

APPENDIX C8:  
Comments and Responses Report

**PROPOSED ELECTRICAL GRID INFRASTRUCTURE (EGI) FOR THE 100MWAC VREDE PHOTOVOLTAIC (PV) SOLAR ENERGY FACILITIES,  
LOCATED NEAR KROONSTAD, FREE STATE PROVINCE  
(DFFE Ref. No.: 14/12//16/3/3/1/2406)**

**COMMENTS AND RESPONSES REPORT**

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Information regarding the Basic Assessment (BA) and Public Participation (PP) processes for the proposed Electrical Grid Infrastructure (EGI) for the 100MWac Vrede Photovoltaic Solar Energy Facility (SEF), as well as details of the project was made available with the distribution of the Background Information Document (BID) in **November 2020**. Interested and Affected Parties (I&APs) were invited to register their interest in the project and to submit any comments / queries that they might have at the commencement of the BA and PP processes.

The commencement of the BA and Public Participation (PP) processes and the announcement of the availability of the BA Report for a 30-day review and comment period from **Friday, 06 August 2021** until **Monday, 06 September 2021** was announced on **Friday, 06 August 2021**. All written comments received during the announcement of the BA process, as well as the 30-day review and comment period have been included in this Comments and Responses Report (C&RR) to be submitted with the final BA Report to the Department of Forestry, Fisheries, and the Environment (DFFE).

The C&RR is included as **Appendix C8** of the BA Report.

**LIST OF ABBREVIATIONS / ACRONYMS**

BA	Basic Assessment	kV	Kilovolt
BID	Background Information Document	MfP	Moqhaka for the People
BAR	Basic Assessment Report	NHRA	National Heritage Resources Act
BESS	Battery Energy Storage System	OoS	Organ of State
BID	Background Information Document	PP	Public Participation
CBA	Critical Biodiversity Areas	PV	Photo Voltaic
CR&R	Comments and Responses Report	SACAA	South African Civil Aviation Authority
DFFE	Department of Forestry, Fisheries, and the Environment	SAHRA	South African Heritage Resource Agency
EAP	Environmental Assessment Practitioner	SAHRIS	South African Heritage Resources Information System
EIA	Environmental Impact Assessment	SEF	Solar Energy Facility
EMPr	Environmental Management Programme		
ESA	Ecological Support Area		
FGM	Focus Group Meeting		
I&AP	Interested and Affected Party		

## 1. COMMENTS RECEIVED DURING THE BASIC ASSESSMENT REPORT 30-DAY COMMENTING PERIOD

### 1.1. Organs of State

No.	Comment	Raised by	Response
1.	Please send me KMZ files of the proposed grid connections. Please find attached Eskom requirements for works at or near Eskom infrastructure and servitudes.	John Geeringh Senior Consultant Environmental Management Grid Planning: Land and Rights Eskom Transmission Division  E-mail: 10 August 2021	The .KMZ files were e-mailed to the Stakeholder on 10 August 2021.  The documents received were acknowledged and forwarded to the Applicant for their attention.
2.	The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR and EMPr: <ul style="list-style-type: none"> <li>38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) has no objections to the authorised development;</li> <li>38(4)b – The recommendations of the specialists are supported and must be adhered to. Further additional specific conditions are provided for the development as follows;</li> <li>A monitoring report by a palaeontologist must be submitted upon completion of the construction phase that includes site clearance and excavations.</li> <li>38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Sityhilelo</li> </ul>	Sityhilelo Ngcatsha Archaeology, Palaeontology, Meteorite Assistant and Phillip Hine Manager: Archaeology, Palaeontology, Meteorite SAHRA  Email: 31 August 2021	The comment that the SAHRA APM has no objection to the proposed development is noted, and no further action is required.  The recommendations of the specialists have been incorporated into the generic Environmental Management Programmes (EMPrs) developed for this project, for implementation during the project life cycle.  This requirement has been included as a mitigation action in the generic EMPrs developed for this project.  This requirement has been included as a mitigation action in the generic EMPrs developed for this project.

