

APPENDIX C8
COMMENTS AND RESPONSES REPORT



ABERDEEN WIND FACILITY 1 AND ASSOCIATED INFRASTRUCTURE, EASTERN CAPE PROVINCE

(DFFE Ref. No.: 14/12/16/3/3/1/2722)

COMMENTS AND RESPONSES REPORT

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The Aberdeen Wind Facility 1 and Associated Infrastructure applications for Environmental Authorisation was initiated on Monday, on 06 February 2023. The Background Information Document 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. All written comments received from the initiation of the Basic Assessment Processes to date have been included in this Comments and Responses Report (C&RR) and copies of the comments are included in **Appendix C7: Comments Received** of the Basic Assessment (BA) Report.

The BA Report was made available for a 30-day review and comment period from **10 March 2023** to **13 April 2023** and all comments received have been included in this C&RR and included as a separate document in **Appendix C8: Comments & Responses Report** of the Final BA Report.

NOTE:

All comments captured in the C&RR are verbatim and have not been summarised.

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 Meetings held during the initiation of the BA process have been attached as **Appendix C6** of the BA Report. Meeting Notes of meetings to be held during the 30-day BA Report review and comment period will be included in **Appendix C6** of the final BA Report.

LIST OF ABBREVIATIONS / ACRONYMS

| | | | |
|--------|---|---------|--|
| BA | Basic Assessment | EIA | Environmental Impact Assessment |
| BAR | Basic Assessment Report | I&AP | Interested and Affected Party |
| BC | Biodiversity Conservation | FGM | Focus Group Meeting |
| BESS | Battery Storage System | NEMPAA | National Environmental Management: Protected Areas Act |
| DEDEAT | Department of Economic Development, Environmental Affairs and Tourism | KSW | Key Stakeholder Workshop |
| DFFE | Department of Forestry, Fisheries and the Environment | SABAA | South African Bat Assessment Association |
| DMRE | Department of Mineral Resources and energy | SACNASP | South African Council for Natural Scientific Professions |
| DOD | Department of Defence | SAHRA | South African Heritage resources Agency |
| DWS | Department of Water and Sanitation | SANDF | South African National Defence Force |
| EAP | Environmental Assessment Practitioner | SSVR | Site Sensitivity Verification Report |
| EC HRA | Eastern Cape Heritage Resources Agency | SWMP | Stormwater Management Plan |

1. COMMENTS RECEIVED DURING THE BASIC ASSESSMENT REPORT REVIEW AND COMMENT PERIOD

1.1 Organs of State

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| 1. | <p><u>This letter serves to inform you that the following information must be included to the final BAR:</u></p> <p>(a) Specific Comments</p> <p>(i) The co-ordinates in the BAR must be specific to each activity and infrastructure that is proposed on the site. The co-ordinates for substations and the Battery Energy Storage Systems must be included in the final BAR, i.e., we require that you provide us with the specific development footprints for each development parameter, and not an area outlining the entire site.</p> <p>(ii) Please provide a detailed description as well as any associated assessments related to the technology required for the Battery Storage System (BESS).</p> | <p>Trisha Pillay Case Officer DFFE</p> <p>Letter: 11 April 2023</p> | <p>The co-ordinates for the on-site substation and Battery Energy Storage system have been included in Table 2.1 in Chapter 2 and are also included in the tables below.</p> <p>On-site substation coordinates</p> <table border="1"> <thead> <tr> <th></th> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>Corner 1</td> <td>32°30'44.50"S</td> <td>23°43'18.72"E</td> </tr> <tr> <td>Corner 2</td> <td>32°30'46.46"S</td> <td>23°43'18.78"E</td> </tr> <tr> <td>Corner 3</td> <td>32°30'46.37"S</td> <td>23°43'23.00"E</td> </tr> <tr> <td>Corner 4</td> <td>32°30'44.44"S</td> <td>23°43'22.94"E</td> </tr> </tbody> </table> <p>BESS Coordinates</p> <table border="1"> <thead> <tr> <th></th> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>Corner 1</td> <td>32°30'44.50"S</td> <td>23°43'18.72"E</td> </tr> <tr> <td>Corner 2</td> <td>32°30'46.46"S</td> <td>23°43'18.78"E</td> </tr> <tr> <td>Corner 3</td> <td>32°30'46.37"S</td> <td>23°43'23.00"E</td> </tr> <tr> <td>Corner 4</td> <td>32°30'44.44"S</td> <td>23°43'22.94"E</td> </tr> </tbody> </table> <p>A detailed description of the BESS is included in Section 4.2.1 of the Final BAR and repeated below for ease of reference:</p> <p>As technological advances within battery energy storage systems (BESS) are frequent, two BESS technology alternatives are typically used:</p> <ul style="list-style-type: none"> • Solid state battery electrolytes typically consist of Lead Acid (Pb), Nickel Cadmium (NiCad), Lithium-Ion (Li-ion), Sodium Sulphur (NaS) or Sodium Nickel Chloride (Zebra) (NaNiCl) and use solid electrodes and electrolytes. As a result of the declining costs, Li-ion technology now accounts for more | | Latitude | Longitude | Corner 1 | 32°30'44.50"S | 23°43'18.72"E | Corner 2 | 32°30'46.46"S | 23°43'18.78"E | Corner 3 | 32°30'46.37"S | 23°43'23.00"E | Corner 4 | 32°30'44.44"S | 23°43'22.94"E | | Latitude | Longitude | Corner 1 | 32°30'44.50"S | 23°43'18.72"E | Corner 2 | 32°30'46.46"S | 23°43'18.78"E | Corner 3 | 32°30'46.37"S | 23°43'23.00"E | Corner 4 | 32°30'44.44"S | 23°43'22.94"E |
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| | | | <p>than 90% of battery storage additions globally (IRENA, 2019); and</p> <ul style="list-style-type: none"> Redox-flow technology (e.g. vanadium flow battery, or similar technology and chemistries). Flow batteries use solid electrodes and liquid electrolytes. The most used flow battery is the Vanadium Redox Flow Battery (VRFB), which is a type of rechargeable flow battery that employs vanadium ions in different oxidative states to store chemical potential energy. <p>Considering the nature of the project, only a solid-state technology type would be envisaged for implementation. The technology includes batteries housed within containers which are fully enclosed and self-contained. Therefore, the assessment proposes all solid-state technologies for authorisation to allow the proponent to determine the precise technology when the project is implemented, on the understanding that further investigation into the specific technologies available at the time of project implementation will allow for one of two to be selected and ultimately developed.</p> <p>Section 4.2.2 in Chapter 4 has been added to give additional information on the risks associated with BESS's. BESS modules arrive from the factory fully-assembled and pre-tested in individual containerised/modular enclosures—including battery modules, bi-directional inverters, a thermal management system, an AC main breaker and controls. No assembly is required on site which significantly reduces complexity and ensures an easy installation and connection process.</p> <p>Mitigation measures have been included as Operation OBJECTIVE 10: Ensure appropriate operation and maintenance of the battery energy storage system in the EMPr</p> |

