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South African Heritage Resources Agency



an agency of the
Department of Arts and Culture

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Enquiries: Natasha Higgitt
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CaseID: 15218

Date: Friday August 07, 2020
Page No: 1

Final Comment

In terms of Section 38(4), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Naledi (Pty) Ltd

The development of two (2) 100MW solar photovoltaic (PV) facilities is proposed on a study area consisting of two properties, Portion 3 of the Farm McTaggarts Camp 453 and Portion 12, Portion of Portion 3 of the Farm Klip Punt 452, located 21km south-west of upington in the Northern Cape Province. The two solar PV facilities are known as Ngwedi PV and Naledi PV, and are located to the north of the existing Khi Solar One CSP facility. The two facilities are located within the Kai !Garib Located Municipality, and border the Dawid Jruiper Local Municipality located directly to the east, within the ZF Mgcawu District Municipality.

Savannah Environmental (Pty) Ltd has been appointed by Naledi PV (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed Naledi Solar Photovoltaic facility and associated infrastructure near Upington, Northern Cape Province.

A draft Basic Assessment Report (dBAR) has been submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. The proposed infrastructure will include solar panels, on-site substation, access roads, laydown area, gate and security house, control centre, office building, warehouse, canteen and visitors centre and staff locker rooms. The total extent of the development area will be 330 ha. The proposed development is located within Focus Area 7 of the Renewable Energy Development Zones i.e. the Upington REDZ.

CTS Heritage has been appointed to provide heritage specialist input as part of the BAR process as required by section 24(4)b(iii) of NEMA and section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA). CTS Heritage Sub-contracted Dr Marion Bamford to conduct the Palaeontological Impact Assessment (PIA) and Ubique Heritage Consultants to conduct the Archaeological Impact Assessment (AIA) as part of the Heritage Impact Assessment.

Lavin, J. 2020. Heritage Impact Assessment in terms of section 38(8) of the NHRA: Proposed development of Naledi, a solar PV facility and associated infrastructure on Portion 3 of the Farm McTaggarts Camp 453, near Upington in the Northern Cape Province.



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The recommendations provided in the HIA include the following:

- There is no preferred alternative in terms of impacts to heritage for the Main Access Route and as such, the preferred alternative of the development is preferred in terms of impacts to heritage;
- A Chance Fossil Finds Procedure must be implemented (see attached as part of Appendix 2 of the HIA);
- The mitigation recommendations included in the Visual Impact Assessment are to be implemented (Section 6 of the VIA);
- Although all possible care has been taken to identify sites of cultural importance during the investigation of the study area, it is always possible that hidden or subsurface sites could be overlooked during the assessment. If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit must be alerted;
- If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit, must be alerted immediately as per section 36(6) of the NHRA. A professional archaeologist must be contracted as soon as possible to inspect the findings. A Phase 2 rescue excavation operation may be required subject to permits issued by SAHRA;
- The above recommendations must be included in the Environmental Management Programme (EMPr) for the project.

The following two reports provided the information and results for the HIA.

Engelbrecht, J and Fivaz, H. 2020. Phase 1 AIA Specialist Field Report: Proposed Khunab PV Facilities, Upington, Northern Cape Province.

A total of three heritage resources were identified within the proposed development area and were all assessed to have no heritage significance.

Bamford, M. 2019. Palaeontological Impact Assessment for the proposed development of the Khunab Photovoltaic facility to the west of Upington, North West Province.

The proposed facility is underlain by red aeolian and alluvial sands of the Quaternary Gordonia Formation, Kalahari Group that are further underlain by possible calcretes. A Chance Finds Protocol should be



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implemented as part of the EMPr and is included in the PIA.

Final Comment

The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR and EMPr:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit no objections to the proposed development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. Further additional specific conditions are provided for the development as follows:
- 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
 - i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;
 - The Final BAR and EMPr must be submitted to SAHRA for record purposes;
 - The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.

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

Our Ref:



an agency of the
Department of Arts and Culture

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CaseID: 15218

Date: Friday August 07, 2020
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Yours faithfully

Natasha Higgitt
Heritage Officer
South African Heritage Resources Agency

Phillip Hine
Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/537823>
(DEA, Ref:)

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.