No.	Comment	Raised by	Response
	<p>Ngcatsha/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;</p> <ul style="list-style-type: none"> <li>• 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;</li> <li>• 38(4)d – See section 51(1) of the NHRA with regards to offences;</li> <li>• 38(4)e – The following conditions apply with regards to the appointment of specialists: <ul style="list-style-type: none"> <li>• i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;</li> </ul> </li> <li>• The Final BAR and EMPr with the conditions provided by SAHRA in this comment along with the Environmental Authorisation (EA) must be submitted to SAHRA for record purposes</li> </ul>		<p>This requirement has been included as a mitigation action in the generic EMPrs developed for this project.</p> <p>This requirement has been included as a mitigation action in the generic EMPrs developed for this project.</p> <p>As per SAHRA's request, the Final BAR and EMPr, as well as the EA, once issued, will be uploaded onto the South African Heritage Resources Information System (SAHRIS) for record purposes.</p>
3.	<p>Find attached information for Developments around aerodromes and prescribed in SACAA Regulations, processes and procedures to follow towards Development where applicable for your comments.</p> <p>Kindly follow the SACAA procedure and processes as per the website towards your proposed Solar Energy Facility.</p>	<p>Lizell Ströh Obstacle Inspector PANS-OPS Section Air Navigation Services Department SACAA</p> <p>E-mail: 31 August 2021</p>	<p>The documents and content of the e-mail were acknowledged and forwarded to the Applicant for their attention.</p> <p>An obstacle application for this project was submitted by the proponent to the SACAA on 05 August 2021.</p>

No.	Comment	Raised by	Response
	<p><a href="http://www.caa.co.za/Pages/Obstacles/Urgent-notice.aspx">http://www.caa.co.za/Pages/Obstacles/Urgent-notice.aspx</a> please read the notices for extra information that is required, as well as fees applicable to the said application</p> <p><a href="http://www.caa.co.za/Obstacles%20Forms/CA139-27.pdf">http://www.caa.co.za/Obstacles%20Forms/CA139-27.pdf</a> application form: apply one centre point co-ordinate, to the said proposed site</p> <p>Kindly note that when the time for formal application comes, the client is required to provide the following together with the application</p> <ul style="list-style-type: none"> <li>• A kmz/kml (Google Earth) file reflecting the footprint to the proposed development site.</li> <li>• Provide coordinates, Height and Elevation as per excel spreadsheet attached herein</li> <li>• Also indicate the highest structure of the project &amp; the Overhead electric power transmission line</li> </ul> <p>As published on SACAA website, should the site be outside of a 3km radius from an airport and not found to be on the on the approach and departure areas, then no Glint and Glare study would be required.</p> <p><b>Information Document is included in Appendix C6 of the final BA Report</b></p>		
4.	<p><u>This letter serves to inform you that the following information must be included to the final BAR:</u></p> <p>a) <b>Listed activities and required information</b></p> <ul style="list-style-type: none"> <li>• Please clarify whether the proposed development also include BESS facility? The Department understands that this application is related to the Rondavel Photovoltaic Solar Energy Facility, Battery Energy Storage System (BESS) and associated infrastructure (DFFE Ref: 14/12/16/3/3/2/2039) which also include a BESS facility. Please clarify this. If no BESS facility is being applied for the proposed development, please ensure that all reference to BESS facility must be removed in the FBAR.</li> </ul>	<p>Constance Musemburi Case Officer DFFE</p> <p>Letter: 02 September 2021</p>	<p>The reference to Rondavel Photovoltaic Solar Energy Facility, Battery Energy Storage System (BESS) and associated infrastructure (DFFE Ref: 14/12/16/3/3/2/2039 is believed to be incorrect as the comment issued is for the Vrede Electrical Grid Infrastructure (EGI), which is related to the Vrede SEF.</p> <p>It should be noted that the proposed Vrede EGI does not include a Battery Energy Storage System (BESS) facility. The 100MWac Vrede Solar Facility (DFFE ref: 14/12/16/3/3/2/2038), which the proposed EGI will support does however include a BESS, hence reference to the BESS</p>

