
ALLEPAD PV3 SOLAR ENERGY GENERATION FACILITY AND ASSOCIATED INFRASTRUCTURE NEAR UPINGTON, NORTHERN CAPE PROVINCE

DEA Ref.No14/12/16/3/3/2/1107

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All written comments received since the announcement of the Environmental Impact Assessment process in October 2018, during the Scoping Report's review and comment period (30-day review and comment period from Friday, 12 October 2018 to Monday, 12 November 2018) are included in this Comments and Responses Report.

Comments raised during the Environmental Impact Assessment Report's review and comment period (**Thursday, 28 February 2019 to Monday, 01 April 2019**) will be included in final Environmental Impact Assessment Report.

NOTE:

In terms Regulation 44(1) of the EIA Regulations of December 2014 (as amended on 07 April 2017), please note that the comments raised and responses provided at the various Focus Group Meetings held during the 30-day review period of the Basic Assessment Report have not been captured in this Comments and Responses Report. The notes of the meetings are attached as **Appendix C7**.

List of Abbreviations / Acronyms

ATNS	Air Traffic Navigation Services	DEA	Department of Environmental Affairs
SANRAL	South African National Roads Agency	SAHRA	South African heritage Resource Agency
SARAO	South African Radio Astronomy Observatory		

1. COMMENTS RECEIVED DURING EIA ANNOUNCEMENT PHASE

No.	Comment	Raised By	Response
No comments were received during the Announcement Phase			

2. COMMENTS RECEIVED BY ORGANS OF STATE DURING SCOPING REPORT PUBLIC REVIEW

No.	Comment	Raised By	Response
1.	The application form and the draft Scoping Report (SR) dated October 2018 as received by this Department on 12 October 2018, refer. <u>This Department has the following comments on the abovementioned application:</u>	Olivia Letlalo Control Environmental Officer: Strategic Infrastructure Developments DEA	Comment noted, no response required.
Alternatives 1.1.	It has been noted that the location, design and layout as well as no-go alternatives have been included in the draft report, taking into consideration the advantages and disadvantages as why the site is believed to be the preferred. Therefore, should there be any other alternatives considered, you are required to include the information in the final SR.	Letter: 02-11-2018	No other alternatives in addition to those identified in the Scoping Report released for public comment are being considered.
Impacts Assessment 1.2.	This Department requests the EAP to familiarise themselves with the requirements of Appendix 2 of GNR 982 of the EEA Regulations, 2014 (as amended) and ensure that the final SR submitted to this Department for consideration meets the requirements in terms of identifying, assessing and providing mitigation measures of the impacts on the alternatives and preferred site.		The Final Scoping Report has been prepared in accordance with the requirements of Appendix 2 of the 2014 EIA Regulations (GNR 326). An overview of where the corresponding information required under Appendix 2 of the 2014 EIA Regulations (GNR 326) is provided in the Final Scoping Report is contained in Chapter 1, Table 1.2 of the Final Scoping Report.
Maps			

No.	Comment	Raised By	Response
1.3.	Please provide the following maps depicting the footprint of each project specific site, instead of maps that are illustrating the whole site for all four proposed projects. Note that this request applies for the four applications, i.e. 1105; 1106; 1107 and 1108 respectively.		Copies of maps which have been prepared for the footprint of each of the project specific sites in accordance with DEA's requirements are included in Appendix J of the Final Scoping Report.
1.4.	Locality Map An A3 locality map. The scale of the locality map must be relevant to the size of the development (at least 1:50 000. For linear activities of more than 25 kilometres, a smaller scale e.g. 1:250 000 can be used. The scale must be indicated on the map).		An A3 Locality Map which has been prepared for the project site in accordance with DEAs requirements is included in Appendix J of the Final Scoping Report.
1.5.	The map must indicate the following: » An accurate indication of the project site position as well as the positions of the alternative sites, if any; indication of all the alternatives identified; closest town(s). » Road access from all major roads in the area. » Road names or numbers of all major roads as well as the roads that provide access to the site(s). » All roads within a 1km radius of the site or alternative sites. » A north arrow; a legend and locality: GPS co-ordinates must indicate the position of the activity using the latitude and longitude of the centre point of the site for each alternative site. The co-ordinates must be provided in degrees, minutes and seconds. The projection that must be used in all cases is the Hartebeesthoek94 WGS84 co-ordinate system, in line with Regulation 5(6) of the EIA Regulations, 2014 as amended.		An A3 Locality Map which has been prepared for the project site in accordance with DEAs requirements is included in Appendix J of the Final Scoping Report.
1.6.	A3 Layout map		An A3 Layout Map which has been prepared for the project site in accordance with DEA's requirements utilising information which is