South African Radio Astronomy Observatory

The Directors
Naledi (Pty) Ltd
3 Kiepersol Close
Platteklouf
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8000

Email: peter@atlanticep.com
cc: nicolene@savannahsa.com
Date: 19 August 2020

To whom it may concern.

RE: IMPACT OF NALEDI PV ON THE SKA RADIO TELESCOPE

SARAO has revised the preliminary risk assessment with regard to the electromagnetic emissions of the above mentioned solar development project and its possible impact on the SKA radio telescope.

Based on the information provided on the Basic Assessment Report (BAR) that was provided by Atlantic Renewable Energy Partners (Pty) Ltd (Atlantic) and Savannah Environmental Pty (Ltd) (Savannah), this development will present a medium risk of electromagnetic interference to the SKA radio telescope. This determination was based on the total number of solar panels and the maximum applicable CISPR 11 radiated emission levels. It therefore, represents a high level risk assessment.

SARAO, therefore, would like to inform you that there is a possible need to implement RFI control measures on this plant and to ensure that it adheres to the prescribed compliance limits. The determination of the level of attenuation that will be required, if any, will be made when full details and information of all electrical equipment is available. We will therefore appreciate if Atlantic can inform us once these have been determined and further assessment can be undertaken. The cost of the implementation of mitigation measures will be borne by the facility.

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.

Thank you for your patience and our office remains open for any discussion relating to this project and its impact on the SKA radio telescope.

Regards,



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

Department of Agriculture, Environmental
Affairs, Rural Development & Land Reform:
Northern Cape Province



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Department:
Environment & Nature Conservation
NORTHERN CAPE PROVINCE
REPUBLIC OF SOUTH AFRICA

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Imibuzo : Samantha De la Fontaine
Navrae :
Reference : Naledi PV
Tshupelo : Ngwedi PV
Isalathiso :
Verwysing : DEA ref. 14/12/16/3/3/1/2020

Date : 30 July 2020
Leshupelo :
Umhla :
Datum :

Mr Sabelo Malaza
Chief Director: Integrated Environmental Authorizations
Department of Environmental Affairs
Private Bag X447
PRETORIA
0001

Attention: Mr Ephron Maradwa, EMaradwa@environment.gov.za (Please also forward a copy to the EAP, Nicolene Venter on behalf of Savannah SA nicolene@savannahsa.com)

Dear Mr Sabelo Malaza

RE: DRAFT BASIC ASSESSMENT PROCESSES:

- 1. BASIC ASSESSMENT REPORT FOR NALEDI PV, A SOLAR PV FACILITY AND ASSOCIATED INFRASTRUCTURE PROPOSED ON A SITE NEAR UPINGTON AND WITHIN THE UPINGTON RENEWABLE ENERGY DEVELOPMENT ZONE, IN THE NORTHERN CAPE PROVINCE**
- 2. BASIC ASSESSMENT REPORT FOR NGWEDI PV, A SOLAR PV FACILITY AND ASSOCIATED INFRASTRUCTURE PROPOSED ON A SITE NEAR UPINGTON AND WITHIN THE UPINGTON RENEWABLE ENERGY DEVELOPMENT ZONE, IN THE NORTHERN CAPE PROVINCE**

Background

Two separate BA processes are being conducted for each of the 2 proposed 100 MW solar PV power generation facilities i.e. Naledi & Ngwedi PV, however, comments and recommendations in this report

are provided as a collective for the 2 proposed PV facilities and will be referred to as the proposed development.

Naledi PV is proposed directly to the east of the Ngwedi PV development area. The development area for the 2 developments borders the operational Khi Solar One Facility which is located directly to the south-east and the Sirius PV Project One located directly to the south of Khi Solar One on the Remaining Extent of the Farm Tungsten Lodge 638. The Dyasons Klip 1 and 2 solar PV projects are located 5km to the south-west of the Ngwedi PV development area and are also operational. The Klip Punt PV1, McTaggarts PV1, PV2, PV3 (all located within the study area) and the Sirius Solar PV Projects 3 and 4 have been granted environmental authorization by the DEA and will be bid under future Department of Mineral Resources and Energy's REIPPP Programme(s).

