GUNSTFONTEIN BATTERY ENERGY STORAGE SYSTEM (BESS), NORTHERN CAPE PROVINCE

COMMENTS AND RESPONSE REPORT

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The Gunstfontein BESS Process was announced on Friday, 16 October 2020 with the announcement of the availability of the Basic Assessment (BA) Report. The BA Report was made available for a 30-day review and comment period from **Friday**, **16 October 2020** to **Monday**, **16 November 2020**. The Comments and Responses Report (C&RR) includes comments received during the review and comment period and is included in **Appendix C6** of the <u>Revised</u> BA Report.

A revised Basic Assessment Report, including an optimised layout, has been made available for public review and comment from **Friday**, **11 December 2020** to **Monday**, **01 February 2021**. The C&RR will be updated to include comments received during the review and comment period and will be included in **Appendix C6** of the final Basic Assessment Report.

LIST OF ABBREVIATIONS / ACRONYMS

BA	Basic Assessment	BAR	Basic Assessment Report
DBAR	Draft Basic Assessment Report	EA	Environmental Authorisation
EIA	Environmental Impact Assessment	EMPr	Environmental Management Programme
HIA	Heritage Impact Assessment	I&APs	Interested and Affected Parties
NEMA	National Environmental Management Act	NHRA	National Heritage Resources Act
OoS	Organs of State	SAHRIS	South African Heritage Resources Information System
SAHRA	South African Heritage Resources Agency		

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

1.1. Organs of State

NO.	COMMENT	RAISED BY	RESPONSE
1.	This letter serves to inform you that the following information	Thulisile Nyalunga	Depending on the Battery Technology selected for implementation, assembly
	must be included to the final BAR	Case Officer	on site may be required and electrolyte solution may be brought to site in
	<u>Listed Activities</u>	DEFF	storage totes and temporarily stored on site before being pumped into the
	a) Please ensure that all relevant listed activities are applied		battery system. The activities 14 of Listing Notice 1 and 10(g)(ii)(ee) of Listing
	for, are specific and can be linked to the development	Letter: 12 November	Notice 3 are therefore considered applicable due to the assembly and
	activity or infrastructure as described in the project	2020	temporary storage nature possible of potential electrolytes.
	description. Only activities applicable to the		
	development must be applied for and assessed. In this		The description of the applicability of these listed activities has been updated
	regard, please note installations, facilities or infrastructure		in the BAR, for clarity.
	related to the development (or expansion) of a battery		
	energy storage system will not trigger any of the activities		
	related to the development and related operation of		
	facilities or infrastructure, for the storage, or storage and		
	handling of a dangerous good, unless the battery is not		
	fully assembled and the electrolyte (or substances		
	making up such electrolyte) intended for such battery,		
	may potentially be stored on site, in a container (e.g.		
	tanks), prior to filling. In light of this, please clarify the		
	applicability of the applied for activities 14 of Listing		
	Notice 1 and 10(g)(ii)(ee) of Listing Notice 3		
	b) If the activities applied for in the application form differ		As above, the activities 14 of Listing Notice 1 and 10(g)(ii)(ee) of Listing Notice
	from those mentioned in the final BAR, an amended		3 are therefore considered applicable due to the assembly and temporary
	application form must be submitted. Please note that the		storage nature possible of potential electrolytes. All listed activities in the BAR
	Department's application form template has been		are aligned with those in the application form.
	amended and can be downloaded from the following		
	link htlps://www.environment.gov.za/documentsiforms.		No revised application form is therefore necessary.
	c) Please ensure that the written consent of the landowner		Please refer to Appendix 3 of the application form for a written consent of the
	is attached to the application, where the proponent is		one landowner applicable to this project – Andreas Muller.

