

Droogfontein 4 Solar and Battery Storage Energy Facility: Comments and Response Report (Appendix C6)

Comments received during the 30-day review and comment period of the draft Basic Assessment Report

Organisation	Person	Issue or comment raised (see Appendix C4 & C5 of the Final Basic Assessment report)	Addressing or incorporation of issue or comment
WESSA	Morgan Griffiths	<p>In an email, dated 22 September 2022, the following correspondence was received on the Notification of the BA process from WESSA:</p> <p>Thank you for contacting WESSA for comments on this EIA application.</p> <p>WESSA supports the development of green power installations, as a cleaner alternative to the burning of fossil fuels. In balancing the positives and negatives of this technology, WESSA is satisfied that it is a much cleaner power generating technology than carbon-based energy extraction. But solar energy facilities (SEFs) do have a few negatives that need to be looked at, namely:</p>	<p>The support for the development of a renewable energy facility by WESSA is noted. The negative impacts referred to in the comment is responded to in the sections below.</p>
		<p>Land-use: unlike wind facilities, there is less opportunity for SEFs to share land with agricultural or conservation uses. It is crucial SEFs are only sited at lower-quality locations such as brownfields, abandoned mining land, or existing transportation and transmission corridors. Greenfield sites should be avoided. Understanding that vegetation around and under these panels needs to be managed from fire risk and shading aspects, WESSA recommends very careful management of the site vegetation, so as to prevent erosion, alien plant infestation and loss of local biodiversity. The EIA should consider assessing the impact of</p>	<p>The site and directly surrounding areas has already undergone a transformation and disturbance as an existing solar energy facility has been constructed and is currently operation just to the south of the preferred development area (Option B).</p> <p>The impact of the solar energy facility has been assessed by multiple specialist fields (including but not limited to fauna, flora and terrestrial</p>

		<p>this large-scale solar facility on the receiving land's diversity and abundance of native pollinator insects, birds, and bats. The EIA should also develop technologies and methodologies to better monitor and understand interactions between large-scale solar facilities and avian species, as well as mitigate any currently known and later identified impacts.</p>	<p>biodiversity), as appropriate and relevant, and impact assessment reports have been provided to inform the overall impact of the proposed facility on the receiving environment.</p> <p>Monitoring requirements, as required in terms of the site-specific results, are included in the Environmental Management Programme for the facility (Appendix E1 of the final BAR).</p>
		<p>Water-use: WESSA recognises that the solar panels needed to be periodically cleaned for optimal sunlight energy conversion. We are concerned about where this water will be sourced, and what impact that this will have; as well as to the cumulative impact of whatever cleaning chemicals are used on the receiving environment? Can rainwater be collected from the panels for use for cleaning instead? Can water and chemical use be limited by alternative, less impactful methods (such as air-hosing?)</p>	<p>Water for the proposed development will most likely be obtained from the local municipality, or alternatively from ground water resources. The Local Municipality has been requested by the Applicant to confirm the water resource availability for the development of the project in order to ensure sustainable water supply. It is foreseen that water use authorisation from the Department of Water and Sanitation would be required by the development.</p> <p>The Environmental Management Programme for the facility (Appendix E1 of the final BAR) recommends specific management measures for the washing of the panels which includes:</p> <ul style="list-style-type: none"> • Washing of panels must be undertaken in a way that conserves fresh water and encourages limited wastage. The annual maximum volume required for panel

			<p>washing should be considered and planned for accordingly.</p> <ul style="list-style-type: none"> • Biodegradable / environmentally friendly soaps must be used for the washing of panels. <p>The collection of rain water (where available) and alternative methods for cleaning of the solar panels will be explored by the Applicant during the pre-construction phase, where relevant.</p>
		<p>Hazardous materials: The solar panels are made from hazardous materials. WESSA calls upon by the company that builds this SEF to procure these panels from companies that are complying with their national environmental standards i.t.o of handling, manufacturing and disposing of these hazardous materials. The SEF also needs to be directed to recycle, but if not recyclable, to store and dispose of broken or worn-out panels in the manner required by South African legislation and international best practice relevant for these hazardous materials. And if there isn't a recycling facility for solar panels in South Africa, how can this SEF contribute to bring that about?</p> <p>WESSA trusts that these issues will be taken into consideration</p>	<p>The Applicant takes note of the requirement to procure the panels from companies that are complying with the national environmental standards i.t.o. of handling, manufacturing and disposing of these hazardous materials.</p> <p>The Environmental Management Programme for the facility (Appendix E1 of the final BAR) recommends specific management measures for the recycling of the solar panel systems.</p>
<p>DFFE Directorate: Biodiversity Conservation</p>	<p>Kamogelo Mathetja</p>	<p>In an email, dated 1 November 2022, the following correspondence was received on the Notification of the availability of the draft Basic Assessment Report:</p>	<p>Environamics responded on 04 November 2022, via email.</p> <p>The allocation of the project to the relevant officials and the process for the submission of</p>

		<p>DFFE Directorate: Biodiversity Conservation hereby acknowledge receipt of the invitation to review and comment on the project mentioned on the subject line. Kindly note that the project has been allocated to Mrs P Makitla and Ms M Mudau (Both copied on this email).</p> <p>Please note: All Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries will be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@environment.gov.za for attention of Mr Seoka Lekota</p>	<p>the Public Participation Process documents were acknowledged.</p>
<p>Department of Forestry, Fisheries and the Environment (DFFE)</p>	<p>Jay-Jay Mpelane</p>	<p>In a letter dated 18 November 2022, the DFFE provided the following comments on the draft Basic Assessment Report:</p> <p>The draft Basic Assessment Report (BAR) dated 27 October 2022 and received by this Department on 27 October 2022, refer.</p> <p>This letter serves to inform you that the following information must be included to the final BAR:</p>	<p>confirmed that the final BAR includes the requirements listed by the Department in the comments received on the draft BAR, as per the responses provided by the EAP below.</p>
		<p><u>Listed Activities</u></p> <ul style="list-style-type: none"> The EAP must 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. 	<p>The listed activities included in the Application for Environmental Authorisation (submitted to the Department with the draft BAR for review and comment) and the final BAR are specific to the proposed development and is specifically linked to the project components that form part of the proposed development. The activities</p>

			<p>applied for are applicable and relevant and have been assessed as part of the draft BAR.</p>
		<ul style="list-style-type: none"> If the activities applied for in the application form differ from those mentioned in the final BAR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link https://www.dffe.gov.za/documents/forms. 	<p>The listed activities included in the amended Application for Environmental Auhtorisation (submitted to the Department with the final BAR for decision-making) and the final BAR are exactly the same. Therefore an amended Application form has been submitted to the Department with the final BAR.</p>
		<ul style="list-style-type: none"> It is imperative that the relevant authorities are continuously involved throughout the basic assessment process as the development property possibly falls within geographically designated areas in terms of numerous GN R. 985 Activities. Written comments must be obtained from the relevant authorities and submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided. 	<p>The relevant authorities, including the Northern Cape Department of Agriculture, Environmental Affairs, Rural Development and Land Reform, DFFE Directorate: Biodiversity Conservation and DFFE Directorate: Protected Areas have been consulted regarding the proposed development since the commencement of the BA process (see Appendix C4 of the final BAR for proof of correspondence). Other relevant authorities have also been consulted as per the I&AP database and proof of correspondence provided in the final BAR (Appendix C3 and C4). Refer to Figure H included as part of the final BAR for an indication of the respective geographical areas that are relevant to the proposed project.</p> <p>Comments have been received from DFFE Directorate: Biodiversity Conservation and the Northern Cape Department of Agriculture,</p>