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| | <p>(iii) Please provide a concise, but complete, summary and bullet list of the project description and associated infrastructure (or project scope) to be included in the decision (or as it should appear in the decision), should a positive Environmental Authorisation be granted. This must include a list of all development components and associated infrastructure.</p> | | <p>A list has been included in Chapter 12, Section 12.5. This list is also included below:</p> <p>Aberdeen Wind Facility 1 (Pty) Ltd, a Special Purpose Vehicle (SPV), proposes the development of a commercial wind energy facility and associated infrastructure, on a site located approximately 20km west of the town of Aberdeen in the Eastern Cape Province. The site is located within the Dr Beyers Naude Local Municipality in the greater Sarah Baartman District Municipality. The entire extent of the site falls within the Beaufort West Renewable Energy Development Zone (REDZ). The facility is known as Aberdeen Wind Facility 1.</p> <p>The proposed wind energy facility is set to inject up to 240MW into the national grid.</p> <p>The infrastructure associated with the 240MW Aberdeen Wind Facility 1 will include:</p> <ul style="list-style-type: none"> » Up to 41 wind turbines with a maximum hub height of up to 200m. The tip height of the turbines will be up to 300m. » Concrete turbine foundations and turbine hardstands. » An internal road network between project components inclusive of stormwater infrastructure. » Medium-voltage (MV) power lines internal to the wind farm trenched and located adjacent to internal access roads, where feasible. » Substation, Battery Energy Storage System (BESS) and O&M buildings hub, including: <ul style="list-style-type: none"> o On-site facility substation (132kV). o Battery Energy Storage System (BESS). o Operation and Maintenance buildings, including control centre. |

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| | | | » Warehouse, laydown area and site camp hub, including: <ul style="list-style-type: none"> ○ Construction laydown areas ○ Site camp ○ Warehousing and buildings » Upgrade to a main access road of approximately 2.5km in length and up to 10m in width. |
| | (iv) According to the Avifaunal Specialist Report (Appendix F), the high-risk areas (class 5.5 and above) displayed in Figure 6 on page 48 must be regarded as no-go areas, however several wind turbines seem to be encroaching into these high-risk areas. The wind turbines on the layout plans in the Avifaunal Specialist Report are not numbered therefore making it difficult to reference the exact placement of the wind turbines that seem to be encroaching into the high-risk areas. Kindly revise Figure 6 in the Avifaunal Specialist Report to reflect sequentially numbered wind turbines which will aid in future referencing. In addition, the layout plan must be amended to illustrate all turbines located outside the high-risk areas as identified in Figure 6 of the Avifaunal Specialist Report. Caution should be applied for wind turbines Chief Directorate: Integrated Environmental Authorisations located in close proximity to avifaunal no-go areas to ensure the full blade length of the wind turbines do not encroach into any pre-defined sensitive areas. | | All high avifaunal sensitivity areas have been avoided. This is also confirmed within the Avifaunal specialist report in the caption for Figure 6 on Page 48. Figure 6 on page 48 of the avifaunal report has been revised to indicate this more clearly as the turbines have been numbered. |
| | (v) The generic Environmental Management Programme (EMPr) for the substation, Part B Section 2 is incomplete in the draft BAR. The generic EMPr must be signed by the applicant as required by 7.3. The reason provided by the EAP that <i>"This declaration will be signed by the proponent/applicant/holder of the EA once the</i> | | The applicant has now signed the generic EMPr and this has been resubmitted. |

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| | <p><i>contractor is appointed and has provided inputs to this Generic EMPr as per the requirements of this template."</i> is not accepted. Please take note failure to submit all the required information that forms part of the generic EMPr will be regarded as non-compliance. We request that you adequately complete all applicable sections in the generic EMPr.</p> | | |
| | <p>(vi) The Stormwater Management Plan for the Aberdeen Wind Facility 1 included in the EMPr prepared by SRK Consulting is illegible. Please include a clear copy of the SWMP in the final BAR.</p> | | <p>The Stormwater Management Plan has been revised and included in the EMPr. It has been checked to make sure it is legible.</p> |
| | <p>(vii) The Site Sensitivity Verification Report (SSVR) (Appendix P) omitted one of the specialist assessments identified by the screening tool, namely the Geotechnical Assessment. Kindly include the requirement of this assessment in the SSVR and provide a motivation as to why this specialist assessment was not done.</p> | | <p>Information regarding the geotechnical assessment and a motivation as to why this study was not included in the SSVR is presented in the SSVR and Table 7.5 of the final BAR.</p> <p>"A preliminary desktop geotechnical study was undertaken as part of the pre-feasibility studies by the Applicant. This study indicated that the project was considered to meet feasibility criteria and there are no geotechnical constraints to prevent the progress to preliminary and detailed design-level investigations. This indicates a low risk for the theme. Further study is not required as part of the basic assessment process, and no risk was assigned for this theme in the Screening Tool report. The requirements for an infield Geotechnical Assessment is to inform the turbine and substation foundation designs. A detailed geotechnical study and survey will be conducted prior to construction."</p> |
| | <p>(viii) Comments must be obtained from this Department's Biodiversity Conservation Directorate at BCAdmin@dffe.gov.za.</p> | | <p>Written comments were received from the DFFE: BC Directorate and a copy of the letter is included in Appendix C 7: Comments Received of the final BA Report and have been captured in this C&RR under 1.2 Organs of State, point 2.</p> |

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| | <p>(b) <u>Listed Activities</u></p> <p>(i) The listed activities applied for in the application form and the draft BAR have been quoted incorrectly, as they do not correlate with the listed activities in the EIA Regulations 2014, as amended. The following discrepancies were noted with regards to the activities applied for in the application form and the draft BAR:</p> <ul style="list-style-type: none"> ➤ “Activity 12 (xii)(a)(c) of Listing Notice 1”- These sub activities have been changed with the recent amendments to the EIA Regulations made in 2017. The Activity should be referenced as “Activity 12 (ii)(a)(c) of Listing Notice 1”. ➤ “Activity 19 (i) of Listing Notice 1”- This sub activity has been changed with the recent amendments to the EIA Regulations made in 2017. The Activity should be referenced as “Activity 19 of Listing Notice 1”. ➤ “Activity 18 (i)(ii)(aa) of Listing Notice 3”- Is quoted incorrectly and failed to apply for the applicable province (Eastern Cape) the activity occurs within. Furthermore, the sub activity (aa) refers to “A protected area identified in terms of NEMPAA, excluding conservancies” and this does not correlate to the description provided in the report and application form. The Activity should be quoted as “Activity 18 (a) (i)(ii) of Listing Notice 3” <p>Kindly ensure all activities applied for in the application form and the final BAR are applicable to the proposed development and are quoted correctly as per the EIA Regulations 2014, as amended.</p> | | <p>Activities 12 (ii)(a)(c) of Listing Notice 1, Activity 19 of Listing Notice 1 and Activity 18(a)(i)(ii) have been corrected to correlate to the listed activities.</p> <p>All activities applied for in the application form and the final BAR are applicable to the proposed development and are now quoted correctly as per the EIA Regulations 2014, as amended.</p> |

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| | (ii) 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. | | All relevant listed activities 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. These are listed in Table 7.1 in Chapter 7. |
| | (iii) Please ensure that all relevant listed activities and sub-activities are correctly numbered as per the relevant listing notices. | | All activities applied for in the application form and the final BAR are applicable to the proposed development and are now quoted correctly as per the EIA Regulations 2014, as amended. |
| | (iv) The EAP must clearly identify and provide a final list of all applicable listed activities. If any activities are to be removed, motivation for their removal must be included in the final BAR. | | The listed activities included in the final BAR correspond to those included in the application form. |
| | (v) The listed activities represented in the final BAR and the application form must be the same and correct. 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.dffe.gov.za/documents/forms . | | <p>The listed activities included in the final BAR correspond to those included in the application form.</p> <p>An amended application has been submitted and the listed activities represented in the BAR do not differ from those in the application form.</p> <p>The relevant listed activities which are linked to the proposed development have been applied for. It should be noted that only activities applicable to the development have been applied for and assessed.</p> |
| | (vi) The final BAR must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for. | | <p>An assessment of all impacts and mitigation measures are included in Chapters 10 and 11 of the Final BAR.</p> |
| | (vii) 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 numerous GN R. 985 Activities. Written comments must be obtained | | Savannah has a stakeholder database which is occasionally updated. All the relevant authorities/ state owned entities are automatically registered on the database and they are kept informed during the Basic Assessment Process. This includes the Department of Agriculture, Land Reform, and Rural Development (DALRRD), |

