

APPENDIX C6
COMMENTS RECEIVED





forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X 447· PRETORIA 0001· Environment House 473 Steve Biko Road, Arcadia,· PRETORIA

DFFE Reference: 14/12/16/3/3/2/2223

Enquiries: Ms Azrah Essop

Telephone: (012) 399 8529 **E-mail:** AEssop@dfpe.gov.za

Ms Nkhensani Masondo
Savannah Environmental (Pty) Ltd
P.O. Box 148
SUNNINGHILL
2191

Telephone Number: (011) 656-3237
Email Address: nkhensani@savannahsa.com

PER E-MAIL / MAIL

Dear Ms Masondo

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED KOTULO TSATSI ENERGY PV3 FACILITY IN THE NAMAKWA DISTRICT MUNICIPALITY, NORTHERN CAPE PROVINCE

The Application for Environmental Authorisation received by the Department on 20 October 2022, the acceptance of the final scoping report issued on the 23 January 2023 and the amended application form and Draft Environmental Impact Assessment Report (EIAR) received on 04 April 2023, refer.

This letter serves to inform you that the following information must be included in the final EIAR:

1. Specific comments

- a) The draft EIAR mentions that: *'The PV facility is planned to be located within an area previously authorised for CSP project infrastructure, which is adjacent to the authorised Kotulo Tsatsi Energy PV1 and PV2 Facilities as well as the authorised CSP3 facility and associated infrastructure.'*

And that:

The PV infrastructure assessed in this application is in response to the Applicant's need to change the authorised generation technology for the facility located on the farm Portion 2 of Farm Styns Vley 280. That is, a technology change from the previously authorised CSP project infrastructure to PV project infrastructure.

The comments and responses report submitted with the draft EIAR states on page 10:

'The Applicant intends on changing the previously authorised CSP project infrastructure to PV project infrastructure. However, previously authorised infrastructure will be retained for use for the planned PV facility:

The infrastructure that will be retained will include other associated infrastructure such as the grid connection via a previously authorised grid connection solution, which consists of internal grid reticulation and the authorised 400kV substation.'

WA

Further information is required in this regard relating to the footprint. Clarify whether the developments (i.e. PV and CSP) are located on the same farm portion as well as the same footprint.

Please clearly state what infrastructure will be utilised from the authorised CSP EA (14/12/16/3/3/2/694) for the current PV application (14/12/16/3/3/2/2223).

- b) Clarify whether the aspects of the offsets contained in the EA for the CSP facility impact on this current application for the PV facility.
- c) Please ensure that all relevant listed activities are applied for, are specific (down to sub-regulation e.g. Activity 12 (ii)(a)(c) and that it can be linked to the development activity or infrastructure as described in the project description. Ensure to include thresholds of the infrastructure.
- d) If the activities applied for in the application form differ from those mentioned in the final EIAR, an amended application form must be submitted. Ensure to include the facility substation in the listed activities table.
- e) Provide a separate appendix which includes the GPS coordinates, affected properties and SG codes of the preferred alternative. When providing coordinates as part of the information submitted regarding the location of an activity as part of an application for environmental authorisation, such coordinates must be provided in degrees, minutes and seconds using the Hartebeesthoek WGS84 coordinate system as per regulation 5(6) of the NEMA EIA Regulations, 2014, as amended.

2. Undertaking of an Oath

- a) Please note that the final EIAR must have an undertaking under oath/ affirmation by the EAP.
- b) Based on the above, you are therefore required to include an undertaking under oath or affirmation by the EAP (administered by a Commissioner of Oaths) as per Appendix 3 of the NEMA EIA Regulations, 2014, as amended, which states that the EIAR 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;*
 - III. *the inclusion of comments and inputs from stakeholders and I&APs;*
 - IV. *the inclusion of inputs and recommendations from the specialist reports where relevant; and*

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.”

3. Environmental Management Programme

- a) The EMPr must include the following:
 - I. All recommendations and mitigation measures recorded in the final EIAR and the specialist studies conducted.
 - II. An environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process.
 - 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.
- b) In addition to the above, the EMPr must comply with Appendix 4 of the EIA Regulations, 2014, as amended.

wh

General

Please also ensure that the final EIAR includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 3 of the NEMA EIA Regulations, 2014, as amended.

You are further reminded to comply with Regulation 23(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: *“The applicant must within 106 days of the acceptance of the scoping report submit to the competent authority -*

(a) an environmental impact 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 must 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 has been added to the EIAR 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 23(1)(b) of the NEMA EIA Regulations, 2014, as amended, which states: *“The applicant must within 106 days of the acceptance of the scoping report submit to the competent authority – (b) a notification in writing that the documents contemplated in sub-regulation 1(a) will be submitted within 156 days of acceptance of the scoping report by the competent authority or where regulation 21(2) applies, within 156 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 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 contemplated in sub-regulation 1(a) will be subjected to another public participation process of at least 30 days”.*

Should you fail to meet any of the timeframes stipulated in Regulation 23 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.

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.

Yours sincerely



Mr Sabelo Malaza
Chief Director: Integrated Environmental Authorisations
Department of Forestry, Fisheries & the Environment
Signed by: Mr Wayne Hector
Designation: Deputy Director: Priority Infrastructure Projects
Date: 04/05/2023

cc:	Adriaan Botha	Kotulo Tsatsi Energy (Pty) Ltd	Email: AttieBotha@KotuloTsatsiEnergy.com
	Bryan Fisher	Northern Cape DENC	Email: Bfisher@ncpg.gov.za
	Jl Swartz	Hantam Local Municipality	Email: Jiswartz@hantam.gov.za



OFFICE OF THE HOD

90 Long Street, Kimberley, Northern Cape, South Africa, 8300, Tel: (053) 807 7300,
E-mail: zmogorosi@ncpg.gov.za, web: www.agrinc.gov.za

Date:	3/5/2023	Reference:	DFFE Ref.: 14/12/16/3/3/2/2223
To:	Ms. Nicolene Venter (on behalf of the EAP: Savannah SA)	From:	S. De la Fontaine (sdelafontaine@gmail.com)
RE: Environmental Impact Assessment for the Kotulo Tsatsi Energy PV3 and associated infrastructure			

Nicolene Venter
Public Participation and Social Consultant
Savannah SA
Tel: (011) 656 3237
Fax: 086 684 0547
Email: nicolene@savannahsa.com

Please cc Ms. Azrah Essop (AEssop@dfpe.gov.za), the DFFE case officer for the proposed development in all communication.

Dear Nicolene

RE: ENVIRONMENTAL IMPACT ASSESSMENT FOR THE KOTULO TSATSI ENERGY PV3 AND ASSOCIATED INFRASTRUCTURE

Background

Savannah SA (Pty) Ltd (the EAP) have released a report on behalf of the proponent, Kotula Tsatsi Energy (Pty) Ltd, that summarizes the impacts and environmental impact assessment process to be undertaken for the proposed Kotulo Tsatsi PV3 with a contracted capacity of 480MW. An application to obtain an environmental authorization in terms of the National Environmental Management Act, 1998, as amended, will be lodged, in respect of listed activities that will be triggered because of the proposed Kotulo Tsatsi PV3 development and its associated infrastructure. The proposed development will be located W of the R27, on Portion 3 of the Farm Styns Vley No. 280, approximately 70 kilometres SW of Kenhardt and 60 kilometres NE of Brandvlei, within the Namakwa District Municipality, Northern Cape Province. The PV development is proposed for an area where a CSP development has been approved previously. The proposed Kotulo Tsatsi PV 3 will be located adjacent to the Kotulo Tsatsi PVs 1 and 2 facilities as well as the Kotulo Tsatsi CSP 3 development (biodiversity off-set due pending REIPP status).

Please Cc: Director B. Fischer, Environmental Management BFischer@ncpg.gov.za (Secretary: T. Makedi TMakedi@ncpg.gov.za)

Recommendations / comments:

1. The field assessment that informed the plant specialist report took place on 12 December 2021, for 1 day, during a dry period, i.e., changes in the environment / faunal and floral species brought about by differences in seasonality / more wetter periods could have been omitted from the assessment. Furthermore, the field assessment took place > 4 seasons ago (a year and 5 months ago) and numerous changes could have already occurred within the past 17 months. Hence it is advised that the EA be issued on condition that a full walk-through assessment be conducted of the final approved PV development's footprint area, in the appropriate season for this respective area i.e., towards the end of the wet season of the area, that quantifies the protected species that will be impacted on (destroyed and or translocated) during the development of proposed PV facility. This report will be used to inform the permitting process.
2. The name of this Department should be amended throughout the EIR and specialists' reports [from Department of Environment and Nature Conservation (DENC) to Department of Agriculture, Environmental Affairs, Rural Development and Land Reform (DAERL)].
3. This Department strongly supports the recommendation in the EMPr regarding fencing of the construction / development area i.e., lower wires of security fence are not electrified and that electrified stands should be placed on the inside of the stands. The Department however strongly suggest that, in addition, daily fence patrols are undertaken to monitor for potential animal mortality caused by electrified fences / security fences along site boundaries.
4. A serious complaint was recently brought under this Department attention regarding heavy dust clouds from a solar development site within the Kenhardt area, notwithstanding the fact that the developer is fully compliant in terms of dust control. The local farming community alleges that their livestock is falling sick because they ingest dust laden plants. The dust clouds, that are especially prevalent during commuting hours, stretches for kilometres and are also affecting the *Aloidendron dichotomum* trees in the area. Locals are of the opinion that the dust monitoring buckets are placed incorrectly, thus giving a false sense that all is well, when it is not. They are furthermore of the opinion that the prevailing wind direction was not taken into consideration with

the placement of the dust monitoring stations. Locals are also complaining that, even though they do not always have water in their taps, water is still sold by the municipality to solar developers. Furthermore, 3 boreholes have, to date, supposedly dried up since construction of solar developments commenced within the area due to high groundwater consumption affecting neighbouring boreholes. The locals are of the opinion that current construction of the solar developments in the Kenhardt area should be halted / no further solar developments should be allowed in the vicinity of Kenhardt OR and / authorisations should clearly stipulate that access roads must be tarred, and that no groundwater consumption be allowed during construction and operation of such facilities. This Department strongly urges the developer and competent authorities to investigate these matters pertaining to the proposed Kotulo Tsatsi developments in order prevent further exacerbation of the above-mentioned issues. Especially because the proposed development is located close to several ephemeral water bodies (wetlands, rivers, depressions).

5. The development is proposed for an area where several large-scale PV (Kotulo Tsatsi PVs 1 and 2) and a concentrated solar development (Kotulo Tsatsi CSP3) are planned. There is a gap in the knowledge regarding heat island effects of solar developments and its potential impacts on local climates/regional climates. Hence, heat island effect monitoring must be included in the EMPr as there is a need to understand the heat island effects of solar developments (especially their cumulative impacts).
6. In addition to the above-mentioned, the following monitoring programmes are requested to be included in the EMPr (for the entirety of the Kotulo Tsatsi 3xPV and 1xCSP projects):
 - a. What faunal species are attracted due to the high concentration of insects attracted by the project / development lights (e.g., attracting bats / birds?)
 - 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 diurnal species. This applies for panels and fence lines, as well as power lines. Where injured raptors are encountered the birds must be collected and taken to a veterinarian or rehabilitation centre.

- d. 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).

We hope you find these recommendations in order.

