
From: Fiona Grimett <FGrimett@environment.gov.za>
Sent: Thursday, July 9, 2020 4:09 PM
To: Ethanne Soar <Ethanne@savannahsa.com>
Cc: Bongeka Mtyana <BMtyana@environment.gov.za>; Sindiswa Dlomo <SDlomo@environment.gov.za>
Subject: Approval of PP plan for the Gunstfontein BESS project, Great Karoo BESS project and Gunstfontein OHL Project, Northern Cape Province

Dear Ethanne,

The public participation plans for the Gunstfontein BESS project, Great Karoo BESS project and Gunstfontein OHL Project, Northern Cape Province, on page 83 - 110 of the attached document, have reference.

The Department has reviewed the attached Public Participation Plans, submitted in terms of the Directions Regarding Measures to Address, Prevent and Combat the Spread of COVID-19 Relating to National Environmental Management Permits and Licences. The proposed plans contain suitable public consultation measures, and are hereby **approved**, however please make provision for supplying (e.g. posting) hard copy executive summaries of the draft report to I&APs who request it, because they are unable to access the e-version, and where hard copies could not safely be made available at a suitable location (e.g. library). You may proceed with the implementation of the PP plan.

Further note that the attached directions apply for submitting draft documents to the Competent Authority for comment.

Regards,

Fiona Grimett
Department of Environmental Affairs
Chief Directorate: Integrated Environmental Authorisations
Directorate: National Infrastructure Development: National Infrastructure Projects
Email: fgrimett@environment.gov.za

PUBLIC PARTICIPATION PLAN

IN TERMS OF THE DIRECTIONS REGARDING MEASURES TO ADDRESS, PREVENT AND COMBAT THE SPREAD OF COVID-19 RELATING TO NATIONAL ENVIRONMENTAL MANAGEMENT PERMITS AND LICENCES DURING COVID-19 ALERT LEVEL 3

ENVIRONMENTAL AUTHORISATION FOR A BATTERY ENERGY STORAGE SYSTEM AND ASSOCIATED INFRASTRUCTURE AT GUNSTFONTEIN WIND ENERGY FACILITY, NORTHERN CAPE ('Gunstfontein BESS')

Application to be submitted

The restrictions enforced in terms of Government Gazette 43096 which placed the country in a national state of disaster limiting the movement of people to curb the spread of the COVID-19 virus has placed some limitations on the commencement and continuation of the public consultation as part of an EIA process. Considering these limitations, the following consultation process has been designed and will be implemented, on approval by the DEA, to cater for the conducting of the public participation process which includes I&APs, the competent authority, directly impacted landowners/occupiers, adjacent landowners/occupiers, relevant Organs of State departments, Municipalities, ward councillors and other key stakeholders.

Project Details:

Gunstfontein Wind Farm (Pty) Ltd would like to provide for the installation of a Battery Energy Storage System (BESS) at the authorised Gunstfontein WEF (DEA Ref: 14/12/16/3/3/2/826) in the Northern Cape. The BESS is proposed to be located near to the facility substation and will be approximately 3-4ha in total extent. MV cabling (33kV or less) will connect the BESS to the substation. An area of ~500m around the boundary of each facility substation is to be assessed, to allow for the optimization of the placement of the BESS. An access road to the BESS will be developed. The BESS is envisaged to become an integral component of the authorised WEF. The project will be located on the Remaining extent of Farm Gunstfontein 131, Sutherland, Northern Cape, located within the Karoo Hoogland Municipality of the Namakwa District Municipality (DC6). The following activities will be triggered by the proposed development, requiring a Basic Assessment process for environmental authorisation:

Listing Notice 1 (GNR 327 of 7 April 2017):

- » Activity 14: for the storage, or for the storage and handling, of a dangerous good (pending clarification from DEA)
- » Activity 27: clearance of an area of 1 hectares or more

Listing Notice 3 (GNR 324 of 7 April 2017):