NO.	COMMENT	RAISED BY	RESPONSE
	not the owner or person in control of the land on which		
	the activity is to be undertaken		
	d) It is imperative that the relevant authorities are		Please refer to Appendix C of the revised Draft BAR for a record of relevant
	continuously involved throughout the basic assessment		authorities contacted for comments. Please also refer to the biodiversity
	process as the development property possibly falls within		directorate comments received from Mr Seoka Lekota included in this C&RR
	geographically designated areas in terms of GN R. 985		(and responses thereto), as well as the sensitivity map for the project showing
	Activities. Written comments, or proof of the attempt to		the Critical Biodiversity Areas for the project.
	obtain comments, from the relevant authorities must be		
	submitted to this Department. In addition, a graphical		Please refer to the Figure 5.9 of the revised Draft Basic Assessment report for a
	representation of the proposed development within the		map depicting the Critical Biodiversity areas in relation to the 500m assessment
	respective geographical areas must be provided		zone of the proposed BESS.
	Layout & Sensitivity Maps		Please refer to Figure 8.1 (Layout Map, Revision 1 dated December 2020) of
	e) Please ensure that the final BAR includes a layout map		the Basic Assessment report for a final layout map showing the location of the
	which indicates the following:		BESS within the 500m assessment region, along with all supporting infrastructure
	i. The location of the battery storage system in relation		and all sensitive environmental features including buffer areas or no-as as
	to the authorised Great Karoo Wind Energy Facility,		applicable.
	with associated infrastructure;		
	ii. All supporting onsite infrastructure e.g. roads		The layout has been overlain on the environmental sensitivity map (refer to
	(existing/authorised and proposed);		Figure 8.1, Layout Map, Revision 1 dated December 2020). Please note, no
	iii. The location of sensitive environmental features on		heritage features were determined present within the 500m assessment zone
	site e.g. CBAs, heritage sites, wetlands, drainage		of the Gunstfontein BESS and therefore none are included in the layout map.
	lines etc. that will be affected by the BESS; and		Please note: the facility layout, indicated in Layout map (Refer Figure 8.1,
	iv. Buffer areas; and, all "no-go" areas.		Layout Map, Revision 1 December 2020) is requested to be approved along
	f) The above map must be overlain with a sensitivity map		with the environmental authorisation, should one be issued for the project.
	and a cumulative map which shows neighbouring		
	renewable energy developments; and existing grid		A cumulative map showing neighbouring renewable energy developments;
	infrastructure.		and existing grid infrastructure is included in Figure 7.1 of the BAR.
			Please also refer to the CBA map contained with the revised draft Basic
			Assessment report for the location of the BESS in relation to the Gunstfontein
			Wind Energy Facility.
	g) Google maps will not be accepted.		No google maps were used

С	OMMENT	RAISED BY	RESPONSE
Al	<u>ternatives</u>		Please refer to Chapter 2.3 of the Basic Assessment report for a detailing of the
h)	Please note that you are required to provide a full description of the process followed to reach the		alternatives considered for the project, in particular the technology alternatives for the BESS. In particular, please refer to 2.3.3 for a detailing of the
	proposed preferred technology alternative within the site, in terms of Appendix 1(3)(1)(h) of the EIA Regulations		advantages and disadvantages associated with the alternatives.
	2014, as amended, including details of all the technology		
	alternatives considered (particularly the Lithium-ion and		
	Redox-flow, and the advantages and disadvantages associated with each).		
i)	Please provide written proof of an investigation and		Please refer to Chapter 2.3 of the Basic Assessment report for a detailing of the
	motivation, if no reasonable or feasible alternatives exist in terms of Appendix 1.		alternatives considered for the project, in particular the technology alternatives.
C	pordinates		Please refer to Table 2.1 within the BAR for coordinates of the bounds of the
j)	Kindly ensure that coordinates of the BESS with associated infrastructure are provided in the format: degrees, minutes and seconds.		proposed BESS in degrees, minutes and seconds format.
k)	Specialist Assessments		Please refer to Appendix D, E, F and G of the Basic Assessment report for the
	Specialist studies to be conducted must provide a		specialist studies, each of which contains a description of the project and the
	detailed description of their methodology, as well as all other associated infrastructures that they have assessed		methodology utilised in assessment.
- 13	and are recommending for the authorisation.		
')	The specialist studies must also provide a detailed description of all limitations to their studies. All specialist		Please refer to Appendix D, E, F and G of the Basic Assessment report for the specialist studies, each of which contains a description of assumptions and
	studies must be conducted in the right season and providing that as a limitation, will not be accepted.		limitations applicable to their respective study. All studies were conducted within a suitable season, where applicable.
m) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this		No contradictions between the findings of the BAR and the specialist studies are applicable.
	with defendable reasons; and were necessary, include further expertise advice.		
n)	Please ensure that declaration forms are attached for all		Please refer to Appendix J of the Basic Assessment report for specialist
n)	further expertise advice.	-	Please refer to Appendix J of the Basic Assessment report declarations.

