

Herewith our responses to the comments received from BMM on 9 October 2019 (After the closure of the PPP comment period).

BMM COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORTS FOR THE PROPOSED VELD PV SOUTH (DEA Reference: 14/12/16/3/3/1/2052) AND NORTH (DEA Reference: 14/12/16/3/3/1/2051) SOLAR ENERGY FACILITY AND ASSOCIATED INFRASTRUCTURE NEAR AGGENEYS IN THE NORTHERN CAPE

Black Mountain Mining would like to comment on the **Draft Basic Assessment Reports for both DBAR** as follows:

<p>1. BMM comment: BMM want to put on record that the REM of the farm Haramoep 53 is located in close proximity to the newly declared Gamsberg Nature Reserve that was declared as a Nature Reserve under the Protected Area Act on the 5 August 2019. The farm was included in Annexure B_ B1 properties to the Biodiversity Offset Agreement between DENC and BMM as per requirement of the Environmental Authorization that was granted by DENC to BMM in 2013. REM of the farm Haramoep 53 therefore identified as a biodiversity sensitive and important for conservation of biodiversity.</p> <p>BMM have engaged with Mr Jason Cope in this regard as BMM are in negotiation to secure the REM of farm Haramoep 53 to be included as an Protected Area and will be included in the Gamsberg Nature Reserve should DENC approve the inclusion of solar adjacent to the Gamsberg Nature reserve. The proposal by BMM to DENC is to fence the proposed solar development out of the proposed Protected Area and include the remaining sensitive vegetation of the REM of the farm Haramoep 53 into the Gamsberg Nature Reserve Protected Area</p>	<p>1. Noted</p>
<p>2. BMM would like to clarify of these surface areas include only the Solar Energy Facility comprising of numerous rows of PV modules or does this also included all access roads and related infrastructure such as power lines, substations, inverters, etc. within the fenced-off surface areas?</p>	<p>2. The areas mentioned on page 3 will include the substations and inverters. The access roads and powerlines will fall outside those areas.</p>
<p>3. BMM comment: Will the applicant also apply for a Water Use license for water uses that will be triggered due to the proposed development? Especially regarding Section 21 c and l water uses associated with</p>	<p>3. Yes, the applicant will apply for Section 21 c and i.</p>

<p>access road crossing of rivers/streams and the associated upgrade of such roads?</p>	
<p>4. The proposed grid connection for Veld PV North will either consist of a 132 kilovolt (kV) overhead power line, approximately 25 km in length that would feed into the national electricity grid at the Aggeneys substation. The proposed grid connection for Veld PV South will either consist of a 132 kilovolt (kV) overhead power line, approximately 27 km in length that would feed into the national electricity grid at the Aggeneys substation. A 35m servitude will be required for the construction of the power line and it will run adjacent to the existing 220 kV power line that runs past the site, comprising single circuit steel monopoles with bird perches. Alternatively: Veld PV South would connect via a 220 kV Loop-in, Loop-out (LILo) line between the facility and an existing 220 kV transmission line, with the line being approximately 2100 m in length</p> <p>BMM Comment: Will these power lines be supplied with bird deterrents (e.g. flappers) to reduce bird collisions.</p>	<p>4. Yes, the powerlines will be supplied with bird deterrents where applicable and as determined by the bird specialist during the site walkdown (before construction).</p>
<p>5. The Applicant (or its successor in title) will be responsible for the construction phase of the development. After construction is complete, ownership of the grid connection infrastructure will be transferred to Eskom, where appropriate (as per Eskom's requirements), and Eskom will then be responsible for the operation and maintenance of the infrastructure that falls under their ownership, as well as decommissioning should the need to decommission the infrastructure arise. The plant itself will be owned and operated by the applicant or its successor, and operation and maintenance of the plant, and any required decommissioning at the end of the plant's life, will fall to them.</p> <p>BMM comment: Who will be responsible for the implementation and execution for the implementation of Environmental Management Plan within the proposed development footprint areas after construction? We assume that the Eskom will be responsible for implementation of the</p>	<p>5. Veld North and South will be responsible for the for the implementation of Environmental Management Plan within the proposed development footprint areas after construction.</p> <p>Eskom will be responsible for implementation of the EMP along the grid connection.</p>