- » Activity 4: The development of a road wider than 4 metres with a reserve less than 13,5 metres, within critical biodiversity areas.
- » Activity 10: the storage, or storage and handling of a dangerous good, within critical biodiversity areas (pending clarification from DEA).
- » Activity 12: clearance of an area of 300 square metres or more of indigenous vegetation

Public Participation Plan:

The public participation (PP) process will be undertaken in accordance with the requirements of Regulations 39 to 44 of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended, (GNR 326). The aim of the public participation process is primarily to ensure that:

- » information containing all relevant facts in respect of the proposed project is made available to potential stakeholders and I&APs;
- » participation by I&APs is facilitated in such a manner that all potential stakeholders and I&APs are provided with a reasonable opportunity to comment on the proposed project; and
- » comments received from potential stakeholders and I&APs are recorded and incorporated into the EIA process.

Alternative means of undertaking consultation has been designed and will be implemented by Savannah Environmental to ensure that I&APs are afforded sufficient opportunity to raise comments on the project through an interactive web-based platform readily available and accessible to any person illustrating interest in the project and enables the public participation process to be undertaken in line with Regulations 41 to 44 of the EIA Regulations, 2014, as amended. This online stakeholder engagement platform allows the EAP to visually present details regarding the project and our consultation documentation, including project maps and plans, presentations and posters regarding the project, and reports available for review. The use of online tools enables stakeholders and I&APs to explore the project-specific content in their own time, and allow them to participate in a meaningful way in the consultation process. The online platform allows for instant feedback and comments to be submitted, in so doing saving time for the stakeholder and also giving the assurance that their comments have been submitted for inclusion in the project reporting. The online stakeholder engagement platform considers the limitations applied by the Disaster Management Act Regulations prohibiting the gathering of people, as well as limitations which certain I&APs may have in terms of access to computers and internet as well as access to public spaces not open for operation or which have restricted access.

The benefits of the online stakeholder engagement platform include:

- Ability to create a dedicated project-specific online platform to enable easy access to project-related information.
- Ability to reach a wider audience, allowing more widespread consultation for major infrastructure projects.
- Allowing stakeholders and I&APs the opportunity to engage on a project without leaving their office or home.
- Enabling stakeholders and I&APs to register their interest in a project (for inclusion on the project database), and automatically gaining access to comprehensive project documentation.
- Enabling the EAP to maintain a complete database of I&APs through maintaining a record of persons accessing the online stakeholder consultation platform.
- Enabling the EAP and stakeholders/I&APs to meet virtually.
- Provides a resilient solution to a public consultation process.

Where I&APs do not have the applicable facilities i.e. access to internet, mobile phones, or computers, provision has been made to include these I&APs in the consultation process by consulting with the Ward Councillor, the ward committee members, community representatives and local community forum members.

The schematic illustration below provides an overview of the tools that are available to I&APs and stakeholders to access project information and interact with the public participation team to obtain project information and resolve any queries that may arise, and to meet the requirements for public participation.

i. Stakeholder identification and register of I&APs	<ul style="list-style-type: none">• Register as an I&AP on the online platform via completion of a form and provision of contact information, by responding to an advert, or sending a 'please call me' which will be responded to• State interest in the project• Receive all project related information via email
ii. Advertisements and notifications	<ul style="list-style-type: none">• Advertisements, site notices and email notifications provide information and details on where to access project information• Notifications regarding the EIA process and availability of project reports for public review to be sent via email, post or SMS notifications
iii. Public Involvement and consultation	<ul style="list-style-type: none">• Distribution of a notification letter providing details on the project and how I&APs can become involved in the process• Submission of comments or queries via the online platform to the PP team• Virtual presentations (both English and Afrikaans) available via the online platform• Availability of project information via the online platform• An opportunity for I&APs and stakeholders to request virtual meetings with the project team
iv. Comment on the BA Report	<ul style="list-style-type: none">• Availability of the project reports via the online platform for 30-day comment period• Submission of comments via the online platform, email or post to the PP team• Comments recorded and responded to, as part of the process
v. Identification and recording of comments	<ul style="list-style-type: none">• Comments and Responses Report, including all comments received, and included within the final Report for decision-making

The PP plan, as set out in the table below, has been drafted for the above-mentioned project to ensure that reasonable opportunity is provided to I&APs and that all administrative actions are reasonable. Proof of all notifications will be included in the public participation appendix included in the Basic Assessment report.