			<p>Environmental Affairs, Rural Development and Land Reform which are included in Appendix C5 of the final BAR.</p> <p>Attempts to obtain comment from all other authorities is included in Appendix C4, including a reminder email of the draft BA report review period ending.</p>
		<ul style="list-style-type: none"> • Ensure that the SG codes, farm names and numbers are correct and consisted throughout the reports. 	<p>It is confirmed that the details of the one affected property associated with the development is correct and consistent throughout the documents provided to the Department for review and comment.</p> <p>Refer to Table 2.1 of the final BAR.</p>
		<ul style="list-style-type: none"> • The EAP must provide needs and desirability of the proposed project. 	<p>The draft BAR that was made available to the Department for review and comment includes an entire section on the need and desirability of the development. Refer to section 4 of the final BAR.</p>
		<ul style="list-style-type: none"> • The EAP must provide a clear description of the proposed photovoltaic solar energy facility (SEF), inclusive of a Battery Energy Storage System (BESS) and associated infrastructure that will support the proposed development of 200MW (direct current) with up to 180MW alternating current. 	<p>The draft BAR that was made available to the Department for review and comment included an entire section which provides the details of the project description (section 2.3 of the final BAR also includes this information. The descriptions talks to the solar energy facility, the BESS and the associated infrastructure.</p>

			<p>Furthermore the technical details of the infrastructure is also included in section 2.4 of the final BAR which provides a layout description, including the coordinates associated with the layout.</p>
		<p><u>Layout & Sensitivity Maps</u></p> <p><u>Please provide a layout map which indicates the following:</u></p> <ul style="list-style-type: none"> • The 200MW Solar PV project and its associated infrastructure, • All supporting onsite infrastructure e.g., roads (existing and proposed); administration Office, access roads, security control, temporary laydown area, on-site facility substation: up to 3ha, Collector Substation: up to 3ha, BESS: up to 5ha, 33kV/ 132kV, and etc. • The location of sensitive environmental features on site e.g., CBAs, heritage sites, wetlands, drainage lines, etc., that will be affected by the proposed 200MW Solar PV project and its associated infrastructure. • Buffer areas; and all “no-go” areas. • The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments and existing grid infrastructure. • Google map is also accepted 	<p>A layout map was made available to the Department as part of the 30-day review and comment period for the draft BAR. The layout map was optimized to consider the environmental sensitivities identified by the independent specialists. Refer to Figure J2 of the final BAR. The optimized layout map includes all infrastructure associated with the development. The sensitive environmental features associated with the development area are also displayed and the avoidance of the sensitive features (including buffer and no-go areas) through appropriate placement of the development footprint is illustrated.</p> <p>A map was also provided to the Department as part of the draft BAR which indicated the sensitivity and layout map of the proposed development which is overlain with the</p>

			<p>cumulative map indicating other renewable energy developments within the area.</p> <p>It is noted that the Department accepts Google Earth maps.</p>
		<p><u>Alternatives</u></p> <p>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:</p> <ul style="list-style-type: none"> • details of all the alternatives considered. 	<p>Alternatives were fully considered and assessed as part of the draft BAR submitted to the DFFE for the 30-day review and comment period. Section 5.1 provides all information relating to the alternatives considered and assessed which includes the no-go alternative, location alternative, development area alternatives, activity alternatives, technical alternatives, design and layout alternatives and technology alternatives.</p>
		<ul style="list-style-type: none"> • The EAP is required to provide clear assessment for each identified site alternative, power line route alternative, and further provide clear motivation and reasons as to why the chosen grid connection corridor alternative and site alternative proves to be the preferred compared to other alternatives. A concluding statement indicating the preferred alternatives, including preferred location of the activity is required. 	<p>A sensitivity analysis and comparative assessment was provided in the draft BAR which was made available to the Department as part of the 30-day review and comment period, (Section 6.4), furthermore an impact assessment of the proposed project, including all the alternatives under assessment (development area alternatives and the associated grid connection corridors) was included in Section 6.1 and</p>

			<p>Section 6.2 – also included in the final BAR submitted to the Department for decision-making.</p> <p>The sensitivity analysis undertaken as part of the BA Report focusses on providing an understanding of the environmentally sensitive areas and features identified within the site, and specifically the two development area alternatives (with the respective grid connection corridors under assessment). Section 6.4 considers the findings of each of the independent specialist studies undertaken for the development and describes the sensitive features and areas identified, including the location, the sensitivity rating of the features or areas as well as the associated buffers recommended by the specialist (where a buffer is considered to be relevant).</p> <p>A concluding statement on the alternatives assessed is included in Section 6.4 and Section 6.6 of the final BAR.</p>
		<ul style="list-style-type: none"> • If no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such must be provided. 	<p>Where no alternatives were investigated, a motivation has been included in section 5.1 where relevant.</p>

		<ul style="list-style-type: none"> • Written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 1. 	<p>Reasonable and feasible alternatives exist for the proposed development and were investigated as part of the Basic Assessment Process (as per the information provided to the Department as part of the draft BAR for review and comment). This comment is therefore not relevant to the final BAR submitted to the Department for decision-making.</p>
		<p><u>Specialist Declaration of Interest</u></p> <p>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>The Specialist Declarations of Interest forms for the project is included in Appendix D of the final BAR. Declarations for all specialists are included as part of the final BAR.</p>
		<p><u>Specialist Assessments</u></p> <ul style="list-style-type: none"> • All required specialist studies must be recommended and assessed. 	<p>Section 1.5 of the draft and final BAR includes an indication of the specialist studies identified in the DFFE Screening Tool Report (Appendix B) as well as an indication of whether the studies were undertaken or not and a motivation or confirmation of the studies being included or not (as per the DFFE Screening Tool requirements).</p>
		<ul style="list-style-type: none"> • Specialist studies to be conducted must provide a detailed description of their methodology, as well as all other 	<p>Each of the specialist studies included in Appendix D of the final BAR (which were also distributed to the DFFE for review during the 30-</p>

		<p>associated infrastructures that they have assessed and are recommending for the authorisation.</p>	<p>day review and comment period) provides a description of the methodology applied for the respective study undertaken. Each specialist report includes a description of the proposed development, and the associated infrastructures to provide a fully rounded image of the proposed development and its associated impacts.</p>
		<ul style="list-style-type: none"> The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted. 	<p>The specialist studies provide a description of the limitations and gaps associated with the studies, where relevant. The results of the studies are considered sufficient, and no recommendations have been made in terms of the need for further studies or assessments by the respective specialists, other than the usually required walk-throughs associated with the micro-siting phase of the development.</p>
		<ul style="list-style-type: none"> Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and were necessary, include further expertise advice. 	<p>No contradicting recommendations have been specified by the specialists and therefore this comment is not relevant.</p>
		<ul style="list-style-type: none"> It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government 	<p>The Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes have been complied with by the relevant independent specialist studies. The relevant specialist reports specifically refer to the requirements and comply with the</p>

		<p>Notice No. 320 of 20 March 2020 (i.e. “the Protocols”), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. Please note that specialist assessments must be conducted in accordance with these protocols.</p>	<p>requirements as part of the reporting. Refer to Appendix D of the final BAR. Also refer to section 1.5 of the final BAR.</p> <p>Section 1.5 of the draft and final BAR includes an indication of the specialist studies identified in the DFFE Screening Tool Report (Appendix B) as well as an indication of whether the studies were undertaken or not and a motivation or confirmation of the studies being included or not (as per the DFFE Screening Tool requirements).</p>
		<p><u>Cumulative Assessment</u></p> <ul style="list-style-type: none"> • Should there be any other similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following: <ul style="list-style-type: none"> – Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land. – Detailed process flow and proof must be provided, to indicate how the specialist’s recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project. 	<p>Other similar projects are located within a 30km radius from the proposed development site. Refer to Figure G of the final BAR.</p> <p>Section 7 of the draft BAR, that was submitted to the DFFE for the 30-day review and comment period defines, considers and assessed the potential cumulative impacts associated with the development. This information is also included in the final BAR that has been submitted to the Department for decision-making.</p> <p>A detailed process flow is included in section 7.5 of the final BAR.</p>