No.	Comment	Raised By	Response
	<p>A copy of the final site layout map. All available biodiversity information 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> <ul style="list-style-type: none"> » Photovoltaic facility footprint and its associated infrastructure. » Temporary construction camp. » Permanent laydown area footprint. » Internal roads indicating width (construction period width and operation period width) and with numbered sections between the other site elements which they serve (to make commenting on sections possible). » Wetlands, drainage lines, rivers, stream and water crossing of roads and cables indicating the type of bridging structures that will be used. » The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure. » Substation(s) and / or transformer(s) sites including their entire footprint. » Connection routes (including pylon positions) to the distribution / transmission network. » All existing infrastructure on the site, especially roads. » Buffer areas. » Buildings, including accommodation. » All "no-go" areas. 		<p>available at this stage of the EIA process is included in Appendix J of the Final Scoping Report. Information which is not available at this stage of the EIA process (i.e. during Scoping) will be incorporated into the layout maps to be prepared as part of the EIA phase. The layout map to be prepared as part of the EIA phase will take into consideration all DEA's requirements, as well as any additional requirements which may be included in DEA's subsequent comments on the project, and information from the detailed specialist studies to be conducted as part of the EIA phase.</p>
1.7.	<p>A3 Sensitivity Map The layout plan as indicated above must be overlain with a sensitivity map that indicates all the sensitive areas associated with the site, including, but not limited to:</p>		<p>An A3 Sensitivity Map, which has been prepared for the project site in accordance with DEA's requirements utilising information which is available at this stage of the EIA process, is included in Appendix J of the Final Scoping Report. Information which is not available at this stage of the</p>

No.	Comment	Raised By	Response
	<ul style="list-style-type: none"> » Watercourses, drainage lines. » The 1:100 year flood line (where available or where it is required by DWS). » Ridges. » Cultural and historical features. » Areas with indigenous vegetation (even if it is degraded or infested with alien species). » Critical biodiversity area. » Buffer areas. » No-go areas. 		<p>EIA process (i.e. during Scoping) will be incorporated into the sensitivity map to be prepared as part of the EIA phase. The sensitivity map to be prepared as part of the EIA phase will take into consideration all DEA's requirements, as well as any additional requirements which may be included in DEA's subsequent comments, and information from the detailed specialist studies to be conducted as part of the EIA phase.</p>
<p>Public Participation Process</p> <p>1.8.</p>	<p>Please ensure that all issues raised and comments received during the circulation of the SR from the 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 SR.</p>		<p>Comments received from I&APs and organs of state during the 30-day public review period are included in Appendix C6 and Appendix C4 of the Final Scoping Report respectively, and have been incorporated into this Comments and Response Report attached as Appendix C8 to the Final Scoping Report. Where applicable, comments received have been utilised in the preparation and finalisation of the Scoping Report. Comment was requested from Mr. Stanley Tshitwamulomoni of the Biodiversity Conservation Section at the Department of Environmental Affairs (refer to Appendix C4 of the Final Scoping Report); however none have been received to date.</p>
<p>1.9.</p>	<p>Proof of correspondence with the various stakeholders must be included in the final SR, should you be unable to obtain comments, proof of the attempts that were made to obtain comments must be submitted to the Department.</p>		<p>Proof of correspondence with various stakeholders is attached in Appendix C4 (organs of state correspondence) and Appendix C5 (stakeholder correspondence) of the Final Scoping Report. Proof of attempts that were made to obtain comments is attached in Appendix C4 (organs of state correspondence) and Appendix C5 (stakeholder correspondence) of the Final Scoping Report.</p>
<p>1.10.</p>	<p>The Public Participation Process must be conducted in terms of Regulations 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.</p>		<p>The Public Participation Process is being conducted in accordance with Regulations 39, 40, 41, 42, 43 and 44 of the 2014 EIA Regulations (GNR 326) as amended. An overview of the Public Participation Process is provided in Chapter 6, Section 6.4.2 of the Final Scoping Report.</p>
<p>General Comments</p>			