Yours sincerely



M. Smit

Acting Scientific Manager: Environmental Research and Development (ERD)

Department of Agriculture, Environmental Affairs, Rural Development & Land Reform (DAERL)

Date 05/03/2023

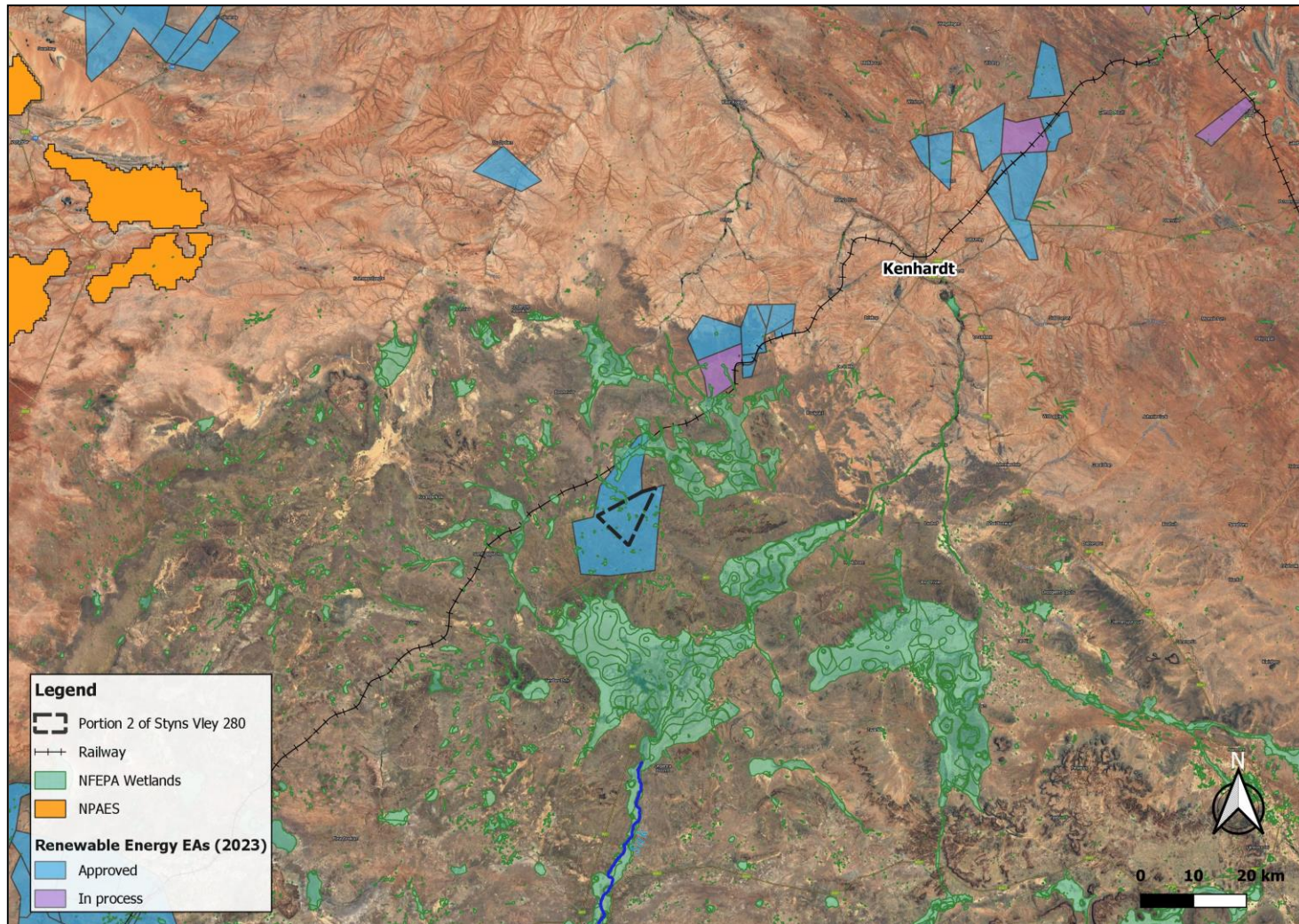


Figure 1. The property proposed for the Kotulo Tsatsi PV 3 development in relation to other renewable energy developments (approved / in process) within the vicinity.

Our Ref:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Natasha Higgitt
Tel: 021 202 8660
Email: nhiggitt@sahra.org.za
CaseID: 21042

Date: Wednesday May 10, 2023
Page No: 1

Interim Comment

In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Savannah Environmental (Pty) Ltd

PO Box 148
Sunninghill
2157

The Applicant, Kotulo Tsatsi Energy (Pty) Ltd, is proposing the construction of a photovoltaic (PV) solar energy facility (known as the Kotulo Tsatsi Energy PV3) located on a site located approximately 70km south-west of the town of Kenhardt and 60km north east of Brandvlei in the Northern Cape Province. The solar energy facility will comprise several arrays of PV panels and associated infrastructure and will have a contracted capacity of up to 200MW. The facility will be located within the farm Portion 2 of Farm Styns Vley 280. The PV facility is planned to be located adjacent to the authorised 100MW Kotulo Tsatsi PV2 facility, and within an area previously authorised for CSP project infrastructure. The project site 1 falls under the Hantam Local Municipality which is part of Namakwa District Municipality. The site is accessible via an existing gravel farm road (known as Soafskolk Road) which provides access to the farm off of the R27 which is located east of the project site.

Savannah Environmental was appointed by Kotulo Tsatsi Energy (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed Kotulo Tsatsi Energy PV 3 Facility, near Brandvlei, Northern Cape Province (DFFE Ref: 14/12/16/3/3/2/2223).

A draft Environmental Impact Assessment Report has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 NEMA Environmental Impact Assessment (EIA) Regulations. It must be noted that SAHRA was not consulted during the Scoping Phase of the application. The proposed development will include the construction of a solar PV array, cabling between the project components, access and internal roads, two substations and BESS hubs, 132 kV power line, operation and maintenance buildings and lay down area within a development footprint of 1350 ha.

CTS Heritage was appointed to provide heritage specialist input into the EA process as required by section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Lavin, J. 2023. Heritage Impact Assessment in terms of section 38(8) of the NHRA for the proposed

PROPOSED DEVELOPMENT OF KOTULO TSATSI ENERGY PV 3 NEAR KENHARDT, NORTHERN CAPE

Our Ref:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Natasha Higgitt
Tel: 021 202 8660
Email: nhiggitt@sahra.org.za
CaseID: 21042

Date: Wednesday May 10, 2023
Page No: 2

development of Kotulo Tsatsi Energy PV 3 near Kenhardt, Northern Cape

The HIA draws on results of specialist reports (Lavin, 2021 and Almond, 2015). The proposed development area is underlain by deeply weathered and calcretised bedrocks of the Dwyka and Ecca Groups. Two palaeontological sites are present in the proposed development area i.e. 90934 and 90935 rated as sites of Grade IIIC heritage significance, and no mitigation recommendations are provided.

The heritage survey conducted in 2021 was limited, as the development layout was not yet known. A total of 11 heritage resources were identified within the development footprint. These include Stone Age lithics and historical artefacts of negligible heritage significance.

Recommendations provided in the report include the following:

- All excavation activities are subject to the Paleontological Chance Finds Procedure;
- A Chance Finds Procedure is recommended to be implemented.

Interim Comment

SAHRA requests that a letter be provided by a palaeontologist, confirming if the results of the 2015 PIA are still relevant for the current development application.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Natasha Higgitt
Manager: Development Applications Unit
South African Heritage Resources Agency

PROPOSED DEVELOPMENT OF KOTULO TSATSI ENERGY PV 3 NEAR KENHARDT, NORTHERN CAPE

Our Ref:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Natasha Higgitt
Tel: 021 202 8660
Email: nhiggitt@sahra.org.za
CaseID: 21042

Date: Wednesday May 10, 2023
Page No: 3

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/615978>

Savannah Public Process

From: Savannah Public Process
Sent: Thursday, 13 April 2023 12:49
To: Marc Caplan
Subject: RE: SE3450: KOTULO TSATSI ENERGY PV3 AND ASSOCIATED INFRASTRUCTURE - Notification of Availability of the Environmental Impact Assessment Report for Review and Comment
Attachments: 3450 KT PV3 App C8-CRR.pdf

Dear Mark,

Thank you for your email below following up on your comments submitted on the Scoping Report for Kotulo Tsatsi Energy PV3 and Associated Infrastructure.

I confirm that your comments were included in the Comments & Responses Report submitted as part of the Scoping Report, and also included in the EIA report (refer to Appendix C8 of the EIA Report). Responses have been included for all comments. For ease of reference, please find attached a copy of the C&RR.

The Kotulo Tsatsi Energy PV3 project is not cancelled. The EIAR is currently available for your review.

Kind regards,



t: +27 (0)11 656 3237
f: +27 (0) 86 684 0547

Nicolene Venter

Public Participation and Social
Consultant

e: publicprocess@savannahsa.com
c: +27 (0)60 978 8396

SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015

Processing of personal information / POPIA compliance

We respect your privacy and acknowledge that this e-mail will contain Personal Information, which may belong to you, others and/or to your organization and which we will process. The processing of your personal information by Savannah Environmental may be included in reports submitted to governmental departments or on our public platforms, which processing will be done in accordance with our processing notice housed on our website - <https://savannahsa.com/privacy-policy-privacy-policy-page/>. By sending and/or receiving this message, you hereby consent to the lawful processing of personal information for the intended purposes, as described by the Protection of Personal Information Act, 2013 (Act No 4 of 2013).

This email has been scanned for viruses and malware, and automatically archived by **Mimecast SA (Pty) Ltd**, and is believed to be clean

From: Marc Caplan <remsmc@gmail.com>
Sent: Tuesday, April 11, 2023 9:56 AM
To: Savannah Public Process <publicprocess@savannahsa.com>
Subject: Re: SE3450: KOTULO TSATSI ENERGY PV3 AND ASSOCIATED INFRASTRUCTURE - Notification of Availability of the Environmental Impact Assessment Report for Review and Comment

Hello Nicolene,

The attached response from AEs was sent to your email on the 21st Nov 2022.

Looking at the Bid map is the project cancelled? As none of our queries were answered to this date.

Would your client respond to our pertinent questions and concerns?

regards
Marc

On Mon, 3 Apr 2023 at 16:05, Savannah Environmental Public Process <publicprocess@savannahsa.com> wrote:

**ENVIRONMENTAL IMPACT ASSESSMENT FOR THE KOTULO TSATSI ENERGY PV3 AND ASSOCIATED INFRASTRUCTURE,
NORTHERN CAPE PROVINCE
(DFFE Reference No.: 14/12/16/3/3/2/2223)**

Dear Stakeholder and Interested & Affected Party,

Kotulo Tsatsi Energy (Pty) Ltd, is proposing the construction of a photovoltaic (PV) solar energy facility (known as the Kotulo Tsatsi Energy PV3) located on a site located approximately 70km south-west of the town of Kenhardt and 60km north east of Brandvlei in the Northern Cape Province. The solar energy facility will comprise several arrays of PV panels and associated infrastructure and will have a contracted capacity of up to 480MW. The facility will be located within the farm Portion 2 of Farm Styns Vley 280. The PV facility is planned to be located within an area previously authorised for CSP project infrastructure, which is adjacent to the authorised Kotulo Tsatsi Energy PV1 and PV2 Facilities as well as the authorised CSP3 facility and associated infrastructure. The project site falls under the Hantam Local Municipality which is part of Namakwa District Municipality.