		<ul style="list-style-type: none"> - The cumulative impacts significance rating must also inform the need and desirability of the proposed development. - A cumulative impact environmental statement on whether the proposed development must proceed. 	<p>A statement on the need and desirability of the proposed development and a cumulative impact environmental statement considering the cumulative impacts significance rating are included in section 7.7 of the final BAR.</p>
		<ul style="list-style-type: none"> • Both Droogfontein PV4-Option A and B Solar Energy screening tool exclude cumulative impact and visual impact assessment. Both of these specialist studies are deemed necessary for the proposed project. Therefore, please ensure that these studies are recommended and assessed. If not conducted, clear motivation and reasons must be submitted to the Department. 	<p>A Visual Impact Assessment was undertaken and included in the draft BAR submitted to the Department as part of the 30-day review and comment period (refer to Appendix D3 of the final BAR for the Visual Impact Assessment Report).</p> <p>The cumulative impacts associated with the proposed development was investigated and assessed in each individual specialist report (as per Appendix D of the final BAR), which informed the overall cumulative impact assessment undertaken for the project, as included in Section 7 of the draft and final BAR documents submitted to the Department for consideration.</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 period for which the Environmental Authorisation is required has been included in Chapter 8, section 8.4, of the final BAR. A period of 10 years is stipulated.</p>

			<p>It is not possible to provide the date on which the activity will be concluded as the project has not received preferred bidder status as yet.</p>
		<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 – (a) a basic assessment report, inclusive of any specialist reports, an EMPr, a closure plan in the case of a closure activity and where the application is a mining application, the plans, report and calculations contemplated in the Financial Provisioning Regulations, which have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority.”</i></p>	<p>The submission of the final BAR to the DFFE for decision-making falls well within the prescribed timeframe of 90 days from submission of the Application for Environmental Authorisation to the Department. The Final BAR includes all the relevant specialist reports and the EMPr(s) as required for the development.</p> <p>This requirement has therefore been complied with.</p>
		<p>Should there be significant changes or new information that has been added to the BAR or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 19(1)(b) of the NEMA EIA Regulations, 2014, as amended, which states: <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 documents contemplated in sub-regulation 1(a) will be submitted within 140 days of receipt of the application by the competent authority, as</i></p>	<p>No significant changes or new information has been added to the final BAR or EMPrs which was not made available for the 30-day review and comment period from 27 October – 28 November 2022. Therefore Regulation 19(1)(b) is not relevant.</p>

		<p><i>significant changes have been made or significant new information has been added to the documents which changes or information was not contained in the original documents consulted on during the initial public participation process contemplated in sub-regulation (1)(a) and that the revised documents will be subjected to another public participation process of at least 30 days."</i></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>The submission of the final BAR to the DFFE for decision-making is within the prescribed timeframe of the EIA Regulations.</p>
		<p>You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.</p>	<p>It is noted and acknowledged by the Applicant that no activity may commence prior to obtaining an Environmental Authorisation.</p>
SOLA	Reuben Maroga	<p>In an email, dated 21 November 2022, the following request was received on the Notification of the availability of the draft Basic Assessment Report:</p> <p>Could we kindly get the site's KML and the grid connection route?</p>	<p>Environamics responded on 22 November 2022, via email, and submitted the requested information to the I&AP.</p>
South African Heritage Resources Agency (SAHRA)	Natasha Higgitt	<p>In a letter, dated 28 November 2022, the final comment was issued by SAHRA for the project. The content of the comment is included below:</p> <p>The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of</p>	<p>The comments received from SAHRA are noted and responded to below.</p>

		<p>the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR and EMPr:</p>	
		<ul style="list-style-type: none"> • 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed development; 	<p>It is noted that SAHRA has no objection to the proposed development.</p>
		<ul style="list-style-type: none"> • 38(4)b – The recommendations of the specialists are supported and must be adhered to. No further additional specific conditions are provided for the development; 	<p>It is noted that the recommendations made by the specialists are supported and that no additional specific conditions are provided.</p>
		<ul style="list-style-type: none"> • 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be 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>The additional specific conditions provided by SAHRA is noted. The EMPr of the solar power plant (Appendix E1 of the Final EIR) has been updated to reflect these requirements.</p>
		<ul style="list-style-type: none"> • 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Ngqabutho Madida 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; 	<p>The additional specific conditions provided by SAHRA is noted. The EMPr of the solar power plant (Appendix E1 of the Final EIR) has been updated to reflect these requirements.</p>

		<ul style="list-style-type: none"> 38(4)d – See section 51 of the NHRA regarding offences; 	<p>Section 51 with regards to offences is noted and will be considered by the Applicant.</p>
		<ul style="list-style-type: none"> 38(4)e – The following conditions apply with regards to the appointment of specialists: With reference to the mitigation work noted above, a qualified archaeologist must be appointed to undertake the work in terms of the permit applied for as noted above; 	<p>The additional specific conditions provided by SAHRA is noted. The EMPr of the solar power plant (Appendix E1 of the Final EIR) has been updated to reflect these requirements.</p>
		<ul style="list-style-type: none"> 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; 	<p>The additional specific conditions provided by SAHRA is noted. The EMPr of the solar power plant (Appendix E1 of the Final EIR) has been updated to reflect these requirements.</p>
		<ul style="list-style-type: none"> As the Final EIA has been finalised without including SAHRA comments, this comment must be forwarded directly to the competent authority for their consideration as per section 38(8) of the NHRA. Proof of the delivery and receipt thereof must be provided to SAHRA; 	<p>The final comment was received by SAHRA on the last day of the 30-day review and comment period (i.e. 28 November 2022).</p> <p>Environamics submitted confirmation to SAHRA via email on 29 November 2022 (Appendix C4 of the final BAR) indicating that the Final Basic Assessment Report had not yet been submitted to the Department of Forestry, Fisheries and the Environment, and that the final comments from SAHRA will be included in the submission to the</p>

			<p>Department as well as the comments and responses report.</p> <p>It was requested from the official to confirm if proof of submission to the Department of the final Report as per the requirements of the comment will still be required.</p> <p>SAHRA confirmed via email on 29 November 2022 that the final BAR Comments and Responses Report (including the SAHRA comments) must be uploaded to the SAHRIS portal and that further proof of submission following the upload of the documents will not be required.</p> <p>It is confirmed that the final BAR, EMPs and the Comments and Responses Report have been uploaded to the SAHRIS online portal as requested.</p>
		<ul style="list-style-type: none"> • The Final BAR and EMPs must be submitted to SAHRA for record purposes; 	<p>The Final BAR and EMP(s) have been submitted to the case file on SAHRIS for the project.</p>
		<ul style="list-style-type: none"> • The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application. 	<p>The decision on the Application for Environmental Authorisation will be submitted to the case on SAHRIS once available.</p>