<p>EMP along the grid connection, while the applicant or its successor will be responsible for implementation of the EMP within the solar and solar plant areas?</p>	
<p>6. Membership of the EAP – page 26 of both Draft BAR stated that Membership of the EAP: the last column stated that “International Association for Impact Assessment South Africa (IAIAsa), and”</p> <p>BMM Comment – some text missing? Please update</p>	<p>6. It should read without the “and”, “and” has been deleted.</p>
<p>7. Page 29 Refers to the National Environmental Management Biodiversity Act but the summary in second column stated “The Act calls for the management of all biodiversity within South Africa. As a number of listed species may occur on the site, it is imperative to ensure their long-term survival and conservation. The Threatened or Protected Species Regulations (2007) provides such protection through a permit system as well as through the identification of restricted activities. There is no part of the main Veld PV South that has any ‘red flags’ except for the requirement to relocate plants <i>Hoodia gordonii</i>. In addition, along the southern boundary of the site, care should be taken to avoid impact on trees of <i>Boscia albitrunca</i>. This should be possible because the trees are mostly within the area excluded due to freshwater ecological constraints. However, if disturbance of any <i>Boscia albitrunca</i> trees is unavoidable, a permit for disturbance or removal of such trees would be required from the Department of Environment, Forestry and Fisheries (DEFF). (Refer Botanical Impact Assessment, 2019)</p> <p>BMM Comment: Will the applicant apply for an Integrated Flora Permit application, as well Protected tree application as required by NEMBA and NFA? In addition, was the Alien Invader Plant Regulations also considered during the infield assessment and was any Declared Alien Invader recorded? Is there an Alien Invader Management Plan compiled for the management of Alien Invader plants such as <i>Prosopis</i> sp as we are aware of dense stand on the farm?</p>	<p>7. Yes, all the necessary permits will be applied for as appropriate and applicable to the development sites.</p> <p>Response from the appointed independent Botanical Specialist:</p> <p><i>Alien invasive plants were indeed considered, and no such species were found in the footprint of the proposed solar PV development. Prosopis spp. are a problem and could be introduced to the site by disturbance but precautions would be taken to prohibit or at least limit this eventuality. The dense stand on the farm is well away from the development site and would not influence it in any way. No Alien Invader Management Plan has been compiled at this stage because the selected sites are free of alien invasive plants.</i></p>

<p>8. Page 29 – refer to the National Forest Act and second column stated that “There is no part of the main Veld PV South that has any ‘red flags’ except for the requirement to relocate plants <i>Hoodia gordonii</i>. In addition, along the southern boundary of the site, care should be taken to avoid impact on trees of <i>Boscia albitrunca</i>. This should be possible because the trees are mostly within the area excluded due to freshwater ecological constraints. However, if disturbance of any <i>Boscia albitrunca</i> trees is unavoidable, a permit for disturbance or removal of such trees would be required from the Department of Environment, Forestry and Fisheries (DEFF). (Refer Botanical Impact Assessment, 2019).</p> <p>BMM Comment was the location of these species recorded and mapped? Consultation with DAFF and DENC should be included in Comments and response reports and the required permit applied for if and where applicable.</p>	<p>8. DAFF and DENC will be included in all comments and responses should a permit be required.</p> <p>Response from the appointed independent Botanical Specialist:</p> <p><i>The sensitive species were mapped, and their locations recorded. Apart from Hoodia gordonii and relocation of the few plants present, it is unlikely that any Boscia albitrunca trees would be affected so no permits have been applied for. Such permits would only be applied for in the event of it being necessary.</i></p>
<p>9. Page 30 refer to the Water Act and the second column stated “Section 21 of the NWA recognises water uses that require authorisation by DWS before they commence. Water uses may be triggered by the following project activities: i) Construction of infrastructure within 32 m of a drainage lines; and ii) The relevant approvals are being sought from DWS in parallel through a WULA process.</p> <p>BMM Comment: Will a 21 c and I water use license application or a GA regarding section 21 c and I water uses be applied for? Does the Public Participation Process include the application for 21 c and i water uses?</p>	<p>9. Section 21 c and i will be applied for, the PPP did not include the application as it is still in process</p>
<p>10. Listed Activities: Page 30/31: Listing Notice 3: GN R985 of 8 December 2014 as amended on 7 April 2017 (GN R324) – the second column stated that:” The project is located within a National Protected Area Expansion Strategy Focus as well as areas designated as Critical Biodiversity Areas. The project is also located within an Important Bird Area.:</p> <p>BMM Comment: Please take note that the Gamsberg Nature Reserve has been</p>	<p>10. The wording should rather read: The national, provincial and regional authorities that were identified as I&APs are tabled in Table 1 Appendix C1.</p> <p>Response from the appointed independent Botanical Specialist:</p> <p><i>The negotiations pertaining to and the configuration of the Gamsberg Nature Reserve are outside the scope of the</i></p>

