
PROPOSED ESTABLISHMENT OF THE ILANGA CSP 4 PROJECT, NORTHERN CAPE PROVINCE

COMMENTS AND RESPONSES REPORT

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COMMENTS RECEIVED: EIA PHASE

NO.	ISSUE/COMMENT	ISSUE RAISED BY	RESPONSE
IMPACTS TO ESKOM INFRASTRUCTURE			
1.	Please find attached Eskom requirements for works at or near Eskom infrastructure.	John Geeringh Senior Consultant Environmental Management Eskom Email: 20-04-2016	Eskom's requirements for works at or near Eskom infrastructure is noted and this information has been submitted to the Developer.
REQUESTS FOR INFORMATION RECEIVED FROM I&APS			
2.	As discussed I am trying to map the area of the Karoshoek Solar Valley. Can you provide a geo file (KMZ) of the various Ilanga sites 1 to 9?	Leonard Shaw Specialist: Network Transformation and Planning Telkom Email: 21-04-2016	A kmz file illustrating the various Ilanga CSP sites was emailed to Leonard Shaw on 17 May 2016. No further comments were received.
3.	Please send me a kml file indicating the footprint areas for the proposed Ilanga CSP developments as well as that of the approved CSP development.	Samantha De la Fontaine District Ecologist Department of Environment and Nature Conservation Email:	A kml file illustrating the Ilanga CSP sites was emailed to Samantha De la Fontaine on 11 May 2016. No further comments were received.

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		04-05-2016	
ACKNOWLEDGMENT LETTERS RECEIVED FROM ORGANS OF STATE DEPARTMENTS			
4.	<p>The Department confirms having received the Draft EI report for public review for environmental authorisation of the above mentioned project on the 28th April 2016. As required in terms of the Environmental Impact Assessment Regulations, 2014.</p> <p>The application has been assigned the reference number NC/NAT/ZFM/KHA/UPI2/2016. Kindly quote this reference number in any future correspondence in respect of the application. Please note the responsible officer is going to be Mr. Ordain Riba.</p>	<p>Ms L. Tools-Bernado EIA Administration</p> <p>Northern Cape Department of Environment and Nature Conservation</p> <p>Letter: 04-05-2016</p>	<p>Acknowledgment noted. Mr Ordain Riba has been registered on the project's I&AP database.</p>
CONSULTATION WITH THE NATIONAL DEPARTMENT OF ENVIRONMENTAL AFFAIRS			
5.	<p>i. Please ensure that all relevant listed activities are applied for, and are specific and can be linked to the development activity or infrastructure as described in the project description.</p> <p>ii. If the activities applied for in the application form differ from those mentioned in the final EIAR, an amendment application form must be submitted. The Departments amended application form template can be downloaded from https://www.environment.gov.za/documents/forms</p> <p>iii. The purpose of the proposed development is indicated as for purposes of facilitating the increase in capacity of the authorised Karoshoek</p>	<p>Mmamohale Kabasa Case Officer</p> <p>Department of Environmental Affairs</p> <p>Letter: 23-05-2016</p>	<p>i. All relevant listed activities have been applied for, and are specific and can be linked to the development activity or infrastructure as described in the project description. Refer to Chapter 4 and Chapter 7 of the EIA Report.</p> <p>ii. Comment noted. The application form will be amended and submitted with the final EIAR should this be necessary following completion of the process.</p> <p>iii. Comment noted. The purpose as indicated in correct. Details are included within the EIA report.</p> <p>iv. A summary of impacts of the approved project (Karoshoek LFTT 2 (14/12/16/3/3/2/295) from information within the EIA undertaken for this project (Savannah Environmental. July 2012) has been included into the revised draft EIAR. This</p>