<p>Registered I&AP – Surrounding Landowner</p>	<p>Jacob Bostander</p>	<p>In an email, dated 24 November 2022, the following comments were received on the draft Basic Assessment Report from an I&AP:</p> <p>Good day the above matter bear’s reference. I wish to record my comments herein.</p> <ol style="list-style-type: none"> 1. I am farming at my place. I have animals and I also do crop farming. I have genuine fear that the project will impact negatively on the lives of my livestock and crops. 2. I also-ran worry that radioactivity will harm myself, my family and other animals in the area. 3. We have already complained a regarding excessive noise caused by the existing similar facility. <p>I therefore suggest that I be relocated by project or be compensated.</p>	<p>Environamics responded on 28 November 2022, via email. The response provided to the I&AP was as follows.</p> <p>The comments on the proposed development were noted.</p> <p>Environamics created and submitted a Google Earth file to the I&AP to provide an indication and understanding of the location of the preferred site for the solar development (Option B) in relation to relevant property (Portion 45 of the Farm Roode Pan No. 70) – Option B is the area which has been put forward for environmental authorisation as per the recommendations of the draft Basic Assessment Report. The edge of the preferred site for development is located 4.9km north from the property property in question and is located to the north of the existing solar energy facility. A map was also submitted to the I&AP providing feedback in this regard in terms of the distance of the facility.</p> <p>The concern raised regarding the impact of the proposed development on the current agricultural activities (livestock and crops) is noted. It must be noted that based on the distance between the preferred development area and the property in questions direct</p>
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			<p>impacts are not expected to occur. The Environmental Management Programme (Appendix E of the draft Basic Assessment Report) provides management measures that will need to be followed by the contractors, which includes measures to avoid impacts to the surrounding areas of the development, including that of security and theft in terms of livestock.</p> <p>The concern regarding radioactivity is noted. The operation of photovoltaic solar panels to generate electricity using the sun as a resource does not emit radioactivity. The panels rather absorb the energy from the sun and generate electricity which is evacuated into the national grid for use.</p> <p>The concerns regarding noise impact is noted. Noise is expected to primarily be generated during the construction phase when the construction activities are being undertaken, including earthworks. The impact is considered to be temporary and will be insignificant during the operation phase when only operation and maintenance activities will be undertaken as and when needed. The Environmental Management Programme (Appendix E of the draft Basic Assessment Report) provides management measures that will need to be followed by the</p>
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			<p>contractors, which includes measures to make use of silencers where equipment is noisy and to keep the construction activities limited to the day time. Also, the distance of the preferred area for development from the property in question (Portion 45 of the Farm Roode Pan No. 70) will mitigate the impact to some extent as the development is proposed to take place 4.9km away.</p> <p>The suggestion of relocation and compensation is noted and has been communicated to the Applicant/developer. It must be noted that no direct impact is expected to occur based on the location of the development, which is located 4.9km to the north, in relation to the property in question. Considering the above, no relocation/compensation is considered to be reasonable at this time.</p>
<p>DFFE Directorate: Biodiversity Conservation</p>	<p>Mashudu Mudau</p>	<p>In an email, dated 24 November 2022, the following correspondence was received on the Notification of the BA process:</p> <p>Thank you for the reminder. Kindly note that the aforementioned project is still under review, and we will provide our comments within the legislative timeframe.</p>	<p>Environamics responded on 28 November 2022, via email, and acknowledged the feedback.</p> <p>Comments were received from the Directorate on 28 November. Refer to the row below.</p>

<p>DFFE Directorate: Biodiversity Conservation</p>	<p>Seoka Lekota</p>	<p>In a letter, dated 28 November 2022, a comment was issued by DFFE Biodiversity Conservation for the project. The content of the comment is included below:</p> <p>The Directorate: Biodiversity Conservation has reviewed and evaluated the reports.</p> <p>The proposed development alternatives include areas of very high, high, and medium sensitivity areas. Alternative Option B has been identified as the preferred development area for the placement of the project development footprint since the area mainly consists of medium sensitivity with only a small portion along the southern boundary being of a very high sensitivity.</p> <p>To minimize possible loss to biodiversity the following recommendation amongst others must be adhered to:</p>	<p>The recommendations made by the Directorate for the minimization of possible loss to biodiversity is noted and responded to accordingly below.</p>
		<ul style="list-style-type: none"> • Vegetation clearing prior and during construction must be limited to the footprint of the proposed development 	<p>The Environmental Management Programme (Appendix E1) makes provision for limiting vegetation clearance to the development footprint.</p>
		<ul style="list-style-type: none"> • A map combining the final layout map superimposed (overlain) on the environmental sensitivity map. This map must reflect the proposed infrastructure's location. 	<p>Figure J2 included in the draft BAR and the final BAR provides the optimized layout map for the Option B development area, which illustrates the environmental sensitivities present and how these areas have been avoided through the careful and appropriate placement of the development footprint.</p>

		<ul style="list-style-type: none"> The 'no-go' areas of the development property must be clearly demarcated and must be excluded from the final layout plan. 	<p>Figure J2 included in the draft BAR and the final BAR provides the optimized layout map for the Option B development area, which illustrates the environmental sensitivities present and how these areas have been avoided through the careful and appropriate placement of the development footprint.</p>
		<ul style="list-style-type: none"> Where possible proposed infrastructure must be aligned to the existing development i.e., roads 	<p>The Environmental Management Programme (Appendix E1 of the final BAR) has been updated to include this measure.</p>
		<ul style="list-style-type: none"> Anti-collision devices such as bird flappers must be installed where power lines cross avifaunal corridors (e.g. grasslands, rivers, wetlands, and dams) 	<p>The Environmental Management Programme (Appendix E2 of the final BAR) has been updated to include this measure.</p>
		<ul style="list-style-type: none"> A Search and Rescue Plan to remove and relocate Species of Conservation Concern identified within the study area must be developed by a professional and qualified ecologist 	<p>The Environmental Management Programme (Appendix E1 of the final BAR) has been updated to include this measure.</p>
		<ul style="list-style-type: none"> Permit from relevant authorities must be obtained prior commencement of any construction activities for the disturbance or removal of any nationally or provincially protected species 	<p>The Environmental Management Programme (Appendix E1 of the final BAR) has been updated to include this measure.</p>
		<ul style="list-style-type: none"> 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 	<p>The Environmental Management Programme (Appendix E1 of the final BAR) has been updated to include this measure.</p>

		<ul style="list-style-type: none"> Rehabilitation Plan must include the ongoing monitoring and maintenance of the surrounding natural vegetation 	<p>The Environmental Management Programme (Appendix E1 of the final BAR) has been updated to include this measure.</p>
		<ul style="list-style-type: none"> Alien Invasive Plant Species Management and Rehabilitation Plans must be developed and submitted as part of the final report to mitigate on habitat degradation due to erosion and alien plant invasion. 	<p>An Alien Invasive Plant Species Management and Rehabilitation Plan was submitted to the Directorate for review and comment as part of the draft Basic Assessment Report. Refer to Appendix E4 of the final Basic Assessment report for the document distributed as part of the draft Basic Assessment Report.</p>
		<p>In conclusion, the Public Participation Process documents related to Biodiversity EIA for review and queries should be submitted to the Directorate: Biodiversity Conservation at Email; BCAdmin@dffe.gov.za for the attention of Mr. Seoka Lekota.</p>	<p>The process for the submission of the Public Participation documents to the Directorate is noted, and has been undertaken accordingly throughout the Basic Assessment Process.</p>
<p>Northern Cape Department of Agriculture, Environmental Affairs, Rural Development and Land Reform</p>	<p>Elsabe Swart and Natalie Uys</p>	<p>In a letter, dated 28 November 2022, a comment was issued by the Northern Cape Department of Agriculture, Environmental Affairs, Rural Development and Land Reform for the project. The content of the comment is included below:</p> <p>Your BA report dated 27 October 2022 has reference.</p>	<p>The comments submitted by the Northern Cape Department of Agriculture, Environmental Affairs, Rural Development and Land Reform are noted and responses to the comments are provided below.</p>
		<ol style="list-style-type: none"> Please note that the botanical site visit appears to have been outside out of season (May 2022) and thus SCC might have been missed (refer to p 89). 	<p>The field survey was undertaken on the 4th-7th of July in 2022, and not May 2022.</p> <p>The specialist has recommended that a search and rescue plan needs to be implemented for the proposed project for the floral and faunal</p>