The PV infrastructure assessed in this application is in response to the Applicant's need to change the authorised generation technology for the facility located on the farm Portion 2 of Farm Styns Vley 280. That is, a technology change from the previously authorised CSP project infrastructure to PV project infrastructure. In this regard, the solar PV facility will be connected to the grid via a 132kV grid connection solution to the authorised 400kV collector substation located on Portion 2 of Farm Styns Vley 280, and will comprise on-site switching substations, facility substations and a 132kV power line within a 500m wide corridor.

AVAILABILITY OF THE ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR REVIEW AND COMMENT

The Environmental Impact Assessment Report for the Kotulo Tsatsi Energy PV3 Facility is available for a 30-day review and comment period from **04 April 2023** to **09 May 2023** and can be downloaded from our website [CLICK HERE](#).

Please do not hesitate to contact us should you require any additional information at this stage.

Kind regards,
[Unsubscribe this type of email](#)



t: 011 656 3237
f: 086 684 0547

Nicolene Venter
Public Process

e: publicprocess@savannahsa.com
c: +27 (0) 60 978 8396

SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015

--

M. Caplan

Agricultural Extension Services

Professional Natural Scientist (Ecologist)

Savannah Public Process

From: Savannah Public Process
Sent: Sunday, 07 May 2023 17:45
To: 'Marc Caplan'
Cc: Jo-Anne Thomas; Nkhensani Masondo
Subject: Kotulo Tsatsi Energy 3 - RE: Comment period extensio required
Attachments: SE3450-Kotulo Tsatsi PV3-CAPLAN Marc (Proof of Correspondence).pdf

Tracking:	Recipient	Delivery
	'Marc Caplan'	
	Jo-Anne Thomas	Delivered: 2023/05/07 17:45
	Nkhensani Masondo	Delivered: 2023/05/07 17:45

Dear Marc,

According to our records you have received the notification of the availability of the Environmental Impact Assessment (EIA) Report, to which you had send us a responding e-mail dated 11 April 2023 (please refer to proof of correspondence attached).

As a registered I&AP you was duly notified of the commencement of the review period and therefore your request for an extension of the review period cannot be granted.

Should we receive your written comments after the review period had ended, these will be provided to the Department of Forestry, Fisheries and the Environment (DFFE) as late comment.

Kind regards,



t: +27 (0)11 656 3237
f: +27 (0) 86 684 0547

Nicolene Venter

Public Participation and Social
Consultant

e: publicprocess@savannahsa.com
c: +27 (0)60 978 8396

SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015

Processing of personal Information / POPIA compliance

We respect your privacy and acknowledge that this e-mail will contain Personal Information, which may belong to you, others and/or to your organization and which we will process. The processing of your personal information by Savannah Environmental may be included in reports submitted to governmental departments or on our public platforms, which processing will be done in accordance with our processing notice housed on our website - <https://savannahsa.com/privacy-policy-privacy-policy-page/>. By sending and/or receiving this message, you hereby consent to the lawful processing of personal information for the intended purposes, as described by the Protection of Personal Information Act, 2013 (Act No 4 of 2013).

This email has been scanned for viruses and malware, and automatically archived by **Mimecast SA (Pty) Ltd**, and is believed to be clean

From: Marc Caplan <remsmc@gmail.com>
Sent: Friday, May 5, 2023 12:03 PM
To: Savannah Public Process <publicprocess@savannahsa.com>

Cc: Jo-Anne Thomas <joanne@savannahsa.com>

Subject: Comment period extensio required

Hello Nicoline, Jo Anne and company,

There must be a mistake with the dates of the comment period. As I've only received the email advising me of the comment period on the 4th May. So I expect another 30 days that gives AES until 3 June to respond to KTSE planned nuclear facility?

regards

Marc

On Thu, 4 May 2023 at 12:12, Savannah Environmental Public Process <publicprocess@savannahsa.com> wrote:

**ENVIRONMENTAL IMPACT ASSESSMENT FOR THE KOTULO TSATSI ENERGY PV3 AND ASSOCIATED INFRASTRUCTURE,
NORTHERN CAPE PROVINCE
(DFFE Reference No.: 14/12/16/3/3/2/2223)**

Dear Stakeholder and Interested & Affected Party,

The development of a solar photovoltaic (PV) facility with a generating capacity of up to 480MW and other associated infrastructure is proposed by Kotulo Tsatsi Energy (Pty) Ltd on a site located approximately 70km south-west of the town of Kenhardt in the Northern Cape Province. The solar PV development will be known as the Kotulo Tsatsi Energy PV3 Facility. The project is within the in the Namakwa District Municipality.

Kotulo Tsatsi Energy PV3 Facility is located on Portion 2 of Farm Styns Vley 280. The grid connection infrastructure will include an on-site facility substation and power line/s within a 500m wide corridor extending to the Eskom Aries Substation, located north-east of the site.

With reference to our letter dated 03 April 2023 in which we notified registered Interested and Affected Parties (I&APs) that the Environmental Impact Assessment (EIA) Report for the Kotulo Tsatsi Energy PV3 and Associated Infrastructure is available for review and comment from **04 April 2023** until **09 May 2023** has reference.

We would like to take this opportunity to thank those Stakeholders and I&APs who submitted their written comments on the EIA Report and we kindly urge those who have not yet submitted their written comments on the EIA Report to please do so before or on **Tuesday, 09 May 2023**.

The EIA Report can be downloaded from our website: [CLICK HERE](#).

Please do not hesitate to contact us should you require any additional information.

Kind regards,

[Unsubscribe this type of email](#)

savannah
environmental

t: 011 656 3237
f: 086 684 0547

Nicolene Venter
Public Process

e: publicprocess@savannahsa.com
c: +27 (0) 60 978 8396

SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015

|

--

M. Caplan

Agricultural Extension Services

Professional Natural Scientist (Ecologist)



Mvelaphande Trading
30 Blesbok Street
Fauna
BLOEMFONTEIN
9301

Enquiries: Mantwa Gabaitumele
Telephone: 0825216813

E-mail: GabaiMA2@telkom.co.za

Our reference: **CKEN0229-23**

Your reference: SE3450 KOTULO TSATSI ENERGY PV3

26 April 2023

SAVANNAH ENVIRONMENTAL

FOR ATTENTION: NICOLENE VENTER

ENVIRONMENTAL IMPACT ASSESSMENT FOR THE KOTULO TSATSI ENERGY PV3 AND ASSOCIATED INFRASTRURE, NORTHERN CAPE PROVINCE

With reference to your letter dated 14 April 2023.

With reference to your above-mentioned application, I hereby inform you that our Client (OPENSERVE) approves the proposed work indicated on your drawings in terms Section 29 of the Electronic Communications Act 36 of 2005 as amended.

Any changes/deviations from the original planning during or prior to construction must immediately be communicated to this office.

Our Client (OPENSERVE)'s infrastructure is affected by this proposal and the routes are marked in PINK on attached sketch as accurately as possible. **We did our utmost to ensure that we indicate our route as accurate as possible and should you discover any of our cables that are not on the sketch please stop and contact us immediately to arrange a site meeting. Please make use of pilot holes in order not to damage our infrastructure.** Therefore, any damages occurred during construction of work will be repaired at the customer's account. Consequently, the following conditions apply:

Aerial Plant - At points of crossing, the overhead power lines should cross above the communications lines in accordance with and clearances stipulated in the Occupational Health and safety Act no 85 of 1993, Machinery regulations 20 – Crossings, and Electrical Machinery Regulations 15 – Clearance of Power Lines. If the specifications could not be met, all deviation costs will be for the applicant's account. We also refer to section 25 of Electronic Communication Act 36 of 2005.

At points of crossing, the overhead power line should cross over the overhead communication lines with a minimum vertical separation of **0.8** meters.

Suitable protection as laid down in section 5 of the Code of Practice should be provided at all important crossings.

The crossing of supply lines or overhead service mains directly above or adjacent to communication poles must be avoided if possible. If not clearance of **3** meters must be provided.

In order to minimize noise induction into the telecommunication systems, the angle of crossing between the overhead power line and all communication lines, should be as near to a right angle as possible – the following deviation from the right angle being permitted at:

- Power voltage of 48 kV and higher - 30 degrees
- Power voltage of lower than 48 kV - 45 degrees
-SWER must be as near as 90 degrees as possible

Approved on condition that, should it later be found necessary to deviate the existing communication line due to existing noise interference or any other reason whatsoever, the cost of such remedial action shall be repayable.

Paragraph 2.4.1 of the Code of Practice stipulates the minimum acceptable horizontal separation between power and the communication lines and where this cannot be met, the design of the power line is also stipulated. This could apply between the attached plans and these requirements should strictly be adhered to.

In cases where an underground power cable will run parallel with an existing underground communication cable, a separation as great as possible should be maintained with a minimum separation of 600mm. should the separation be less than 600mm and the power cable are not enclosed in a suitable pipe, a concrete slab must be provided immediately above the power cable for the length of parallelism. If the separation is less than 300mm, additional protection is required by placing concrete slabs between our Client (OPENSERVE) cables/pipes and the power cables.

Underground Crossings - At the points where our Client (OPENSERVE)'s existing underground communication cable will be crossed by an underground cable; the latter should be laid a depth of at least 300mm below the communication cable – normally laid at a depth of 600mm. If the power cable is not enclosed in a suitable pipe, protection in the form of a concrete slab should be provided immediately above the power cable for a minimum of 2 (Two) metres on either side of crossing.

Calculations have shown that an earth fault on the high voltage Power lines will induce excessive low frequency induction into the Communication lines. As a result of this, the cost to deviate / alter the communication lines to prevent this induction will be for the power provider.

Relocations of our Client (OPENSERVE) plant will be done at customer's request and will be a repayable project.

Please notify the office within 21 working days from date of this letter of acceptance and if any alternative proposal is available of if a recoverable work should commence, the liaison officer is **Mantwa Gabaitumele** at tel. no. **0825216813**.

As important cables are affected, **Mr Vivian Groenewald must be contacted at 054 338 6501 /081 362 6738, (2) two weeks' prior of commencement on construction work. It would be appreciated if this office can be notified within 30 days on completion of construction work.** Confirmation is required on completion of construction as per agreed requirements.

On completion of this project please certify that all requirements as stipulated in this letter have been met. Please note that should any of our Client (OPENSERVE) infrastructure has to be relocated or altered as a result of your activities the cost for such alterations or relocations will be for your account in terms of section 25 of the Electronic Communications Act.

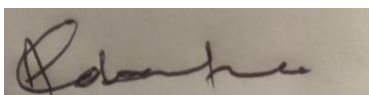
This approval is valid for 6 months only, after which re-application must be made if the work has not been completed.

Should our Client (OPENSERVE) infrastructure be damaged while work is undertaken, kindly call the Toll-free number **0800203951** immediately

All of our Client (OPENSERVE) rights remain reserved.

Mr Vivian Groenewald must be contacted at 054 338 6501 /081 362 6738, Two weeks before any commencement of proposed work.