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	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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 <a href="https://www.environment.gov.za/documents/forms">https://www.environment.gov.za/documents/forms</a>.</li> <li>• It is imperious 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 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.</li> </ul>		<p>was made in the application for EA submitted to the DFFE on 06 August 2021.</p> <p>Since no BESS is being applied for as part of the proposed development (i.e., the Rondavel EGI), all reference to the BESS have been removed in the final BAR as per the DFFE's request.</p> <p>All relevant listed activities have been applied for as detailed in the application for EA submitted to the DFFE on 06 August 2021 and in Chapter 4 of the final BA Report.</p> <p>The listed activities applied for in the application form are the same of those mentioned in the final BAR. No amended application form is submitted with the final BAR as no changes have been introduced to the application form since the version submitted to the DFFE on 06 August 2021.</p> <p>As per GN R. 324, the proposed project falls within the Free State Province, within 32m and 100m of a watercourse, measured from the edge of a watercourse, within an Ecological Support Area (ESA), and within a National Protected Area Expansion Strategy focus area.</p> <p>Since the project falls within the Free State Province, the following provincial and local governments, and relevant provincial authorities were consulted as part of the BA process:</p> <ul style="list-style-type: none"> <li>» Free State Department of Economic Development, Tourism and Environmental Affairs</li> <li>» Free State Department of Police, Roads and Transport</li> </ul>

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			<p>» Free State Department of Agriculture and Rural Development</p> <p>» Free State Heritage Resources Authority</p> <p>» Fezile Dabi District Municipality</p> <p>» Moqhaka Local Municipality</p> <p>» Agri Free State</p> <p>No written comments were received from the above listed authorities, However, representatives from the local municipality attended the Focus Group Meeting (FGM) held on 19 August 2021. Issues raised by the local municipality during the FGM have been noted and included as Appendix C7 to the BA Report.</p> <p>Other relevant authorities consulted include the DWS and the DFFE Directorate: Biodiversity Conservation. No comments have been received from the DWS. Comments were received from the DFFE Directorate: Biodiversity Conservation on 06 September 2021.</p>
	<ul style="list-style-type: none"> <li>The Environmental Assessment Practitioner (EAP) is required to provide the potential impacts and mitigation measures of the proposed infrastructure</li> </ul>		<p>The potential impacts associated with the proposed infrastructure have been identified and assessed in the BA Report. Appropriate mitigation and enhancement measures for each identified impact have been prescribed. Refer to Chapters 6 and 7 of the BA Report.</p>
	<ul style="list-style-type: none"> <li>The EMPr must include mitigation and monitoring measures to all the environmental impacts identified and assessed for the above-mentioned proposed activity. Furthermore, the EMPr must include all recommendations and mitigation measures recorded in the final BAR.</li> </ul>		<p>The generic EMPrs developed for this project include mitigation and monitoring measures to all the environmental impacts identified and assessed for the proposed project. Furthermore, the EMPrs include all recommendations and mitigation measures recorded in the final BAR. Refer to Appendix I and J of the BA Report for copies of the generic EMPrs.</p>
b)	<b><u>Layout &amp; Sensitivity Maps</u></b>		



No.	Comment	Raised by	Response
	<p>Please provide a layout map which indicates the following:</p> <ul style="list-style-type: none"> <li>• All supporting onsite infrastructure that will support the proposed development, e.g. roads (existing and proposed), camp sites, and etc.</li> <li>• The preferred route/layout alternative.</li> <li>• The location of sensitive environmental features on site e.g. Critical Biodiversity Areas (CBAs), heritage sites, wetlands, drainage lines, anticipated erosion, farming activities, existing substation, etc, that will be affected.</li> <li>• Buffer areas; and, all “no-go” areas.</li> <li>• The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring developments and all existing infrastructure that will be affected by the proposed project.</li> <li>• The total footprint and centre coordinates of the area and exact location of the proposed development and associated infrastructure must be mapped at an appropriate scale.</li> </ul>		<p>A layout and sensitivity map, which includes all features listed in this comment has been prepared and included in the BA Report and EMPs. The layout and sensitivity map is also attached as Appendix K to the BA Report.</p>
	<p><b>(c) <u>Specialist Declaration of Interest</u></b> 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 on Department's website (please use the Department's template).</p>		<p>Copies of the signed and commissioned specialist declaration of interest forms for each specialist study conducted are included as Appendix N to the BA Report.</p>
	<p><b>(d) <u>Specialist Assessments</u></b></p> <ol style="list-style-type: none"> <li>i. Specialist studies to be conducted must provide a detailed description of their methodology, as well as all other associated infrastructure that they have assessed and are recommending for the authorisation.</li> <li>ii. The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.</li> </ol>		<p>Each specialist study undertaken in support of the proposed project includes a description of the methodology used to conduct the assessment. Refer to Appendix D to H of the BA Report for the specialist assessment reports.</p> <p>Each specialist study provides a detailed description of all assumptions and limitations to the study. Refer to Appendix D to H of the BA Report for the specialist assessment reports.</p>