Public Participation Process		
 The following information must be submitted with the final BAR: 		The database containing the contact details of registered I&APs is included as Appendix C1 to the revised Draft BAR.
 i. A list of registered interested and affected parties as per Regulation 42 of the NEMA EIA Regulations, 2014, as amended; 		
ii. Copies of all comments received during the draft BAR comment period; and		The draft Basic Assessment Report was made available for review and comment from 16 October 2020 to 16 November 2020, and comment received during this comment period are included in Appendix C5 of the revised Draft BAR.
iii. 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.		The C&RR which includes written comments received on the draft BAR is included as Appendix C6 of the revised Draft BAR. The comments received from the competent authority are captured in the C&RR (this report).
iv. Please ensure that all issues raised and comments received during the circulation of the draft BAR from registered I&APs and organs of state which have jurisdiction (including this Departments Biodiversity Section) in respect of the proposed activity are adequately addressed in the final BAR.		All written comments received, including that of the DEFF's Biodiversity Conservation Directorate, are included in Appendix C5 of the revised Draft BAR.
v. Proof of correspondence with the various stakeholders must be included in the final BAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.		Proof of correspondence with various stakeholders is attached in Appendix C3 (Consultation with Organs of State) and Appendix C4 (Consultation with Stakeholders) of the revised Draft BAR. Proof of attempts that were made to obtain comments is attached in Appendices C3 and C4 of the revised Draft BAR. The Public Participation Process has been conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended (GNR 326), as
	per Regulation 42 of the NEMA EIA Regulations, 2014, as amended; ii. Copies of all comments received during the draft BAR comment period; and iii. 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. iv. Please ensure that all issues raised and comments received during the circulation of the draft BAR from registered I&APs and organs of state which have jurisdiction (including this Departments Biodiversity Section) in respect of the proposed activity are adequately addressed in the final BAR. v. Proof of correspondence with the various stakeholders must be included in the final BAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process must be conducted in	per Regulation 42 of the NEMA EIA Regulations, 2014, as amended; ii. Copies of all comments received during the draft BAR comment period; and iii. 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. iv. Please ensure that all issues raised and comments received during the circulation of the draft BAR from registered I&APs and organs of state which have jurisdiction (including this Departments Biodiversity Section) in respect of the proposed activity are adequately addressed in the final BAR. v. Proof of correspondence with the various stakeholders must be included in the final BAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA

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			approved Public Participation Plan is included in the revised Draft BAR as Appendix C7. The BAR was made available for a 30-day review and comment period from
			16 October 2020 to 16 November 2020. As per the approved Public Participation Plan, the availability of the BAR was:
			 Advertised in Noordwester/Oewernuus/Messenger, a local community newspaper, on Friday 16 October (tear sheet included in Appendix C2 of the revised Draft BAR). Notification letter sent to all registered I&APs (Appendix C4) and Organs of State (Appendix C3) on the project database informing them of the
			 application and that the BAR is available for review and comment. The BAR was also made available for downloaded 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, from Savannah Environmental.
	vi. Environmental Management Programme vii. Please ensure that the content of the EMPr complies with the requirements of the Appendix 4 of the EIA Regulations 2014, as amended.		Please refer to Table 4.1 of the EMPr where the requirements of Appendix 4 of the EIA regulations 2014, as amended, and the location within the EMPr where such information has been addressed have been indicated.
	viii. The EMPr must distinguish between impact management actions and impact management outcomes, per Appendix 4 of the EIA Regulations 2014, as amended.		The EMPr provides clear outcomes, with concomitant actions across all the project phases.
	ix. The EMPr must include: i. A map at an appropriate scale, which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided (no-		Please refer to Figure 2.3 of the EMPr for a sensitivity map including no-go areas or buffers as may be applicable.
	go areas), including buffers.		