proclaimed on the 5 August 2019 (See Northern Cape Provincial Gazette published on 5 Aug 2019". The nearby farms namely Portion 2 and REM of the farm Rozybosch 42 form part of the Gamsberg Nature Reserve declared as an Protected Area under the Protected Area Act. Please update and align the FBAR accordingly. BMM is currently negotiating with the landowner and the Department of Environment and Nature Conservation to secure the REM of the farm Haramoep 53 for inclusion in the BMM Offset Agreement and therefore inclusion in the Gamsberg Nature Reserve should DENC accept the presence of the proposed solar development within the surface areas of the Gamsberg Nature Reserve. BMM have propose to DENC that the propose Solar Development can be fenced out of the Gamsberg Nature Reserve by doing so, BMM can secure the sensitive vegetation types as recorded within the REM of Haramoep 53 for inclusion in the Gamsberg Nature Reserve. This was communicated with Mr Jason Cope and BMM is in continuous discussion with Mr Cope in this regard. BMM recommend that the EAP also consultant with DENC official in this regard and that the inputs and comments from Mrs Elsabe Swart and N van Olmen from DENC are also included in the FBAR to ensure consultation with DENC in this regard are included in the FBAR.

In addition, the clearance of more than 20 ha of indigenous vegetation will occur. The area is located with Critical Biodiversity Area. Is a BAR sufficient or should a full EIA be conducted? From page 8 in the DBAR it was stated that "The outcome of the gazetting process means that wind and solar PV activities within the 8 Renewable Development Zones and electricity grid expansion within the 5 Power Corridors will be subjected to a Basic Assessment and not a full EIA process." And we would therefore just get confirmation to ensure that although the area is located in a Critical Biodiversity Area and that more than 20 of indigenous vegetation will be impacted, that only a BAR is required and not a full EIA.

botanical assessment and not further response if offered in this regard.

The vegetation of the respective Veld Namaqua PV South and Veld Namaqua PV North has been adequately described in the relevant reports.

In both reports it was noted that parts of the areas selected would fall with CBA1 and CBA2 areas. However, it was stated in the reports as follows:

Veld PV North:

"From field observations it has been determined that the Veld PV North 'NEW' focus area has none of these attributes. The rationale for assigning this area to CBA1 and CBA2 is not clear and no documentation is currently available that explains this designation. It is my contention, based on observations, that the Veld PV North 'NEW' focus area should be assigned Ecological Support Area (ESA) status which still points to its ecological value but does not assign a 'critical' status to the area."

Veld PV South:

The map designates the Veld PV South 'focus area' as falling within a Critical Biodiversity Area 2 (CBA2 – Figure 21). The definition and parameters of CBA2 according to Desmet & Marsh (2008) are given in Appendix 1. CBA2 includes important areas that have endangered vegetation types, important habitat types and threatened species. The Veld PV South 'focus area' has none of these attributes except for Hoodia gordonii and marginally Boscia albitrunca. The rationale for assigning this area to CBA2 is not clear and no documentation is currently available that explains this designation. Based on field observations I believe that the Veld PV South area should be assigned Ecological Support Area (ESA) status which still points to its ecological value but does not assign a 'critical' status to the area.

Please refer to the listed activities in the BAR:

<p>In addition, Listed Activity 18: was the road expansion areas surveyed and threatened and protected species as well as protected trees identified that may require Integrated Flora and Protected tree permits? Was any IUCN red listed, NEMBA Threatened or Protected Species and species listed as protected by the Northern Cape Nature Conservation Act recorded?</p>	<p><i>The clearance of an area of 300 square metres (m²) or more of indigenous vegetation</i></p> <p>Reference is made to the wrong number of hectares that will be cleared and does not constitute a full EIA.</p> <p>Please note:</p> <p>The outcome of the gazetting process means that wind and solar PV activities within the 8 Renewable Development Zones and electricity grid expansion within the 5 Power Corridors will be subjected to a Basic Assessment and not a full EIA process</p>
<p>11. Page 38 and 39 refers to the following: Authority involvement commences at the start of the project with the pre-application meeting with DEA to notify them of the proposed project. The following national, provincial and regional authorities were identified as I&APs:"</p> <p>BMM Comment – no list of National, Provincial and Regional authorities identified by the EAP were include and it seems that some text went missing. BMM want to get confirmation that the Northern Cape Department of Environment and Nature Conservation was also consulted during this process. As DENC was the key authorities that needs to be consulted regarding Biodiversity Aspects and Biodiversity Offsets as the REM of the farm Haramoep 53 was identified as one of the proposed offset properties as included in the Biodiversity Offset Agreement between BMM and DENC.</p>	<p>11. DENC: T Makedi of the Department of Environment and Nature Conservation was consulted, refer to the I&AP Database in annexure C1, proof of emails sent as well as letter and CD posted forms part of the annexures submitted to DEA (Final BAR).</p>
<p>12. Page 51/52 of the tow DBAR under section 5.3.3 stated that:" The Khai-Ma Municipality indicated in a letter dated 15 May 2019 that bulk water for the proposed Veld PV North Facility should be purchased from Sedibeng Water (Refer Annexure C). Sedibeng Water has confirmed that they will be able to supply water for the proposed project during the construction and operational phases" while section 5.6.3 refer (page 52/3) that "Water is proposed to be brought in by bowser and either supplied by municipality under the Verdana Zinc international supply</p>	<p>12. Noted, the amendment to the words will be made. The arrangement is that bulk water for the proposed Veld PV North Facility should be purchased from Sedibeng Water. The statement: <i>Water is proposed to be brought in by bowser and either supplied by municipality under the Verdana Zinc international supply at Aggeneys under agreement by both or by a private contractor.</i>" Was wrongly quoted from the original agreement.</p> <p>No groundwater will be used during any of the phases.</p>

<p>at Aggeneys under agreement by both or by a private contractor.”</p> <p>BMM Comment – or should it read that water will be provided by Sedibeng and not under Vedanta Zinc International supply. Vedanta Zinc does not have a water use license to supply water. The water service provider with the WUL is Sedibeng Water and no Vedanta Zinc International. Will groundwater be used during any of the phase of the development? If yes, where?</p>	
<p>13. Page 54 and 55 of the two DBAR stated under section 5.6.4 that “Replanting with a suitable indigenous grass seed mix” will take place during rehabilitation.</p> <p>BMM Comment please include description of suitable seed mixture. Will this be provided by rehabilitation specialist/arid ecologist? Will soil samples be collected and submitted for analysis to determine soil fertility and chemical composition?</p>	<p>13. Refer to answer below:</p> <p>Response from the appointed independent Botanical Specialist:</p> <p><i>It is my strongly held view that the rehabilitation by “Replanting with a suitable indigenous grass seed mix” should not be pursued. The rehabilitation should be “passive” and the indigenous grass species that would be present in the soil should be allowed to recolonize the disturbed areas naturally. They are more than capable of doing so when there is adequate rainfall. Introduction of other grass-species non-native to the area would be undesirable. Collection and analysis of soil samples would not be necessary.</i></p>
<p>14. Page 54 and 55 of the two DBAR under section 5.6.4 stated that Removal of alien vegetation for a period of no less than 1 year, or as otherwise prescribed by a rehabilitation specialist “</p> <p>BMM Comment: The management of Alien Invader Plant for only one year will not be sufficient. The farm Haramoep have a dense infestation of Prosopis species and eradication and control of his species, should it be established can be managed and control in only one year. This will require at least a 5 year programme should Prosopis invade the areas. An Alien Invader Management Plan must be compiled and submitted during operational phase of the project with annual monitoring along disturbed areas and any establishemnt of such species should be conducted soonest possible.</p>	<p>14. Refer to answer below:</p> <p>Response from the appointed independent Botanical Specialist:</p> <p><i>The repeated reference to the dense infestation of Prosopis spp. on the farm Haramoep has NO bearing on the sites selected for the solar PV installations. This dense infestation is far away from the solar PV sites.</i></p> <p><i>It is agreed that should Prosopis sp. invade the development areas, an ongoing programme of monitoring and removal of alien species would be necessary. This could be developed as required but an Alien Invader Management Plan should not be a mandatory requirement for authorisation of the developments.</i></p>
<p>15. Page 63 of the DBAR for the south development address location alternatives.</p> <p>BMM Comment: Was Critical Biodiversity Area also taken into consideration? Engagement</p>	<p>15. Refer to answer below:</p> <p>Response from the appointed independent Botanical Specialist:</p>