Yours faithfully



MANTWA GABAITUMELE

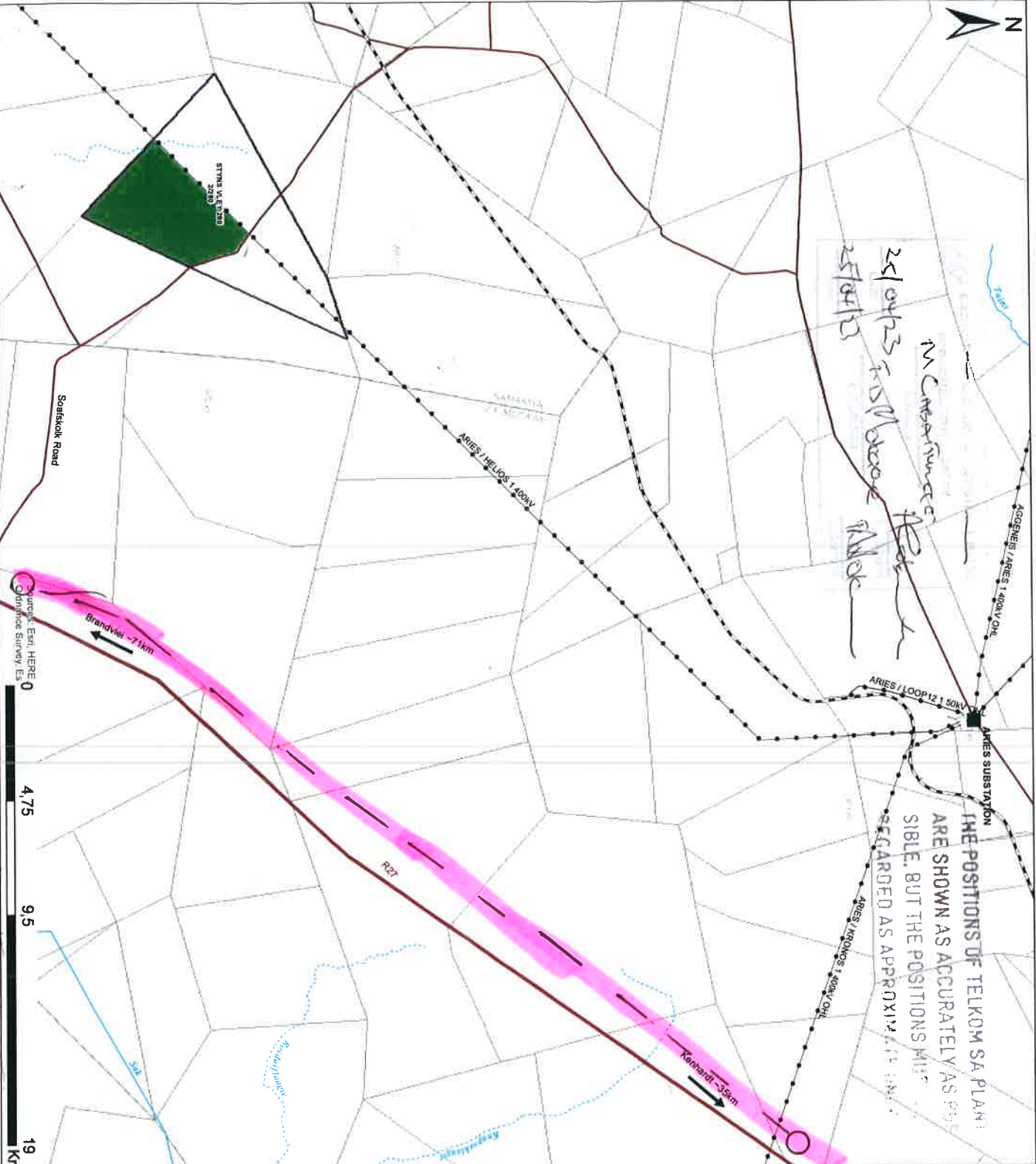
CKB10229-23

Kotulo Tsatsi Energy PV3, Northern Cape

Locality Map

THE POSITIONS OF TELKOM SA PLANT ARE SHOWN AS APPROXIMATELY AS POSSIBLE, BUT THE POSITIONS MUST BE REGARDED AS APPROXIMATE ONLY.

Handwritten notes:
 25/04/23
 25/04/23
 25/04/23
 M. C. ...
 ...
 ...



Legend

- Eskom substation
 - Existing Power Line
 - Railway
 - Regional road
 - Main road
 - Perennial river
 - Non-perennial river
 - Farm portions
 - Project Site
 - Development Area
- Handwritten notes:
 ORANGE VERBOD
 VERTICALE
 OORHEGSE
 ARBEI
 POLE

Scale: 1:155,000
 Projection: WGS, 1984
 Map Ref: Kotulo Tsatsi Energy PV3 - Locality

savannah
 ENVIRONMENTAL



Savannah Public Process

From: Carlo Herselman [MTN South Africa] <Carlo.Herselman@mtn.com>
Sent: Thursday, 04 May 2023 10:38
To: Shaun Hendricks [MTN South Africa]; Kelvin Durrheim [MTN South Africa]; Savannah Public Process; Morne Van Der Westhuizen [MTN South Africa]
Subject: RE: SE3197: KLEINZEE SOLAR PV FACILITY AND DAISY SOLAR PV FACILITY - Notification of Basic Assessment Reports and Availability for Review and Comments
Attachments: SE3197-Kleinzee&Daisy_BAR_Notification-FINAL.pdf

Good morning,

No objections from a radio perspective.

[@Morne Van Der Westhuizen \[MTN South Africa \]](#)

Any concerns from a TX point of view?



Warm regards,
Carlo Herselman
Team Leader - Radio Planning and Quality
C: +27 83 212 5799
Carlo.Herselman@mtn.com | www.mtn.co.za

From: Shaun Hendricks [MTN South Africa] <Shaun.Hendricks@mtn.com>
Sent: Thursday, May 4, 2023 9:59 AM
To: Kelvin Durrheim [MTN South Africa] <Kelvin.Durrheim@mtn.com>; Savannah Environmental Public Process <publicprocess@savannahsa.com>; Carlo Herselman [MTN South Africa] <Carlo.Herselman@mtn.com>
Subject: RE: SE3197: KLEINZEE SOLAR PV FACILITY AND DAISY SOLAR PV FACILITY - Notification of Basic Assessment Reports and Availability for Review and Comments

Hi [@Carlo Herselman \[MTN South Africa \]](#)

Can you please revert.

Thanks Kelvin



Warm regards,
Shaun Hendricks
Manager - Radio Planning and Quality
C: +27 83 214 0733
Shaun.Hendricks@mtn.com | www.mtn.co.za

This email is confidential. If you have received it in error, you are on notice of its status. Please notify us immediately by reply email and then delete this message from your system. Please do not copy it or use it for any purpose, disclose its contents to any other person as to do so could be a breach of confidentiality. Thank you for your cooperation.

From: Kelvin Durrheim [MTN South Africa] <Kelvin.Durrheim@mtn.com>
Sent: Wednesday, 03 May 2023 18:35
To: Savannah Environmental Public Process <publicprocess@savannahsa.com>; Shaun Hendricks [MTN South Africa] <Shaun.Hendricks@mtn.com>
Subject: RE: SE3197: KLEINZEE SOLAR PV FACILITY AND DAISY SOLAR PV FACILITY - Notification of Basic Assessment Reports and Availability for Review and Comments

Hi Shaun

This project is in your region.



Warm regards,
Kelvin Durrheim
Team Leader - Radio Planning and Quality
C: +27 83 212 2999
Kelvin.Durrheim@mtn.com | www.mtn.co.za

This email is confidential. If you have received it in error, you are on notice of its status. Please notify us immediately by reply email and then delete this message from your system. Please do not copy it or use it for any purpose, disclose its contents to any other person as to do so could be a breach of confidentiality. Thank you for your cooperation.

From: Savannah Environmental Public Process <publicprocess@savannahsa.com>
Sent: Wednesday, 03 May 2023 17:44
To: Kelvin Durrheim [MTN South Africa] <Kelvin.Durrheim@mtn.com>
Subject: SE3197: KLEINZEE SOLAR PV FACILITY AND DAISY SOLAR PV FACILITY - Notification of Basic Assessment Reports and Availability for Review and Comments

You don't often get email from publicprocess@savannahsa.com. [Learn why this is important](#)

CAUTION: This email originated from outside of the MTN organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

**KLEINZEE SOLAR PV FACILITY AND DAISY SOLAR PV FACILITY, NORTHERN CAPE PROVINCE
(DFFE Ref. Nos.: To be Issued)**

Dear Stakeholder and Interested & Affected Party,

Energy Team (Pty) Ltd proposes the development of two (2) separate solar photovoltaic (PV) facilities ~20km west of the town of Komaggas, and 24km southeast of Kleinsee, within the Springbok Renewable REDZ and within the Northern Corridor of the Strategic Transmission Corridors. These projects are located in the Nama Khoi Local Municipality within the Namakwa District Municipality, Northern Cape.

Our letter and e-mail dated 19 January 2023 in which you were informed of the commencement of the Basic Assessment and Public Participation Process has reference.

Please find attached the notification letter providing information regarding the Basic Assessment (BA) Reports for the Kleinzee Solar PV Facility and Daisy Solar PV Facility, and the availability for review and comment.

Kind regards,

[Unsubscribe this type of email](#)



t: 011 656 3237

f: 086 684 0547

Nicolene Venter

Public Process

e: publicprocess@savannahsa.com

c: +27 (0) 60 978 8396

SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015

Sensitivity: MTN Internal

Sensitivity: MTN Internal

Sensitivity: MTN Internal

Savannah Public Process

From: Morne Van Der Westhuizen [MTN South Africa]
<Morne.VanDerWesthuizen@mtn.com>
Sent: Thursday, 04 May 2023 10:50
To: Carlo Herselman [MTN South Africa]; Shaun Hendricks [MTN South Africa]; Kelvin Durrheim [MTN South Africa]; Savannah Public Process
Subject: RE: SE3197: KLEINZEE SOLAR PV FACILITY AND DAISY SOLAR PV FACILITY - Notification of Basic Assessment Reports and Availability for Review and Comments

Hi

No objection from TXM either.

Ta



Warm regards,
Morne Van Der Westhuizen
Specialist - Transmission Planning
C: +27 83 200 2653
Morne.VanDerWesthuizen@mtn.com | www.mtn.co.za

This email is confidential. If you have received it in error, you are on notice of its status. Please notify us immediately by reply email and then delete this message from your system. Please do not copy it or use it for any purpose, disclose its contents to any other person as to do so could be a breach of confidentiality. Thank you for your cooperation.

From: Carlo Herselman [MTN South Africa] <Carlo.Herselman@mtn.com>
Sent: Thursday, May 4, 2023 10:38 AM
To: Shaun Hendricks [MTN South Africa] <Shaun.Hendricks@mtn.com>; Kelvin Durrheim [MTN South Africa] <Kelvin.Durrheim@mtn.com>; Savannah Environmental Public Process <publicprocess@savannahsa.com>; Morne Van Der Westhuizen [MTN South Africa] <Morne.VanDerWesthuizen@mtn.com>
Subject: RE: SE3197: KLEINZEE SOLAR PV FACILITY AND DAISY SOLAR PV FACILITY - Notification of Basic Assessment Reports and Availability for Review and Comments

Good morning,

No objections from a radio perspective.