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| | <p>from the relevant authorities and submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided.</p> | | <p>Department of Water and Sanitation (DWS), South African Heritage Resources Agency (SAHRA), the Department of Environment, Forestry and Fisheries, Directorate Biodiversity and Conservation, EC Department of Economic Development, Environmental Affairs and Tourism, EC Department of Rural Development and Agrarian Reform, EC Provincial Heritage Resources Authority, EC Department of Agriculture and Interested & Affected Parties I&As, amongst others. This database has been included as Appendix C1, and all correspondence in C4 and C5.</p> <p>A locality map has been included as Figure 1.1 in Chapter 1 indicating the locality of the project</p> |
| | <p>(c) <u>Layout & Sensitivity Maps</u></p> <p>(i) The final BAR must provide coordinate points for the proposed development site (note that if the site has numerous bend points, at each bend point coordinates must be provided) as well as the start, middle and end point of all linear activities.</p> | | <p>The co-ordinates of the corner points of the perimeter of this proposed site and the start, middle and end points for the road have been included in Chapter 1, Table 1.1 of the BAR.</p> |
| | <p>(ii) All preferred turbine positions must be clearly numbered. The turbine position numbers must be consistently used in all maps to be included in the reports.</p> | | <p>All turbine positions are clearly numbered and consistent in all maps, including Figure 2.1 in Chapter 2.</p> |
| | <p>(iii) A copy of the final layout map must be submitted with the final BAR. All available biodiversity information, specialist studies and comments from Interested and Affected Parties must be used in the finalisation of the layout map. Existing infrastructure must be used as far as possible, e.g. roads. The layout map must indicate the following:</p> <p>a) The envisioned area for the facilities, i.e. placing of infrastructure and all associated infrastructure should be mapped at an appropriate scale.</p> | | <p>A copy of the sensitivity maps and the final optimised layout have been included in Chapter 12, Figure 12.1 and 12.3 respectively of the BAR. The maps have been included in Appendix O of the BAR. The facility layout responds to identified sensitivity, and an optimised layout has been provided for the facility considering environmental limitations.</p> <p>In response to the identified need to adequately manage impacts within sensitive areas identified on the site development footprint, and</p> |

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| | <ul style="list-style-type: none"> b) Position of the wind turbines (wind turbines to be numbered); c) Internal roads; d) All supporting onsite infrastructure such as laydown area, guard house and control room etc.; e) Battery Energy Storage System; f) Substations, transformers, switching stations and inverters; g) Connection routes (including pylon positions) to the distribution/transmission network; h) All existing infrastructure on the site, especially railway lines and roads; and i) Buildings, including accommodation | | <p>in order to demonstrate the commitment of the project to adhere to recommended mitigation measures, the project Applicant has developed a best practice mitigation strategy with regards to the facility layout. The wind turbine layout has been refined to avoid the areas identified as being of high sensitivity and no-go areas. Appendix S details the changes in layout in response to sensitivities. No comments received required changes to the layout be implemented.</p> <p>An Environmental Sensitivity Map which includes the location of the sensitive environmental features in site, buffer areas and no-go areas is included in Figure 12.2 in the BAR and the A3 maps have also been included in Appendix O of the BAR.</p> |
| | <p>(iv) Please provide an environmental sensitivity map which indicates the following:</p> <ul style="list-style-type: none"> a) The location of sensitive environmental features on site, e.g. CBAs, protected areas, heritage sites, wetlands, drainage lines, nest and roost sites, etc. that will be affected by the facility and its associated infrastructure; b) Buffer areas; and c) All "no-go" areas. | | <p>A CBA/ESA map is included in Figure 8.11</p> |
| | <p>(v) The above layout map must be overlain with the sensitivity map and a cumulative map which shows neighbouring and existing infrastructure.</p> | | <p>A cumulative map which indicates the location of the facility in relation to all other operating and proposed wind energy facilities located within a 30km radius of the of the project site has been included in Chapter 11, Figure 11.1 of the BAR.</p> |
| | <p>(vi) Google maps will not be accepted.</p> | | <p>The maps included in the BAR have been created using ArcGIS</p> |
| | <p>(d) Alternatives</p> <ul style="list-style-type: none"> (i) Please note that you are required to provide a full description of the process followed to reach the proposed | | <p>A full description of the proposed process followed to reach the preferred alternative is included in Appendix S. In summary, the development footprint assessed within this BA Report was designed by the project Applicant in order to respond to and avoid the sensitive</p> |

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| | <p>preferred alternative within the site, in terms of Appendix 1(3)(1)(h) of the EIA Regulations 2014, as amended, including the following content:</p> <p>a) details of all the alternatives considered;</p> | | <p>environmental and social features located within the project site. This approach ensured the application of the mitigation hierarchy (i.e. avoid, minimise, mitigate and offset) to the project, which ultimately ensures that the development is appropriate from an environmental perspective and is suitable for development within the development area (located within the project site).</p> <p>A detailed description of the various alternatives considered (Site-specific and Layout Alternatives, Activity Alternatives, Technology Alternatives and the Do-Nothing Alternative) has been included in Chapter 3 of the BAR.</p> |
| | <p>b) details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs;</p> | | <p>Details of the public participation process undertaken in terms of the EIA Regulations 2014, as amended, Regulation 41, Public Participation Process are detailed in Section 7.3.</p> |
| | <p>c) a summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them;</p> | | <p>All issues raised during the public participation process were captured into the Comment and Responses Report and well as the BAR. Where required, the Final BAR was updated.</p> |
| | <p>d) the environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;</p> | | <p>The environmental attributes focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects have been taken into consideration. Refer to Chapter 8 of the BAR.</p> |
| | <p>e) The impacts and risks identified for each alternative, including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts - (aa) can be reversed; (bb) may cause irreplaceable loss of resources; and</p> | | <p>The impacts identified were assessed in greater detail by the specialists (refer to Appendix D to M) and well as in Chapter 10 of the BAR.</p> |

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| | (cc) can be avoided, managed or mitigated; | | |
| | f) the methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives; | | The methodology used to assess the significance of the impacts has been included in Chapter 7 Section 7.5 of the BAR. |
| | g) positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects; | | All positive and negative environmental impacts identified within the receiving environment has been assessed and included in Chapter 10 and 11. |
| | h) the possible mitigation measures that could be applied and level of residual risk; | | All mitigation measures proposed by the specialists have been included in the Chapter 10, 11 and the EMPRs. |
| | i) the outcome of the site selection matrix; | | Refer to Chapter 3, Table 3.1 and Appendix S for the outcome of the site selection criteria. |
| | j) if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such; and | | A motivation has been provided where alternatives were not considered to be feasible (refer to Chapter 3 of the BAR). |
| | k) a concluding statement indicating the preferred alternatives, including preferred location of the activity. | | A concluding statement indicating the preferred alternatives, including preferred location of the activity has been included in Chapter 12 of the BAR |
| | (ii) Written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 1. | | Where no feasible alternatives have been provided, the motivation has been included in Chapter 3 of the BAR. |
| | (e) <u>Specialist Declaration of Interest</u> | | The original signed Specialist Declaration of Interest forms are included in Appendix T of the final BAR. |
| | (i) Specialist Declaration of Interest forms must be attached to the final BAR. You are therefore requested to submit original signed Specialist Declaration of Interest forms for each specialist study conducted. The forms are available | | |