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	<p>LFTT 2 (14/12/16/3/3/2/295).</p> <p>iv. Due to the number of similar applications in the area, and this being an 'expansion' of the approved projects, the assessment must include the impacts of the approved projects, and then provide the impacts of the proposed expansion developments. This must be done for all impacts identified and assessed, as well as the specialist studies.</p> <p>v. All the specialist assessments must include a cumulative environmental impact statement. Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be indicated and quantified, i.e. hectares of cumulatively transformed land.</p> <p>vi. Identified cumulative impacts associated with the proposed development must be rated with the significance rating methodology approved with the acceptance of the scoping report.</p> <p>vii. The cumulative impacts rating must inform the need and desirability of the proposed development.</p> <p>viii. The EIAR must indicate the impact of the approved facility, then quantify and assess the impact of the expansion.</p> <p>ix. The preferred layout plan with the preferred substation, service routes, and construction camp must be indicated in the final EIAR. A map combining the final layout map superimposed</p>		<p>includes consideration of all impacts identified and assessed (refer to Chapter 6 of the revised EIA report).</p> <p>v. All the specialist assessments reports include a cumulative environmental impact statement. Identified cumulative impacts have been clearly defined, and where possible the size of the identified impact has been indicated and quantified, i.e. hectares of cumulatively transformed land (refer to Chapter 8 of the revised EIA report).</p> <p>vi. The identified cumulative impacts associated with the proposed development have been rated with the significance rating methodology approved with the acceptance of the scoping report.</p> <p>vii. The cumulative impacts rating has informed the need and desirability of the proposed development (refer to Chapter 2, Section 2.1.1 of the revised EIA report).</p> <p>viii. A summary of impacts of approved project (Karoshoek LFTT 2 (14/12/16/3/3/2/295) from information within the EIA undertaken for this project (Savannah Environmental, July 2012) has been included into the revised draft EIAR (refer to Chapter 6 of this report). The EIAR has quantified and assessed the impact of the expansion (refer to Chapter 7 of the revised EIA report).</p> <p>ix. The preferred layout plan with the preferred substation, service routes, and construction camp has been included in the revised EIAR. A map</p>

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	<p>(overlain) on the environmental sensitivity map which must also be included in the EIAR.</p> <p>x. The layout plan must indicate the area of expanded footprint, the approved footprint as well as the combined project footprints. This must be clearly demarcated.</p> <p>xi. Should any of the proposed project footprint fall within the authorised footprint, this must be removed, as the Department cannot issue a EA on a footprint with an existing valid EA. Should this not be possible, the EA's for the approved sites must be lapsed, and this assessment must assess the impacts of the larger site.</p> <p>xii. Recommendations provided by the specialist's reports must be considered and used to inform the preferred layout alternative. Specifically, the solar field, power block, and associated services must be removed from all sensitive areas as recommended by the specialists.</p> <p>xiii. Condition xii of the acceptance letter signed 15th February 2016 required that the surface water assessment of the study area be conducted. This was not done. The ecological study identifies that the study area is effected by non-perennial drainage lines and pans and these were not assessed in terms of the terms of reference indicated in the acceptance letter signed 15th February 2016. The water resources report attaches as Appendix F to the Draft EIAR does not assess the surface hydrological state of the</p>		<p>combining the final layout map superimposed (overlain) on the environmental sensitivity map has also been included the EIAR (refer to Chapter 8 and Appendix O).</p> <p>x. The locality map which indicates the area of expanded footprint, the approved footprint as well as the combined project footprints has been included in this report (refer to Chapter 1, Figure 1.2 and Appendix O). As the intention is to develop the expanded site together with the already authorised site, a combined layout for the authorised area and the expanded area is presented.</p> <p>xi. A locality map which illustrates the proposed project footprint which does not fall within the authorised footprint (i.e. the expanded area only which is the subject of the current application) has been included in the report (refer to Figure 1.3 and Appendix O). As the intention is to develop the expanded site together with the already authorised site, a combined layout for the authorised area and the expanded area is presented. This report however assesses the potential impacts of the expanded area.</p> <p>xii. All recommendations provided in the specialist's reports have been considered and used to inform the preferred layout alternative.</p> <p>xiii. The ecological impact assessment contained within Appendix D includes the identification of drainage lines affected by the project and an assessment of</p>