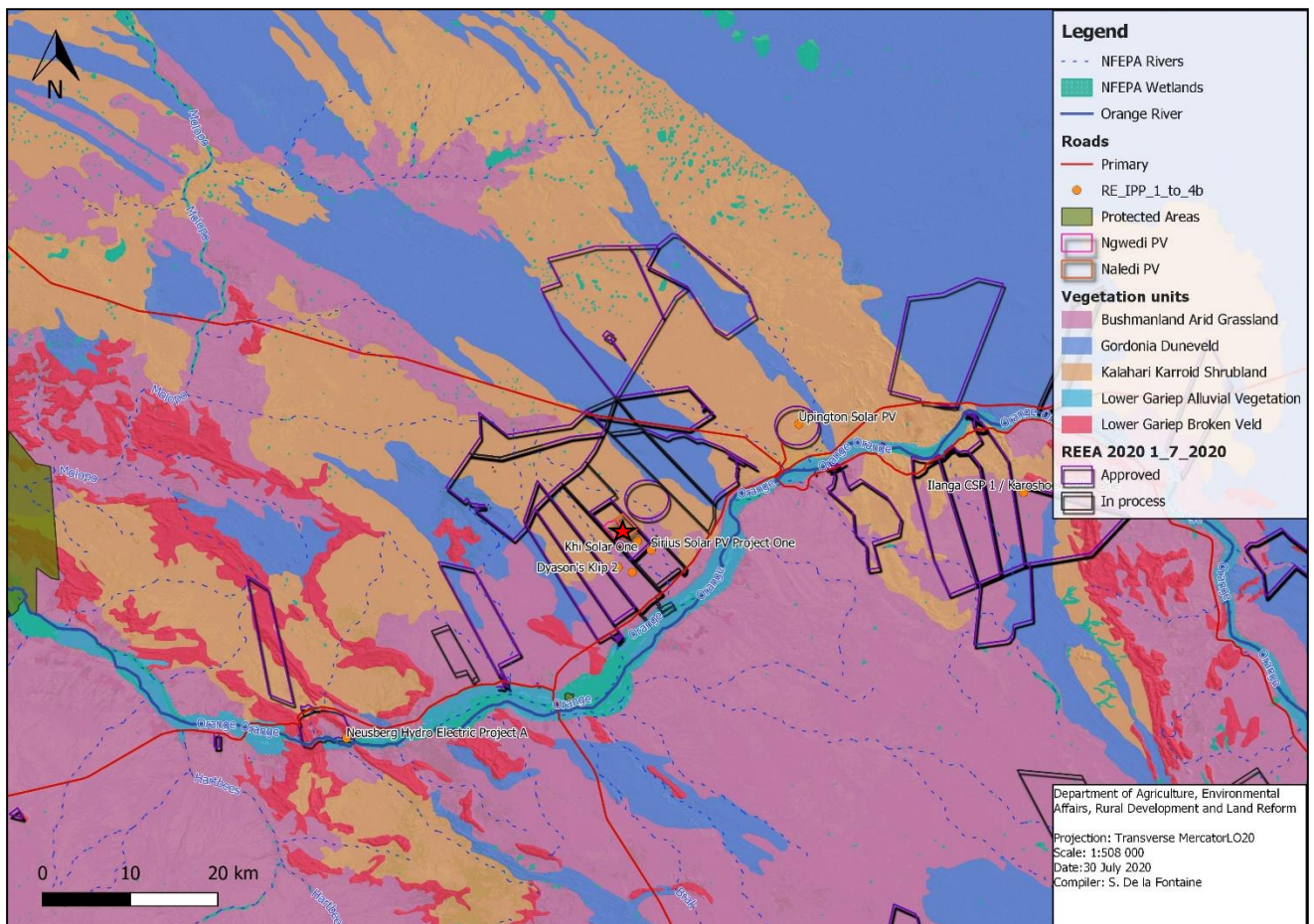


Figure 1. The Naledi and Ngwedi PV developments (red star) are proposed within an area where several other renewable energy developments have been approved, or is currently under construction or already in operation. The majority of these developments will impact on the Kalahari Karroid Shrubland and Bushmanland Arid Grassland vegetation units..