No.	Comment	Raised By	Response
1.11.	You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of Scoping Reports in accordance with Appendix 2 and Regulation 21(1) of the amended EIA Regulations, 2014.		The Final Scoping Report has been prepared in accordance with the requirements of Appendix 2 of the 2014 EIA Regulations (GNR 326). An overview of where the corresponding information required under Appendix 2 of the 2014 EIA Regulations (GNR 326) is provided in the Final Scoping Report is contained in Chapter 1, Table 1.2 of the Final Scoping Report.
1.12.	Further note that in terms of Regulation 45 of the EIA Regulations 2014, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of the these Regulations, unless an extension has been granted in terms of Regulation 3(7).		The applicant is cognisant of the need to comply with the requirements of Regulation 45 of the 2014 EIA Regulations (GNR 326) with regards to stipulated timeframes. In accordance with Regulation 21 of the 2014 EIA Regulations (GNR 326), an applicant must within 44 days of receipt of the application by the competent authority submit to the competent authority a Scoping Report which has been subjected to a public participation process of at least 30 days. The DEA confirmed having received the application form and Draft Scoping Report for Allepad PV Three on 12 October 2018. The Final Scoping Report is therefore required to be submitted by 26 November 2018.
1.13.	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.		The applicant is cognisant of the need to comply with Section 24F of NEMA with regards to commencing with listed activities. No activities have or will commence on site prior to EA being granted by the DEA.
2.	Please find attached Eskom requirements for works at or near Eskom infrastructure. Please send me KMZ files of the affected properties. Please send me the DEA reference numbers as soon as they become available. <u>Wayleave requirements and Renewable Energy Plant Setback to Eskom Infrastructure documents included in Appendix C4.</u>	John Geeringh Snr Consultant Environmental Management Group Capital Division: Land Development and Management Eskom Holdings SOC Ltd E-mail: 02-11-2018	The documents submitted was acknowledged and forwarded to the Applicant. The requested KMZ files and the DEA reference number was e-mailed on 02 November 2018. Copies of the correspondences are included in Appendix C4 .

No.	Comment	Raised By	Response
3.	The above listed project bears reference. I would hereby wish to register as an I&AP for this particular project.	Nicole Abrahams Environmental Coordinator: Western Region	It is confirmed that Nicole Abrahams is registered as a Key Stakeholder on the project database.
3.1.	The South African National Roads Agency SOC Limited (SANRAL) has received background information and a site layout plan for this project and based on the proximity of the pipeline in relation to the National Road N10, it appears that SANRAL could be impacted by this development.	SANRAL Email: 06-11-2018	It was confirmed with regards to the reference made to a "pipeline" that the solid yellow line reflected on the locality map represents the 300m wide power line corridor (for environmental assessment purposes). The proposed power line corridor is located within the project property and runs parallel and adjacent to the road reserve and SANRAL's pipeline servitude.
3.2.	Could you also indicate the number appearing on the nearest blue km marker board on N10.		<p>The number appearing on the nearest blue km marker board (i.e. 15.6N) located at 28° 24' 20.15" S and 21° 08' 09.10" E on the N10 has been obtained (refer to Figure 1), and forwarded to SANRAL.</p> <div data-bbox="1256 699 2107 1219" data-label="Image"> </div> <p>Figure 1: Photo showing the nearest blue km marker board on the N10.</p>
3.3.	If services need to be constructed over or under the national road, (in this case the N10) or within 60m measured from the road reserve fence, the service owner		The applicant is cognisant of the need to apply for written permission from SANRAL, before any work may be carried out over or under the N10 national road, or within 60m measured from the road reserve fence,

No.	Comment	Raised By	Response
	<p>must apply for a written permission from SANRAL, before any work may be carried out. Attached please find an application form for the proposed encroachment. Do not hesitate to contact the sender should you have any further queries.</p>		<p>however no services need to be constructed over or under the N10 national road, or within 60m measured from the road reserve fence. The proposed power line corridor runs internal to the project property and is located adjacent to the road reserve and SANRAL's pipeline servitude.</p>
4.	<p>Savannah Environmental (Pty) Ltd has been appointed by ILEnergy Development (Pty) Ltd to conduct an Environmental Authorisation (EA) Application process for the proposed Allepad PV Three facility, near Upington, Northern Cape Province. A draft Scoping Report (DSR) has been completed in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 NEMA Environmental Impact Assessment (EIA) Regulations. The proposed development will include the construction of an array of PV panels with a generation capacity of up to 100 MW, mounting structures for the PV panels, electrical infrastructure, on-site substation, powerline, cabling, energy storage area, access roads, control building, offices, ablutions, guard house, temporary construction camp and laydown area. CTS Heritage had been appointed to provide heritage input into the EA Application process as per section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).</p>	<p>Natasha Higgitt Heritage Officer SAHRA Letter: 8-11-2018</p>	<p>Comment noted, no response required.</p>
4.1.	<p>Lavin, J. 2018. Heritage Screener. Proposed development of Allepad PV Three, a solar PV Facility and associated infrastructure on a site near Upington, in the Northern Cape Province.</p>		<p>Comment noted, no response required.</p>
4.2.	<p>The Heritage Screener showed that the heritage resources in the proposed development area have not been sufficiently recorded, and that an archaeological field assessment be conducted to inform a full Heritage Impact</p>		<p>Comment noted, no response required.</p>