<p>with Mr Jason Cope did indicate that sensitive biodiversity areas was taken into consideration and it can be seen that this has been considered but is not properly reflected/described in this section. Include short description (if not included Page 7 under flora consideration) to ensure that all Interested ad Affected Parties are aware f the implementation of mitigation hierarchy that was considered and implemented during site location and alternatives considered. The layout presented in this application has responded to the constraints identified by the Aquatic and visual specialists and avoids buffer areas and sensitive sites they identified, but no mention of sensitive biodiversity (flora) are discussed for the southern development while it was properly address for the north development. Please align and give short description regarding sensitive plant communities as well as presence of threatened or protected species at both developments.</p>	<p><i>The comments are a repetition of the Critical Biodiversity issues dealt with in Paragraph 10. The botanical reports adequately describe the plant communities encountered and their sensitivity etc.</i></p>
<p>16. Linear structure on page 64 and 66 of the two DBAR – refer to liner alternatives and for the south development it stated that “The transmission line route has been revised in response to the Aquatic specialist’s recommendation to avoid drainage lines and aquatic buffers”.</p> <p>BMM Comment – was this also consider for the north development? Was sensitive flora areas also considered? Was screening of the presence of threatened and protected species also conducted? Recommend that screening prior to clearance are conducted and the permit application for Integrated Flora Permit (DENC) as well as Protected tree permit (DAFF) be applied for. This will be required if any threatened and protected species are recorded that will require translocation to prevent any loss of threatened or protected species. This will be applicable to linear structure and include power lens and roads.</p>	<p>16. Yes, it was also considered for Veld PV North and yes sensitive flora areas were also considered together with the screening of the presence of threatened and protected species. Refer to the Botanical Assessment for Veld PV North. Yes, screening of the presence of threatened and protected species were also conducted. Should it be necessary the permits for Integrated Flora Permit (DENC) as well as Protected tree permit (DAFF) will be applied for. The walkthrough before construction as per the recommended condition for EA addresses this issue.</p> <p>Response from the appointed independent Botanical Specialist:</p> <p><i>The linear transmission line routes were investigated in the field survey and there would be minimal clearance of vegetation. The comments made in Paragraph 16 are largely repetitive of comments in paragraphs 10 and 11.</i></p>
<p>17. Page 67 and 69 of the two DBAR refers to “quartz desert pavement in places” under heading 7.1.2</p>	<p>17. No, the quarts areas will not be impacted on. Please refer to the layout plan.</p>

<p>BMM Comments: Will any of these quartz areas be impacted due to the development? The fine grain quartzite patches are known as habitat for threatened or protected species and if any of these areas will be impacted, a search and rescue programme should be compiled and submitted to DENC for approval and implementation. It is BMM understanding that these areas are avoided and that the proposed developments will only occur on sandy plains, but confirmation in this regard is required.</p>	
<p>18. Page 68 and 70 stated that The biome classification for the site is Bushmanland Arid Grassland.</p> <p>BMM Comment – the Bushmanland Arid Grassland is a vegetation type and not a Biome.</p>	18. Noted.
<p>19. Page 69 and 71 refers to operational mitigation and storm water management.</p> <p>BMM Comment: Will storm water management system be design and implemented that will look at sediment control? Will erosion management and monitoring plan be developed and implemented? In addition topsoil and (if required) sub-soils should be stockpiled separately and nit be mixed. Demarcate stock piles areas for topsoil and separate stockpile are for subsoil if and when required. Detailed soil analysis should be conducted of topsoil before rehabilitation to determine soils chemical and physical properties and once know soil amelioration should be implemented according to recommendation based on results of soil analysis. Inputs regarding re-vegetation by an arid ecologist/rehabilitation specialist should be included regarding suitable species for rehabilitation taking the growth medium and surrounding area ad vegetation types into consideration.</p>	19. Please refer to the revised and updated hydrology report.
<p>20. Page 74 and 76 refers to cumulative impacts on agriculture, but only refer to solar developments.</p> <p>BMM Comment: Was surrounding mining activities impacts also considered as part of Cummulative impacts? If not, any specific reason why it was excluded? Please include</p>	20. The Strategic Environmental Assessment (SEA) for Wind and Solar Photovoltaic (PV) Energy in South Africa (CSIR, 2015) has identified 8 Renewable Energy Development Zones (REDZs) that are of strategic importance for large scale wind and solar PV development in terms of Strategic Integrated Project 8: Green Energy in Support of the South African Economy, as well as