NO.	COMMENT	COMMENT	RAISED BY	RESPONSE
	 ii. All recommendations and mitigation measures recorded in the BAR and the specialist studies conducted. 	ii.		The EMPr contains all recommendations and mitigation measures as recorded in the BAR and the specialist studies conducted.
	iii. Measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments, and other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants.	iii.		Please refer to outcome 6 for measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments. Please also refer to outcome 12 and outcome 22 for management measures towards containment and spillage related to the BESS components and materials.
	x. Please ensure that the EMPr also includes: i. The method of monitoring the implementation of the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.			Please refer to the Performance Indicator and Monitoring tables provided for each outcome as listed in the EMPr for a detailing of the method of monitoring required towards monitoring the management actions contemplated for each outcome.
	ii. The <u>frequency of monitoring</u> the implementation of the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.	ii.		Please refer to the Performance Indicator and Monitoring tables provided for each outcome as listed in the EMPr for a detailing of the frequency of monitoring required towards monitoring the management actions contemplated for each outcome.
	iii. An <u>indication</u> of the <u>persons</u> who will be responsible for the implementation of the impact management actions.	iii.		Please refer to the responsibility column provided for each action as listed in the EMPr for a detailing of the person responsible for the implementation of the impact management actions contemplated for each outcome.
	iv. The time <u>periods</u> within which the impact management actions contemplated in paragraph (0 of Appendix 4 of the EIA Regulations 2014, as amended, must be implemented.	iv.		Please refer to the timeframe column provided for each action as listed in the EMPr for a detailing of the periods related to the implementation of the impact management actions contemplated for each outcome.
	v. The mechanism for monitoring of compliance with the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.	V.		Please refer to the Performance Indicator and Monitoring tables provided for each outcome as listed in the EMPr, as well as Sections 6.4 and 6.5 of the EMPr for a detailing of the mechanisms of monitoring required towards monitoring the management actions contemplated for each outcome.

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	vi. A <u>program for reporting on compliance</u> , taking into account the requirements as prescribed by the Regulations.		Please refer to Chapter 6 of the EMPr for a programme for reporting on compliance.
	General xi. Please ensure that the final BAR includes an undertaking under oath or affirmation by the EAP (administered by a Commissioner of Oaths) as per Appendix 1(3)(r) of the NEMA EIA Regulations, 2014, as amended, which states that the BAR must include: i. an undertaking under oath or affirmation by the EAP in relation to: ii. the correctness of the information provided in the reports;		Please refer to Appendix M of the Basic Assessment report for an undertaking under oath by the EAP.
	iii. the inclusion of comments and inputs from stakeholders and I&APs		Please refer to Appendix M of the revised Draft Basic Assessment report for an undertaking under oath by the EAP. In addition, please refer Appendix C6 for the Comments and Response report showing a complete record of the comments and inputs from Stakeholders.
	iv. the inclusion of inputs and recommendations from the specialist reports where relevant; and		Please refer to Appendix M of the revised Draft Basic Assessment report for an undertaking under oath by the EAP. In addition, please refer to Chapter 6 and 7 for a complete listing of the inputs and recommendations made by specialists.
	v. 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".		Please refer to Appendix M of the Basic Assessment report for an undertaking under oath by the EAP. In addition, please refer to Appendix C for a complete record of the information provided to interested and affected parties.
	xii. 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.		Please refer to Section 8.5 of the BAR for a determination of the period for which an Environmental Authorisation is requested. A 10-year validity period is requested for the Environmental Authorisation if approved by the competent authority.