Herewith the comments for the proposed developments:

1. A conglomerate of PV developments are proposed for Gordonia region within the same vicinity as the proposed Naledi and Ngwedi PV developments. These developments all fall within the Bushmanland Arid Grassland and Kalahari Karroid Shrubland vegetation units (as per Mucina & Rutherford, 2006; see **Figure 1**).
 - 1.1 Both these vegetation units' conservation status is *Least threatened* with ~99.4% and ~99.2% remaining for the Bushmanland Arid Grassland and Kalahari Karroid Grassland vegetation units respectively as per the year 2006's data (Mucina & Rutherford, 2006). Major changes has however occurred thus far as these vegetation units are under severe constraint due to agricultural activities (overgrazing, viticulture, etc.) and recent renewable energy developments.
 - 1.2 This is of particular concern for the Kalahari Karroid Shrubland as the latter is considerably smaller in size when compared to the Bushmanland Arid Grassland (828 389.89 ha < 4 547 896.73 ha).
 - 1.3 Only 0.4% of Bushmanland Arid Grassland vegetation unit is formally protected (although conservation land in the vegetation unit has been added since 2006) yet it has a conservation target of 21%. Furthermore, only 0.1% of the Kalahari Karroid Shrubland is protected and although it has a conservation target of 21%, no conservation land has been added to this vegetation unit since 2006.
 - 1.4 Furthermore, increased impacts on these vegetation units can result in fragmented islands which can ultimately result in the hindering of ecosystem functions and processes.
 - 1.5 Accordingly, it is advised that the competent authority (together with the commenting authority) consider biodiversity offsets / contribution to conservation land for these 2 vegetation units (or at least prioritize this for the Kalahari Karroid Shrubland vegetation unit) through a joint effort of all the larger scale developments impacting on these vegetation units.
2. The names of the following departments should be corrected throughout the documents:
 - 2.1 The Department of Agriculture, Forestry and Fisheries (DAFF) is now the Department of Environment, Forestry and Fisheries and the
 - 2.2 Northern Cape Department of Environment and Nature Conservation (DENC) is now the Department of Agriculture, Environmental Affairs, Rural Development and Land Reform.
3. Access Road Alternative 1 is supported as the preferable option as oppose to Alternative 2, because, from an ecological perspective, it will have a seemingly lower impact [i.e. it is shorter (8km <12km) and follows an existing road for the larger part with only 2km of new road to be built].

4. *Vachellia erioloba*, *V. haematoxylon* and *Boscia spp.* are known to occur in the proposed development area. These trees are keystone species and provide micro-habitats to a multitude of fauna and flora species which might not be able to persevere in the harsh environment of the Kalahari region if not for the availability of these trees.
 - 4.1 The specialist did indicate that there will be no impact on *Vachellia erioloba* and *Boscia albitrunca*, yet there will be (unavoidable) impact on *Boscia foetida*.
 - 4.2 The specialist stated that the latter species is widespread in the Gordonia district and that the impact of this single development will not have a major impact on this species, HOWEVER, this Department processes permits for the destruction of substantial amounts of *Boscia foetida* in the Gordonia region due to developments and this is of great concern as the species is extremely slow growing and cannot be trans-located.
 - 4.3 A species conservation assessment will thus be requested with permit applications if large amounts of *Boscia foetida* are to be impacted on.

5. As per the specialist's reports, the region favors local avifaunal diversity. Furthermore, 68 species were recorded on site during the two field surveys. Eight (8) of these species are listed as threatened (5 were recorded during the site-visits), and another four (4) are considered Near-Threatened (2 were recorded during the site-visits). Seven species are considered true near-endemics to South Africa, while twelve (12) are considered biome-restricted. In addition, Karoo Korhaan (NT) breeding pairs and their habitat was confirmed to the east of the development site. The cumulative impact the conglomerate of PV developments (proposed and already in operation) and the multiple associated overhead powerlines can thus be of significant negative impact on the birdlife within the area in question. With regard to bird mortalities at a large, well-known PV facility within the Northern Cape, Visser (2016) found that the only collision-related injuries were that of n large-bodied birds with the underside of the panels and entrapment between fencing, yet all of these were non-fatal. In addition, fatalities were estimated to 4.53 fatalities MW/yr (95% CI 1.51-8.50). The author did however conclude the study period was quite short and that a lack of comparable results from other sources made it difficult to provide a meaningful assessment on avian mortality at PV facilities. The author further stated that in order to fully understand the risk of solar energy development on birds, further collation and analysis of data from solar energy facilities across spatial and temporal scales, based on scientifically rigorous research designs, is required. It is thus hereby proposed that bird mortality as well as bird species richness and density within the PV facility and various sections

surrounding the facility (e.g. the boundary zone, adjacent untransformed land, etc.) be monitored during the lifespan (pre-construction through to operational phases) of the development. This information should be provided to both the provincial and national conservation authorities.