			<p>component, especially for Black Footed Cat which was indicated by the landowner as relevant to the property.</p> <p>Therefore, an ecological walkthrough of the development footprint must be undertaken to identify any protected species that may be impacted and may require permits for the removal of the individuals.</p> <p>These recommendations have been included in the EMPr (Appendix E1 of the final BAR) for implementation to ensure that all SCCs are considered in the permitting process prior to construction.</p>
		<p>2. Recommend that water saving devices and technologies must be implemented due to the area being an arid area.</p>	<p>The Environmental Management Programme (Appendix E1 of the final BAR) includes and recommends the implementation of water saving devices such as dual flush toilets.</p>
		<p>3. No groundwater extraction is supported. Ground water extraction should be prohibited, even if it is only for an interim period during construction as no underground water study has been done that addressed aspects like underground connectivity, its ecosystem services, recharge rate, current social provision, etc.).</p>	<p>As indicated in Section 2.5.1 of the final BAR water for the proposed development will most likely be obtained from the local municipality, or alternatively from ground water resources. The Local Municipality has been requested by the Applicant to confirm the water resource availability for the development of the project in order to ensure sustainable water supply. It is foreseen that water use authorisation from the</p>

			<p>Department of Water and Sanitation would be required by the development. A full assessment of the application for water use authorisation will only be undertaken in the event that the project proponent has obtained preferred bidder status by the Department of Mineral Resources and Energy for the development of the project or is successful in any other generation opportunities/programmes.</p> <p>At this time the use of groundwater is not considered to be the primary source of water for the development. The primary source will be from the Local Municipality.</p> <p>Should groundwater be identified as the confirmed source, an aquifer report (including aquifer connectivity and production, recharge, etc.) and the ecological services below surface flow in drainage lines it provided in this area will need to be undertaken.</p>
		<p>4. It is requested that clarity, being more specific, is provided on the management of broken panels. It is not acceptable to just indicate waste will be disposed of in an appropriate manner due to the fact that it has been found that such are dumped illegally or at inappropriate dumping sites that are not suitable for the toxic waste contained in these panels.</p>	<p>The Environmental Management Programme (Appendix E1 of the final BAR) includes measures for the replacement and removal of the solar panels as part of the maintenance process. The EMPr states the following:</p>

			<p>Should panels be required to be replaced, the following will apply:</p> <ol style="list-style-type: none"> 1. Materials and panels are to be stored within the previously disturbed construction laydown area. No disturbance of areas outside of these areas should occur. 2. Full clean-up of all materials must be undertaken after the removal and replacement of the solar panel arrays and associated infrastructure is complete, and disturbed areas appropriately rehabilitated. 3. Most of the materials used for solar panel systems can be recycled. The majority of the glass and semiconductor materials can be recovered and re-used or recycled. Recyclable materials must be transported off-site by truck and managed at appropriate facilities in accordance with relevant waste management regulations. No waste materials may be left on-site. 4. Waste material which cannot be recycled must be disposed of at an appropriately licensed waste disposal site or as required by the relevant legislation.
		<ol style="list-style-type: none"> 5. For all revegetation, restoration and rehabilitation projects only locally indigenous species should be used. 	<p>The Environmental Management Programme (Appendix E1 of the final BAR) includes and recommends that re-vegetation of disturbed</p>

			surfaces must occur immediately after activities are completed. This must be done through seeding with indigenous grasses. Therefore, this recommendation is already included in the EMPr for the facility.
		6. Please note that both NFA licenses and NCNCA (Northern Cape Nature Conservation Act, No. 9 of 2009) permits are needed for the removal of protected trees.	The Environmental Management Programme (Appendix E1 of the final BAR) includes the requirements to obtain the necessary permits in terms of the National Forest Act and the Northern Cape Nature Conservation Act.
		7. The availability of foundational and baseline data for this area is limited and therefore should be considered during the walk through in identifying protected species.	The Environmental Management Programme (Appendix E1 of the final BAR) includes the requirement to undertake an ecological walkthrough of the development footprint, prior to site preparation and construction to identify any protected species that may be impacted and may require permits for the removal of the individuals. This requirement has also been included in the final recommendations of the EAP and conditions to be included as part of the Environmental Authorisation (Section 8.4 of the final Basic Assessment Report).
		8. Please revise the section on protection status of the Kimberley Thornveld as Vaalbos National Parks has been de-proclaimed many years ago (refer to p 88).	Section 5.3.1.2 has been updated in the final BAR, and the Terrestrial Ecology Impact Assessment (Appendix D1 of the final BAR). The update includes the revised protection status of the Kimberley Thornveld which is Least Concern

			and Poorly Protected. The status of the Vaalbos National Park has also been updated to de-proclaimed.
		9. Note that <i>Acacia melifera</i> is not an alien invasive species but an indigenous encroacher species (refer to p 88).	It is noted that <i>Acacia melifera</i> is not an alien invasive species but an indigenous encroacher species. The Terrestrial Ecology Impact Assessment (Appendix D1) and the final BAR has been updated accordingly.
		10. It is recommended that the vegetation type section be revised and the SANBI vegetation map 2019 (an update on Mucina & Rutherford 2006) and NBA 2018 findings are incorporated into this section (refer to p 92 that actually do refer to the SANBI 2019 map).	The Ecological Specialist has confirmed that the section in the report which is referred to in the comment pertains to the updated SANBI vegetation map of 2019, with the Vegetation Type descriptions by Mucina & Rutherford, 2006 (which are unchanged) for the relevant vegetation type. Confirmation of the information has been included in the Terrestrial Ecology Impact Assessment (Appendix D1) and the final BAR has been updated accordingly.
		11. Alien and alien invasive species management is prudent throughout the lifetime of the development; from construction to the closure of the site. It should be noted however, that cacti species cannot be treated the same as some other alien species and it may not be disposed of in waste dumps. Please contact SANBI to liaise regarding relevant treatment and management of cacti (Alien	The Environmental Management Programme (Appendix E1 of the final BAR) has been updated to include the requirements for the treatment of cacti species. The contact information of the relevant official at SANBI is also included in the EMPr.