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	<p>study area, but solely focuses on the impacts of abstraction of water from the Orange River. The hydrological impact assessment must address, inter alia the following:</p> <ul style="list-style-type: none"> » Identification, assessment of all potential impacts on the water courses and suggestion of mitigation measures; » Identification and sensitivity rating of all surface water courses for the impact phase of the proposed development, and, » Recommendations on the preferred placement of the parabolic troughs and all associated infrastructure and preference must be provided to the avoidance of the watercourse on the property. <p>xiv. The soils and agricultural study prepared by Savannah Environmental (Pty) Ltd. dated September 2015 and peer reviewed by ARC-Institute for Soil, Climate and Water in April 2016 does not provide significance ratings for the cumulative impacts associated with the loss of agricultural land on the site and within the area as required in the acceptance of the scoping report Signed 15th February 2016. As such, as requested in the acceptance of the SR, the soil and agricultural study must be done.</p> <p>xv. The format of the Peer-Review must address the following:</p> <ul style="list-style-type: none"> » Acceptance of the ToR » Is the methodology clearly explained and 		<p>impacts in this regard. This includes identification of the sensitivity of these features and recommendations regarding avoidance and mitigation measures required. The water resources report considers the water resource, i.e. impact of water abstraction associated with the project.</p> <p>xiv. The agricultural assessment conducted by Savannah Environmental was peer reviewed by Garry Paterson of ARC-Institute for Soil, Climate and Water who confirmed that the site has low agricultural potential and that a detailed field assessment will not be required to confirm impacts (refer to Appendix H and H-1 of the revised EIA report). Appendix A of the revised peer review letter by ARC-Institute for Soil, Climate and Water, dated June 2016, includes the significance ratings for the cumulative impacts associated with the loss of agricultural land on the site and within the area (refer to Appendix H-1 of the revised EIA report).</p> <p>xv. The revised peer review letter by ARC-Institute for Soil, Climate and Water in June 2016 addresses all requirements listed (refer to Appendix H-1 of this report).</p> <p>xvi. Birds & Bats Unlimited Environmental Consultants undertook the avian surveys for the project. Two visits were undertaken. The site visits were timed to maximise the chances of recording as many resident birds and nomadic birds as possible present on site.</p>

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	<p>acceptable?</p> <ul style="list-style-type: none"> » Evaluate the validity of the findings (review data evidence) » Discuss the mitigation measures and recommendations » Evaluate the appropriateness of the reference literature » Is the article well written and easy to understand? » Identify any shortcomings <p>xvi. It must be noted that this Department in its acceptance of the SR letter, requested that the avifaunal assessment cover the summer and winter seasons. Upon review of this report, the specialist conducted a site visit from the 31 October – 7 November 2015 and 29 February – 09 March 2016 which is deemed as spring and autumn. As such the study must be conducted within the seasons as requested by the DEA. Furthermore, no reason or motivation was provided for the deviation from the acceptance of the SR.</p> <p>xvii. The specialist studies to be conducted must comply with Appendix 6 of the EIA Regulation 2014, and proof of compliance must be provided in the final EIAR.</p> <p>xviii. This Department requires comments from the DWS as requested in point xi of the acceptance of the scoping. Proof of obtaining comments from those specific directorates within the</p>		<ul style="list-style-type: none"> • Such visits were timed therefore to capture the first breeding peak of resident arid-adapted birds in October-November; and capture the influx of nomadic birds that arrive with the rains and breed 2-4 weeks later. • Therefore the site visit conducted by the specialist in October-November 2015 coincided with late spring when many resident arid-species first start to breed (blue above). Furthermore, according to Lepage and Lloyd (2004) who analysed the breeding seasons of all South Africa's birds (with an emphasis on arid-breeding birds), the top breeding month is October (even for areas which have late-summer rains). The study area fits into the latter category. Most breeding is finished by the winter (June-July). • For really arid areas such as that under consideration which have late summer (March) rains, nomadic birds respond to (fly into) areas with rains and breed within 14 days (insectivores) or 32 d (granivores) (Maclean 1969). Therefore, both specialist visits were timed perfectly to record resident (October) and nomadic (March) birds present and breeding in the study area. A summer and winter visit would miss both peaks (refer to Appendix E-1 for the motivation letters from the specialist) thereby potentially resulting in an under-estimation of the potential impacts.