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| | <p>on the Department's website (please use the Department's template).</p> | | |
| | <p>(f) Specialist Assessments</p> <p>(i) The EAP must ensure that the terms of reference for all the identified specialist studies must include the following:</p> <p>a) A detailed description of the study's methodology; indication of the locations and descriptions of the development footprint, and all other associated infrastructures that they have assessed and are recommending for authorisation.</p> | | <p>Each Specialist study provides an outline of their terms of reference.</p> <p>All specialist assessments (Appendices D to M) include the complete project description as well as methodology used to assess the project impacts.</p> |
| | <p>b) 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.</p> | | <p>Specialist assessments (Appendices D to M) detail any applicable study limitations relevant to the study. Limitations and assumptions of the EIA are also included in Chapter 6.</p> |
| | <p>c) 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.</p> | | <p>The Department's consideration of a no-go area is noted in that no development is permitted within all areas demarcated as a 'no-go' area. No-go areas have been demarcated within the assessed development footprint. In response to the identified need to adequately manage impacts within sensitive areas identified on the site development footprint, and in order to demonstrate the commitment of the project to adhere to recommended mitigation measures, the project Applicant has developed a best practice mitigation strategy with regards to the facility layout.</p> <p>The specialist recommendations have been taken into account by the project Applicant, and all infrastructure avoids the areas identified as being of high sensitivity and no-go areas. It should be noted that no-go areas differ for certain infrastructure, such as aquatic no-go for turbines and roads. This is detailed in Chapter 9.</p> |

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| | d) Should the specialist definition of 'no-go' area differ from the Department's definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable. | | All No-Go, including any buffer areas have been clearly demarcated as detailed in Chapter 9 and specialist reports. It should however be noted that the terrestrial ecology, avifauna, bats, heritage and aquatic specialists indicated that the linear components could cross high sensitivity areas as these were not considered to be no-go areas (refer to Appendices D - M of the BA Report). |
| | e) 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. | | All specialist studies submitted as part of the BA are final and provide detailed/practical mitigation measures for implementation. |
| | f) Bird and bat specialist studies must have support from Birdlife South Africa and SABAA. | | Both BirdLife South Africa and the SABAA are registered I&APs on the project database (refer to Appendix C2 of the final BA Report), and it can be confirmed that no written comments were submitted on the BA Report. These Organisations were informed of the availability of the BA Report for review and comment on 10 March 2023 (refer to Appendix C6 of the final BA Report) and were invited to public meetings |
| | g) Should a specialist recommend specific mitigation measures, these must be clearly indicated. | | Specific specialist mitigation measures are included in the BAR and specifically the EMPs (refer to Appendices N1 and N2 of the final BA Report). |
| | (ii) 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. | | During our review of the specialist reports Savannah Environmental did not identify recommendations that contradict one another, therefore the most reasonable recommendations have been presented in the final BA Report. |
| | (iii) It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting in identified Environmental Themes in terms of Sections | | Savannah Environmental has taken note of the various specialist assessments protocols. The specialists are aware of the protocols and their assessments comply with the requirements. |

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| | <p>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>(iv) Please also ensure that the final BAR includes the Site Verification Report and Compliance Statements (where applicable) as required by the relevant themes.</p> | | <p>The site verification report and compliance statements are included with each specialist report and an overall summary is included as Appendix P.</p> |
| | <p>(v) Please note further that the protocols, if applicable, require certain specialists' to be SACNASP registered. Please ensure that the relevant specialist certificates are attached to the relevant reports.</p> | | <p>The Specialist Declaration of Interest forms which indicate the scientific organisation registration/member number and status of registration/membership for each specialist and all the declarations been included in Appendix T.</p> |
| | <p>(vi) <u>As such, the Specialist Declaration of Interest forms must also indicate the scientific organisation registration/member number and status of registration/membership for each specialist.</u></p> | | |
| | <p>(g) <u>Cumulative Assessment</u></p> <p>(i) Should there be any similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:</p> <p>a) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land.</p> | | <p>Cumulative Impacts were assessed in detail in Chapter 11 of the BAR. The assessment considered projects within a 30km radius of the proposed development site. Identified cumulative impacts are clearly defined, described and assessed in the Cumulative Impacts chapter. Where possible, the extent of the identified impacts has been quantified and indicated. The cumulative impacts significance rating informed the need and desirability of the proposed development. A cumulative impact environmental statement on whether the proposed development must proceed has also been included in Chapter 11 of the final BAR.</p> |

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| | b) Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project. | | |
| | c) The cumulative impacts significance rating must also inform the need and desirability of the proposed development. | | |
| | d) A cumulative impact environmental statement on whether the proposed development must proceed. | | |
| | (h) <u>Undertaking of an Oath</u> | | The affirmation by the EAP has been included as part of the application which was submitted to the Department. |
| | (i) Please ensure that the final BAR includes an undertaking under oath or affirmation by the EAP. | | |
| | (ii) Based on the above, you are therefore required to include 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:</i> <ol style="list-style-type: none"> <i>a) the correctness of the information provided in the reports;</i> <i>b) the inclusion of comments and inputs from stakeholders and I&APs;</i> <i>c) the inclusion of inputs and recommendations from the specialist reports where relevant; and</i> <i>d) any information provided by the EAP to interested and affected parties and any responses by the EAP</i> | | |

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| | <p><i>to comments or inputs made by interested and affected parties".</i></p> | | |
| | <p>(i) Details and Expertise of the EAP</p> <p>(i) You are required to include the details and expertise of the EAP in the BAR, including a curriculum vitae, in order to comply with the requirements of Appendix 1(3)(1)(a) of the NEMA EIA Regulations, 2014, as amended.</p> | | <p>The details of the EAP have been included in Chapter 1 Section 1.3 and Appendix A of the BAR.</p> |
| | <p>(j) Public Participation Process</p> <p>(i) Please ensure that comments from all relevant stakeholders are submitted to the Department with the final BAR. This includes but is not limited to the Eastern Cape Department of Economic Development, Environmental Affairs and Tourism (DEDEAT), the Dr Beyers Naude Local Municipality, the Eastern Cape Parks and Tourism Agency, the Eastern Cape Provincial Heritage Resources Authority, the Department of Water and Sanitation (DWS), the South African Heritage Resources Agency (SAHRA), BirdLife SA, the South African Bat Assessment Association (SABAA), the Department of Mineral Resources and Energy, and the Department of Forestry, Fisheries and the Environment: Directorate Biodiversity and Conservation at BCadmin@dffe.gov.za.</p> | | <p>All comments received from relevant Organs of State, Key Stakeholders and I&APs are included in Appendix C7: Comments Received in the Final BA Report and captured in this C&RR and responded to as appropriate and applicable.</p> <p>Organs of State and Key Stakeholders were invited to a series of virtual meetings during which the content of the BA Report was presented (refer to Appendix C4: Correspondence Organs of State and Appendix C5: Correspondence Stakeholders).</p> <p>Written comments were not received from:</p> <ul style="list-style-type: none"> • Dr Beyers Naude Local Municipality, however attended the virtual FGM held on 28 March 2023 – meeting notes included in Appendix C6: Meeting Notes of the final BA Report; • SABAA, however attended the virtual KSW held on 29 March 2023 - meeting notes included in Appendix C6: Meeting Notes of the final BA Report; • the DEDEAT, but attended the virtual FGM held on 12 April 2023 meeting notes included in Appendix C6: Meeting Notes of the final BA Report; and • BirdLife SA, DMRE, DWS, ECHRA & Eastern Cape Parks & Tourism was invited to the KSW held on 29 March 2023. |