[@Morne Van Der Westhuizen \[MTN South Africa \]](#)

Any concerns from a TX point of view?

Warm regards,



Carlo Herselman
Team Leader - Radio Planning and Quality
C: +27 83 212 5799
Carlo.Herselman@mtn.com | www.mtn.co.za

From: Shaun Hendricks [MTN South Africa] <Shaun.Hendricks@mtn.com>
Sent: Thursday, May 4, 2023 9:59 AM
To: Kelvin Durrheim [MTN South Africa] <Kelvin.Durrheim@mtn.com>; Savannah Environmental Public Process <publicprocess@savannahsa.com>; Carlo Herselman [MTN South Africa] <Carlo.Herselman@mtn.com>
Subject: RE: SE3197: KLEINZEE SOLAR PV FACILITY AND DAISY SOLAR PV FACILITY - Notification of Basic Assessment Reports and Availability for Review and Comments

Hi [@Carlo Herselman \[MTN South Africa \]](#)

Can you please revert.

Thanks Kelvin



Warm regards,
Shaun Hendricks
Manager - Radio Planning and Quality
C: +27 83 214 0733
Shaun.Hendricks@mtn.com | www.mtn.co.za

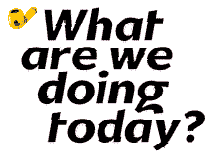
This email is confidential. If you have received it in error, you are on notice of its status. Please notify us immediately by reply email and then delete this message from your system. Please do not copy it or use it for any purpose, disclose its contents to any other person as to do so could be a breach of confidentiality. Thank you for your cooperation.

From: Kelvin Durrheim [MTN South Africa] <Kelvin.Durrheim@mtn.com>
Sent: Wednesday, 03 May 2023 18:35
To: Savannah Environmental Public Process <publicprocess@savannahsa.com>; Shaun Hendricks [MTN South Africa] <Shaun.Hendricks@mtn.com>
Subject: RE: SE3197: KLEINZEE SOLAR PV FACILITY AND DAISY SOLAR PV FACILITY - Notification of Basic Assessment Reports and Availability for Review and Comments

Hi Shaun

This project is in your region.

Warm regards,
Kelvin Durrheim
Team Leader - Radio Planning and Quality
C: +27 83 212 2999



This email is confidential. If you have received it in error, you are on notice of its status. Please notify us immediately by reply email and then delete this message from your system. Please do not copy it or use it for any purpose, disclose its contents to any other person as to do so could be a breach of confidentiality. Thank you for your cooperation.

From: Savannah Environmental Public Process <publicprocess@savannahsa.com>

Sent: Wednesday, 03 May 2023 17:44

To: Kelvin Durrheim [MTN South Africa] <Kelvin.Durrheim@mtn.com>

Subject: SE3197: KLEINZEE SOLAR PV FACILITY AND DAISY SOLAR PV FACILITY - Notification of Basic Assessment Reports and Availability for Review and Comments

You don't often get email from publicprocess@savannahsa.com. [Learn why this is important](#)

CAUTION: This email originated from outside of the MTN organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

**KLEINZEE SOLAR PV FACILITY AND DAISY SOLAR PV FACILITY, NORTHERN CAPE PROVINCE
(DFFE Ref. Nos.: To be Issued)**

Dear Stakeholder and Interested & Affected Party,

Energy Team (Pty) Ltd proposes the development of two (2) separate solar photovoltaic (PV) facilities ~20km west of the town of Komaggas, and 24km southeast of Kleinsee, within the Springbok Renewable REDZ and within the Northern Corridor of the Strategic Transmission Corridors. These projects are located in the Nama Khoi Local Municipality within the Namakwa District Municipality, Northern Cape.

Our letter and e-mail dated 19 January 2023 in which you were informed of the commencement of the Basic Assessment and Public Participation Process has reference.

Please find attached the notification letter providing information regarding the Basic Assessment (BA) Reports for the Kleinzee Solar PV Facility and Daisy Solar PV Facility, and the availability for review and comment.

Kind regards,

[Unsubscribe this type of email](#)



t: 011 656 3237
f: 086 684 0547

Nicolene Venter
Public Process

e: publicprocess@savannahsa.com
c: +27 (0) 60 978 8396

Sensitivity: MTN Internal

Sensitivity: MTN Internal

Sensitivity: MTN Internal

Sensitivity: MTN Internal



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X 447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, Tel: +27 12 399 9000, Fax: +27 86 625 1042

Reference: Kotulo Tsatsi Energy PV3

Enquiries: Ms. Portia Makitla/ Ms. Mashudu Mudau

Telephone: 012 399 9411 **E-mail:** pmakitla@dffe.gov.za

Ms. Nicolene Venter
Savannah Environmental
1st Floor, Block 2, 5 Woodlands Drive Office Park
Cnr of Woodlands Drive & Western Service Road
WOODMEAD
2191

Telephone Number: (+27) 11 656 3237
Email Address: publicprocess@savannahsa.com

PER E-MAIL

Dear MS. Venter

COMMENTS ON THE DRAFT SCOPING REPORT OF THE PROPOSED KOTULO TSATSI ENERGY PV3 AND ASSOCIATED INFRASTRUCTURE, NORTHERN CAPE PROVINCE

The Directorate: Biodiversity Conservation has reviewed and evaluated the reports.

Based on the information provided in the report, most of the site is considered to be of low sensitivity due to the lower abundance of protected species and dominance of vegetation which is generally an indicator of poor veld condition. However, it has been noted that during the study site assessment, the northern portion of the development area has been demarcated as Critical Biodiversity Area:1, and several species of concern have been recorded for both floral, fauna, and protected forest. It is recommended that these areas must be treated as No-go areas.

Furthermore, to minimize possible loss to biodiversity the following recommendation amongst others must be adhered to:

- Vegetation clearing prior and during construction must be limited to the footprint of the proposed development
- A map combining the final layout map superimposed (overlain) on the environmental sensitivity map. This map must reflect the proposed infrastructure's location (e.g., BESS).
- The 'no-go' areas of the development property must be clearly demarcated and must be excluded from the final layout plan.
- Where possible proposed infrastructure must be aligned to the existing development i.e., roads
- Anti-collision devices such as bird flappers must be installed where power lines cross avifaunal corridors (e.g., grasslands, rivers, wetlands, and dams)
- 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



Batho pele- putting people first

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED DROOGFONTEIN 4 SOLAR AND BATTERY STORAGE ENERGY FACILITY, NEAR KIMBERLEY, NORTHERN CAPE PROVINCE

- 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
- 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
- Rehabilitation Plan must include the ongoing monitoring and maintenance of the surrounding natural vegetation
- 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.

In addition, please note that the Directorate Biodiversity Conservation does not support any development within a very highly sensitive area that will result with significant negative residual impacts after mitigation.

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.

Yours faithfully



Mr Seoka Lekota
Control Biodiversity Officer Grade B: Biodiversity Conservation
Department of Forestry, Fisheries & the Environment
Date: 01/12/2022





forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X 447· PRETORIA 0001· Environment House 473 Steve Biko Road, Arcadia· PRETORIA

DFFE Reference: 14/12/16/3/3/2/2223

Enquiries: Azrah Essop

Telephone: (012) 310 8529 **E-mail:** AEssop@dffe.gov.za

Ms Nkhensani Masondo
Savannah Environmental (Pty) Ltd
P.O. Box 148
SUNNINGHILL
2191

Telephone Number: 011 656 3237
Email Address: nkhensani@savannahsa.com

PER E-MAIL / MAIL

Dear Ms Masondo

ACCEPTANCE OF THE SCOPING REPORT FOR THE PROPOSED KOTULO TSATSI ENERGY PV3 FACILITY IN THE NAMAKWA DISTRICT MUNICIPALITY, NORTHERN CAPE PROVINCE

The final Scoping Report (FSR) and the Plan of Study for Environmental Impact Assessment (PoSEIA) dated December 2022 and received by the Department on 1 December 2022, refer.

The Department has evaluated the submitted FSR and the PoSEIA dated December 2022 and is satisfied that the documents comply with the minimum requirements of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended. The FSR and the PoSEIA is hereby accepted by the Department in terms of Regulation 22(1)(a) of the EIA Regulations, 2014, as amended.

You may proceed with the environmental impact assessment process in accordance with the tasks contemplated in the PoSEIA as required in terms of the EIA Regulations, 2014, as amended.

In addition, the following amendments and additional information are required for the Environmental Impact Assessment Report (EIAR):

1. Listed Activities

- a) The EIAR must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for.
- b) The listed activities represented in the EIAR and the application form must be the same and correct.
- c) The EIAR must assess the correct sub-listed activity for each listed activity applied for. The onus is on the EAP and applicant to ensure that no other activities are triggered, and the correct activities are applied for.

wk

2. **Public Participation**

- a) Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAR.
- b) Please ensure that all issues raised and comments received during the circulation of the FSR and draft EIAR from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final EIAR. Proof of correspondence with the various stakeholders must be included in the final EIAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.
- c) A Comments and Response trail report (C&R) must be submitted with the final EIAR. The C&R report must incorporate all comments for this development. The C&R report must be a separate document from the main report and the format must be in the table format as indicated in Appendix 1 of this comments letter in chronological order. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as “noted” is not regarded as an adequate response to I&AP’s comments.
- d) Comments from I&APs must not be split and arranged into categories. Comments from each submission must be responded to individually.
- e) The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations, 2014, as amended.

3. **Layout & Sensitivity Maps**

- a) The EIAR must provide the following:
 - Clear indication of the envisioned area for the solar PV facility, i.e., location of solar PV, Battery Energy Storage System (BESS); powerlines, supporting Infrastructure: main sub-station, operation and maintenance office, weather station, internal roads, parking, offices, staff ablutions and all associated infrastructure should be mapped at an appropriate scale.
 - Clear description of all associated infrastructure. This description must include, but is not limited to the following:
 - Powerlines;
 - Internal roads infrastructure; and;
 - All supporting onsite infrastructure such as laydown area, guard house and control room etc.
- b) An environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process.
- c) A map combining the final layout map superimposed (overlain) on the environmental sensitivity map.

4. **Specialist assessments**

- a) The EAP must ensure that the terms of reference for all the identified specialist studies must include the following:
 - A detailed description of the study’s methodology; indication of the locations and descriptions of the development footprint, and all other associated infrastructures that they have assessed and are recommending for authorisations.
 - Provide a detailed description of all limitations to the studies. All specialist studies must be conducted in the right season and providing that as a limitation will not be allowed.

wh

- Please note that the Department considers a 'no-go' area, as an area where no development of any infrastructure is allowed; therefore, no development of associated infrastructure including access roads is allowed in the 'no-go' areas.
 - Should the specialist definition of 'no-go' area differ from the Departments definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable.
 - All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA.
 - Should a specialist recommend specific mitigation measures, these must be clearly indicated.
 - 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.
- b) 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 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.
- c) The screening tool output:
- The screening tool and the gazetted protocols (GN R320 of 20 March 2020 and GN R 1150 of 30 October 2020) require a site sensitivity verification to be completed to either confirm or dispute the findings and sensitivity ratings of the screening tool.
 - It is the responsibility of the EAP to confirm the list of specialist assessments and to motivate in the assessment report, the reason for not including any of the identified specialist studies including the provision of photographic evidence of the site situation. The site sensitivity verification for each of the recommended studies, as per the protocols, must be compiled and attached.
- d) Additionally, the protocols specify that an assessment must be prepared by a specialist who is an expert in the field and is SACNASP registered for e.g. an aquatic assessment must be prepared by a specialist registered with SACNASP, with expertise in the field of aquatic sciences.
- e) 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.
- f) Please include a table that shows the proposed studies and the relevant specialists carrying out the study. In addition, a summary should be included of the specialist's recommendations in terms of the alternatives that are preferred based on the findings of their study.