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	<p>Department must be provided.</p> <p>xix. The draft EIAR does not provide proof of compliance with Regulation 40, 41, 42, 43 and 44 of the EIA Regulations of 2014. Please ensure that all issues raised and comments received during the circulation of the EIAR form I&APs and Organs of state which have jurisdiction (including the Departments Biodiversity Section) in respect of the proposed activity are adequately addresses and included in the Final EIAR. Proof should be submitted to the department of the attempts that were made to obtain comments and proof that the proposed development was advertised in at least one local newspaper.</p> <p>xx. In their comments dated 10 February 2016 for the Illanga CSP 7, 8 and 9 by the same applicant, assessed by Savannah Environmental (Pty) Ltd., and located on the same farm portion as Illanga CSP 3; the Department of Agriculture, Forestry and Fisheries (DAFF) requested a precautionary approach be taken for the cumulative impacts assessment of the protected trees in the area (Boscia and Acacia species). The DAFF was of the view that there was a underestimation of the significance of the residual cumulative impacts on the protected floral species and that there is a possibility that a biodiversity offset may be triggered. As such, the final EIAR must take DAFF's</p>		<p>xvii. The specialist studies conducted comply with Appendix 6 of the EIA Regulation 2014.</p> <p>xviii. DWS was notified of the proposed development. The draft EIAR was submitted to the DWS for Review. A meeting was held with DWS on 5 May 2016 in which the EIA team was notified that they would receive the comments on the DEIAR. No comments have been received to date. Please refer to Appendix C for the minutes of the meeting and the proof of notification and request for comment.</p> <p>xix. As the Draft Report was still subject to comment, it was not possible to include comments in this regard within the Draft document. The revised draft EIAR provides proof of compliance with Regulation 40, 41, 42, 43 and 44 of the EIA Regulations of 2014. All issues raised during the circulation of the draft EIAR to I&APs and Organs of State which have jurisdiction in respect of the proposed activity have been included in the revised EIAR and the comment and responses report. Proof of the attempts that were made to obtain comments and proof that the proposed development was advertised in at least one local newspaper has also been provided in the revised draft EIAR (refer to Appendix C).</p> <p>xx. As detailed in the Ecological Impact Assessment (Appendix D), where large numbers of protected tree species are affected, DAFF may request an offset to counter the negative impact of the</p>

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	<p>recommendations into consideration. Further, the Final EIAr must provide proof of compliance with these recommendations as well as final comments from DAFF.</p> <p>xxi. The EMPr must include a provision to audit the effectiveness of the mitigation measures and recommendations for amongst others the following: grievance incidents, waste management, alien and open space management, re-vegetation and rehabilitation, plant rescue and protection and traffic and transportation. These results must be made available to the Department and relevant competent authority on request, and must be part of monitoring and audit reports.</p> <p>xxii. The EMPr must identify and indicate the applicable section of the National Heritage Act (Act 20 of 1999).</p> <p>xxiii. The EMPr must indicate the management interventions table referred to in the last paragraph on page 5 of the draft EMPr.</p> <p>xxiv. Please note that the final EIAr must comply with all conditions of the acceptance of the scoping report signed 15 February 2016 and must address all comments contained in this comments letter.</p> <p>xxv. In terms of Appendix 3 of the EIA regulation 2014, the report must include an undertaking under oath or affirmation by the EAP in relation to:</p>		<p>development on protected tree species. In the current context, the development of this site is likely to result in moderate numbers of <i>Boscia albitrunca</i> and <i>Boscia foetida</i> subsp. <i>foetida</i> being lost. Although the development on its own may not warrant an offset in this regard, the cumulative potential loss of trees in the area is very high and this would certainly trigger such a requirement from DAFF, should several of the developments in the area reach preferred bidder status. Whether or not an offset would be required, would usually be evaluated by DAFF following the walk-through of the final approved development footprint and the establishment of how many individuals of protected trees would be impacted. However, since the development is part of the larger Karoshoek development area, it would be advantageous for the developer to engage with DAFF at an early stage so that the required offsets can be negotiated and developed in a more holistic manner for the wider development and not on a case by case basis. This should include an evaluation of <i>Boscia albitrunca</i> and <i>Boscia foetida</i> population structure and abundance within the wider area and an evaluation of the significance of the affected individuals for the local populations. In most cases, the offset would entail the acquisition, protection and conservation of similarly sized or larger populations within adjacent areas. Alternatively the offset may involve research into</p>