<p>mining impacts of adjacent mining activities as well.</p>	<p>associated strategic transmission corridors, including the rollout of its supporting transmission and distribution infrastructure, in terms of Strategic Integrated Project 10: Electricity Transmission and Distribution. On 17 February 2016, Cabinet approved the: Renewable Energy Development Zones (REDZs) for large scale wind and solar photovoltaic development; associated Strategic Transmission Corridors which support areas where long term electricity grid will be developed; process of basic assessment to be followed and reduced decision-making timeframe for processing of applications for environmental authorisation in terms of NEMA; and acceptance of routes which have been pre- negotiated with all landowners as part of applications for environmental authorisations for powerlines and substations.</p> <p>The proposed development site and projects fall within the REDZ zone and cumulative impacts such as the mining that is referred to in your comment has hence already been assessed in the SEA for the REDZ area. The re- assessment of these does not fall into the scope of scope of the proposed applications.</p>
<p>21. Impact on aquatic system – stated that is recommended that a buffer of approximately 100m from these streams be allowed for.</p> <p>BMM Comments: Please ensure a 100m buffer from all watercourse and washes. Will a water use license application / GA for section 21 c and i water uses application submitted to DWS? Follow mitigation measures as recommended by the aquatic specialist with sufficient buffers around water course and washes. No impacts / disturbance within freshwater features and buffers should take place, unless a WULA /GA regarding 21 c and i water uses are approved by DWS. It is recommended that set back lines are demarcated on the ground to delineate the buffer area as recommended as follows by the specialist:</p> <p>i. Due to the wide and unconfined nature of the stream to the north of the site, it is recommended that a buffer of approximately 175m from top of bank of the stream, (narrowing down to about</p>	<p>21. Please refer to the latest layout plan which indicates these buffers, as informed by the freshwater ecologist and the hydrology specialist. The appropriate S21 c and i application will be made.</p> <p>22. Please refer to the mitigation measures as provided by the independent appointed specialists.</p>

<p>100m in the downstream extent at the site where the watercourse becomes less significant) be allowed for as a development setback (green polygons as per the Specialist Report);</p> <ul style="list-style-type: none"> ii. This riparian buffer zone of the stream contains a number of Shepherd trees, particularly on the stream's northern bank, that should also preferably remain. Some modules may need to be moved slightly to accommodate the recommended buffer; iii. The smaller stream to the east of the PV site is much smaller in extent and a buffer of approximately 100m is recommended from the stream. The proposed access road and the powerline for PV South occur within this buffer and should be slightly realigned; iv. It is recommended that 1 in 50 year and 1 in 100 floodlines be determined for the site to ensure that the proposed infrastructure is located outside of these flood risk areas; v. Invasive alien plant growth should be monitored on an ongoing basis to ensure that these disturbed areas do not become infested with invasive alien plants. Should any erosion features develop they should be stabilised as soon as possible; vi. The PV facilities should be moved to ensure that they are located outside of the freshwater features and recommended buffers. vii. The Veld PV North powerline routes should be realigned to remain outside of the buffers. The pylons for the Aggenys transmission line should be placed at least 30m outside of the delineated stream channels. viii. Where the access route for transmission lines needs to be constructed through the drainage channels, disturbance of the channels should be limited. These areas should be rehabilitated after construction is complete and the areas monitored for growth of invasive alien plants. 	
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<p>ix. Existing road infrastructure should be utilized as far as possible to minimize the overall disturbance created by the proposed project. Where crossings associated with the access routes need to be constructed through ephemeral streams, disturbance of the channel should be limited.</p> <p>x. All crossings over drainage channels or stream beds should be such that the flow within the drainage channel is not impeded. Road infrastructure and transmission lines should coincide as much as possible to minimize the road network and impact of these activities.</p> <p>xi. Any disturbed areas should be rehabilitated to ensure that these areas do not become subject to erosion or invasive alien plant growth.</p> <p>xii.</p> <p>A General Authorization (GA) regarding 21 c and later uses should be applied for any water crossing by roads that will require upgrade/expansion should the risk assessment indicated that the impacts are of a low risk. If risk assessment indicate high risk a WUL application may be required.</p>	
<p>22. Cumulative impacts – was surrounding mining activities included in cumulative impact assessment?</p>	<p>23. Repeat of comment 21</p>
<p>23. Fauna Assessment:</p> <p>BMM Comment – it is recommended to engage with Birdlife SA regarding Red Lark distribution and monitoring programmes. Suitable habitat for red lark are present within the development footprint area. A walk through must be conducted once the final pole positions have been pegged to demarcate the sections requiring marking with Bird Flight Diverters along power lines needs to be implemented.</p>	<p>23. Birdlife SA received the email re PPP and letter. They had no comments re the Red Lark distribution. On site monitoring has also been conducted.</p>
<p>24. Flora assessment:</p> <p>BMM Comments: From flora assessment report, impacts are limited to the following vegetation types:</p> <p>i. Bushmanland Arid Grassland.</p>	<p>24. Refer to answer below</p> <p>Response from the appointed independent Botanical Specialist:</p> <p><i>The first part of this comment is a re-hash of the points made in the botanical assessment.</i></p>