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| | <p>(ii) The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 and 44 of the EIA Regulations, 2014, as amended.</p> | | <p>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 follows:</p> <ul style="list-style-type: none"> » Project database: A register of I&APs has been compiled and updated throughout the BA process (refer to Appendix C1: I&AP Database). » BA process announcements: <ul style="list-style-type: none"> * The BID (Afrikaans & English), accompanied by a cover letter inviting I&APs to register on the project database, was distributed via email to those I&APs identified and the relevant OoS on 06 February 2023 (refer to Appendices C4: Correspondence Organs of State and C5: Correspondence Stakeholders of the Final BA Report.) * Site Notices were placed at the proposed development site (refer to Appendix C2: Site Notices & Advertisements of the Final BA Report) » BA Report available for review and comment: The BA Report was made available for review and comment from 10 March 2023 to 13 April 2023. <ul style="list-style-type: none"> * All registered Stakeholders were notified of the availability of the BA Report for review and comment via e-mail (refer to Appendix C4: Correspondence Organs of State and Appendix C5: Correspondence Stakeholders of the final BA Report). * Commenting authorities and District and Local Municipal Officials which have jurisdiction in the area received personalised letter requesting written comments on the BA Report (refer to Appendix C4: Correspondence Organs of State of the Final BA Report). * Advertisements were placed as follows: |

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| | | | <ul style="list-style-type: none"> ▪ Die Courier (Afrikaans) – 24 February 2023 (original review period 03 April 2023 to 03 April 2023) ▪ Die Courier (Afrikaans) – 03 March 2023 (retraction of advert placed 24 February 2023) ▪ Graaff-Reinet Advertiser (English) – 09 March 2023; and ▪ Die Courier (Afrikaans) – 10 March 2023. <p>Tearsheets included in Appendix C2: Site Notices & Advertisements</p> <ul style="list-style-type: none"> » Attempts to obtain comments on the BA Report: <ul style="list-style-type: none"> * Email reminder to all registered OoS, Key Stakeholders and I&APs regarding the end of the review and comment period for the BA Report on 13 April 2023 (refer to Appendix C4: Correspondence Organs of State and Appendix C5: Correspondence Stakeholders of the final BA Report). » Meetings <ul style="list-style-type: none"> * Information Sharing Discussion held with affected and adjacent Landowners: 13 February 2023 * Meetings held during the BA Report review and commenting period with: <ul style="list-style-type: none"> • Virtual FGM with Dept of Agriculture (EC), DFFE: Biodiversity Conservation and Protected Areas, Planning & Management Effectiveness and DWS: 28 March 2023 • Virtual FGM with Sarah Baartman District & Dr Beyers Naude Local Municipalities: 28 March 2023 • Virtual KSW: 29 March 2023 • Virtual FGM with DEDEAT, Provincial Commenting Authority: 12 April 2023 • In-person: <ul style="list-style-type: none"> Occupiers (conducted in Afrikaans): 07h00 & 10h00 - 30 March 2023 Landowners: 16h00 30 March 2023 |

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| | | | <p>Meeting notes are included in Appendix C6: Meeting Notes of the final BA Report.</p> <p>» Consultation:</p> <ul style="list-style-type: none"> * Correspondence and consultation with key stakeholders and I&APs are included in Appendix C4: Correspondence Organs of State and Appendix C5: Correspondence Stakeholders of the final BA Report. <p>» Comments & Responses Report:</p> <p>All comments received during initiation of the BA Process and the BA Report review and comment period have been captured in this C&RR which is attached as a separate document to the final BA Report (refer Appendix C8: Comments & Responses Report of the final BA Report).</p> |
| | <p>(iii) Please ensure that all issues raised and comments received during the circulation of the draft BAR from registered Interested and Affected Parties (I&APs) and organs of state (including this Department's Biodiversity Section), as listed in your I&APs Database, and others that have jurisdiction in respect of the proposed activity are adequately addressed and included in the final BAR.</p> | | <p>All comments received during initiation of the BA Process and the BA Report review and comment period have been captured in this C&RR, and responded to as applicable. The C&RR is attached as a separate document to the final BA Report (refer Appendix C8: Comments & Responses Report of the final BA Report).</p> |
| | <p>(iv) Copies of original comments received from I&APs and organs of state, which have jurisdiction in respect of the proposed activity are submitted to the Department with the final BAR and must be incorporated into a Comments and Response Report (CRR).</p> | | <p>All written comments received are included in Appendix C6: Comments Received of the final BA Report.</p> |
| | <p>(v) 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. In terms of Regulation 41(2)(b) of the EIA</p> | | <p>Proof of correspondence, and notification of the availability of the BA Report for review and comment, with the various stakeholders and I&APs are included in Appendix C4: Correspondence Organs of State and Appendix C5: Correspondence Stakeholders of the final BA Report. The attempt to secure comments are also included in the above-mentioned appendices.</p> |

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| | Regulations, 2014, as amended, please provide proof of written notice for the availability of the BAR for comment. | | |
| | (vi) The CRR 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. | | The C&RR is included as a separate document to the Final BA Report (refer to Appendix C8: Comments and Responses Report). |
| | (vii) Please refrain from summarising comments made by I&APs. All comments from I&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&APs' comments. | | Comments have been captured verbatim and have not been summarised. Responses to the comments submitted and captured in this C&RR has been responded to, as applicable, and have not been responded to as "noted". |
| | (viii) Minutes and attendance registers (where applicable) of any physical/virtual meetings held by the Environmental Assessment Practitioner (EAP) with Interested and Affected Parties (I&APs) and other role players must be included in the final BAR. | | Minutes, including the attendance registers / records, of all meetings held are included in Appendix C6: Meeting Notes of the Final BA Report. |
| | (k) Environmental Impact Statement | | The Environmental Impact Statement has been included in Chapter 12 of the BAR in Section 12.5. |
| | (i) You are reminded that an <u>environmental impact statement must be included in the final BAR</u> , therefore you are kindly requested to include an environmental impact statement which contains – | | |
| | a) a summary of the key findings of the environmental impact assessment; | | |
| | b) a map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers; and | | Figure 12.2 of Chapter 12 includes these requirements. An A3 size version of this is included in Appendix O . |
| | c) a summary of the positive and negative impacts and risks of the proposed activity and identified alternatives. | | A summary of the positive and negative impacts and risks of the proposed activity and identified alternatives has been included in Chapter 12 of the BAR. |