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	<p>iii. 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.</p>		<p>This comment is noted and has been adhered to.</p>
	<p><b>(e) Alternatives</b></p> <ul style="list-style-type: none"> <li>• Please note that you are required to provide a full description of the process followed to reach the proposed preferred alternative within the site, in terms of Appendix 1(3)(1)(h) of the EIA Regulations 2014, as amended, including the following content: <ul style="list-style-type: none"> <li>a) details of all the alternatives considered;</li> </ul> </li> </ul>		<p>One viable substation location and two alternative grid corridors have been identified and assessed in the BA Report. Details of all the alternatives considered are included in Chapter 2 of the BA Report.</p>
	<ul style="list-style-type: none"> <li>b) details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs;</li> </ul>		<p>Details of the public participation process undertaken in terms of regulation 41 of the NEMA EIA Regulation, 2014, as amended are included in Chapter 4, Section 4.3, of the BA Report.</p>
	<ul style="list-style-type: none"> <li>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;</li> </ul>		<p>Issues raised by I&amp;APs and responses thereto, indicating the manner in which the issues were incorporated (where applicable) have been captured in this C&amp;RR to be submitted with the final BAR.</p>
	<ul style="list-style-type: none"> <li>d) the environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;</li> </ul>		<p>A description of the receiving environment is included in Chapter 5 of the BA Report.</p>
	<ul style="list-style-type: none"> <li>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—</li> <li>f) (aa) can be reversed;</li> <li>g) (bb) may cause irreplaceable loss of resources; and</li> <li>h) (cc) can be avoided, managed or mitigated</li> </ul>		<p>An assessment of the impacts and risks identified with each alternative is included in Chapter 6 and 7 of the BA Report.</p>

No.	Comment	Raised by	Response
	i) 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 in determining the significance of each impact as described in Chapter 4, Section 4.6. of the BA Report.
	j) 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;		An assessment of the impacts that the proposed activity and alternatives will have on the environment and on the community is included in Chapter 6 and 7 of the BA Report.
	k) the possible mitigation measures that could be applied and level of residual risk;		Mitigation and where relevant, enhancement measures, have been prescribed and included in Chapter 6 and 7 of the BA Report and in the generic EMPs attached as Appendices I and J to the BA Report.
	l) the outcome of the site selection matrix;		No alternative sites/locations for the establishment of the proposed infrastructure were assessed as part of the BA process, and as such, no site selection matrix is included. Specific characteristics, including, land use and availability, access to the national grid, topographical and geographical considerations, sensitive environmental features, and landowner support, considered in identified the preferred site have been discussed in Chapter 2 of the BA Report
	m) if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such; and		Design/layout alternatives were considered for this project and have been assessed in the BA Report. Since location and technology alternatives were not considered, motivation for not considering such is included in Chapter 2 of the BA Report.
	n) a concluding statement indicating the preferred alternatives, including preferred location of the activity.		A comparative assessment of the proposed alternatives was undertaken as part of the BA process. A concluding statement indicating the preferred grid corridor alternative is included in Chapter 8, Section 8.5 of the BA Report.
	<ul style="list-style-type: none"> <li>• Written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 1.</li> </ul>		Details of all the alternatives considered are included in Chapter 2 of the BA Report.