No.	Comment	Raised By	Response
	<p>Assessment (HIA). The Heritage Screener indicated that the development area is of low palaeontological sensitivity and therefore no further assessment of palaeontological resources is required.</p>		
<p>Interim Comment 4.3.</p>	<p>The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit notes the submitted Heritage Screener and awaits the pending HIA. SAHRA does not accept the recommendation of the Heritage Screener that no further assessment of palaeontological resources is required. The SAHRIS PalaeoSensitivity map shows that the development area is located within an area of moderate palaeontological sensitivity and therefore a desktop assessment of palaeontological resources is required. The assessment must comply with the 2012 SAHRA Minimum Standards: Palaeontological Components of Heritage Impact Assessments and must be compiled by a qualified palaeontologist. The 2012 Minimum Standards makes reference to a Letter of Recommendation for Exemption that may be submitted, should the palaeontologist deem is necessary.</p>		<p>The Heritage Specialist appointed to the project has indicated that a Letter of Recommendation for Exemption will be prepared and submitted by a palaeontologist in accordance with the 2012 SAHRA Minimum Standards: Palaeontological Components of Heritage Impact Assessments.</p>
4.4.	<p>SAHRA awaits the pending HIA inclusive of an archaeological and palaeontological component, that takes into consideration the results of the Visual Impact Assessment and any heritage related comments during the public review periods, along with the Final Scoping report and the draft EIA with associated appendices when available for public review before further comments are issued.</p>		<p>A copy of the HIA will be uploaded to SAHRIS for SAHRA's review and comment as part of the 30-day public review period to be conducted as part of the EIA phase.</p>
4.5.	<p>Should you have any further queries, please contact the designated official using the case number quoted above in the case header.</p>		<p>Comment noted, no response required.</p>

No.	Comment	Raised By	Response
5.	<p>This letter is a response to the Draft Scoping Report for all four photovoltaic facilities and associated infrastructure on a site near Upington, in the Northern Cape Province submitted for environmental authorisation in terms of the National Environmental Management Act, 1998.</p> <p>SARO (Formerly SKA SA) notes that the identified location for the project is approximately 210km away from the nearest SKA infrastructure. We, therefore, do not anticipate any negative impact on the SKA and have no objections on the Draft Scoping Report for all four Allepad PVs.</p>	<p>Selaelo Matlhane SARO</p> <p>Letter: 07-11-2018</p>	
6.	<p>Please note that ATNS is aware of the above mentioned.</p>	<p>Simphiwe Masilela Obstacle Evaluator</p>	<p>Comment noted, no response required.</p>
6.1.	<p>The area in which the proposed Allepad PV will be situated falls within the boundaries of the ICAO Annex 14 surfaces and Procedures of Air Navigation Services Operations associated with Upington Airport, therefore we cannot verify whether the proposed will affect the safety of flights, we would have to conduct a formal assessment once the project is ready for construction. You may be required to have a glint and glare impact assessment done as per SACAA requirement (refer to: Obstacle Notice 4/2017 (17/11/2017): Additional Requirements for Solar Project Applications)</p>	<p>ANTS</p> <p>Email: 8-11-2018</p>	<p>If the need for a glint and glare impact assessment to be conducted in accordance with SACAA's requirements is confirmed, then one will be conducted accordingly.</p>
6.2.	<p>Please update us should there be any new developments that may affect our interests.</p>		<p>ATNS is a registered stakeholder for the project, and will therefore be kept informed regarding the proposed project.</p>
6.3.	<p>For future projects please forward all queries to ObstacleEvaluators@ats.co.za</p>		<p>All future queries will be forwarded to ObstacleEvaluators@ats.co.za as per ATNS's request.</p>
6.4.	<p>For note for us to carry out a successful assessment we require the following information:</p> <ol style="list-style-type: none"> 1. LOCATION (Co-ordinates WGS84 system) 2. SITE/GROUND ELEVATION (AMSL) 		<p>Information pertaining to the location, site / ground elevation and height to top of the proposed development will be provided to ATNS once it is available.</p>

No.	Comment	Raised By	Response
	3. HEIGHT TO TOP OF PROPOSED DEVELOPMENT (in meters)		
6.5.	Please also note that there is a fee attached to the Obstacle Evaluations for all formal applications following the EIA process.		The applicant is cognisant of the fee attached to the Obstacle Evaluations for all formal applications following the EIA process.