<ul style="list-style-type: none"> a. This vegetation type occurs over a wide expanse in the Northern Cape Province from the Bushmanland Basin in the south to the vicinity of the Orange River in the north and from Prieska in the east to Aggeneys in the west. b. It is considered to be Least Threatened; c. In the study area, it is found on sandy, well-drained yellow to red soils. The landscape is prone to sheet-wash at times of heavy rain. Bushmanland Sandy Grassland is described by Mucina et al. (2006) as occurring in the surround of Aggeneys and in a few isolated patches near Copperton in the Northern Cape Province. d. It occurs on red sands >300 mm deep mainly on the Af land-type (in this case Af20). ii. The proposed site is covered with Open Plains Grassland (a sub-unit of Bushmanland Arid Grassland) <ul style="list-style-type: none"> a. Least Threatened. b. It is described as semi-desert 'steppe' and is typically dominated by Gha grass (<i>Centropodia glauca</i>) and 'white grasses' (<i>Stipagrostis</i> spp.). c. This vegetation occurs on shallow red sandy soils. d. Due to the extremely dry conditions prevailing at the time of the site visit, no other plant species apart from the grasses were seen or identified in this vegetation type; iii. Bushmanland Sandy Grassland. <ul style="list-style-type: none"> a. This vegetation type differs very little from Bushmanland Arid Grassland except that it occurs where sandy dunes are present and where the sand is somewhat more mobile than in Bushmanland Arid Grassland; b. The vegetation is dominated by 'white' grasses (<i>Stipagrostis</i> spp. and <i>Schmidtia kalahariensis</i>) as well as drought-resistant shrubs. 	<p><i>Again, the second part of Paragraph 24 is repetitive of previous paragraphs. All the comments have been addressed above. Should it be necessary to obtain permits for relocation of threatened species, such action will be implemented.</i></p>
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- c. This vegetation type is Least Threatened;
- d. The layout of Veld PV North has been deliberately designed to exclude any drainage lines;
- e. This is positive since *Boscia albitrunca* (shepherd' tree or witgatboom) occurs along drainage lines north and immediately west of the focus area
- f. This species is protected under the National Forests Act 1998 (Act 84 of 1998). If, for some reason, any trees of this species must be removed or otherwise affected (e.g. pruned) a permit for such activity would be required from the Department of Agriculture, Forestry and Fisheries

The specialist report stated that “the rationale for assigning this area to CBA1 and CBA2 is not clear and no documentation is currently available that explains this designation” in addition, it is the Botanical Specialist’s contention, based on observations, that the Veld PV North focus area should be assigned Ecological Support Area (ESA) status which still points to its ecological value but does not assign a ‘critical’ status to the area (Botanical Impact Assessment, 2019)”

Hoodia gordonii is a protected plant species in the Northern Cape Province. A permit would therefore be necessary to translocate the plants occurring in the proposed Veld PV South focus area to a nearby suitable area that would not be affected by the proposed PV project (search & rescue). BMM recommend that Search and Rescue Plan be compiled and implemented once a detailed screening of the development area are conducted to record any threatened and protected species and that Integrated Flora permit application are submitted to DENC for approval.

BMM recommend that a search and rescue plan be compiled and that all area be screened and all threatened and protected species recorded be mapped and permit application submitted to DENC and DAFF for translocation of threatened and protected

<p>species. This needs to be done during rainy season. Due to the prolonged drought various species could have been missed during the infield assessment.</p>	
<p>25. REM of the farm Haramoep 53 was identified as a B1 property as part of BMM and DENC Biodiversity Offset Agreement. However, the area of the proposed development is located outside the sensitive biodiversity areas which includes gravel quartzite's, mountain plateau areas, southern slope and washes. The site layout was requested from Mr Jason Cope and a map was compiled by BMM and presented to DENC to discuss the potential impact of solar development on the REM of Haramoep 53 as a Biodiversity Offset farm. It is recommended that consultation with DENC regarding the proposed development are conducted to record DENC comments and recommendation in this regards. Having evaluating the proposed development footprint area BMM would recommend that all washes are avoided as far as practical possible and that the solar farm be fenced off from the remainder of the REM of the farm Haramoep 53.</p> <p>The Gamsberg Nature Reserve was proclaimed on 5 Aug 2019 under the Protected Areas Act and BMM are in negotiations with DENC and the landowner to secure the REM of the farm Haramoep 53 for inclusion in the Gamsberg Nature Reserve that will also be proclaimed as part of the Gamsberg Nature Reserve under the protected areas Act. BMM are also in constant discussion with Mr Jason Cope in this regard. Inputs, recommendations and consultation with DENC by the applicant are therefore recommended to ensure that all comments and recommendation from DENC are considered.</p> <p>BMM Comments: Impact on threatened or protected species not addressed in the impact assessment. There may be a loss of threatened and protected species due to vegetation clearance and mitigation measure to address this should consider a proper Search and rescue plan for any threatened or protected species as listed by the NEMBA TOPS list, the IUCN Red listed</p>	<p>25. Refer to answer below</p> <p>Response from the appointed independent Botanical Specialist:</p> <p><i>The possible cumulative loss of vegetation due to adjacent mining operations was not considered since the extent of the mining operations was not available to the author. However, given the extensive nature of the vegetation type (Bushmanland Arid Grassland) cumulative impacts would most likely be very low to negligible.</i></p> <p>It is presumed that this would have been investigated in the SEA that was undertaken to inform the establishment of the REDZ.</p>