No.	Comment	Raised by	Response
	<p><b>(f) <u>Undertaking of an Oath</u></b></p> <p>i. The Department has noted that the submitted application form has an undertaking under oath or affirmation by the EAP. However, the aforementioned oath was not included in the draft BAR, but rather an appendix of the application form attached to the BAR. Please note that the final BAR must also have an undertaking under oath/ affirmation by the EAP.</p> <p>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: “an undertaking under oath or affirmation by the EAP in relation to: a) the correctness of the information provided in the reports; b) the inclusion of comments and inputs from stakeholders and I&amp;APs; c) the inclusion of inputs and recommendations from the specialist reports where relevant; and d) any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties”.</p>		<p>An undertaking under oath by the EAP is included as Appendix L to the BA Report.</p>
	<p><b>(g) <u>Details and Expertise of the EAP</u></b></p> <p>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>A short summary of the details and expertise of the EAP is included in Chapter 1, Section 1.4 of the BA Report. CVs of the EIA consulting team are included as Appendix A to the BA Report.</p>
	<p><b>(h) <u>Public Participation Process</u></b></p> <p>i. The following information must be submitted with the final BAR:</p>		<p>The I&amp;AP database is included as <b>Appendix C1</b> of the final BA Report.</p>

No.	Comment	Raised by	Response
	<p>a) A list of registered interested and affected parties as per Regulation 42 of the NEMA EIA Regulations, 2014, as amended;</p>		
	<p>b) Copies of all comments received during the draft BAR comment period; and</p>		<p>All written comment received during the review period of the BA Report are included in <b>Appendix C6</b> of the final BA Report.</p>
	<p>c) A comment and response report which contains all comments received and responses provided to all comments and issues raised during the public participation process for the draft BAR. Please note that comments received from this Department must also form part of the comment and response report.</p>		<p>All written comments received from I&amp;APs and Organs of State (OoS) during the BA process and on the BA Report have been included within this C&amp;RR, and have been responded to, as required, and included as <b>Appendix C8</b> of the final BA Report.</p> <p>Comments submitted have been captured verbatim, as received, and have not been summarized.</p>
	<p>ii. Please ensure that all issues raised and comments received during the circulation of the draft BAR from registered I&amp;APs and organs of state which have jurisdiction (including this Department's Biodiversity Section) in respect of the proposed activity are adequately addressed in the final BAR.</p>		<p>All written comments received from I&amp;APs and Organs of State (OoS) during the BA process and on the BA Report have been included within this C&amp;RR, and have been responded to, as required, and included as <b>Appendix C8</b> of the final BA Report.</p> <p>No written comments were received from the DFFE's Biodiversity Conservation Directorate prior to the submission of the final BA Report. Should these comments be received after submission of the final BA Report, the comments will be submitted to the Case Officer.</p>
	<p>iii. Proof of correspondence with the various stakeholders must be included in the final BAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 &amp; 44 of the EIA Regulations 2014, as amended.</p>		<p>Attempts to obtain written comments on the BA Report are included in <b>Appendix C4</b> (Organs of State) and <b>Appendix C5</b> (Stakeholders) of the final BA Report.</p> <p>The Public Participation Process has been conducted in terms of Regulation 39, 40, 41, 42, 43 &amp; 44 of the EIA Regulations 2014, as amended (GNR 326), as well as in accordance with the approved Public Participation Plan (<b>Appendix C9</b>).</p>

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			<ul style="list-style-type: none"> <li>• <b>Background Information Document (BID)</b> Information on the Vrede EGI was provided to I&amp;APs and OoS in the BID (refer to <b>Appendix C3</b> of the final BA Report), which was accompanied by a cover letter sent via email to those I&amp;APs identified and the relevant OoS on 18 November 2020 (refer to <b>Appendices C4</b> and <b>C5</b> of the final BA Report).</li> <li>• <b>Site Notices</b> Site notices announcing the BA process were placed at various visible locations on the affected farm properties on 16 November 2020. Various <u>process notices</u> were erected at public places such as shopping malls, government departments and filling stations. Proof of placement of the site and process notices is included in <b>Appendix C2</b> of the final BA Report.</li> <li>• An advertisement announcing the availability of the BA Report for a 30-day review and comment period was placed in 'die Volksblad' newspaper on 30 July 2021 (tearsheet included in <b>Appendix C2</b> of the final BA Report)</li> </ul> <p>The BA Report was made available for a 30-day review and comment period from Friday, 06 August 2021 until Monday, 06 September 2021.</p> <p>A notification letter was sent to all registered I&amp;APs and OoS on the project database on 06 August 2021 (<b>Appendix C1</b> of the final BA Report) informing them of the availability of the BA Report for a 30-day review and comment period and the details of where the report could be accessed for review.</p>