The PP plan is submitted to the Department of Environmental Affairs, for discussion and agreement before the PP process is undertaken for the proposed project.

Public Participation Plan: Discussion of approach and methodology to meet the requirements of the Regulations

Regulation	Approach & Methodology to meet requirements
<p>Regulation 40(1), Regulation 40(3) & Regulation 43 – provide all potential or registered interested and affected parties, including the competent authority, access to project related information, access to the BA report which will be made available for a period of at least 30 days to submit comments on draft reports prior to submission of final reports for decision-making.</p>	<p><u>Notification of Basic Assessment (BA) process to be undertaken for application for Environmental Authorisation (EA) to be distributed using the following means:</u></p> <ul style="list-style-type: none"> • E-mail • Dedicated project page on the Savannah Environmental online stakeholder engagement platform • Post (where email or telephonic notifications is not possible) • Process notices placed at locations that are accessible to I&APs • Advertisement in the printed media. <p><u>Notification of availability of report and period for review using the following means:</u></p> <ul style="list-style-type: none"> • Newspaper advert, including details of where the report can be accessed and details of the Savannah Environmental website. • Notification letter (to be sent via email, fax or post) to registered I&APs. • Notifications to communities via any of the following where available: Ward Councillor, ward committee members, identified and confirmed community representatives, and local community forum members. • SMS and/ or WhatsApp notifications where no other means are available. <p><u>Availability of report for review:</u></p> <ul style="list-style-type: none"> • Report available on the Savannah Environmental website for download. • Electronic copies can be made available to parties via a secure Dropbox link that will be emailed upon request for the documentation. • CDs to be posted, if requested. • Hard copy report to be available only where appropriate sanitary conditions can be maintained. • Report will be submitted to the DEA using the DEA online portal.

Regulation	Approach & Methodology to meet requirements
	<ul style="list-style-type: none"> • Report will be submitted to Organs of State and commenting authorities via an agreed electronic platform (such as on CD, or via a secure Dropbox link). <p><u>Submission of comments to EAP:</u></p> <ul style="list-style-type: none"> • Comments will be able to be submitted directly to the EAP using the Savannah Environmental online stakeholder engagement platform. A customised reply form is available on this webpage. • The online platform allows for instant feedback and comments to be submitted, in so doing saving time for the stakeholder and also giving the assurance that their comments have been submitted for inclusion in the project reporting. • Written comments can also be submitted via email, post or fax. • Any comments provided telephonically or via instant message will be transcribed and recorded as formal comments.
<p>Regulation 40(2) - Provide access to all project information that has the potential to influence any decision regarding the application, unless protected by law, and must include consultation with Competent Authority, Organs of State & registered I&APs.</p> <p>Regulation 41(6) – Relevant information available and accessible</p>	<p>Provision of project information and consultation via various means including:</p> <ul style="list-style-type: none"> • Telephonic consultation. • Email correspondence. • Correspondence sent via post (where email or telephonic correspondence is not available). • SMS and/or WhatsApp. • The Savannah Environmental online stakeholder engagement platform will ensure that I&APs are afforded sufficient opportunity to participate in the project and raise comments on the project to any person with interest in the BA process for the project. This online stakeholder engagement platform which will include the following: <ul style="list-style-type: none"> ○ A means to register on the project database and provide details of their interest in the project ○ Background information on the project