Recommendations:

- Off-sets/contribution to conservation land should be considered, for the conglomerate of developments impacting on the Kalahari Karroid Shrubland and Bushmanland Arid Grassland.
- The names of the national and provincial departments as stated above should be corrected throughout the documents.
- Access Road Alternative 1 is supported as the preferable option as oppose to Alternative 2.
- A species conservation assessment will be requested with permit applications if large amounts of *Boscia foetida* are to be impacted on.
- The monitoring of bird mortality as well as bird species richness and density within the PV facility and various sections surrounding the facility during the lifespan of the development is strongly supported.

We hope you find these recommendations in order.

Yours sincerely



E Swart

Scientific Manager Gr B

7/8/2020

References

Visser, E. 2016. The impact of South Africa's largest photovoltaic solar energy facility on birds in the Northern Cape, South Africa. Master's Dissertation. Percy FitzPatrick Institute of African Ornithology, University of Cape Town, South Africa

DEA



environment, forestry & fisheries

Department:
Environment, Forestry and Fisheries
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DEA Reference: 14/12/16/3/3/1/2202

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PER MAIL / E-MAIL

Dear Sir/Madam

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF A 100MW NALEDI PHOTOVOLTAIC (PV) SOLAR ENERGY FACILITY AND ASSOCIATED INFRASTRUCTURE ON A SITE LOCATED NEAR 18KM SOUTHWEST OF THE TOWN OF UPINGTON IN THE NORTHERN CAPE PROVINCE.

The Draft Basic Assessment Report (BAR) dated July 2020 and received by this Department on 08 July 2020, refer.

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

(a) Listed Activities

- Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure as described in the project description. Only activities applicable to the development must be applied for and assessed.
- If the activities applied for in the application form differ from those mentioned in the final BAR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link <https://www.environment.gov.za/documents/forms>.
- It is imperative that the relevant authorities are continuously involved throughout the basic assessment process as the development property possibly falls within geographically designated areas in terms of numerous GN R. 985 Activities. Written comments must be obtained from the relevant authorities and submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided.

(b) Lease agreement

- A lease agreement from landowner Khi CSP South Africa (Pty) Ltd. must be obtained and submitted to the Department with the final BAR.

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(c) Specialist Assessments

- The approach of not undertaking the Electro Magnetic Interference (EMI) and Radio Frequency Interference (RFI) studies as part of the basic assessment process is noted. However, comments from the Square Kilometre Array (SKA) office regarding this must be sought.

(d) Cumulative Assessment

- Should there be any other similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:
 - Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land.
 - Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.
 - The cumulative impacts significance rating must also inform the need and desirability of the proposed development.
 - A cumulative impact environmental statement on whether the proposed development must proceed.

(e) Public Participation Process

- The following information must be submitted with the final BAR:
 - A list of registered interested and affected parties as per Regulation 42 of the NEMA EIA Regulations, 2014, as amended;
 - Copies of all comments received during the Draft BAR comment period; and
 - A comment and response report which contains all comments received and responses provided to all comments and issues raised during the public participation process for the Draft BAR. Please note that comments received from this Department must also form part of the comment and response report.
- Please ensure that all issues raised and comments received during the circulation of the Draft BAR from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section) in respect of the proposed activity are adequately addressed in the final BAR.
- Proof of correspondence with the various stakeholders must be included in the final BAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.

(f) Environmental Management Programme

- The EMPr must also include the following:
 - 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 realization of such facilities, the generic Environmental Management Programme, contemplated in Regulations 19(4) must be used and submitted with the final report over and above the EMPr for the facility.
 - There needs to be an EMPr for the facility, the onsite substation as well as the overhead line.
 - Further to the above, you are required to comply with the content of the EMPr in terms of Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended.
 - Please be informed that the following content must be incorporated within the EMPr's as indicated in Appendix 4 of the EIA Regulations 2014, as amended:
 - Details of the EAP who prepared the EMPr; and the expertise of that EAP to prepare an EMPr, including curriculum vitae.

