clear outcomes, with concomitant actions across all the project phases.
	<p>t) The EMPr must include:</p> <p>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.</p>		Please refer to Figure 2.3 of the EMPr for a sensitivity map including no-go areas or buffers as may be applicable.
	<p>ii. All recommendations and mitigation measures recorded in the BAR and the specialist studies conducted.</p>		The EMPr contains all recommendations and mitigation measures as recorded in the BAR and the specialist studies conducted.
	<p>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.</p>		Please refer to outcome 6 for measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments. Please also refer to outcome 12 and outcome 22 for management measures towards containment and spillage related to the BESS components and materials.
	<p>u) Please ensure that the EMPr also includes:</p> <p>i. The <u>method of monitoring</u> the implementation of the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.</p>		Please refer to the Performance Indicator and Monitoring tables provided for each outcome as listed in the EMPr for a detailing of the method of monitoring required towards monitoring the management actions contemplated for each outcome.
	<p>ii. The <u>frequency of monitoring</u> the implementation of the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.</p>		Please refer to the Performance Indicator and Monitoring tables provided for each outcome as listed in the EMPr for a detailing of the frequency of monitoring required towards monitoring the management actions contemplated for each outcome.

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	iii. An <u>indication of the persons</u> who will be responsible for the implementation of the impact management actions.		Please refer to the responsibility column provided for each action as listed in the EMPr for a detailing of the person responsible for the implementation of the impact management actions contemplated for each outcome.
	iv. The <u>time periods</u> within which the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended, must be implemented.		Please refer to the timeframe column provided for each action as listed in the EMPr for a detailing of the periods related to the implementation of the impact management actions contemplated for each outcome.
	v. The <u>mechanism for monitorina compliance</u> with the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.		Please refer to the Performance Indicator and Monitoring tables provided for each outcome as listed in the EMPr, as well as Sections 6.4 and 6.5 of the EMPr for a detailing of the mechanisms of monitoring required towards monitoring the management actions contemplated for each outcome.
	vi. A <u>program for reporting on compliance</u> , taking into account the requirements as prescribed by the Regulations.		Please refer to Chapter 6 of the EMPr for a programme for reporting on compliance.
	<p>General</p> <p>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:</p>		Please refer to Appendix M of the Basic Assessment report for an undertaking under oath by the EAP.
	i. <i>"an undertaking under oath or affirmation by the EAP in relation to:</i>		
	ii. <i>the correctness of the information provided in the reports;</i>		
	iii. <i>the inclusion of comments and inputs from stakeholders and I&APs;</i>		Please refer to Appendix K of the Basic Assessment report for an undertaking under oath by the EAP. In addition, please refer Appendix C6 for the Comments and Response report showing a complete record of the comments and inputs from Stakeholders.
	iv. <i>the inclusion of inputs and recommendations from the specialist reports where relevant; and</i>		Please refer to Appendix K of the Basic Assessment report for an undertaking under oath by the EAP. In addition, please refer to Chapter 6 and 7 for a complete listing of the inputs and recommendations made by specialists.

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	v. <i>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</i> ".		Please refer to Appendix K of the Basic Assessment report for an undertaking under oath by the EAP. In addition, please refer to Appendix C for a complete record of the information provided to 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.		Please refer to Section 8.5 of the BAR for a determination of the period for which an Environmental Authorisation is requested. A 10-year validity period is requested for the Environmental Authorisation if approved by the competent authority.
	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.		The BAR complies with the scope and content requirements as determined in Appendix 1 of the EIA 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.		Please refer to Chapters 6 and 7 of the BAR for an assessment of impacts and risks related to the BESS technologies as well as the mitigation measures provided for the control and management thereof. Please also refer to Outcomes 11, 12, 19, 20 21 and 22 of the EMPr for measures required to manage the risks associated with the BESS.
	You are further reminded to comply with Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: <i>"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</i>		The BAR will be submitted within the prescribed regulated timeframes.

NO.	COMMENT	RAISED BY	RESPONSE
	<i>received, including any comments of the competent authority."</i>		
	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: <i>"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"</i> .		Comment noted, no further action required. No significant changes or new information has been added to the BAR or EMPr.
	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.		Comment noted, no further action required.
	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.		Comment noted, no further action required.
2.	Final Comment	Natasha Higgitt	Comment noted, no further action required.