General

Kindly expand on the applicant's intention with the existing EA for Kotulo Tsatsi CPS 2 i.e. (DFFE Ref.: 14/12/16/3/3/2/694/2). The status of this EA must be taken into consideration and must be demonstrated to this Department whether the applicant intends to lapse this EA.

wh

The applicant is hereby reminded to comply with the requirements of Regulation 45 of GN R982 of 04 December 2014, as amendment, regarding the time allowed for complying with the requirements of the Regulations.

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.

Yours faithfully



Mr Vusi Skosana
Acting Chief Director: Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment
Signed by: Mr Wayne Hector
Designation: Deputy Director: Priority Infrastructure Projects
Date: 23/01/23

cc:	Adriaan Botha	Kotulo Tsatsi Energy (Pty) Ltd	Email: AttieBotha@KotuloTsatsiEnergy.com
	Bryan Fisher	Northern Cape: DENC	Email: Bfisher@ncpg.gov.za
	Jl Swartz	Hantam Local Municipality	Email: Jiswartz@hantam.gov.za

Annexure 1

Format for Comments and Response Trail Report:

Date of comment, format of comment name of organisation/I&AP	Comment	Response from EAP/Applicant/Specialist
27/01/2016 Email Department of Environment, Forestry and Fisheries: Priority Infrastructure Projects (John Doe)	Please record C&R trail report in this format Please update the contact details of the provincial environmental authority	EAP: (Noted) The C&R trail report has been updated into the desired format, see Appendix K EAP: Details of provincial authority have been updated, see page 16 of the Application form

Annexure 2: Sample of minimum technical details for the proposed facility

Component	Description / dimensions
Area occupied by inverter / transformer stations / substations	
Capacity of on-site substation	
PV array	
Area occupied by both permanent and construction laydown areas	
Area occupied by buildings	
Length of internal roads	
Width of internal roads	
Proximity to grid connection	
Height of fencing	

SCOPING PHASE

Organs of State



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X 447· PRETORIA 0001· Environment House 473 Steve Biko Road, Arcadia,· PRETORIA

DFFE Reference: 14/12/16/3/3/2/2223

Enquiries: Ms Azrah Essop

Telephone: (012) 399 8529 **E-mail:** AEssop@dfffe.gov.za

Ms Nkhensani Masondo
Savannah Environmental (Pty) Ltd
PO Box 148
SUNNINGHILL
2191

Telephone Number: (011) 656 3237
Email Address: nkhensani@savannahsa.com; /
karen@savannahsa.com

PER MAIL / E-MAIL

Dear Ms Masondo

COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED KOTULO TSATSI ENERGY PV3 FACILITY, BESS AND ASSOCIATED INFRASTRUCTURE, NEAR KENHARDT, NORTHERN CAPE PROVINCE

The Application for Environmental Authorisation and Draft Scoping Report (SR) dated October 2022 and received by the Department on 17 October 2022, refer.

This letter serves to inform you that the following information must be included to the final SR:

1. Competent Authority

Clarify the reason for this department being the competent authority in terms of S24C of NEMA. This must be expanded on and updated in the application form as well as the report.

2. Listed Activities

- a) It is noted that the proposed solar facility does not fall within any renewable energy development zones.
- b) Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure (including thresholds) as described in the project description. Only activities (and sub-activities) applicable to the development must be applied for and assessed.
- c) Please include the capacity of the proposed onsite substation and powerline(s) in the project description under Activity 11 LN1.
- d) It is imperative that the relevant authorities are continuously involved throughout the environmental impact assessment process, as the development property possibly falls within geographically designated areas in terms of Listing Notice 3 Activities. Written comments must be obtained from the relevant authorities (or proof of consultation if no comments were received) and

WA

submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided.

- e) If the activities applied for in the application form differ from those mentioned in the final SR, 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>,

3. **Layout & Sensitivity Maps**

- a) Please provide a layout map which indicates the following:
- the PV development area;
 - Position of all infrastructure e.g. panels, BESS, substations, grid connection etc.;
 - Permanent laydown area footprint;
 - All supporting onsite infrastructure e.g. roads (existing and proposed);
 - Substation(s) and/or transformer(s) sites including their entire footprint;
 - Connection routes (including pylon positions) to the distribution/transmission network; and
 - All existing infrastructure on the site.
 - The location of sensitive environmental features on site e.g., CBAs, heritage sites, wetlands, drainage lines etc. that will be affected;
 - Buffer areas; and
 - All "no-go" areas.
- b) The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments and existing grid infrastructure. All available biodiversity information must be used in the finalisation of the map and infrastructure must not encroach on highly sensitive areas as far as possible.
- c) Ensure that similar colours are not used to differentiate between infrastructure. i.e. items must be easily distinguishable in the Legend.
- d) Google maps will not be accepted for decision-making purposes.

4. **Project Overview:**

- a) It is mentioned on page 4, that '*The development area was previously authorised for the development of Concentrated Solar Power (CSP) technology (DEFF Ref: 14/12/16/3/3/2/694/2), known as Kotulo Tsatsi Concentrated Solar Plant 2. However, this project is no longer being considered for the site as the development of CSP no longer forms part of the energy mix of the Country as indicated in the IRP.*' The proposed development lies within an area previously authorised for CSP project infrastructure, kindly provide further information where possible in this regard.
- b) Kindly clarify whether the grid connection is part of this application or whether existing infrastructure will be utilised. Section 8.2. states that the grid will not be reassessed, however, it is included in project infrastructure and the listed activities.

5. **Public Participation Process**

- a) Please ensure that all issues raised, and comments received on the draft SR from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section: BCAdmin@dffe.gov.za) in respect of the proposed activity are adequately addressed in the final SR. Proof of correspondence with the various stakeholders must be included in the final SR. Should you be unable to obtain comments, proof must be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process (PPP) must be

wh

conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.

- b) A comments and response trail report (C&R) must be submitted with the final SR. The C&R report must incorporate all historical comments (pre and post submission of the draft SR) for this development. The C&R report must be a separate document from the main report and the format must be in the table format which reflects the details of the I&APs and date of comments received, actual comments received, and response provided. Please ensure that comments made by I&APs are comprehensively captured (copy verbatim if required) and responded to clearly and fully. Please note that a response such as "Noted" is not regarded as an adequate response to I&AP's comments.

6. Specialist Assessments to be conducted in the EIA Phase

- a) It is noted, under section 8.2. that the applicant intends to utilise previous specialist information conducted through the assessment for Kotulo Tsatsi CSP2. It is acceptable to use this information as a basis point for current specialist assessments, however, specialist assessments produced for Kotulo Tsatsi PV3 must be specific to the current project. Specialist studies must not be older than 5 years for you to use it for the current project.
- b) Specialist studies to be conducted must provide a detailed description of their methodology, as well as indicate the locations and descriptions of PV arrays, and all other associated infrastructures that they have assessed and are recommending for authorisations.
- c) 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.
- d) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expertise advice.
- e) 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 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.** Please note further that the protocols require the specialists' to be registered with SACNASP in their respective field.
- f) Additionally, the protocols specify that an assessment must be prepared by a specialist who is an expert in the field and is SACNASP registered for e.g. an aquatic assessment must be prepared by a specialist registered with SACNASP, with expertise in the field of aquatic sciences.
- g) The screening tool output:
- The screening tool and the gazetted protocols (GN R320 of 20 March 2020 and GN R 1150 of 30 October 2020) require a site sensitivity verification to be completed to either confirm or dispute the findings and sensitivity ratings of the screening tool.
 - Site sensitivity verifications for all the identified specialist studies (according to the screening tool) must be provided.
 - The screening tool (Application form) identifies thirteen (13) Specialist reports. It is the responsibility of the EAP to confirm this list and to motivate in the assessment report, the reason for not including any of the identified specialist study including the provision of photographic evidence of the site situation. The site sensitivity verification for each of the recommended studies, as per the protocols, must be compiled and attached. If the findings of

the site verification differed from the screening tool and was found to be of a different sensitivity level, then a compliance statement would be acceptable.

- Please include a table in the report, summarising the specialist studies required by the Department's Screening Tool, a column indicating whether these studies were conducted or not, and a column with motivation for any studies not conducted. Please note that if any of the specialists' studies and requirements/protocols recommended in the Department's Screening Tool are not commissioned, motivation for such must be provided in the report per the requirements of the Protocols.
- h) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expert advice.

7. Cumulative Assessment to be conducted in the EIA Phase

It is noted that the PV facility is planned adjacent to the authorised Kotulo Tsatsi Energy PV 1 and PV2 and occurs within an area previously authorised for CSP project infrastructure. Kindly ensure to expand on this in the scoping and EIA reports.

8. Environmental Management Programme

The EMP must include the following:

- a) It is drawn to your attention that for substation and overhead electricity transmission and distribution infrastructure, when such facilities trigger activity 11 or 47 of the Environmental Impact Assessment Regulations Listing Notice 1 of 2014, as amended, and any other listed and specified activities necessary for the realisation of such facilities, the Generic Environmental Management Programme, must be used and submitted with the final report over and above the EMP for the facility i.e. separate EMP for the substation, powerline and the facility.
- b) Further to the above, you are required to comply with the content of the EMP in terms of Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended.

General

You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that:

"If S&EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a SR which has 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"

You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of SRs in accordance with Appendix 2 and Regulation 21(1) of the NEMA EIA Regulations 2014, as amended.

Further note that in terms of Regulation 45 of the EIA Regulations 2014, as amended, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).

wh

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.

Yours sincerely



Ms Milicent Solomons
Acting Chief Director: Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment
Letter signed by: Mr Wayne Hector
Designation: Deputy Director: Priority Infrastructure Projects
Date: 02/11/22

cc:	Adriaan Botha	Kotulo Tsatsi Energy (Pty) Ltd	Email: AttieBotha@KotuloTsatsiEnergy.com
	Bryan Fisher	Northern Cape: DENC	Email: Bfisher@ncpg.gov.za
	Jl Swartz	Hantam Local Municipality	Email: Jiswartz@hantam.gov.za



Mvelaphande Trading
P/A C Schutte
3 La Motte Street
Bayswater
Bloemfontein
9301

Enquiries: Chris Schutte
Telephone: 078 741 5862
E-mail: Schutce5@telkom.co.za

Our Ref no: CKEN0632-22

Your Ref: **Kotulo Tsatsi Energy Grid Connection Corridor**

26 October 2022

Savannah Environmentals
P.O. Box 148
Sunninghill
2157

FOR ATTENTION: Nicolene Venter

ENVIRONMENTAL IMPACT ASSESSMENT FOR THE KOTULO TSATSI ENERGY PV3 AND ASSOCIATED INFRASTRUCTURE, NORTHERN CAPE PROVINCE

With reference to your above- mentioned application, I hereby confirm that the proposed work installation is approved in terms of Section 29 of the Electronic Communications Act No. 36 of 2005 as amended.