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			<p>Virtual Focus Group Meetings were held with various key stakeholder groups on 19 and 20 August 2021. Notes of the meetings are included in <b>Appendix C7</b> of the final BA Report.</p> <p>The BA Report was made available for download from Savannah Environmental's website and could also be sent via other file transfer services i.e. We Transfer, Dropbox, etc. or on CD, on request.</p>
	<p><b>(i) Environmental Management Programme</b> a) 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>The EMPrs are in line with GN R.453 of March 2019. The Generic EMPr for the Development and Expansion of Substation Infrastructure for the Transmission and Distribution of Electricity was used for the on-site substation and the Generic EMPr for the Development and Expansion of Overhead Power Line Infrastructure for the Transmission and Distribution of Electricity was used for the 132kV double- or single-circuit overhead power line.</p>
	<p><b>(j) Environmental Impact Statement</b> It is noted that an environmental impact statement is not included in the draft BAR, 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;</p>		<p>An environmental impact statement providing a summary of the key environmental findings, a map of the layout superimposed on the environmental sensitivities and a summary of the positive and negative impacts is included in Chapter 8 of the BA Report.</p>
	<p>b) a map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the site indicating any areas that should be avoided, including buffers; and</p>		
	<p>c) a summary of the positive and negative impacts and risks of the proposed activity and identified alternatives.</p>		
	<p>Please also ensure that the final BAR includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 1(3)(1)(q) of the NEMA EIA Regulations, 2014, as amended.</p>		<p>The final BA Report includes the period for which the EA is required. As detailed in the BA Report, the EA is required to remain valid is 10 years from the date of authorisation, with a</p>

No.	Comment	Raised by	Response
	<p>You are further reminded to comply with Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: <i>“Where basic assessment must be applied to an application, the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority -</i></p> <p><i>(a) a basic assessment report, inclusive of specialist reports, an EMPr, and where applicable a closure plan, which have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority.”</i></p>		<p>period of 10 years for the design, planning, construction, and commissioning of the activity to be concluded.</p> <p>The final BA report is being submitted in accordance with the regulated timeframe.</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(b) of the NEMA EIA Regulations, 2014, as amended, which states: <i>“the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (b) a notification in writing that the basic assessment report, inclusive of specialist reports an EMPr, and where applicable, a closure plan, will be submitted within 140 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the basic assessment report or EMPr or, where applicable, a closure plan, which changes or information was not contained in the reports or plans consulted on during the initial public participation process contemplated in subregulation (1)(a) and that the revised reports or, EMPr or, where applicable, a closure plan will be subjected to another public participation process of at least 30 days”.</i></p>		<p>No significant changes which would warrant the BA Report and EMPrs to be subjected to another public participation process of at least 30 days were made to the final BA Report and EMPrs.</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>No extension of timeframes is required for this project and the submission of the final EIAR is within the legislated timeframe.</p>