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	<p>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:</p> <ul style="list-style-type: none"> • 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 	<p>Heritage Officer and Phillip Hine Manager: Archaeology, Palaeontology and Meteorites Unit SAHRA</p> <p>Letter: 12 November 2020</p>	<p>Comment noted, no further action required.</p> <p>The specialist report (refer Appendix E – Heritage Impact Assessment) reviewed the BESS and 500m assessment zone within the context of the referenced case (which pertains to the original EIA for the Great Karoo WEF), and details the measures applicable from this case to the proposed footprint and location of the BESS. All measures specified by the heritage impact assessment were included into the EMPr and BAR and therefore the applicable requirements from the case detailed has been incorporated into this application.</p> <p>Please also refer to Outcome 10 of the EMPr for this application, which details the requirement of a chance find procedure during the construction phase.</p> <p>Please also refer to Outcome 10 of the EMPr for this application, which now includes this requirement verbatim.</p> <p>Please also refer to Outcome 10 of the EMPr for this application, which now includes this requirement verbatim.</p>

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	<p>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;</p> <ul style="list-style-type: none"> • 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. 		<p>The BAR and EMPr will be uploaded to the SAHRIS Case once submitted to the DEFF for decision making, to ensure record keeping.</p> <p>The Environmental Authorisation will be uploaded to the SAHRIS case once received from the Competent Authority.</p>
3.	<p>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</p>	<p>Mmatlala Rabothata Case Officer DEFF: Biodiversity Conservation Directorate</p>	<p>Please refer to Outcome 2 of the EMPr for this application, which requires a pre-construction walk-through of the final layout in order to locate species of conservation concern that can be translocated as well as comply with the Northern Cape Nature Conservation Act and DENC/DAFF permit conditions.</p>

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	<p>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.</p> <p>Notwithstanding the above, the following recommendations must be considered in the final report:</p> <ul style="list-style-type: none"> • Pre-construction walk-through to locate species of conservation concern that can be trans located or avoided must be undertaken. 	<p>Letter: 16 November 2020</p>	<p>Please further note: the layout as proposed utilises only low ecological sensitivity areas, with the exception of MV cabling which will cross a high ecological sensitivity area. The specialist findings in relation to the MV cabling were as follows:</p> <p><i>“In instance where the BESS MV cabling cross this drainage line and cannot be avoided, overhead lines should be employed to reduce impact. However, considering the short length of the cabling planned, the use of overhead MV cabling across the drainage line will be acceptable. Access roads related to the BESS should not however be located within high or very high areas.”</i></p> <p>As such, the specialist finding was such that the MV cabling was considered acceptable at the current location and proposed layout, and that therefore this area is not considered a no-go for the purposes of the planned MV cabling.</p>
	<ul style="list-style-type: none"> • Search and rescue plan for the identified plant Species of Conservation Concern (SCC) must be developed. 		<p>Please refer to Appendix L of the EMPr for a plant rescue and protection plan in accordance with this comment.</p>
	<ul style="list-style-type: none"> • Permits from relevant authorities must be obtained for the removal or disturbance of any TOPs, Red Data listed or provincially protected species. 		<p>Please refer to Outcome 2 of the EMPr for this application, which requires appropriate biodiversity permits to be obtained prior to commencement with on-site construction activities.</p>
	<ul style="list-style-type: none"> • 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 		<p>Please refer to Appendix E of the EMPr for an Alien Invasive plant species Management Plan in accordance with this comment.</p> <p>Please also refer to the Appendix G of the EMPr for a Revegetation and Rehabilitation Plan in accordance with this comment.</p>
	<ul style="list-style-type: none"> • Sensitive areas in close proximity to the development footprint must be demarcated and regarded as No-Go area i.e. drainage features. 		<p>The layout as proposed utilises only low ecological sensitivity areas, with the exception of MV cabling which will cross a high ecological sensitivity area. The specialist findings in relation to the MV cabling were as follows:</p> <p><i>“In instance where the BESS MV cabling cross this drainage line and cannot be avoided, overhead lines should be employed to reduce</i></p>

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			<p><i>impact. However, considering the short length of the cabling planned, the use of overhead MV cabling across the drainage line will be acceptable. Access roads related to the BESS should not however be located within high or very high areas."</i></p> <p>As such, the specialist finding was such that the MV cabling was considered acceptable at the current location and proposed layout, and that therefore this area is not considered a no-go for the purposes of the planned MV cabling. No other areas of high sensitivity are utilised by the proposed layout.</p>

1.2. Interested and Affected Parties

NO.	COMMENT	RAISED BY	RESPONSE
1.	<p>No actual link from where to download is provided in the e-mail.</p> <p>Can you at least indicate the location of the proposed facility?</p>	<p>Abrie du Plessis</p> <p>E-mail: 16 November 2020</p>	<p>The link to the project page on Savannah Environmental's website was provided including the release code enabling the I&AP to download the BAR on 18 October 2020.</p> <p>The .KMZ shows the 500m assessment zone within which the Battery Energy Storage System facility was attached to the responding e-mail.</p> <p>Proof of the e-mail correspondence is included in Appendix C4 of the BAR.</p>
2.	<p>Please send me a KMZ file of the location of the BESS in relation to the WEF.</p>	<p>John Geeringh Senior Environmental Advisor Eskom Holdings SOC Ltd</p> <p>E-mail: 19 October 2020</p>	<p>The requested .KMZ file was e-mail to the stakeholder on 20 October 2020 (proof of correspondence included in Appendix C4 of the BAR.</p>