- (ii) A map at an appropriate scale which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffers.
- (iii) A description of the impact management outcomes, including management statements, identifying the impacts and risks that need to be avoided, managed and mitigated as identified through the environmental impact assessment process for all phases of the development including —
 - (a) Planning and design;
 - (b) Pre-construction activities;
 - (c) Construction activities;
 - (d) Rehabilitation of the environment after construction and where applicable post closure; and
 - (e) Where relevant, operation activities.
- (iv) A description of proposed impact management actions, identifying the manner in which the impact management outcomes contemplated in paragraph (d) of Appendix 4 of the EIA Regulations 2014, as amended, will be achieved, and must, where applicable, include actions to —
- (v) Avoid, modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation;
- (vi) Comply with any prescribed environmental management standards or practices;
- (vii) Comply with any applicable provisions of the Act regarding closure, where applicable; and
- (viii) Comply with any provisions of the Act regarding financial provision for rehabilitation, where applicable.
- (ix) The method of monitoring the implementation of the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.
- (x) The frequency of monitoring the implementation of the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.
- (xi) An indication of the persons who will be responsible for the implementation of the impact management actions.
- (xii) The time periods within which the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended, must be implemented.
- (xiii) The mechanism for monitoring compliance with the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.
- (xiv) A program for reporting on compliance, taking into account the requirements as prescribed by the Regulations.

(g) Environmental Impact Statement

- (i) It is noted that an environmental impact statement is not included in the Draft BAR, therefore you are kindly requested to include an environmental impact statement which contains —
 - (a) a summary of the key findings of the environmental impact assessment;
 - (b) a map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers; and
 - (c) a summary of the positive and negative impacts and risks of the proposed activity and identified alternatives.

Please also ensure that the final BAR includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 1(3)(1)(q) of the NEMA EIA Regulations, 2014, as amended.

You are further reminded to comply with Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: *“Where basic assessment must be applied to an application, the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority -*

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(a) a basic assessment report, inclusive of specialist reports, an EMPr, and where applicable a closure plan, which have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority.”

Should there be significant changes or new information that has been added to the BAR or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 19(b) of the NEMA EIA Regulations, 2014, as amended, which states: “the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (b) a notification in writing that the basic assessment report, inclusive of specialist reports an EMPr, and where applicable, a closure plan, will be submitted within 140 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the basic assessment report or EMPr or, where applicable, a closure plan, which changes or information was not contained in the reports or plans consulted on during the initial public participation process contemplated in subregulation (1)(a) and that the revised reports or, EMPr or, where applicable, a closure plan will be subjected to another public participation process of at least 30 days”.

Should you fail to meet any of the timeframes stipulated in Regulation 19 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.

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 Environment, Forestry and Fisheries**

Signed by: Mr Vusi Skosana

Designation: Director: National Infrastructure Development

Date: 03 August 2020

cc:	Ms Jo-Anne Thomas	Savannah Environmental (Pty) Ltd	E-mail: joanne@savannahsa.com
	Mr Federico Rizzo	Ngwedi PV (Pty) Ltd	E-mail: Federico.zanotta@abengoa.com
	Mr Bryan Fischer	Department of Environment and Nature Conservation Northern Cape Province	E-mail: Bfisher@ncpg.gov.za
	Mr Godfrey Mackay	Kai !Garib Local Municipality	Email: mackayg@kaiqarib.gov.za

Department of Environmental Affairs
(Biodiversity Conservation)



environment, forestry & fisheries

Department: Environment, Forestry
and Fisheries
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Reference: Ngwedi PV facility

Enquiries: Ms Portia Makitla

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

Ms Nicolene Venter
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PER E-MAIL

Dear Ms. Venter

DRAFT BASIC ASSESSMENT REPORT COMMENTS FOR THE PROPOSED DEVELOPMENT OF THE NGWEDI SOLAR PHOTOVOLTAIC (PV) FACILITY AND ASSOCIATED INFRASTRUCTURE NEAR UPINGTON, NORTHERN CAPE PROVINCE

The Directorate: Biodiversity Conservation reviewed and evaluated the aforementioned draft report. Based on the information provided in the specialist report, the proposed development falls within Renewable Energy Development Zone (REDZ) 7 (Upington REDZ) which is an area identified as highly suitable for the development of a solar energy facilities.