3. WRITTEN COMMENTS RECEIVED AFTER SCOPING REPORT REVIEW PERIOD

No.	Comment	Raised By	Response
1.	You may proceed with the EIA process in accordance with the tasks contemplated in the PoSEIA and the requirements of the EIA Regulations 2014, as amended. However, you must take note of the following comments from the Department:	Olivia Letlalo Control Environmental Officer: Strategic Infrastructure Developments DEA	
1.1.	<u>Technical Details of the proposed facility and design alternative</u>	Letter: 05-12-2018	
1.1.1.	The EIAR must provide the technical details for the proposed facility in a table format as well as their description and/or dimensions. A sample for the minimum information required is listed under point 2 of the EIA information required for PV facilities below.		1.1.1. Table 2.2, Chapter 2 of the Environmental Impact Assessment (EIA) Report provides the technical details for the Allepad PV Three solar energy facility, including their description and/or dimensions.
1.1.2.	Further, the EIAR must include the design alternative for the proposed 100MW PV facility.		1.1.2. Chapter 3 of the EIA Report provides a description of the various alternatives considered for Allepad PV Three. The design alternative proposed for Allepad PV Three is considered to be the most reasonable and feasible alternative for the development considering technical and environmental constraints, and therefore no design alternatives were identified or assessed
1.2.	<u>Application for re-zoning</u> The EIAR must include proof indicating that an application for the re-zoning has been lodged with the relevant authority as		An application for rezoning has been submitted to the Dawid Kruiper Local Municipality. The municipality informed the applicant that an application can only be processed once the project has received EA. Proof of

	<p>the proposed development will take place on land currently zoned for agricultural land uses.</p>		<p>correspondence with the municipality has been included in Appendix L of the EIA Report. A rezoning application will be undertaken as a separate process by the developer once the project has been selected as a preferred bidder project in the Department of Energy's Renewable Energy Independent Power Producer Procurement (REIPPP) Programme</p>
<p>1.3. 1.3.1.</p>	<p><u>The EIA must also provide the following:</u> Provide a clear indication of the proposed development footprint of the PV solar facility as well as the all associated infrastructure; i.e. placement of photovoltaic (PV) panels.</p>		<p>The project footprint has been included in Chapter 2, Section 2.1.1 of the EIA Report and consist of footprint of the facility and all associated infrastructure.</p>
<p>1.3.2.</p>	<p>Clear description of all associated infrastructure. This description must include, but not limited to the following:</p> <ul style="list-style-type: none"> • Power lines; • Internal roads infrastructure; • All supporting onsite infrastructure such as laydown area, guard house and control room etc. • All necessary details regarding all possible locations and sizes of the proposed satellite substation and the main substation. • Information on services required on the site, e.g. sewage, refuse removal, water and electricity, agreements with suppliers and confirmation of capacity been obtained must be provided. 		<p>The Allepad PV Three and all associated infrastructure has been described in Chapter 2 of the EIA Report.</p> <p>Information on services required on the site, e.g. sewage, refuse removal, water and electricity, agreements with suppliers and confirmation of capacity been requested from the municipality but not confirmation has been received to date. Proof of the requests have been included in Appendix L2 of the EIA Report.</p>
<p>1.4. 1.4.1.</p>	<p><u>Need and Desirability of the proposed development</u> The Department has noted that there are other projects of similar nature in the area, therefore; your EIA must provide detailed description of the need and desirability taking into account cumulative impacts of the proposed development in the area.</p>		<p>The need and desirability of the project has been described in detail in Chapter 5 of the EIA Report which considers other projects operating and under construction in the area. Chapter 9 of the EIA Report assesses the potential for cumulative impacts associated with the project and other projects in the area.</p>
<p>1.5. 1.5.1.</p>	<p><u>A copy of the final site layout map and alternatives.</u> All available biodiversity information must be used in the finalisation of the layout map. The layout map must indicate the following:</p>		<p>A copy of the final site layout map which indicates the information requested by DEA in its Acceptance of Scoping is provided in Appendix M of the EIA Report.</p>