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| | <p>(I) <u>Environmental Management Programme</u></p> <p>(i) 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, contemplated in Regulations 19(4) must be used and submitted with the final report over and above the EMPr for the facility.</p> <p>(ii) There needs to be an EMPr for the facility, the onsite substation as well as the power line, for whichever alternative is chosen.</p> <p>(iii) Further to the above, you are required to comply with the content of the EMPr in terms of Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended.</p> <p>(iv) Please be informed that the following content must be incorporated within the EMPr/s as indicated in Appendix 4 of the EIA Regulations 2014, as amended:</p> <p>a) Details of the EAP who prepared the EMPr; and the expertise of that EAP to prepare an EMPr, including a curriculum vitae.</p> <p>b) A <u>map</u> 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, including buffers.</p> | | <p>A generic EMPr (refer to Appendix N2 of the final BA Report has been drafted for the substation as well as a separate EMPr for the Facility and its associated infrastructure (refer to Appendix N1 of the final BA Report).</p> <p>The content of the EMPrs complies with Appendix 4 of the EIA Regulations 2014, as amended.</p> <p>The EMPr for the Wind Energy Facility has been compiled in accordance with the requirements of Appendix 4 of the EIA Regulations, 2014 (as amended). The EMPr for the substation has been compiled using the generic EMPr template. The details of the EAP who prepared the EMPr and their relevant experience has been included in Section 4.1 of the EMPr and the CVs have been included in Appendix J of the facility EMPr and Appendix 2 of the Substation Generic EMPr.</p> <p>The maps which meet the DFFE requirements have been included in Appendix A of the EMPr.</p> |

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| | c) A description of the <u>impact management outcomes</u> , including management statements, identifying the impacts and risks that need to be avoided, managed and mitigated as identified through the environmental impact assessment process for all phases of the development including - (aa) Planning and design; (bb) Pre-construction activities; (cc) Construction activities; (dd) Rehabilitation of the environment after construction and where applicable post closure; and (ee) Where relevant, operation activities. | | |
| | d) A description of proposed impact management actions, identifying the manner in which the impact management outcomes contemplated in paragraph (d) of Appendix 4 of the EIA Regulations 2014, as amended, will be achieved, and must, where applicable, include actions to — | | |
| | e) Avoid, modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation; | | |
| | f) Comply with any prescribed environmental management standards or practices; | | |
| | g) Comply with any applicable provisions of the Act regarding closure, where applicable; and h) Comply with any provisions of the Act regarding financial provision for rehabilitation, where applicable. | | |
| | i) The method of monitoring the implementation of the impact management actions contemplated in | | |

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| | paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended. | | |
| | j) 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. | | |
| | k) An indication of the persons who will be responsible for the implementation of the impact management actions. | | |
| | l) 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. | | |
| | m) The mechanism for monitoring compliance with the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended. | | |
| | n) A program for reporting on compliance, taking into account the requirements as prescribed by the Regulations. | | |
| | (m) General | | |
| | (i) The final BAR must include a list providing a clear description of the infrastructure associated with the development. | | <p>A list has been included in Chapter 12, Section 12.5. This list is also included below:</p> <ul style="list-style-type: none"> » Up to 41 wind turbines with a maximum hub height of up to 200m. The tip height of the turbines will be up to 300m. » Concrete turbine foundations and turbine hardstands. » An internal road network between project components inclusive of stormwater infrastructure. » Medium-voltage (MV) power lines internal to the wind farm trenched and located adjacent to internal access roads, where feasible. |

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| | | | <p>» Substation, Battery Energy Storage System (BESS) and O&M buildings hub, including:</p> <ul style="list-style-type: none"> ○ On-site facility substation (132kV). ○ Battery Energy Storage System (BESS). ○ Operation and Maintenance buildings, including control centre. <p>» Warehouse, laydown area and site camp hub, including:</p> <ul style="list-style-type: none"> ○ Construction laydown areas ○ Site camp ○ Warehousing and buildings <p>Upgrade to a main access road of approximately 2.5km in length and up to 10m in width.</p> |
| | <p>(ii) The final BAR must provide the technical details for the proposed facilities in a table format as well as their description and/or dimensions. A sample for the minimum information required is listed under Annexure 2 below.</p> | | <p>A table with all infrastructure and their amount, footprint and dimension is included in Table 2.1 in Chapter 2 of the final BAR.</p> |
| | <p>(iii) The EAP must provide details of the specific locations in the BAR. All associated infrastructure must be clearly indicated in the final BAR and its associated layout plans.</p> | | <p>Table 2.1 in Chapter 2 of the final BAR includes the coordinates of the BESS and substation.</p> <p>The location of all infrastructure is indicated in the layout map in Figure 12.3 in Chapter 12.</p> |
| | <p>(iv) When submitting the BAR and future documents kindly name each of the documents and attachments according to the information it contains e.g., instead of only naming it Appendix A, it must be Appendix A: Maps, Appendix B: EAP Declaration etc.</p> | | <p>The naming convention has been acknowledged and all documents have been labelled in this manner.</p> |
| | <p>(v) The EAP must provide an outline of where in the final BAR each of this Department's comments are addressed. This must be a separate document and must be submitted as an appendix to the final BAR.</p> | | <p>The C&RR includes reference to where each department's comments are addressed within the report. It is included as a separate document to the Final BA Report (refer to Appendix C8: Comments and Responses Report).</p> |

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| | <p>(vi) 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)(a) of the NEMA EIA Regulations, 2014, as amended.</p> | | <p>A validity period of 15 years is requested in 12.5 of Chapter 12.</p> |
| | <p>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 any specialist reports, an EMPr, a closure plan in the case of a closure activity and where the application is a mining application, the plans, report and calculations contemplated in the Financial Provisioning Regulations, 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".</p> | | <p>The BA process complies with the requirement of Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended. The BAR application was submitted on 10 March 2023 with a Final Bar deadline of 08 June 2023.</p> |
| | <p>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(1)(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 documents contemplated in subregulation 1(a) 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 documents which changes or information was not contained in the original documents consulted on during the initial public participation process contemplated in</p> | | <p>No significant changes or new information has been added to the BAR or EMPr following the initial public participation process.</p> |

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| | <p>subregulation (1)(a) and that the revised documents will be subjected to another public participation process of at least 30 days."</p> <p>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.</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 submission of the BA report complies with the prescribed timeframes of the EIA Regulations.</p> <p>The Applicant acknowledges that no activity may commence prior to receipt of the Environmental Authorisation.</p> |
| 2. | <p>Based on the information provided in the report, the Gannaleegte non-perennial river passes through the centre of the project site and several non-perennial drainage lines traverse across the project site. It has been noted that the facility layout has avoided all the environmental sensitive ecological areas identified within the development area and the recommended buffers are established. In addition, the proposed development will not result in unacceptable environmental impacts. Cumulative significance of impact of the project will be high to bats.</p> <p>Notwithstanding the above, the following recommendations must be considered in the final report:</p> <ul style="list-style-type: none"> • No turbine development is permitted within the identified no-go areas. • Sensitive habitats in close proximity to the development footprint must be avoided or demarcated as No-Go area (i.e. Gannaleegte River, plains, rocky areas and ridges). | <p>M Rabothata Case Officer DFFE: BC</p> <p>Letter 13 April 2023</p> | <p>The Gannaleegte non-perennial river does pass through the centre of the project site and drainage lines do traverse portions of the site.</p> <p>The facility layout has avoided all high sensitivity areas. A map of the layout of the facility and the environmental sensitivities is included in Figure 12.2 in Chapter 12.</p> <p>Cumulative significance was determined to be "high" for bats. The specialists have provided mitigations for this and acknowledged that the impact is acceptable.</p> <p>No turbines are proposed to be developed in any no-go areas as detailed in Figure 12.2 in Chapter 12.</p> <p>All sensitive habitats (including high sensitivity habitats) have been identified by the various specialists and where recommended (e.g. high sensitive areas) no-go buffers have been recommended and clearly demarcated. Refer to Figure 12.2 in Chapter 12 which presents the high sensitive areas identified and delineated.</p> |