		invasive species management) to eradicate it (Dr Thabiso Mokotjomela, mobile 073 324 6118, email t.mokotjomela@sanbi.org.za).	
		12. Please update the biodiversity section using the NBA 2018 information (not only IUCN 2004) and more recent scientific information (refer to p 103).	The Terrestrial Ecology Impact Assessment (Appendix D1 of the final BAR), which was distributed with the draft BAR to I&APs for the 30-day review and comment period, contains the IUCN 2017 information which is the most recent information. Specific reference to this information has been included in the final BAR.
		13. Figure 5.17 do not reflect biodiversity areas, only avifaunal areas – revision of figure subtitle.	Figure 5.17 illustrates the Bird and Important Biodiversity Areas in relation to the site. Therefore, the subtitle is correct.
		14. Please provide a reference for the statement that all solar development components can be recycled, as there has been indications that certain elements in these cannot be recycled (p 73).	The final BAR indicates that most of the wires, steel and PV modules are recyclable and would be recycled to a reasonable extent. The Silicon and Aluminium in PV modules can be removed and reused in the production of new modules.
		15. Recommend that laydown areas be planned to fall within low sensitive areas where possible (p 146).	The optimized layout included as Figure J2 indicated that the entire development footprint is located within an area of medium sensitivity and therefore the placement of the laydown areas within low sensitive areas will not be possible for the site. It must however be noted that the optimized layout is deemed suitable for

			development by the independent specialist studies (Appendix D).
		<p>16. Although the NBA 2018 indicated that transformation in the area, including this development, amounts to just over 13% (p 207), later it is indicated that the total cumulative loss amounted to 23.91% (under avifauna when renewable energy database information was included, p 208). This might be interpreted as contradicting or questioned i.t.o. what inputs data was used for transformation estimations under the two sections. Please reconsider the presentation of this information for better clarity and uniformity. It would be of value to also do this calculation for the vegetation unit (Kimberley Thronveld) within the boundaries of the Northern Cape, and relative to its extent.</p>	<p>The information has been updated by the Ecological Specialist in the Terrestrial Ecological Impact Assessment (Appendix D1 of the final BAR). The cumulative information provided in Section 7.5.1 of the final BAR has also been updated accordingly.</p>
		<p>17. Clearly state in the EMP your commitment to adaptive management in response to monitoring findings, and the respective monitoring specifics for environmental and biodiversity monitoring.</p>	<p>The Environmental Management Programme (Appendix E1 of the final BAR) has been updated to include the commitment to adaptive management. The measures included in the EMP are as follows:</p> <ol style="list-style-type: none"> 1. Adaptive management in response to monitoring findings must be undertaken throughout the lifecycle of the facility. 2. The Respective monitoring specifics for environmental and biodiversity monitoring must also be adapted as per the outcome of previous monitoring to ensure that negative

			impacts are suitably quantified and managed.
		18. Copies of audit reports / findings must be sent to DAERL annually.	The Environmental Management Programme (Appendix E1 of the final BAR) has been updated to include the requirement.
		19. All environmental and biodiversity data, photos and records must be kept for long-term (including copies of permits received from both DAERL (biodiversity) and DFFE (forestry)). This would be needed to landscape transformation, biodiversity impacts and degradation analyses by the DAERL in the future.	The Environmental Management Programme (Appendix E1 of the final BAR) has been updated to include the requirement.
		20. The following are requested environmental and biodiversity monitoring programmes to be implemented: <ul style="list-style-type: none"> a. Impacts of the light on night insects (what species, estimated deaths, what species are attracted due to the concentration of high numbers of insects (e.g. attracting bats?)). b. Reptile presence and mortalities monitoring (which species, observation frequency, presence of their predators like raptors). c. Bird injuries and mortalities (some species e.g. misjudge the reflection of the panels for water bodies and injure themselves e.g.) of both nocturnal and day species. This applies for panels and fence lines, as well as power lines. 	The requested environmental and biodiversity monitoring programmes are noted. Where possible the programmes may be implemented by the developer. However, where a specific monitoring requirement is indicated by an independent specialist based on the results of the respective impact assessment studies, the programme must be implemented.

		<p>d. Heat island effect monitoring must be included. There is a need to understand the heat island effects of solar developments.</p> <p>e. Monitoring data to be recorded in registers and reported on quarterly, collating monthly data. Raw data and photos to be made available upon request from the department (DAERL).</p>	
		<p>21. No firewood collection is allowed, irrespective of what the land owner allows. No hunting is allowed.</p>	<p>The Environmental Management Programme (Appendix E1 of the final BAR) includes requirements to avoid the collection of firewood.</p>
		<p>22. Just a reminder that some species are protected under the Forests Act and the Northern Cape Nature Conservation Act, thus permits are needed from both for species like <i>Boscia albitrunca</i>.</p>	<p>The Environmental Management Programme (Appendix E1 of the final BAR) includes the requirements to obtain the necessary permits in terms of the National Forest Act and the Northern Cape Nature Conservation Act.</p>
		<p>CONCLUDING REMARKS</p> <p>The development, specifically Option B, is supported on condition that the above are incorporated and that all mitigation measures provided in the specialist reports are adhered to.</p>	<p>The support for the development of the proposed facility, specifically on the Option B development area alternative assessed is noted.</p>

		<p>No poaching and / or collection of plant material (also no fire wood collection) is allowed during the construction, operational and closure phases.</p>	<p>The Environmental Management Programme (Appendix E1 of the final BAR) has been updated to include the requirement.</p>
		<p>No underground water extraction is allowed without a specific aquifer report (including aquifer connectivity and production, recharge, etc.) and the ecological services below surface flow in drainage lines it provided in this area towards the Vaal river and into the Orange river. Farmers are very dependent on their underground water in this district as well as the ecosystem.</p>	<p>As indicated in Section 2.5.1 of the final BAR water for the proposed development will most likely be obtained from the local municipality, or alternatively from ground water resources. The Local Municipality has been requested by the Applicant to confirm the water resource availability for the development of the project in order to ensure sustainable water supply. It is foreseen that water use authorisation from the Department of Water and Sanitation would be required by the development. A full assessment of the application for water use authorisation will only be undertaken in the event that the project proponent has obtained preferred bidder status by the Department of Mineral Resources and Energy for the development of the project or is successful in any other generation opportunities/programmes.</p> <p>At this time the use of groundwater is not considered to be the primary source of water for the development. The primary source will be from the Local Municipality.</p> <p>Should groundwater be identified as the confirmed source, an aquifer report (including</p>

			<p>aquifer connectivity and production, recharge, etc.) and the ecological services below surface flow in drainage lines it provided in this area will need to be undertaken.</p>
		<p>Only local indigenous species are allowed to be used for restoration, rehabilitation and protection of topsoil heaps.</p>	<p>The Environmental Management Programme (Appendix E1 of the final BAR) includes and recommends that re-vegetation of disturbed surfaces must occur immediately after activities are completed. This must be done through seeding with indigenous grasses. Therefore, this recommendation is already included in the EMPr for the facility.</p>
		<p>Please share the Droogfontein 5 development's documentation.</p>	<p>Environamics communicated via email on 29 November 2022 that the Droogfontein 5 Basic Assessment Report is not available as yet, but the documents will be shared with the Department for review and comment at the commencement of the 30-day review and comment period.</p>
<p>Registered I&AP – Surrounding Landowner</p>	<p>Gillian Joy Titus</p>	<p>In an email dated 28 November 2022, the following comments were submitted by the I&AP on the draft Basic Assessment Report:</p> <p>Thank you for the feedback and the information herein. We have read through everything and as far as our understanding</p>	<p>It is confirmed that discussions were undertaken between the I&AP and the Social specialist. The Social Impact Assessment Report (Appendix D7) has been updated (Section 4.5) and is included as part of the final Basic Assessment Report, submitted to the DFFE for decision-making. The mitigation measures included in the Social Impact Assessment Report, as was released as</p>