No infrastructure of our Client (Openserve) will be affected by this proposal. **We did our utmost to ensure that we indicate our route as accurate as possible and should you discover any of our cables that is not on the sketch please stop and contact us immediately to arrange a site meeting. In the event that our cables are exposed and damaged/stolen by a third party the damages will be repaired at the customer's account. Please make use of pilot holes in order not too damage our infrastructure.** Therefore any damages occurred during construction of work will be repaired at the customer's account.

Although we are not affected by this proposal, Mr Vivian Groenewald must be contacted at telephone number 081 362 6738 from our Network Field Services. Two (2) weeks prior to commencement of proposed work.

Approval of the proposed route is valid for six months. If construction has not yet commenced within this period, then the file must be resubmitted for approval.

Any changes/deviations from the original planning during or prior to construction must immediately be communicated to this office.

On completion of this project, please certify that all requirements as stipulated in this letter have been met. Please note that should any of our Client (Openserve) infrastructure has to be

relocated or altered as a result of your activities the cost for such alteration or relocation will be for your account in terms of section 25 of the Electronic Communication Act.

Mr Vivian Groenewald must be contacted at telephone number 081 362 6738. Two (2) weeks prior to commencement of proposed work. It's important that all services are shown on site before construction starts.

Approval of the proposed route is valid for six months. If construction has not yet commenced within this period, then the file must be resubmitted for approval. Any changes / deviations from the original planning during or prior to construction must immediately be communicated to this office.

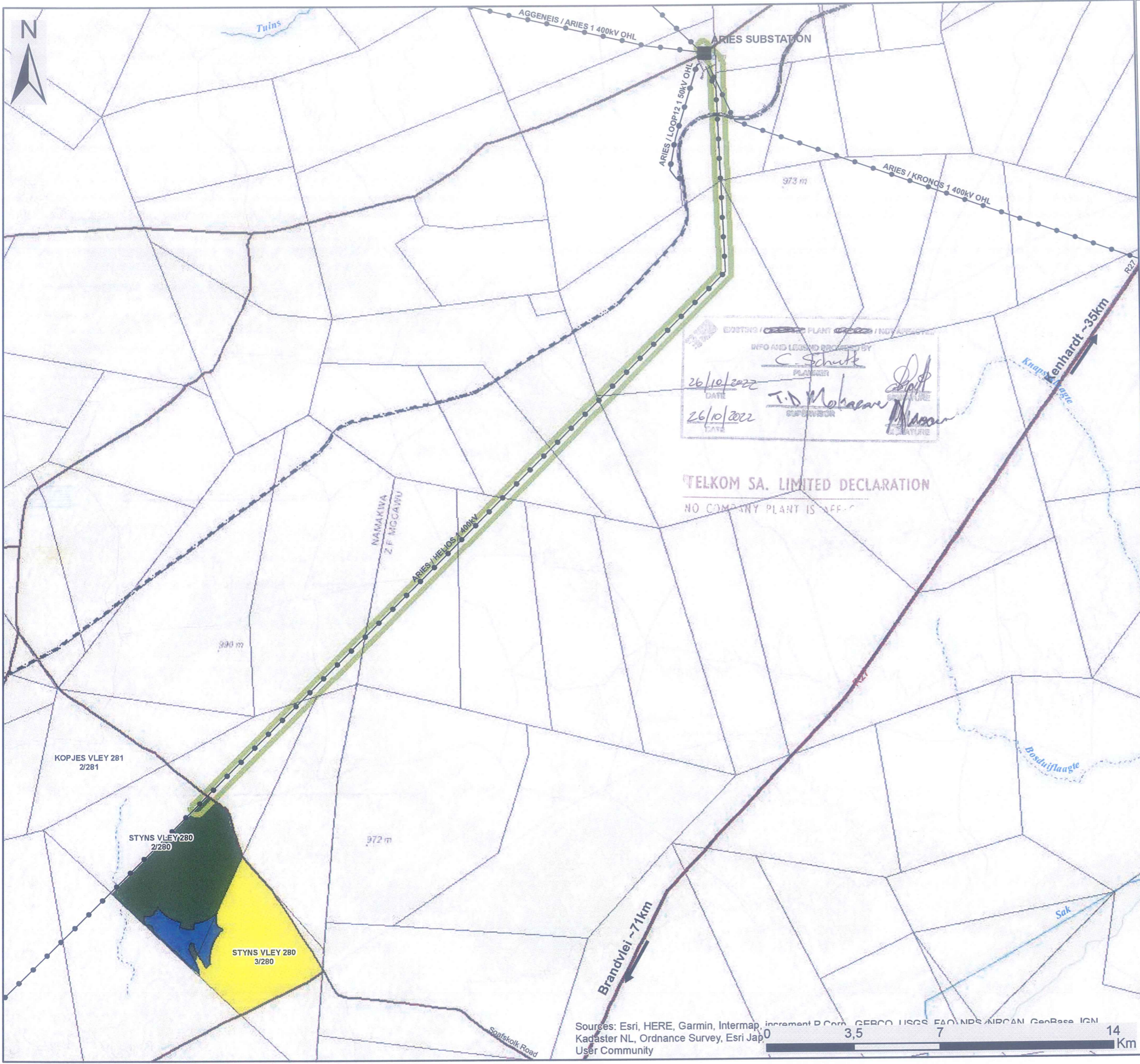
Please notify this office and forward an as built plan, within 30 days of completion of construction.

Mr Vivian Groenewald must be contacted at telephone number 081 362 6738. Two (2) weeks prior to commencement of proposed work. It's important that all services are shown on site before construction starts.

Yours sincerely



CHRIS SCHUTTE



Kotulo Tsatsi Energy PV3 Facility, Northern Cape Locality Map

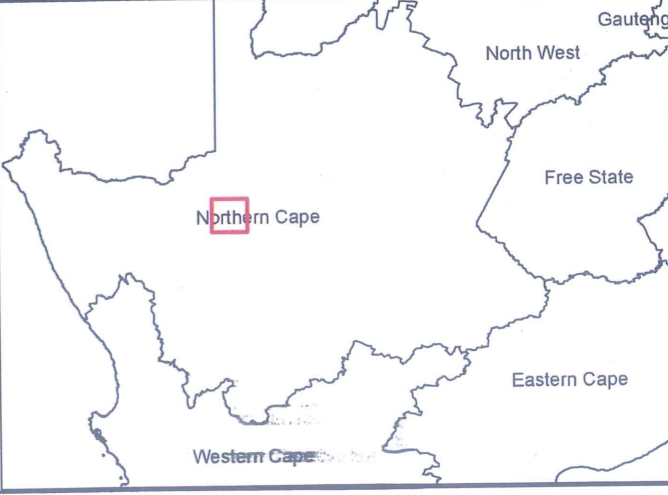
Legend

- Eskom substation
- Existing Power Line
- Regional road
- Main road
- Railway
- Perennial river
- Non-perennial river
- Authorised Kotulo Tsatsi Energy PV1
- Authorised Kotulo Tsatsi Energy PV2
- Farm portions
- Kotulo Tsatsi Energy PV3 Development Area
- Grid Connection Corridor (500m wide)

EXISTING / PLANT / NOT ASSIGNED
 INFO AND LEGEND PROVIDED BY
 C. Schutte
 PLANNER
 DATE: 26/10/2022
 T.D. Makare
 SUPERVISOR
 DATE: 26/10/2022

TELKOM SA. LIMITED DECLARATION
 NO COMPANY PLANT IS AFFECTED

Scale: 1: 150 000
 Projection: WGS1984
 Map Ref: Kotulo Tsatsi Energy PV3 - Locality Map



Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, User Community



Savannah Environmental Pty (Ltd)
First Floor, Block 2
5 Woodlands Drive Office Park
Cnr Woodland Dr & Western Service Road
Woodmead
2191

Email: niclene@savannahsa.com

Date: 09 December 2020

To whom it may concern

RE: SARAO'S COMMENTS ON KOTULO TSATSI ENERGY PV1 SCOPING REPORT, NORTHERN CAPE PROVINCE.

SARAO has completed the preliminary risk assessment with regard to the electromagnetic emissions of the for the above mentioned solar PV facilities and its possible impact on the SKA radio telescope.

The proposed project is located about 52km from the nearest SKA Infrastructure Territory and also located inside the Karoo Central Astronomy Advantage Areas 1. As a result, the project represents a **medium to high risk** of interference to the SKA radio telescope. This level of risk, will require that the developer of the facility to determine the anticipated level of radiated electromagnetic emissions in order for SARAO to undertake a compliance assessment.

In the case where the determined radiated emissions exceed the compliance limits and interferes with the SKA radio telescopes, the developer will be required to develop an EMC control plan and implement mitigation measures prior to construction, to ensure that the levels do not produce harmful interference to the SKA radio telescopes.

SARAO does not object to the development of Kotulo Tsatsi Energy PV1, however, commitment to determine radiated emissions, develop EMC control plan and implement mitigation measures must be included in the EMPr.

www.ska.ac.za

The South African Radio Astronomy Observatory (SARAO) is a National Facility managed by the National Research Foundation and incorporates all national radio astronomy telescopes and programmes. SARAO is responsible for implementing the Square Kilometre Array (SKA) in South Africa.

We apologise for late submission and our office remains open to discuss any matter relating to the above.

Regards,



Mr Selaelo Matlhane
Spectrum & Telecommunication Manager
South African Radio Astronomy Observatory (SARAO)
Tel: 011 442 2434
Email: smatlhane@ska.ac.za

Interested and Affected Parties

Agricultural Extension Services (AES)

remsmc@gmail.com

Tel: 061 758 3232

Ref:kotuTE/Stynvley/01/ 22

21/11/2022

Ms N. Venter
Savannah Environmental
publicprocesses@savannahsa.com
sel: 060 978 8396
Tel: 011 656 3237

cc: DFFE

Beste Nicolene

Navrae oor: Solar Voltaic scoping report for facility includes linear infrastructure, PV1,PV2 & PV3~ SW Kenhardt, vir Kotula Tstatsi Energy (Pty)

With respect to the above application(s) to apply for access to, inspect the farms; Styn's Vley 280, ect.. for suitable grazing camps, in the Hantam & Namakwa district municipalities (as advertised in the Gemsbok koerant 14 Oct' 22). AES is an affected party (that provides services to farms in the area, requests the following information as part of Environmental and Human Rights. Would you reply accurately to these questions so they become public knowledge, some require data from Kotula Tstatsi Energy (KTE) personnel;

Water usage

A. Who is the adjudicator in the application for a water use license for PV1,PV2 &PV3 plus facilities? Can you provide contact details of the Dept Water affairs and or CMA.

How much water are the combined projects of PV1,PV2 & PV3 planning to use from;

- 1) Underground reserves
- 2) The Gariiep River (possibly by the municipal pipeline)

What is the minimum amount of potable water, that PV1,PV2 & PV3 (are combined), utilize a year, during part of the project construction & maintenance activities?

2.51. Project Footprint

The size, extent and location of the footprint is part of a process, that should be re-evaluated given the ecological and social impacts of other solar arrays construction projects, in the Northern Cape, that have become unsustainable. For the negative effects on social dynamics & ecological integrity outweigh so called benefit of industrialization.