Regulation	Approach & Methodology to meet requirements
	<ul style="list-style-type: none"> ○ Project maps (including locality map, layout map, sensitivity map, landowner map, etc) ○ Photos of the project site and surrounds ○ Presentation with narration providing a summary of the project details and the findings of the BA ○ Posters providing a summary of the findings of the BA ○ A means of submitting written comment or queries. ● Virtual meetings using an appropriate platform agreeable to all parties (such as Zoom, Skype or Teams). The meeting will be recorded and the attendees' details captured in an attendance register. Confirmation of their attendance will also be requested by e-mail and the correspondence will be included in the report. ● Communities will be consulted via one of the following where available: the relevant Ward Councillor, ward committee members, community representative or local community forum members, as determined and confirmed during the consultation process.
Regulation 41 (2)(a) – Site notice	<ul style="list-style-type: none"> ● Site notices will be placed at affected properties by the EAP, landowner or specialist, depending on specific travel restrictions applicable at the time. ● Size and content will be in accordance with Regulation 41 (3) & 41 (4).
Regulation 41 (2)(b) – Written notification to affected and neighbouring landowners and occupiers; municipality; ward councillors; Organs of State & other parties required by the CA	<ul style="list-style-type: none"> ● Notification letter to be sent via email, fax or post.
Regulation 41 (2)(c) – (e) – Advertisements	<ul style="list-style-type: none"> ● Advert to be placed in a local newspaper. ● Process notices (A4 size) with site notice details will be placed at public places that are frequented by and accessible to community members during Alert Level 3.
Regulation 42 – Project database	<ul style="list-style-type: none"> ● I&APs to be identified through a process of networking and referral, obtaining information from the Savannah Environmental existing stakeholder database,

Regulation	Approach & Methodology to meet requirements
	<p>liaison with potentially affected parties in the greater surrounding area and a registration process involving the completion of a reply form.</p> <ul style="list-style-type: none"> • Organs of State, key stakeholders and affected and surrounding landowners will be identified and registered on the project database. • Other stakeholders will be required to formally register their interest in the project through either directly contacting the Savannah Environmental Public Participation team via email or fax or use of the Savannah Environmental website. • In order to access the Savannah Environmental online stakeholder engagement platform for a specific project, I&APs will be required to provide their details such that they are automatically registered on the project database. • The register of I&APs will contain the names of: <ul style="list-style-type: none"> ○ all persons who requested to be registered on the database through the use of the Savannah Environmental website, or in writing and disclosed their interest in the project; ○ all Organs of State which hold jurisdiction in respect of the activity to which the application relates; and ○ all persons who submitted written comments or attended virtual meetings and viewed virtual presentations on the Savannah Environmental website during the public participation process. • The information captured on the project database will contain the names, organisation and contact details, as required.
Regulation 44 – Comments to be recorded	<ul style="list-style-type: none"> • Comments will be able to be submitted directly to the EAP using the Savannah Environmental online stakeholder engagement platform. A customised reply form is available on this webpage. • The Savannah Environmental online stakeholder engagement platform includes: <ul style="list-style-type: none"> ○ A means to register on the project database and provide details of their interest in the project ○ A means of submitting written comment or queries.

Regulation	Approach & Methodology to meet requirements
	<ul style="list-style-type: none"> • The online platform allows for instant feedback and comments to be submitted, in so doing saving time for the stakeholder and also giving the assurance that their comments have been submitted for inclusion in the project reporting. • Written comments can also be submitted via email, post or fax. • Any comments provided telephonically or via instant message will be transcribed and recorded as formal comments. • I&APs without the applicable electronic facilities to access the Savannah Environmental website will be provided with the opportunity to submit their comments and communicate with the public participation team via SMS, WhatsApp or by sending a Please-call-me notification. These comments will be transcribed and recorded as formal comments. • All comments received throughout the EIA process will be acknowledged and captured in the comments and responses report (C&RR) with a relevant response. • The C&RR will be included in the final report submitted to the CA.
Regulation 4(2) – Notification of decision on application	<p><u>Notification of Environmental Authorisation (EA) using the following means:</u></p> <ul style="list-style-type: none"> • Notification letter with details as outlined in EA issued will be sent via email, fax or post. • Notification will be available on the Savannah Environmental website • Notifications that the EA has been issued and where to download and/or obtain a copy to communities via any of the following where available: Ward Councillor and his/her ward committee members and identified and confirmed community representatives. • SMS or WhatsApp notification.