Notwithstanding the above, the following recommendation must be considered in the final report:

- Search and rescue plan for the identified Species of Conservation Concern (SCC) must be submitted as part of the final report;
- A botanist must be appointed to perform a final walkthrough prior to finalisation of the final phase of the EIA, to identify all sensitive plant species and assist in identifying the areas that require protection;
- Erosion and Alien Plant Species Management Plan, and Rehabilitation Plan must be submitted as part of the final report to mitigate on habitat degradation due to erosion and alien plant invasion; and

- Sensitive areas in close proximity to the development footprint must be demarcated as no-go area i.e. drainage lines.

The final report must comply with all the requirements as outlined in the Environmental Impact Assessment (EIA) guideline for renewable energy projects and the Revised Best Practice Guideline for Birds & Solar Energy for assessing and monitoring the impact of solar power generating facilities on birds in Southern Africa.

Yours faithfully



Mr Seoka Lekota
Control Biodiversity Officer Grade B: Biodiversity Conservation
Department of Environment, Forestry & Fisheries
Date: 13 August 2020

INTERESTED AND AFFECTED PARTIES



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To;SAVANHA ENVIRONMENT CONSULTANTS(NALEDI AND NGWEDI PV)
EMAIL:publicprocess@savannahasa.com
DATE-06-08-2020

COMMUNITY PARTICIPATION

We as a effected community from Upington and ZFMcgawu district, It is concerning community participation for the term normally 20 years for the construction phase and the trust phase of the 2 solar plants namely.....

It is very important to work and or establish a community structure that are broadly organised, whereby solar plants have a duty to assist financially such structures. An organization that is accountable,transparent,politics free and operate according a constitution.

Our experience in the last few solar plants is they create internal fights by decide to work with different organisations who normally have one objective and riots and strikes occur, that make solar plants work difficult to implent. And in that process the plant must be build according the tender who normally then contracts go to companies who are not from the effected communities. We write to you to consult us so that things never happen cos we are the losers if those unprofessional conducts happen, We are deprived from rightfully belong to us if we can measure those loses its multi millions of rands which we can call it theft.

We write to you that we know our rights as follows and want that it must be handle proper in consultation with us

- 1- One broad community organisation for participation that can prove they are democratically structure with accountability measures in place. This is most important before the plant can even start so it have community consensus as a vital part.

Mining effected community organisations take the dept. of minerals and energy to court and win many cases against department and mines who just start mine and decide also allow marginalisation happening in communities and lose it tender/mining rights once those happen(see section8,2 in the bill of rights)corporations responsibilities' towards communities
- 2- Reason in past municipalities approves solar construction and community don't have a say and in the end without consensus communities are the losers in construction phase.
- 3- Once consensus its agreed then a community liaison officer be chosen by the community and not from the plant.
- 4- We organised ourselves with and our area that plants can come with Epc Company and the rest we got it in our area.
- 5- We got white and black business chambers and others who are not part of it, so we must cater for all. Our moto is contracts must not go to those who did benefit already so much on previous plants. That decision is up to us who knows the area well.
- 6- Legislations are that black locals must benefit and they can sign joint venture agreements to the advanced white community.
- 7- Further if a certain skills is not find in our area then it can be looked outside 50km radius. Most solar plants trust deeds is for the district so it will be best to work with district community organisations, note when I say communities it mean included smmes ,contractors and labourers they all made the community.
- 8- We want a list of smmes and contractors the plant need and pay rates also the labourers and rates.
- 9- Participation-no elected councillor or political party executives must serve as executives on community structures.it will allow marginalisation to exclude certain communities and smme,s and favour politics. It can't be that the state tenders be run and managed by the state employees who represent the state, its conflict.

- 10- Most important don't divide our community and rule because we will not allow that,as we said we experienced all those and we learn out of that even legally arguments of the community rights. Don't sign mou agreements with any other none other than such a community structure, we are aware the municipalities or departments want community trust moneys must channelled into IDP or departments ,it happen because the community are not in administration of the percentage the government give for the communities.

Acting: operational director

Deon.f.j.Bezuidenhout