No.	Comment	Raised by	Response
	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.		This comment is acknowledged, and no further action is required.
5.	<p>The Directorate: Biodiversity Conservation has reviewed and evaluated the report and the following are recommendations that must be considered to minimize loss of biodiversity:</p> <ul style="list-style-type: none"> <li>Vegetation clearing must be limited to the approved areas.</li> <li>Highly sensitive areas near the development footprint must be demarcated as no-go area.</li> <li>Alien Invasive Plant (AIP) Management and Control Plan must be designed and implemented to prevent further loss of floral habitat and diversity as AIPs displace native species; and</li> <li>Erosion management plan, maintenance plan and rehabilitation plan of natural vegetation must be developed to mitigate on habitat degradation and consider all phases of the development.</li> </ul> <p>Notwithstanding the above, kindly take note that any development within a high biodiversity sensitive area, where significant residual negative impacts cannot be mitigated to an acceptable level will not supported.</p> <p>NB: The Public Participation Process documents related to Biodiversity EIA for review and queries should be submitted to the Directorate: Biodiversity Conservation at Email; BCAdmin@environment.gov.za for attention of Mr. Seoka Lekota</p>	<p>Mr Seoka Lekota Control Biodiversity Officer Grade B: Biodiversity Conservation Department of Forestry Fisheries &amp; the Environment Letter: 06 September 2021</p>	<p>This requirement has been included as a mitigation action in the generic EMPs developed for this project.</p> <p>This requirement has been included as a mitigation action in the generic EMPs developed for this project.</p> <p>This requirement has been included as a mitigation action in the generic EMPs developed for this project.</p> <p>This requirement has been included as a mitigation action in the generic EMPs developed for this project.</p> <p>All areas of high sensitivity are regarded as no-go areas and various buffers have been recommended by the specialists within which no development activities are permitted.</p> <p>The draft Basic Assessment Report and associated appendices was submitted to the Biodiversity EIA for their review and comment.</p>

## 1.2. Key Stakeholders and I&APs

No.	Comment	Raised by	Response
1.	Your Public Notice for Public Participation is fundamentally and irretrievably flawed.	Anton B Meyer Executive Member	The typing error was acknowledged and corrected. An updated copy of the notification letter was sent to Anton

No.	Comment	Raised by	Response
	<p>For the following reasons;</p> <ol style="list-style-type: none"> <li>1. The date for submitting submissions is the same as the closing date, both the 6<sup>TH</sup> OF AUGUST 2021,</li> <li>2. Savannah Environmental is wilfully and deliberately ignoring the result of the last, well attended public meeting at the Constantia Hall, Maokeng, Kroonstad, at which the following was decided, <ol style="list-style-type: none"> <li>a) The community of Moqhaka cannot, and WILL NOT support the Mainstream SPV projects,</li> <li>b) This due to the lack of community involvement and participation in the projects,</li> <li>c) There was no financial gain and or accrual to the citizens of Moqhaka,</li> <li>d) In addition the long outstanding question THAT HAS NEVER BEEN ANSWERED, under which REIPPPP (Model / Number) does this Public Participation Process reside.</li> <li>e) You will recall it, the question was asked as early as January 2021, at the first virtual meeting!</li> <li>f) It is my concern that the community of Moqhaka is being embroiled in malfeasance, as to the legality of the various public participatory exercises, (See points d &amp; e above), and any or all further participation in any or all requests for Public Participation will make the Community of Moqhaka complicit the aforementioned malfeasance!</li> <li>g) I for one will and cannot in good conscience continue with this practice!</li> </ol> </li> </ol>	<p>MfP</p> <p>Email: 07 August 2021 @ 11h36)</p>	<p>Meyer on 07 August 2021. Mr. Meyer was also informed that the comments provided are not applicable (as they relate to the PV facilities and had already been addressed through the IEA process for these), to this application but would be included in the C&amp;RR of the grid connection BA Report.</p>
	<p>Dear Savannah,</p> <p>It is clear that you do not understand that Savannah's continuation with this process is deeply irregular &amp; fundamentally flawed!</p>	<p>Email: 07 August 2021 @ 15h15)</p>	<p>The questions asked by the MfP during the EIA for the PV projects were responded to and the information requested was provided by the Applicant at the various meetings held during the public participation process undertaken for those applications.</p>