NO.	COMMENT	RAISED BY	RESPONSE
	xiii. You are reminded that the final BAR to be submitted		The Basic Assessment report complies with the scope and content
	to this Department must comply with all the		requirements as determined in Appendix 1 of the EIA regulations 2014, as
	requirements in terms of the scope of assessment and		amended.
	content of basic assessment reports and EMPr in		
	accordance with Appendix 1, Appendix 4 and		
	Regulation 19(1) (a) of the Environmental Impact		
	Assessment Regulations (2014), as amended		
	xiv. Please ensure that the risks associated with the		Please refer to Chapters 6 and 7 of the BAR for an assessment of impacts and
	Battery Energy Storage System technologies are		risks related to the BESS technologies as well as the mitigation measures
	assessed and included in the final BAR		provided for the control and management thereof. Please also refer to
			Outcomes 11, 12, 19, 20 21 and 22 of the EMPr for measures required to
			manage the risks associated with the BESS.
	You are further reminded to comply with Regulation 19(1)(a)		The final Basic Assessment report will be submitted within the prescribed
	of the NEMA EIA Regulations, 2014, as amended, which states		regulated timeframes.
	that: "Where basic assessment must be applied to an		
	application, the applicant must, within 90 days of receipt of		
	the application by the competent authority, submit to the		
	competent authority -		
	(a) a basic assessment report, inclusive of 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."		
	Should there be significant changes or new information that		A request for extension of timeframe under regulation 19(b) was submitted to
	has been added to the BAR or EMPr which changes or		the DEFF on 10 December 2020.
	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: "the		
	applicant must, within 90 days of receipt of the application		
	by the competent authority, submit to the competent		

NO.	COMMENT	RAISED BY	RESPONSE
	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'.		
	Should you fail to meet any of the timeframes stipulated in		Comment noted, no further action required.
	Regulation 32 of the NEMA EIA Regulations, 2014, as		
	amended, your application will lapse.		
	You are hereby reminded of Section 24F of the National		Comment noted, no further action required.
	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.		
2.	The following comments are made as a requirement in terms	Natasha Higgitt	
	of section 3(4) of the NEMA Regulations and section 38(8) of	South African Heritage	
	the NHRA in the format provided in section 38(4) of the NHRA	Resources Agency	
	and must be included in the Final BAR and EMPr		
	 8(4)a – The SAHRA Archaeology, 	Letter: 12 November	
	Palaeontology and Meteorites (APM) Unit	2020	
	has no objections to the proposed		
	amendment to the authorised		
	development;		
	38(4)b – The recommendations of the specialists are		Comment noted, no further action required.
	supported and must be adhered to. Further		

NO.	COMMENT	RAISED BY	RESPONSE
	additional specific conditions are provided for the		
	development as follows		
	The Final Comments issued on the 18/03/2016		The specialist report (refer Appendix E – Heritage Impact Assessment) reviewed
	(https://sahris.sahra.org.za/node/359844),		the BESS and 500m assessment zone within the context of the detailed cases,
	20/06/2016		and details the measures applicable from these cases to the proposed
	(https://sahris.sahra.org.za/node/365018) and		footprint and location of the BESS. All measures specified by the heritage
	31/05/2019		impact assessment were included into the EMPr and BAR and therefore the
	(https://sahris.sahra.org.za/node/523991) are still		applicable requirements from the cases detailed have been incorporated into
	valid for this application and must be adhered to;		this application.
			Please note that the revised draft BAR report will also be submitted to SAHRIS
			accordingly for any additional SAHRA comment.
	38(4)c(i) – If any evidence of archaeological sites or		Please refer to Section 6.5 of the BAR, and Outcome 10 of the EMPr for
	remains (e.g. remnants of stone-made structures,		evidence of where these conditions have been included into the EMPr and
	indigenous ceramics, bones, stone artefacts, ostrich		BAR reporting.
	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;		
	• 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;		
	 38(4)d – See section 51(1) of the NHRA; 		