<p>species lists and/or the Northern Cape Nature Conservation Act. The prolonged drought over the last years made the visibility of these species currently and during the infield assessment difficult, it is recommended that a proper screening, search, mark and rescue operation be conducted prior to any vegetation clearance and that species are only translocated once an Integrated Flora Permit Application has been submitted and approved by DENC. In addition, any protected trees, as listed by the National Forest Act should be recorded and should any protected trees be destroyed within the proposed development footprint area, a Protected Tree permit application must be submitted to DAFF. Monitoring of any threatened or protected species, as well as any protected trees in close proximity of the development footprint areas must be conducted. A flora monitoring programme must be compiled and implemented.</p> <p>In addition, the establishment of declared alien invader plants may also occur after construction. A declared alien invader plant management plan must be compiled once the first establishment of any declared alien invader plant species are recorded. A monitoring programme of any declared alien invader plant species are recorded.</p>	
<p>26. Cumulative impacts on vegetation.</p> <p>BMM Comment did the cumulative impacts consider cumulative impact associated with the adjacent mining activities as well? If not, please include in FBAR.</p>	<p>26. Refer to answer below</p> <p>Response from the appointed independent Botanical Specialist:</p> <p><i>The possible cumulative loss of vegetation due to adjacent mining operations was not considered since the extent of the mining operations was not available to the author. However, given the extensive nature of the vegetation type (Bushmanland Arid Grassland) cumulative impacts would most likely be very low to negligible.</i></p> <p>It is presumed that this would have been investigated in the SEA that was undertaken to inform the establishment of the REDZ.</p>

<p>27. Visual Impact Assessment</p> <p>BMM Comment: The Gamsberg Nature Reserve was proclaimed on 5 August 2019. The two neighbouring farms namely, REM and Portion 2 of the farm Rozynbosch 41 forms part of the Gamsberg Nature Reserve. Visually BMM is of the opinion that the proposed solar development will not be visible from the Gamsberg Nature Reserve Properties. However, should the REM of Haramoep 53 be secured and incorporated into the Gamsberg Nature Reserve, the proposed solar development will have an impact regarding visual –especially lightning at night and visually regarding solar panels of 5m high. BMM but would like confirmation regarding visual and lightning impacts associated with the proposed development from the farm house at the REM of the farm Haramoep 53.</p> <p>28. In addition, will lightning have an impact on invertebrates? Was this assessed and what mitigation measures are considered</p> <p>BMM appreciate that continuous engagement between BMM and the applicant and recommend that this should be continue. In addition, BMM would like to put on record that proper and continuous engagement, consultation, inputs and recommendations with/from DENC will be critical to ensure that the proposed development area presented to DENC for guidance and inputs regarding biodiversity management and sensitivity of the surrounding areas. The applicant should participate in regular biodiversity awareness, education and training of all employees, services providers and all steps must be taken to avoid any impacts on sensitive biodiversity areas in the surrounding environment.</p> <p>Thank you for the opportunity to comment on the DBAR relating to the Proposed Veld PV North and South Solar Energy Facility and associated infrastructure near Aggeneys in the Northern Cape South and North. Should there be any points for clarification, please do not hesitate to engage with me in this regard.</p>	<p>27. Please refer to the Visual Impact Report</p> <p>Lighting, where necessary, will be shielded downward to reduce light spillage and can be activated by motion sensors if required. The Visual Impact Report states that <i>no overhead lights or broad area spotlights should be utilised without compromising security.</i></p> <p>28. There is unlikely to be extensive lightning at night, if at all. Motion sensor lights are feasible.</p>
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