No.	Comment	Raised by	Response
	<p>Your instructions client, Mainstream Renewable is withholding critical &amp; vital information.</p> <p>Repeated requests for this INFORMATION has willfully &amp; deliberately IGNORED, begging the question? WHY?????</p> <p>Thus compromising the truthfulness &amp; validity of the whole process, and by continuing to engage with persons like myself, under the guise of interested or affected parties, to satisfy a RED TAPE, alternatively Administrative procedure is unacceptable!</p> <p>Your statement that this or any responses will be added to the comments file, is frankly disingenuous, arrogant and uncalled for.</p>		
	<p>You SEE Mainstream &amp; Savannah miss the POINT →, Moqhaka's people have said NO! And yet they blithely continue on their way to send out EMAILS to "engage" with the very same community that has rejected their offer.</p> <p>The strategy is very clear, they are banking on apathy, upon which they can CLAIM, but we did ENGAGE, see our emails!!!!</p> <p>Silence is Consent, vuka sizwe, phapama (<i>images of SA Flag and surprise mojo included</i>).</p> <p><b>Link to article titled "Biokanyo Solar comes on line in the Norther Cape" is included in the WhatsApp screenshot included in Appendix C6 of the final BA Report</b></p>	<p>WhatsApp to Private Mobile Number</p> <p>11 August 2021</p>	<p>South Africa Mainstream Renewable Power Development's submission is along the same line as Boikanyo Solar. Savannah Environmental's Basic Assessment process is being undertaken for the grid connection infrastructure associated with the PV facility independent from Mainstream to assess the environmental impacts (positives and negatives) associated with the grid connection infrastructure.</p> <p>Appreciation was expressed should the MfP submit comments on the Vrede EGI.</p> <p>It was requested that all further WhatsApp communication to be submitted to Savannah Environmental's official public participation mobile phone (060 978 8496) as the current mobile number used is a private number and no further correspondence / communication would be attended to.</p>
	<p>Seeing you have not acceded to my request to be removed from the list. I will now initiate the process to UNSUBSCRIBE from this group &amp; the event/  emails.....</p>	<p>E-mail: 13 August 2021</p>	<p>The I&amp;AP was de-registered from this project's database as requested.</p>

No.	Comment	Raised by	Response
	Upon the sending of this email		
2.	<p>We are still awaiting outstanding information as to questions raised by the MFP, with regard to why Mainstream may or opted to only supply electricity to Eskom and that the community would/could not benefit from an initiative on our doorstep, whilst it is envisioned to utilize the infrastructure of Moqhaka.</p> <p>The following information is hereby required in terms of the Promotion of Access to Information, Act 2 of 2000 (PAIA).</p> <p>1. Audio copies of the Virtual meetings, and transcription thereof, both certified to be true, by affidavit signed by duly authorised persons;</p> <p>Any and all correspondence between Mainstream and Eskom to support the verbal or written assertion of a contract and or agreement between said parties, Mainstream Renewable and Eskom;</p> <p>The REIPPPP process followed, which was mentioned in your original Public Participation Notice, Savannah's and on Mainstream's behest in November 2020.</p> <p>We humbly request that the above information be supplied within 14 (fourteen) working days as per PAIA stipulation and that all timelines affected be put in revision, to accommodate findings, referrals and mediation.</p>	<p>Braam Visagie AJV Project Consultants</p> <p>E-mail: 09 September 2021</p>	<p>Audio copies of the two FGMs held were available on MS Teams to be downloaded directly by attendees at the meetings. These recordings as well as that of the Public Participation Process Meeting (PPPM) held for the PV facilities was sent to MfP via WeTransfer and an affidavit sent as per the request.</p> <p>Information regarding any interactions between Mainstream, Eskom or the National Electricity Regulator of South Africa to any other party is confidential and can therefore not be shared.</p> <p>As mentioned at the various meetings held, both the PVs and grid public participation processes have been conducted in accordance with the EIA Regulations, 2014, as amended. The projects will be submitted into future rounds of the REIPPPP. The timing of these bidding rounds is as determined by the DMRE and not the applicant.</p> <p>The response was sent on 09 September 2021, within the timeframe requested.</p>

## 2. COMMENTS SUBMITTED DURING THE PROJECT ANNOUNCEMENT

### 2.1. Organs of State

No.	Comment	Raised by	Response
No Comments were submitted			

## 2.2. Key Stakeholders and I&APs

No.	Comment	Raised by	Response
No Comments were submitted			