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| | <ul style="list-style-type: none"> Pre--construction walk-through to locate Species of Conservation Concern that can avoided must be undertaken with a qualified specialist. | | <p>A pre-construction walkthrough will be undertaken by a qualified specialist. This is included within the EMPr.</p> |
| | <ul style="list-style-type: none"> 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>An alien invasive plant species management plan has been developed and included as Appendix C of the Facility EMPr (Appendix N1)</p> |
| | <ul style="list-style-type: none"> Appropriate buffer must be established around medium sensitive habitats (i.e. Bats habitats, River), | | <p>Areas of medium sensitivity have been mapped by the specialists in their reports. Areas of medium sensitivity are considered to be acceptable for development but would require mitigation to be implemented. The applicant has outlined the mitigation measures to be implemented in the Facility EMPr (Appendix N1)</p> <p>The following is a response from Caroline Lotter from IWS specifically in regard to bat habitats (Bats specialist) "Medium bat sensitive areas include areas of dolerite and floodplain zones. Available spatial (GIS) data indicate that the areas of dolerite are extensive, but onsite this geology appears to be diffuse. Significant dolerite outcrops with crevices, which might be suitable for bat roosts, were not encountered onsite. Dolomite, which is often associated with karst formations, is not present onsite, so far as IWS is aware. Floodplain zones are similarly extensive, variable, and ephemeral onsite. Therefore, it did not seem sensible to buffer these amorphous habitat types. Distinct rivers, streams, wetlands, farm dams, and reservoirs were, however, assigned 500m High bat sensitive buffers, and ephemeral secondary drainage lines were assigned 200m Medium-High sensitive buffers."</p> |
| | <ul style="list-style-type: none"> The final Layout Map overlaid with sensitivities and indicating the final footprint for the proposed development avoiding | | <p>A map of the layout of the facility and the environmental sensitivities is included in Figure 12.2 in Chapter 12.</p> |

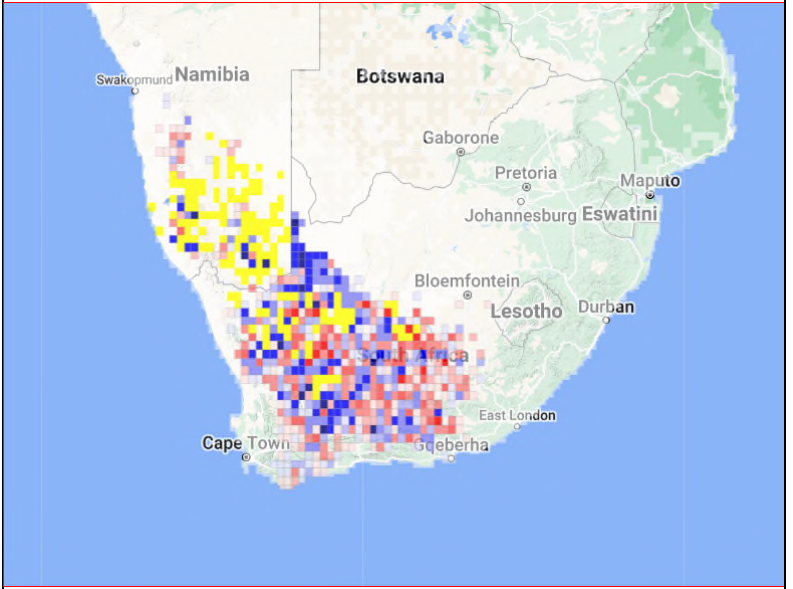
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| | environmentally sensitive areas must be included in the Final report. | | |
| | All Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries must be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@environment.gov.za for attention of Mr Seoka Lekota . | | It is confirmed that all public participation documents relating to Biodiversity EIA review and other Biodiversity EIA queries have been submitted to the contact details as provided. |

1.2 Key Stakeholders and Interested & Affected Parties

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| 1. | <p>We as the above-mentioned organization would like to find the relevant contact persons involve in the project, in terms of public participation. We would like to meet those involve in assisting the smooth public participation arrangement.</p> <p>Can you perhaps assist us with the contact details of the relevant role players please?</p> <p>Trust you can assist us.</p> | <p>Basie J Van Wyk Communication Officer Central Karoo Black Business Development Forum</p> <p>E-mail: 12 April 2023</p> | <p>Stakeholder was informed that Savannah Environmental is responsible for the public participation process and provided an opportunity to submit comments on the project.</p> <p>They have also been informed that their organisation has been registered as an I&AP on the project database to receive future project related information.</p> |
| 2. | <p>My concern about the following, which will impact me but for which i will receive no compensation: (based on previous experiences)</p> <ul style="list-style-type: none"> • Stock theft • Equipment theft (solar panels, fencing etc.) • Security issues resulting from influx of outsourced labor/no locals • Personal Security and safety | <p>Etienne Terblanche Landowner Karoo Plan</p> <p>E-mail: 12 April 2023</p> | <p>It is noted that the project could lead to an increased risk of theft and security in the area. The Socio-Economic Assessment (Refer to Appendix K) has assessed the impact and mitigation measures must be implemented to ensure any negative impact is reduced. Mitigation measures being implemented (amongst others) include:</p> <ul style="list-style-type: none"> • Contractors appointed by the proponent should provide daily transport for low and semi-skilled workers to and from the site. • It is recommended that no construction workers, with the exception of security personnel, should be permitted to stay overnight on the site. • Contractors appointed by the proponent must ensure that construction workers who are found guilty of stealing livestock |

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| | | | <p>and/or damaging farm infrastructure are dismissed and charged. This should be contained in the Code of Conduct. All dismissals must be in accordance with South African labour legislation.</p> <ul style="list-style-type: none"> Where reasonable and practical, the proponent should appoint local contractors and implement a 'locals first' policy, especially for semi and low-skilled job categories. However, due to the low skills levels in the area, the majority of skilled posts are likely to be filled by people from outside the area. <p>With the implementation of mitigation, theft and security impacts were assessed as being of a low significance.</p> |
| | <ul style="list-style-type: none"> Unsightly views/scenery and degradation of the pristine Karoo landscape | | <p>A visual impact assessment was undertaken for the project (Refer to Appendix I). The assessment concluded that the visual impact of the project is expected to be of overall high significance to sensitive visual receptors. Whilst there are no feasible mitigations against this impact, mitigations will be implemented for lighting and construction phase visual impacts. However, due to the remoteness and location of the facility within a REDZ, the impacts were considered acceptable by the specialist.</p> |
| | <ul style="list-style-type: none"> Damage to roads due to additional traffic and heavy vehicles Road management and repairs when the project is done | | <p>The Traffic Impact Assessment Report (Refer to Appendix M) assessed and addressed the traffic impacts. It should be noted that the construction impacts will be temporary and of low significance with the implementation of the mitigation measures. Mitigation measures are included in the EMPr for both anticipated traffic and road maintenance impacts, which include:</p> <ul style="list-style-type: none"> Regular maintenance of gravel roads by the Contractor during the construction phase Stagger component delivery to site Reduce the construction period The use of mobile batching plants and quarries in close proximity to the site |