	<ul style="list-style-type: none"> • PV positions and its numbering as well as the associated infrastructure; • Permanent laydown area footprint; • Internal roads indicating width (construction period width and operation period width) and with numbered sections between the other site elements which they serve (to make commenting on sections possible); • Wetlands, drainage lines, rivers, stream and water crossing of roads and cables indicating the type of bridging structures that will be used; • The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure; • Substation(s) and/or transformer(s) sites including their entire footprint; • Connection lutes (including pylon positions) to the distribution/transmission network; • All existing infrastructure on the site, especially roads; • Buffer areas; • Buildings, including accommodation; and • All "no-go" areas. 		
1.6.	<u>Topographical and sensitive Maps</u>		An A3 environmental sensitivity map is provided in Appendix M of the EIA Report.
1.6.1.	An environmental sensitivity map indicating environmental sensitive areas and features identified during the EIA process must be on an A3 page and must have a clear legend.		
1.6.2.	A topographical map combining the final layout map superimposed (overlain) on the environmental sensitivity map must be submitted with the final EIAR.		A layout map overlain by environmental sensitivities identified within the project site and 300m power line corridor is provided in Appendix M to the EIA Report.
1.7.	<u>Shapefile of the preferred Development layout</u>		
1.7.1.	A shapefile of the preferred development layout/footprint must be submitted to this Department. The shapefile must be created using the Hartebeesthoek 94 Datum and the data should be in Decimal Degree Format using the WGS 84		Shapefiles of the preferred development layout / footprint will be submitted to the DEA with a copy of the final EIA Report.

	<p>Spheroid. The shapefile must include at a minimum the following extensions i.e. .shp; .shx; .dbf; .prj; and, .xml (Metadata file). If specific symbology was assigned to the file, then the .avl and/or the .lyr file must also be included. Data must be mapped at a scale of 1:10 000 (please specify if an alternative scale was used). The metadata must include a description of the base data used for digitizing. The shapefile must be submitted in a zip file using the EIA application reference number as the title.</p> <p>The shape file must be submitted to: Postal Address: Department of Environmental Affairs Private Bag X447, Pretoria 0001 Physical address: Environment House, 73 Steve Biko Road, Pretoria For Attention: Muhammad Essop Integrated Environmental Authorisations Strategic Infrastructure Developments Telephone Number: (012) 399 9406 Email Address: MEssoot6environment.aov.za</p>		
1.8.	<p><u>The Environmental Management Programme (EMPr)</u> The EMPr to be submitted as part of the EIAR must include the following:</p>		
1.8.1.	<p>All recommendations and mitigation measures recorded in the EIAR and the specialist studies conducted.</p>		<p>The Environmental Management Programme (EMPr) prepared for the project is attached as Appendix I to the EIA Report, copies of which have been submitted to DEA for its review and comment. The EMPr contains all recommendations and mitigation measures recorded in the EIA Report and the specialist studies conducted (refer to Appendix D to Appendix H of the EIA Report).</p>
1.8.2.	<p>A good quality final site layout map with clear legend.</p>		<p>A copy of the final site layout map is included in Appendix A of the EMPr prepared for the project and attached as Appendix I to the EIA Report.</p>

1.8.3.	Measures as dictated by the final site layout map and micro-siting.		Measures as dictated by the final site layout map are included in the EMPr, prepared for the project and attached as Appendix I to this EIA Report.
1.8.4.	An environmental sensitivity map indicating environmental sensitive areas and features identified during the EIA process.		A copy of the environmental sensitivity map of the project site and 300m power line corridor is included in Appendix A of the EMPr prepared for the project and attached as Appendix I to the EIA Report.
1.8.5.	A map combining the final layout map superimposed (overlain) on the environmental sensitivity map.		A map which superimposes the layout of Allepad PV Three over the environmental sensitivity map is included in Appendix A of the EMPr prepared for the project and attached as Appendix I to the EIA Report.
1.8.6.	An alien invasive management plan to be implemented during construction and operation of the facility. The plan must include mitigation measures to reduce the invasion of alien species and ensure that the continuous monitoring and removal of alien species is undertaken.		An alien invasive management plan has been prepared for the project, and is included in Appendix C of the EMPr prepared for the project, and attached as Appendix I to the EIA Report.
1.8.7.	A plant rescue and protection plan which allows for the maximum transplant of conservation important species from areas to be transformed. This plan must be compiled by a vegetation specialist familiar with the site and be implemented prior to commencement of the construction phase.		A plant rescue and protection plan has been prepared by a vegetation specialist familiar with the site and is included in Appendix D of the EMPr prepared for the project, and attached as Appendix I to the EIA Report.
1.8.8.	A re-vegetation and habitat rehabilitation plan to be implemented during the construction and operation of the facility. Restoration must be undertaken as soon as possible after completion of construction activities to reduce the amount of habitat converted at any one time and to speed up the recovery to natural habitats.		A re-vegetation and habitat rehabilitation plan has been prepared for the project, and is included in Appendix E of the EMPr prepared for the project, and attached as Appendix I to the EIA Report.
1.8.9.	A traffic management plan for the site access roads to ensure that no hazards would result from the increased truck traffic and that traffic flow would not be adversely impacted. This plan must include measures to minimize impacts on local commuters e.g. limiting construction vehicles travelling on public roadways during the morning and late afternoon commute time and avoid using roads through densely		A traffic management plan has been prepared for the project, and is included in Appendix I of the EMPr prepared for the project, and attached as Appendix I to the EIA Report.