		<p>goes, the following presents as uncertainties/concerns for our position as surrounding land owners.</p> <p>1. Based off of our previous discussions, mention was made of a social economic impact study to be done following our meeting and the issues raised. We have not been in any further discussions regarding the issues raised, yet the report states no issues were found to have any impact on the outcome of the assessment. We were prepared to be in more thorough/detailed discussions based on the information we shared during the meeting. The minutes do carry the details discussed within our meeting but I recall that you would arrange for an "expert" on social economic impact studies, to make contact with us to further discuss our concerns. Or that our specific concerns would be raised and attended to. Our only discussion on the matter was the call we had.</p> <p>2. I want to make mention that the concerns we have as surrounding land owners are still an issue and we are available to discuss with you again and perhaps with more people and more detail. Based off of the outcome of the assessment and the preferred site for the project, we are concerned that our business operations will be compromised as well as our livelihood as a family in business, living on the farm because of the close proximity to the development site.</p> <p>A social economic impact study can only truly be effective and accurate if we were talked to. If someone paid a visit to our property. Or even so much as did a follow up call.</p>	<p>part of the 30-day review and comment period of the draft Basic Assessment report, is considered to be appropriate and sufficient to mitigate the potential negative impact expected for the surrounding landowner.</p> <p>Environamics responded to the I&AP via email on 02 December 2022 and submitted the updated Social Impact Assessment to the landowner. Furthermore, a Google Earth file to provide an indication and understanding of the location of the preferred site for the solar development (Option B) in relation to the respective surrounding property (Portion 49 of the Farm Roode Pan No. 70) was submitted to the I&AP. It was indicated that the edge of the preferred site for development is located 4.85km north of the property and is located to the north of the existing solar energy facility. A figure was also submitted indicating the distance of the property to the proposed development.</p>
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<p>South African Radio Astronomy Observatory (SARAO)</p>	<p>Selaelo Matlhane</p>	<p>In a letter, dated 29 November 2022, a comment was issued by the South African Radio Astronomy Observatory. The content of the comment is included below:</p> <p>This letter is in response to the proposed solar energy facility and its possible impact on the Square Kilometre Array radio telescopes.</p> <p>SARAO has undertaken a high-level impact assessment based on the information provided for the Droogfontein 4 Solar Facility located at coordinates 28°34'50.10"S 24°43'14.09"E. It was determined that the project represents a low risk of interference to the nearest SKA radio telescope with a compliance surplus of 48.73 dBm/Hz. As such, we do not have any objection to the proposed development.</p>	<p>It is noted that the proposed development has a low risk risk of interference to the nearest SKA radio telescope and that there is no objection from SARAO.</p> <p>The result of a low risk corresponds with the RFI theme for the site which is of a low sensitivity (Appendix B of the final Basic Assessment Report).</p>
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Comments received prior to the release of the Draft Basic Assessment Report and during the initial Public Participation 30-day comment period

Organisation	Person	Issue or comment raised (see Appendix C4 & C5 of the Final Basic Assessment report)	Addressing or incorporation of issue or comment
Globeleq	Marli Schoeman	<p>In an email dated 01 August 2022, it was requested by the I&AP that specific individuals be registered on the project database. These include:</p> <p>Xavier Assegaai (Site Manager) and Pieter Oosthuizen (Asset Director) of the existing Droogfontein solar Plant.</p>	<p>Environamics confirmed via email on 02 August 2022 that the relevant I&APs have been registered on the project database and will therefore be receiving further project related information and notification in the future.</p>
Globeleq South Africa Management Services (Pty) Ltd	Marli Schoeman (Environmental Specialist)	<p>The following comments were received from the i&AP via email dated 30 September 2022 and a letter dated 30 September 2022:</p> <p><u>Email correspondence:</u></p> <p>Globeleq is responsible for the operation and maintenance of the Boshof and Droogfontein Solar Power facilities. We have collated our comments in the document attached, note that our comments are based on the Castor Solar PV project Environmental Management Programme, but should be considered for the Droogfontein 4 & 5 project EMPr's as well.</p> <p><u>Content of the letter:</u></p> <p>COMMENTS ON THE CASTOR SOLAR PV PROJECT ENVIRONMENTAL MANAGEMENT PROGRAMME, NEAR BOSHOF, FREE STATE PROVINCE</p>	<p>Environamics responded via email on 04 October 2022.</p> <p>It is noted that the main concerns raised are related to dust generation, water resource, and waste management. The comments on the EMPr are noted and subsequently the EMPr has been drafted to address the concerns raised.</p> <p>The EMPr which addresses the concerns raised by the I&AP is included in the draft Basic Assessment report which has been distributed to the I&AP for review and comment.</p>

		<p>Globeleq is responsible for the operation and maintenance of the Boshof and Droogfontein Solar Power facilities. We have collated our comments in the document attached, note that our comments are based on the Castor Solar PV project Environmental Management Programme, but should be considered for the Droogfontein 4 & 5 project EMPr's as well.</p> <p>Our main concerns are focused around dust generation, water resource, and waste management. We request that the following measures are addressed in the EMPr's for these sites:</p> <p><i>“Contractors and subcontractors...: A construction plan and method statement must be submitted by the Principal contractor and approved by the Developer and/or his appointed Agent prior to the start of activities on site.”</i></p> <p>The method statement(s) submitted by the contractor, which relates to activities impacting the environment, should also be approved by the appointed ECO. The method statement(s) should address waste management, dust abatement, water use, rehabilitation and other aspects as stipulated in the EMPr.</p> <p><i>“Site Clearing: Areas which are not to be constructed on within two weeks (not months) must not be cleared to reduce erosion risks.”</i></p> <p>Cleared, and thus loosened soil lying bare for 2 months will significantly increase airborne dust at our sites and have a big impacts on our production. Areas that have been cleared should undergo dust suppression on windy days, or daily.</p>	
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		<p><i>provide a method statement with regard to waste management.”</i></p> <p>The method statement should be required irrespective of the availability of a registered landfill site. The method statement should be informed by the waste management hierarchy and where disposal of waste is justifiable, no disposal is to take place at any other site than a registered, or municipal landfill site. Where no certificate is produced by the landfill facility, an arrangement must be made to records and maintain evidence of disposal at aforementioned sites. This could take the form of dater photographic evidence, for example, and written approval from the municipality that the waste site may be used.</p> <p>Panel washing: In the table “Proposed Mitigation Measures during the Operational Phase”, no consideration is given to panel washing and water sources to be used should panel washing be required. The annual maximum volume required for panel washing should be considered and planned for.</p>	
Kaofeli Services	Angelo Douwie	<p>In an email dated 30 June 2022, an I&AP contacted Environamics regarding developments in the Northern Cape:</p> <p>We are Safety Training Company base in Upington and have been doing few renewable energy projects and Mining, Our Services are as follow Incase you might be interested or request COMPANY Profile.</p>	<p>Environamics responded via email on 06 July 2022 and indicated that Environamics is only involved in the environmental permitting processes for renewable energy developments and not the actual construction an operation phases of the facilities.</p>

			<p>It was indicated that the I&AP can register on project databases to obtain access to project related documentation.</p> <p>The I&AP requested to be registered on the I&AP database and confirmation of registration was provided to the I&AP by Environamics on 06 July 2022 via email.</p>
Leads 2 Business	Nikita van Tonder	<p>In an email dated 01 July 2022, the I&AP requested the following:</p> <p>I came across an environmental Impact assessment application for the proposed Droogfontein 4 and 5 solar and Bess power plant near Kimberly.</p> <p>I am interested in following the progress of this development and do not have any objections. I follow the progress of projects in South Africa from Conceptual (feasibility) up until construction has reached completion.</p> <p>Please may I ask if you can email me a background information document or motivational memorandum for this development?</p> <p>Details of the Client: ?</p> <p>Details of the Architect: ?</p> <p>Details of the Developer: ?</p> <p>Details of the Principal Agent: ?</p>	<p>Environamics responded via email on 06 July 2022 and requested whether the I&AP would like to be registered on the project database. It was further indicated that the background information document is not available as yet, but will be distributed in due course to registered interested and affected parties.</p> <p>It was also state that the details requested is not available at the time, however the Applicant name was provided to the I&AP as requested.</p> <p>The I&AP confirmed that she would like to be registered and confirmation of registration was provided by Environamics on 06 July 2022.</p>