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| | | | <ul style="list-style-type: none"> Staff and general trips should occur outside of peak traffic periods. <p>No impacts of high significance were identified, and no fatal flaws are associated with the Aberdeen Wind Facility 1, 2 and 3 from a traffic perspective.</p> |
| | <ul style="list-style-type: none"> Pressure on the scarce water resource, previous projects were using more than 1m liters per week only to reduce dust levels | | <p>Water demand during the Construction Phase (up to 24 months) is likely to range between 50 - 162 kl per day (depending on the construction activity taking place). Water demand during the Operation Phase (min 20 years) is likely to range between 3 - 3.5 kl per day (depending on the maintenance activities taking place).</p> <p>Four water source options will be considered:</p> <ol style="list-style-type: none"> Supply from the Local Municipality (LM) - i.e. Dr Beyers Naude Local Municipality. We will approach the LM to enquire whether they can provide all or part of the total water requirements of the Project. Specific arrangements will be agreed with the LM in a Service Level Agreement (SLA), following the appointment of preferred bidder during the financial close period. Supply from a Private Contractor, which may include extraction from any bulk water supply lines nearby to the site. An existing borehole on site, subject to NWA requirements (including hydrocensus and yield impact assessments) A new borehole on site, subject to NWA requirements (including hydrocensus and yield impact assessments) <p>The preferred water source option will be determined further down the project schedule in consultation with the appointed Contractor.</p> |
| | <p>I would also like to find out if any studies have been done on the Vaalkorhaan bird or as known here as the "Vlakte korhaan) which is</p> | | <p>The following reply has been provided by the avifaunal specialist, Dr Rob Simmons:</p> |

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| | <p>limited to a small area in the Karoo. What will be the impact on this specie.</p> | | <p>The last paper to be written on the Vaalkoorhaan (English: Karoo Korhaan) was in 1994. The Roberts' text (2005) gives the most up to date text on the ecology of the bird and the SABAP2 data sets show that the species shows increasing (blue) reporting rates (likelihood that it will occur in a pentad) in the northern and central parts of its range. Orange/pink areas however show declines in reporting rates in many other parts of its range. The yellow squares are areas that have insufficient data. There are no obvious population trends therefore across its large Nama Karoo range.</p>  <p>The Collision-Risk Assessment presented in the avifaunal study took this species into account as a "Priority" species (one of the top 100 that may be affected by the renewable energy industry). In general this Near Threatened species is not expected to be negatively influenced</p> |
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| | | | <p>by any wind farm development. This arises because it rarely flies high enough to be impacted directly by spinning blades (our records show that it spent only 9% of its flight time in the blade swept areas). In a national review of all (848) fatalities at 20 wind farms, only 8 individual korhaans (all three species) were recorded as fatalities (Perold et al. 2020). The impact of the wind farm on the Vaalkoorhaan is therefore expected to be low.</p> |
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2. COMMENTS RECEIVED DURING THE INITIATION OF THE BASIC ASSESSMENT PROCESSES

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| 1. | <p>1. Herewith to respond to your request sent to the Department of Defence (DOD) for clearance.</p> <p>2. Please note that this office can not respond to your request as there is a Formal and Standard process for Applications in the DOD</p> <p>3. The correct Application Process:</p> <p>a. Send your request to the following e-mail addresses only.</p> <p>i. clogfac@gmail.com</p> <p>ii. dfacmiem@gmail.com</p> <p>b. Formulate a comprehensive request, with the Project Plan and formal letter with details of the Project. (Not a n e-mail Message with the criteria) It must be on a formal company letterhead, please.</p> <p>c. Include KMZ / KML file for use in Google Earth.</p> <p>4. Once received by the environments in Par 3, the DOD will request all DOD Stakeholders to respond in writing (Telecoms, Aviation, Environmental, Facilities etc).</p> <p>5. Once the stakeholders has responded, a single response will be sent to the Applicant with Objection / No -objection.</p> <p>6. Stakeholders may not correspond directly to the Applicant.</p> | <p>Lt CI Francois P Strydom Command and Management Information Systems Division Directorate CMIS Static Systems Radion Spectrum & Communication Site Management SANDF</p> <p>E-mail: 07 February 2023</p> | <p>The SANDF has been identified as a key stakeholder to be part of the Basic Assessment and public participation process and to ensure that the proposed development will not have an impact on their infrastructure in the study area, and therefore the notifications sent to the SANDF, at this stage, is not an "Application" process, but an information sharing process.</p> |

1.2. Key Stakeholders and Interested & Affected Parties

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| 1. | Can you please mail me a KML for the proposed wind tower locations | Johan Theron Eastern Vodacom tx Manager Vodacom E-mail: 09 February 2023 | The kmz file was emailed on 10 March 2023. |
| 2. | <p>Please find attached your approved Openseve wayleave.</p> <p>Please note: Our area representative as listed on the wayleave should be contacted at least 48 hours prior to commencement of construction in order to show services out on site, as our services on the attached plan(s) are APPROXIMATE ONLY.</p> <p>Please note, wayleave applications will NOT be accepted by this mailbox. Please send all wayleave requests to wayleaveswr@telkom.co.za</p> <p>Please ensure that the Openseve service plan(s) are printed in colour (if applicable) and on the correct page size as indicated in the bottom right corner, in order to ensure that services can be seen clearly.</p> | <p>Stefan Geldenhuys Building Cabling & Design & Wayleaves Openseve E-mail: 14 February 2023</p> | <p>This information has been shared with the Applicant who will consult with Openseve at the applicable time in the application process.</p> |
| | <p>Please notify this office immediately if you locate any Openseve plant that was not indicated. Please contact our representative Thomas Phillips / 045 838 2968 / 081 366 2823 / Thomasp@openseve.co.za 48 hours prior to commencement of construction work.</p> <p>I hereby inform you that Openseve approves the proposed work indicated on your drawing in principle. This approval is valid for 06</p> | <p>Stefan Geldenhuys Building Cabling & Design & Wayleaves Openseve Letter: 13 February 2023</p> | <p>This information has been shared with the Applicant who will consult with Openseve at the applicable time in the application process.</p> |

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| | <p>MONTHS ONLY, after which reapplication must be made if the work has not been completed.</p> <p>Any changes or deviations from the original planning during or prior to construction must immediately be communicated to this office.</p> <p>As per supplied sketches it would appear as if Openserve infrastructure <u>would not be affected.</u></p> <p>However, care should still be taken should it become evident that there is in fact Openserve network present at the actual sites. Such lines should be treated in accordance with, and clearances stipulated in the Occupational Health and Safety Act no 85 of 1993, Electrical Machinery Regulations 20 – Crossings, and Electrical Machinery Regulation 15 – Clearances of Power Lines. If the specifications could not be met, all deviation costs will be for the applicant's account. We also refer to Section 25 of the electronic Communication Act 36 of 2005.</p> <p>Please notify this office immediately if you locate any Openserve plant not indicated.</p> <p>It would be appreciated if this office can be notified within 30 days of completion of the construction work. Confirmation is required on completion of construction as per agreed requirements.</p> <p>Should Openserve infrastructure be damaged while work is undertaken, kindly contact our representative immediate.</p> <p>All Openserve rights remain reserved.</p> | | |

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| | <p>NOTE: Sketches are attached to the comment and included in Appendix C7 of the BAR.</p> | | |
| 3. | <p>Can you please register EnviroAgri as I&AP on the Aberdeen WEF EIA.</p> <p>We are currently busy with preliminary impact assessments for a WEF cluster in close proximity to the proposed Aberdeen WEFs.</p> | <p>Dirk Pretorius EAP EnviroAgri Environmental Consultants</p> <p>E-mail: 24 February 2023</p> | <p>Stakeholder had been registered on the project database as requested and will be notified once the BAR is available for review and comment.</p> |