NO.	COMMENT	RAISED BY	RESPONSE
	38(4)e – The following conditions apply with regards to the appointment of specialists: 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;		
	 The Final BAR and EMPr must be submitted to SAHRA for record purposes; The decision regarding the EA Amendment Application must be communicated to SAHRA and uploaded to the SAHRIS Case application Should you have any further queries, please contact the designated official using the case number 		The Final BAR and EMPr will be uploaded to the SAHRIS case once submitted to DEFF for decision making, to ensure record keeping. The Environmental Authorisation uploaded to the SAHRIS case once received from the Competent Authority. Comment noted, no further action required.
3.	quoted above in the case header. The following recommendations must be considered during the FBAR phase: High sensitivity areas in close proximity to the development footprint must be demarcated as no-go areas i.e. drainage lines;	Aulicia Maifo & Portia Makitla Case Officers DEFF: Biodiversity Conservation	All high sensitivity areas are avoided by the location of the BESS and associated infrastructure. As per the specifications of Outcome 1 of the EMPr, high sensitivity areas have now been avoided during the final design and layout of the BESS.
	 A plant rescue and protection plan for the identified Species of Conservation Concern which allows for the maximum transplant of conservation species from areas to be transformed must be developed and submitted; Erosion and Alien Plant Species Management Plan, and rehabilitation plan must be submitted as part of the final report to mitigate on habitat degradation due to erosion and alien plant invasion 	Directorate Letter: 16 November 2020	Please refer to Appendix L of the EMPr for a plant rescue and protection plan in accordance with this comment. Please refer to Appendix F of the EMPr for an Alien and invasive plant management plan and Appendix H of the EMPr for an Erosion Management Plan, in accordance with this comment.

NO.	COMMENT	RAISED BY	RESPONSE
NO. 4.	The Department of Water and Sanitation (DWS) hereby acknowledges the receipt of your correspondence detailing the intent of Gunstfontein Wind Farm (Pty) Ltd to submit a proposal to the Department of Energy. It is our understanding that as part of such application it is required of the project proponent to provide confirmation that water is available for the proposed project as well as proof of submission of a water use license application as required under qualification criteria.	RAISED BY Alexia Hlengani Department of Water and Sanitation (DWS) Letter: 05 November 2020	RESPONSE Comment noted, no further action required. (please note: the departmental reference to the photovoltaic solar energy facility appears to be incorrect and should correctly refer to the Wind Energy Facility).
	The Department hereby wishes to confirm that it has engaged with the proponent regarding the water use requirements of the proposed 200MW photovoltaic solar energy facility to be located on Farm Gunstfontein no 131, Sutherland. After due consideration of the water resource availability in the relevant catchment area, it was found that sufficient water is available to meet the water requirements for the proposed project. The water will be sourced from boreholes on the property. The water consumption is estimated to be 40 000m³/annum during the construction phase and 2800m³/annum during operation phase of the proposed wind energy facility.		
	The department further wishes to confirm that a full assessment of the application for water use authorisation by Gunstfontein Wind Farm Pty Ltd: Gunstfontein Wind Energy Project will only be undertaken in the event that the project proponent has been appointed as a preferred bidder by the Department of Energy.		

NO.	COMMENT	RAISED BY	RESPONSE
	This letter of confirmation is non-binding and should not be		
	construed as authorisation to engage in any water use		
	defined in the Section 21 of the National Water Act, 1998 (Act		
	no. 36 of 1998) or that a water use license will necessarily be		
	granted, nor does it grant exemption from the requirements		
	of any other application act, ordinance, regulation or by law.		

2. COMMENTS RECEIVED AT THE COMMENCEMENT OF THE BASIC ASSESSMENT PROCESS

No comments received during the commencement of the Basic Assessment process