2.5.7 Recycling of waste & broken infrastructure pg 20

The dorps of Keimoes, Kenhardt and Brandvlei, do not yet have sufficient solid waste recycling facilities. Where are metals containing toxic elements such as, aluminum, cadmium, lead,

mercury & others, to be removed to (Bloemfontein? or the SW Cape?) for recycling?

Are depots for recycling, ferrous metals, plastics (of all types), glass, used engine oil, hazardous chemicals, to be set up in any of the local towns? Explain where.

- How much does KTE budget for various phases (construction, maintenance & decommissioning) for preventing & cleaning up oil & hydraulic leaks from drilling and other combustion machinery on site?

Waste water treatment

An alternative to chemical toilets should be considered as petrol & diesel costs, are costly. Also fewer motors on the roads results in fewer incidences with itinerant wildlife and fewer accidents with other vehicles and birds.

3.2.1 Fundamentally different alternatives

The need for solar generated electricity is primarily in urban areas and hence alternatives to PV1, PV2 & PV3 need to be found in those urban areas, where the demand is. For these reasons;

The impacts on the biodiversity have proven to be highly negative in terms of species abilities to navigate, adverse affects around human habitation and linear infrastructure such as road & train networks. Currently many birds, mammals, reptiles, and amphibian species are not able to cross over roads with the amount of traffic. The construction phases of the solar array projects have brought more vehicle, faster drivers, stubborn, reckless fast moving drivers from outside the Noord Kaap province. The impact on abundance and distributions of many small mammals particularly the striped pole cat (*Actonyx striatus*), Black footed cat (vulnerable), Serval (near threatened), Honey Badger (near threatened¹).

Rehabilitation costs to restore biodiversity levels are need to be calculated carefully, in the feasibility analysis of any venture. For instance, plant assemblages are require viable seed, nutrient specific micro sites for germination & establishment, the climatic conditions also need to be favourable. If the facility is closed during a drought, restoration of the vegetation communities may take as long as 30-50 years. While animals who are important for moving nutrients and dispersing seeds many be in very short supply, how is the ecosystem to self replicate into the future?

Chapter 4

4.3 Pg 35. Table 4.1. SIP, bottom point on page, Strictly speaking “green energy” is just from photosynthesis. This project used fossil fuels, to reach the location on many times. It is just a regular industrial energy project.

Pg 36. In Table 4.1. Climate Change Bill 2018, last point, is incorrect, Cognisance, is required to

¹ The statutes of these animals and many others has not be accurately assessed since 2020

understand that fossil fuels need to be phased out from all KTE project operations. The project has been planned using fossil fuels, the project needs to be built with other sources of energy, to keep with sustainable development objectives. Just collecting & replacing the chemical treatment of water facilities & and recycling solid waste on site is going to require a solar powered trucks. All employees and contractors on the site would require solar powered vehicles for the last statement to be correct.

Pg 37. Northern Cape, climate change policy, MEC's address correctly notes that the northern Cape's arid ecosystems are extremely vulnerable to climate change driven desertification. This project is going to accelerate desertification in the Kenhardt & Brandvlei region's, by altering key ecosystem processes (such as disturbance of nurse plants in areas, where plant establishment requires micro shaded and moist sites. Another scenario; less rainfall would require more dependence on the Gariep river.

Chapter 5

There may be a need from humans in the region for, cash (to buy food and pay for services), skill transfers. For example Afrimat's management on an other solar construction project, prefers foreign born Africans, to be the site foreman. Manager of construction crew is person needs to be found from the region, to allow a better skills transfer and less social friction.

- A) Leave their companies bakkies running at fuel stations while filling up with petrol.
- B) capture single women from local taverns & intern them in construction camps as sex slaves.
- C) drive drunk, reckless driving at night,
- D) don't apply for fishing licenses for the Gariep river.
- E) are rude to local people, insensitive to cultural norms especially on the weekends.
- F) waste companies money by over using bakkies and emitting unnecessary exhaust fumes when they could walk & leave less of a disturbance.

Regarding company's sustainable objective and environmental ethics

Has KTE installed photo-voltaic panels in their offices and homes ?

What are KTE's previous operating credentials?

What percentage of heavy metals (from equipment), plastic and paper waste, is recycled at

- 1) head office?
- 2) Suppliers of all the equipment to be transported to site?
- 3) Logistic & engineering firms that are proposed to have work on the development envelope?

Where are the solar panels, inverters, batteries procured from? and what are the environmental standards of the various companies?

What sorts current or past vegetation (& aquatic ecosystems) restoration projects is KTE engaged in. Send evidence if they have restored land or polluted waterways or vleis.

Chapter 6.

When are the public participation meetings to be held in Keimoes, Kenhardt & Brandvlei? Send out notices at least a month in advance. Where villages & farmers can hear about the indirect and direct cumulative impacts of unsustainable industrialization! Uneducated people need to hear about, water resource sharing and communal livestock opportunities, that have been offered in english only to certain politically correct cartels.

Chapter 7.

1. A map of the soils (Fig7.2) for CSP2 overlaid with the vegetation communities (Fig 7.3), Another map with the site plan for the panel arrays, ect.. overlaid over Fig 7.3
2. A map that shows the ESA's & the CBA's overlaid with the site plan.
3. As the KTE, PV project has impacts at the regional level, that translates into possible catchment level. Descriptions of the migration movements of birds and mammals in the larger Kenhardt district are required. Surveys must take into account, itinerant, indigenous birds & animals of conservation importance, that may not reside in the area but that move back & forth to at a particular season. Including what troops of Chacma baboons are currently foraging over all the selected farms, within 70-80km radius of the farm's boundaries. Particularly rare and endangered itinerant birds, need to be monitored

that range from Preiska to the western side of Brandvlei and from Keimoes to the foot of the Hantam hills, in the south.

Pg. 101 Various Amphibian & reptile species (9 of the former & 25 of the later were potentially recorded for the locality) range over the regional area. Can Savannah Environmental determine the approximate populations in the region, that includes PV1, PV2 & PV3. To avoid cumulative impacts on these species can the field zoologist. Look at an area 35-40km's radius from the centre of the PV's site?

As mammals are also itinerant over a larger range than reptiles. What are their seasonal and yearly distribution patterns over a larger area, 70-80km's radius of the centre of the PV site?

Pg 103 includes maps showing the ESA's and CBA's, these were overlain with other species movement data, to arrive at Fig 9.1. pg 137. How can the site plan (a.k.a development envelope minus a 35m buffer zone), be adjusted to incorporate biodiversity offsets. So that for instance, areas on adjacent farms that are of lesser biological importance can be traded for areas that have high conservation of biodiversity priority?

The valley floor see Fig 7.3 should receive no impact!!

Pg 120, The table of, nature of impacts, extent needs a number!!

Also the cumulative loss of habitat has regional effects, that should be adjusted.

The avifaunal consultant states that rare & threatened Raptors and Bustards should receive higher priority to live. Sending a message to those people in the city wishing to recharge their cell phones, install photo-voltaic panels on their houses and offices.

Cumulative Impacts pg. 127 & 128, have a table that indicates the areas that could be potentially lost to both, livestock agriculture, biodiversity conservation, and future sustainable use alternatives. That is a regional impact!

8.4.1 pg 131

An analysis of the embodied energy costs of such a project need to be calculated. To start what

amount of fossil fuels are currently used to move KTE's employees motor vehicles & aircraft around, gauteng? To project sites?

What is the anticipated diesel and petrol volumes to be used during the planning, construction, maintenance and decommissioning of PV1, PV2 & PV3? As Climate change actions, requires reducing GHG emissions in the short term.

Cleaner energy - The manufacturers of the PV equipment also need to use cleaner technologies, to prevent the emissions of toxic metals, such as aluminium, cadmium, lead, mercury out of the factories. As cleaner technology requires better filters inside the industrial processes that generated technological gadgets for industry, military and domestic uses

Another pertinent question to the DME is what are the end users of the solar generated energy doing with the electricity. Industries both nationally and internationally need to be screened, evaluated and monitored to reduce their wastage of electricity!! Also

Sending South African metallic ores to china and other countries that generate electricity from coal need to be halted, in order to cut CO₂ emissions

Climate change models do predict higher ambient temperatures for the region, this would result in creased wildfires if alien and or pioneer grasses were to be the dominant vegetation cover.

Fires release carbon hence the revegetation planning after project decommissioning must be done by local vegetation restoration experts. At all costs fire temperatures must be kept low to avoid damage to the soil (and associated biological life), plants and animals.

9.4 Fatal flaws

The PV1, PV2 & PV3 project is too large to not have many fatal flaws, in a area where, indigenous palatable, plant growth is very slow, hence vegetation restoration shall require over 10 years of consistent gardening. Many of the environmental flaws also occur off the site, such as processing of additional toxic waste that is an output from the manufacturing process of solar panels. One of the flaws is that the company did not consider focusing on installing PV panels, on roofs in existing urban areas, such as Upington & Kimberly (even retrofitting retailers in smaller towns such as the spar). Existing roofing provides adequate space for malls and offices (underneath) to host & service PV facilities for powering the electricity demands of shoppers.

10.4 Consideration of Alternatives

KTE should rather concentrate on retrofitting existing buildings in urban areas. This reduces the transaction costs and transformation costs to an almost pristine environment!

Additional Questions from AES

- How much money and human resource budget is set aside (in a ethically managed Trust) for rehabilitation to allow successful farming after decommissioning of the photovoltaic arrays ?
- How flexible is KTE in working out a proper sampling time scheduling? Given the critical seasons that birds and animals are mating and nesting, are too be quiet times. What is the highest decibel noise emitted from KTE's drilling and site engines? In this regard, how does Savannah environmental personnel, plan to prepare the Environmental Safety officers for the site, given that there may be cultural & ethical differences between him/her and the prospecting geologist and contractor teams?
- What sort of compensation is offered to villages & farmers; for construction & maintenance activities that hinder; farming operations, current and future water quality, & wild animal & bird breeding successes?

When are you holding the first the I&AP meeting in Brandvlei en Kenhardt after the specialist studies are completed, stuur kennisgewings in Afrikaans.

Groete

Marc Caplan

Reg. No. 400107/08 SACNSP

Agricultural Extension Services (AES)

Nicolene Venter

From: Attie Botha <attiebotha@kotulotsatsienergy.com>
Sent: Thursday, 03 November 2022 09:31
To: Nicolene Venter; Karen Jodas
Subject: Fwd: Kotulo Tsatsi School project

Best Regards,

Dr Attie Botha, CEO

Mobile: +27(0)82 824 1684 | Email: AttieBotha@KotuloTsatsiEnergy.com | Website: www.KotuloTsatsiEnergy.com



Before printing this email, keep our environment in mind.

Disclaimer: For more information regarding the full legal disclaimer pertaining to this email, visit our website.

Begin forwarded message:

From: bemarker@hmoskool.co.za
Date: 03 November 2022 at 09:12:41 SAST
To: info@kotulotsatsienergy.com
Subject: Kotulo Tsatsi School project

To whom it may concern.
Good day

We are very excited about the Kotulo Tsatsi Project in our vicinity.

Hoërskool Martin Oosthuizen (Kakamas) is the closest High School and hostel for the learners of Kenhardt, Brandvlei, Keimoes and surrounding areas.

If possible, please can you provide me with contact details of the HR department or the person that are responsible for the BEE-projects of the Kotulo Tsatsi Energy project?

Thank you very much.

Kind regards
Ilze Pieterse
Cell 0711546427