	populated built-up areas so as not to disturb existing retail and commercial operations.		
1.8.10.	A storm water management plan to be implemented during the construction and operation of the facility. The plan must ensure compliance with applicable regulations and prevent off-site migration of contaminated stormwater or increased soil erosion. The plan must include the construction of appropriate design measures that allow surface and subsurface movement of water along drainage lines so as not to impede natural surface and subsurface flows. Drainage measures must promote the dissipation of storm water run-off.		A storm water management plan has been prepared for the project, and is included in Appendix G of the EMPr, prepared for the project and attached as Appendix I to the EIA Report. The plan includes appropriate design measures that allow surface and subsurface movement of water along drainage lines.
1.8.11.	A fire management plan to be implemented during the construction and operation of the facility.		A fire management plan has been prepared for the project, and is included in Appendix J of the EMPr, prepared for the project and attached as Appendix I to the EIA Report.
1.8.12.	Measures to protect archaeological sites, artefacts, paleontological fossils or graves from construction and operational impacts		Measures to protect archaeological sites, artefacts, paleontological fossils or graves have been identified and are included in Objective 16 of the EMPr.
1.8.13.	The EAP must provide detailed motivation if any of the above requirements is not required by the proposed development and not included in the EMPr.		Where there are deviation from DEA's requirements stipulated in the Acceptance of Scoping, a motivation has been provided with the EIA Report for Allepad PV Three.
1.8.14.	You are hereby reminded that should the EIAR fail to comply with the requirements of this acceptance letter, the proposed 100MW Allepad Two PV Facility project will be refused in terms of the EIA Regulations 2014, as amended.		Savannah Environmental is cognisant of the requirements stipulated in the Acceptance of Scoping and have addressed these in the EIA Report (as detailed within Table 6.3).
1.9.	<u>Public Participation</u>		
1.9.1.	Ensure that all relevant stakeholders' comments (including original comments) are submitted to the Department with the final EIAR. This includes but is not limited to the Department of Environmental Affairs: Biodiversity and Conservation Directorate, the Department of Agriculture, Forestry and Fisheries (DAFF), Department of Environment and Nature Conservation, the South African Civil Aviation Authority (SACAA), the Department of Transport, The David Kruiper Local		Comments received to date from all relevant stakeholders, have been included within this Comments and Responses Report. Proof of correspondence to and from these stakeholders are included in Appendix C5 and Appendix C6 of the EIA Report.

	<p>Municipality, Department of Water and Sanitation (DWS), the South African National Roads Agency Limited (SANRAL), the South African Heritage Resources Agency (SAHRA), the Endangered Wildlife Trust (EWT), Department of Mineral Resources, National Energy Regulator of South Africa (NERSA), National Department of Energy, Eskom, Cape Nature and Birdlife South Africa.</p>		
<p>1.9.2.</p>	<p>Proof of all correspondence must be included in the EIA. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.</p>		<p>All comments received to date have been included within this Comments and Responses Report. Where comments haven't been obtained, proof that attempts were made to obtain comments have been included in Appendix C4 (organs of state correspondence) and Appendix C5 (stakeholder correspondence). A distribution list for the EIA Report has been drafted and will be updated with the waybill numbers and the proof of follow-up for written comments. This document will be included in Appendix C5 in the final EIA Report.</p> <p>The database with the registered I&APs are included as Appendix C1 in the EIA Report.</p>
<p>1.9.3.</p>	<p>The applicant is hereby reminded to comply with the requirements of Regulation 45 with regard to the time period allowed for complying with the requirements of the Regulations, and Regulations 43 and 44 with regard to the allowance of a comment period for interested and affected parties on all reports submitted to the competent authority for decision-making. The reports referred to are listed in Regulation 43(1).</p>		<p>Savannah Environmental is cognisant of the need to comply with Regulations 43, 44 and 45 of the 2014 EIA Regulations (GNR 326).</p> <p>» Regulation 43 (GNR 326): This EIA Report has been made available for a 30-day public review period from 28 February 2019 to 01 April 2019. The EIA Report has been distributed to relevant Organs of State and a copy has been made available at the Dawid Kruijer Public Library, corner of Mark and Mutual Streets, Upington. The EIA Report which has been submitted to the national DEA, the Northern Cape DENC, and relevant Organs of State is also available for download from www.savannahsa.com or on CD on request from Savannah Environmental (Pty) Ltd.</p> <p>» Regulation 44 (GNR 326):</p>