		<p>Details of the Project Manager: ?</p> <p>Any information would be greatly appreciated.</p>	
South African Heritage Resources Agency (SAHRA)	Natasha Higgit	<p>The following email was received on 04 August 2022 in response to the Notification of the Basic Assessment Process:</p> <p>Please note that all development applications are processed via our online portal, the South African Heritage Resources Information System (SAHRIS) found at the following link: http://sahra.org.za/sahris/. We do not accept emailed, posted, hardcopy, faxed, website links or DropBox links as official submissions.</p> <p>Please create <u>an application on SAHRIS</u> and upload all documents pertaining to the Environmental Authorisation Application Process. As per section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA), an assessment of heritage resources must form part of the process and the assessment must comply with section 38(3) of the NHRA.</p> <p>Once all documents including all appendices are uploaded to the case applications, please ensure that the status of the case is changed from DRAFT to SUBMITTED. Please ensure that all documents produced as part of the EA process are submitted as part of the application.</p>	<p>Environamics responded via email on 04 August 2022 to indicate that a case for the project will be created on SAHRIS in due course. The SAHRIS site was not available at the time and it was therefore not possible to access the portal for upload.</p> <p>SAHRA confirmed on 04 August that the servers are down and being fixed.</p> <p>Environamics confirmed on 10 August via email that the project was uploaded successfully to the SAHRIS portal. The CaseID is 19268.</p>
Eskom	John Geeringh	<p>The following email was received on 08 August 2022 in response to the Notification of the Basic Assessment Process:</p>	<p>Environamics responded via email on 10 August 2022 and submitted to the I&AP a KMZ file of the affected property, site alternatives and grid</p>

		<p>Please send me a KMZ file that shows the affected property, proposed layout and grid connection. Please find attached Eskom requirements for works at or near Eskom infrastructure, as well as the Eskom setbacks guideline for RE projects. Please note that infrastructure within 2km from a Transmission substation needs to be discussed with Eskom to ensure the substation does not get locked in.</p>	<p>connection corridors for the project under assessment.</p> <p>It was also indicated that the requirements for works at or near Eskom infrastructure, as well as the Eskom setbacks guidelines have been submitted to the Applicant.</p> <p>Furthermore, the Applicant has also been informed of the need for discussion with Eskom in terms of developing infrastructure within 2km from a Transmission substation.</p>
<p>Agri Diamantveld L- Unie</p>	<p>Jeremy Bezuidenhout</p>	<p>A letter, dated 02 September 2022, was received via email from the I&AP. The content of the letter is as follows:</p> <p><u>Voorgestelde Ontwikkeling: Droogfontein Nr. 62, buite Kimberley.</u></p> <p>Na aanleiding van die Agtergrond Inligtingsdokument oor die beplanning van bogenoemde ontwikkeling, wat ons ontvang het, wil ons meld dat daar by ons laaste vergadering besluit is om u mee te deel dat daar geen beswaar ge-opper is oor die voorgestelde ontwikkeling van die twee persele van ± 300 hektaar elk nie.</p> <p>Ons sal dit waardeer indien u, soos wat die verskillende stappe vorder, in terme van Tabel 1, ons op hoogte van sake sal hou ter wille van die vordering wat met die projek bereik word.</p> <p>Die behoefte vir meer soortgelyke kragopwekkingsprojekte is buite perke groot en van uiterste belang in hierdie land,</p>	<p>The comments were acknowledged by Environamics via email on 05 September 2022. It was confirmed that the I&AP will be receiving further information regarding the development as the Basic Assessment process progresses.</p> <p>It is further noted that the Agri Diamantveld L-Unie does not have any objections towards the development.</p>

		<p>aangesien die huidige kragvoorsiening vooruitgang geweldige stremming in groei tot gevolg het.</p> <p><u>Translation:</u></p> <p>Following the consideration of the Background Information Document received and discussed during our previous meeting we confirm that there is no objection to the proposed developments of the two 300ha areas.</p> <p>We will appreciate regular updates of the processes and steps of the processes as per the information provided in the Background Information Document. We want to be kept up to date of the progress made on the projects.</p> <p>The need for development of similar energy developments is significant and of great importance for the country considering that the current electricity supply is creating limitations for growth and development.</p>	
<p>South African Heritage Resources Agency (SAHRA)</p>	<p>Natasha Higgitt</p>	<p>Interim comment was received from SAHRA in a letter dated 06 September 2022. The comments are as follow:</p> <p>As the proposed development is undergoing an EA Application process in terms of the National Environmental Management Act, 107 of 1998 (NEMA), NEMA Environmental Impact Assessment (EIA) Regulations as amended, it is incumbent on the developer to ensure that an application specific Heritage Impact Assessment (HIA) is done as per section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA) as required by section 24(4)b(iii) of NEMA. This must include an</p>	<p>A Heritage Impact Assessment and Palaeontological Impact Assessment (Appendix D5 & D6 of the draft Basic Assessment Report) has been distributed to the official for review and comment.</p> <p>These studies include an assessment of the archaeology and palaeontology of the site.</p> <p>The documents have been uploaded to the Case on SAHRIS as required by SAHRA.</p>

		<p>archaeological component, palaeontological component and any other applicable heritage components. The HIA must be conducted as part of the EA Application in terms of NEMA and the NEMA EIA Regulations.</p> <p>SAHRA requests that an assessment of the impacts to heritage resources that complies with section 38(3) of the NHRA as required by section 38(8) of the NHRA and section 24(4)b(iii) of NEMA be conducted as part of the EA process.</p> <p>The assessment must include an assessment of the impact to archaeological and palaeontological resources. The assessment of archaeological resources must be conducted by a qualified archaeologist and the report comply with the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment Reports (see www.asapa.co.za or www.aphp.org.za for a list of qualified archaeologists).</p> <p>The proposed development is located within an area of moderate Palaeontological Sensitivity as per the SAHRIS PalaeoSensitivity map. As such, a desktop Palaeontological Impact Assessment (PIA) must be undertaken by a qualified palaeontologist. (See https://www.palaeosa.org/heritage-practitioners.html for a list of qualified palaeontologists). The report must comply with the 2012 Minimum Standards: Palaeontological Components of Heritage Impact Assessments.</p> <p>Any other heritage resources as defined in section 3 of the NHRA that may be impacted, such as built structures over 60</p>	
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Surrounding landowner	Gillian Titus	<p>An email, dated 13 September 2022, was received by the I&AP following notification of the Basic Assessment process, which reads:</p> <p>Please arrange for a call to discuss the details of this email. We have questions as a family living very close to the development mentioned in your email.</p>	<p>A telephonic discussion was held with the I&AP on 16 September 2022 at 14:00.</p> <p>Specific issues were raised by the I&AP including impacts of the development on the current leisure and tourism activities being undertaken on the property and impacts to livelihood. These concerns were submission to the social specialist to address as part of the Social Impact Assessment (Appendix E7) included in the draft Basic Assessment Report.</p> <p>Notes of the meeting was distributed to the I&AP on 17 October 2022.</p>
Leads 2 Business	Mareez Herselman	<p>An I&AP registration request was received via email on 14 October 2022:</p> <p>I just spoke to Lisa and she advised that I email to register my interest in this project to receive updated.</p>	<p>Environamics responded via email on 17 October 2022 and confirmed that the I&AP has been registered on the project database for the Droogfontein 4 solar energy development near Kimberley.</p> <p>It was further indicated that the I&AP will be receiving further information on the project in future, including the notification of the</p>

			availability of the draft Basic Assessment Report for review and comment.
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