			<p>Comments from I&APs received to date are included in the Comments and Response (C&R) Report attached as Appendix C8 to this EIA Report.</p> <p>» Regulation 45 (GNR 326): Acceptance of Scoping was received from DEA on 05 December 2018. In accordance with Regulation 23(1)(a) (GNR 326) the applicant must within 106 days of the acceptance of the Scoping Report submit to the authority an EIA Report inclusive of any specialist reports, and an EMPr, which must have been subjected to a public participation process of at least 30-days and which includes the incorporation of comments received, including any comments of the competent authority. The EIA Report has been released for a 30-day public review period from 28 February 2019 to 01 April 2019. Comments received during this 30-day public review period will be incorporated into the C&R Report to be attached as Appendix C8 to the Final EIA Report. The Final EIA Report inclusive of specialist studies and an EMPr is due to be submitted by 13 April 2019¹.</p>
	<p>Furthermore, it must be reiterated that, should an application for Environmental Authorisation be subject to the provisions of Chapter II, Section 38 of the National Heritage Resources Act, Act 25 of 1999, then this Department will not be able to make nor issue a decision in terms of your application for Environmental Authorisation pending a letter from the pertinent heritage authority categorically stating that the application fulfils the requirements of the relevant heritage recourse authority as described in Chapter II, Section 38(8) of the National Heritage Resources Act, Act 25 of 1999. Comments from SAHRA and/or the provincial department of heritage must be provided in the EIAR.</p>		<p>Savannah Environmental acknowledges that should the application be subject to Section 38 of the National Heritage Resources Act, Act 25 of 1999, the Department will require a letter from the pertinent heritage authority categorically stating that the application fulfils the requirements of the relevant heritage resources authority. Comments from SAHRA and/or the provincial department of heritage have been requested and will be included in the final EIA Report.</p> <p>Communication with the Provincial Heritage Resources Agent: Northern Cape Province is included in Appendix C4 and the EIA Report has been uploaded on SAHRIS, the official website for all EA Applications and Heritage Reports. The Provincial Authority has also been provided with an electronic copy of the EIA Report and proof of the delivery is included in Appendix C4.</p>

¹ This date has been calculated excluding the period of 15 December to 05 January in accordance with the requirements of Regulation 3(2) of the 2014 EIA Regulations (GNR 326).

2.	The Directorate: Biodiversity Conservation reviewed and evaluated the above-mentioned report including its specialist's studies and it's satisfied with the information provided. The following recommendations must be considered during the final scoping phase:	Stanley Tshitwamulomoni Acting Director: Biodiversity Conservation DEA Letter: 16-11-2018	
2.1.	A detailed Terrestrial Ecological Impact Assessment Report must be compiled and submitted for review;		A detailed Ecology Impact Assessment including fauna and flora has been compiled for the Allepad PV Three project and has been included in the EIA Report for public review as Appendix D .
2.2.	A Wetland Delineation must be undertaken in order to properly determine the boundaries of channels and riparian areas on site; and		The development footprint for Allepad PV Three avoids all drainage systems and small washes located within the project site. The Ecologist has drafted a motivation letter as to why a wetland delineation is not required for this project and has been included as Appendix L3 of the EIA Report for public review.
2.3.	A detailed Avifaunal Impact Assessment Report must be compiled and submitted for review.		A detailed Avifauna Impact Assessment has been compiled for the Allepad PV Three project, including associated infrastructure and is included as Appendix E of the EIA Report for public review.
2.4.	The overall biodiversity objective is to minimize loss to biodiversity as possible. In order to achieve this objective the above mentioned recommendations must be adhered to.		The need for the minimisation of loss to biodiversity is acknowledged. The recommendations made by DEA: Biodiversity Conservation in order to achieve the objective of minimised loss is noted and has been considered and addressed in the EIA Report where necessary as per the responses included under points 2.1 – 2.4 above.

4. COMMENTS RECEIVED BY ORGANS OF STATE DURING IMPACT ASSESSMENT REPORT REVIEW PERIOD

No.	Comment	Raised By	Response
	To be updated and submitted with the final EIAR to the DEA.		

5. COMMENTS RECEIVED BY STAKEHOLDERS AND I&APS DURING IMPACT ASSESSMENT REPORT REVIEW PERIOD

No.	Comment	Raised By	Response
	To be updated and submitted with the final EIAR to the DEA.		

6. GENERAL COMMENTS RECEIVED DURING IMPACT ASSESSMENT REPORT REVIEW PERIOD

No.	Comment	Raised By	Response
	To be updated and submitted with the final EIAr to the DEA.		