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	<ul style="list-style-type: none"> » The correctness of the information provided in the reports » The inclusion of comments and inputs from stakeholders and I&APs » The inclusion of inputs and recommendations from the specialist reports where relevant » Any information provided by the EAP to I&APs; and, » Responses by the EAP to comments or inputs made by I&AP's <p>xxvi. The EIAr must provide the technical details of the proposed facility in a table format as well as their description and/or dimensions. A sample of the minimum information required was listed under point 2 of the EIA information required in the acceptance of the SR.</p> <p>xxvii. You are further reminded that the final EIAr to be submitted to the Department must comply with all the requirements in terms of the scope of the assessment and content of the EIAr in accordance with Appendix 3 of the EIA Regulations 2014.</p> <p>xxviii. Further note that in terms of Regulation 45 of the EIA Regulations 2014, 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).</p> <p>xxix. Failure to comply with these requirements of the acceptance of the SR, the comments of this</p>		<p>the population dynamics or other aspects of the biology of the affected species, aimed at contributing to the future conservation of the affected species. A meeting was held with DAFF and DENC on the 5 of May 2015 (refer to the minutes of the meeting included in Appendix C of the revised EIAr). Although the department did not want to discuss the issue related to off-sets in detail, it was discussed that off-sets will need to be considered, however this process will only commence once the projects have been awarded preferred bidder status.</p> <p>xxi. The EMPr has been amended to include the provision to audit the effectiveness of the mitigation measures and recommendations for amongst others the following: grievance incidents, waste management, alien and open space management, re-vegetation and rehabilitation, plant rescue and protection and traffic and transportation. The EMPr also requires that the results of the audit reports must be made available to the Department and relevant competent authority on request, and must be part of monitoring and audit reports.</p> <p>xxii. The EMPr identifies and indicates the applicable section of the National Heritage Act (Act 25 of 1999). Please refer to Appendix B of the EMPr.</p> <p>xxiii. The section of the EMPr which includes this reference is detailing the findings of the EIA. The management intervention tables refer to the</p>

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	<p>letter as well as the requirements of the EIA Regulations 2014, a negative Environmental Authorisation will be issued by this Department</p> <p>You are hereby reminded that in terms of Section 24F of NEMA, no activity may commence prior to an environmental authorisation being granted by the Department.</p>		<p>impact assessment tables (included in Chapter 7 of this revised Draft EIAr) which include proposed mitigation measures. Information related to the management interventions extracted from the Avifaunal Specialist Report (Refer to Appendix E) has been included within the EMPr in order to clarify this.</p> <p>xxiv. Tables 1 and 2 of the revised EIAr provide details of how the draft EIAr complies with the conditions of the acceptance of the scoping report signed 15 February 2016 and the comments contained in the comments letter from DEA dated 23 May 2016.</p> <p>xxv. The revised draft EIAr complies with requirements listed in Appendix 3 of the EIA regulation 2014. Refer to Appendix M for the EAP Affirmation letter and declaration form.</p> <p>xxvi. The revised EIAr provide the technical details of the proposed facility in a table format as well as their description and/or dimensions (refer to Chapter 2, Section 2.1).</p> <p>xxvii. Comment noted.</p> <p>xxviii. Comment noted.</p> <p>Comment noted.</p>
ISSUES RAISED BY LANDOWNERS			
6.	A servitude has been registered on my farm Vaalkoppies. No map is attached.	<p>Danie Strauss Impacted Landowner</p> <p>Farm Vaalkoppies 6/40</p>	Comment noted, a locality map was provided at the Public Open Day held on 5 May 2016.

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		Reply Form: 11-04-2016	
7.	I am currently renting properties across the N10 (across the proposed CSP 3, CSP 4 and CSP 5). Thus, I will be affected by the projects.	Leon Olivier Adjacent Landowner Issue raised at Public Open Day 5-05-2016	Leon Olivier's has been registered as an Interested and Affected Party (I&AP) on the project's database.
8.	Direct impact on my surroundings. Requests correspondence and a consolidated map of all the projects.	Burger van Staden Adjacent Landowner Issue raised at Public Open Day 5-05-2016	Burger van Staden has been registered as an I&AP on the project's database and his contact details were updated. A consolidated layout map was emailed to Mr Van Staden on 20 May 2016.
9.	A servitude has already been registered on my farm (Rest Vaalkop 40 No. 6). How long will it take for the registration of the servitude and when will the cost for the servitude be determined?	Danie Strauss Impacted Landowner Farm Vaalkoppies 6/40 Issue raised at Public Open Day 5-05-2016	No servitude is required on Vaalkoppies for the proposed projects.
10.	I am renting the land on which one of the projects are proposed on, as well as a local resident. I request the consolidated map showing all the Ilanga projects.	Elno Krapohl Impacted Tenant Olienhof Boerdery Issue raised at Public Open Day	Elno Krapohl has been registered as an I&AP on the project's database. A consolidated layout map was emailed to him on 20 May 2016.

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11.	The Ilanga projects is proposed adjacent to my farm. My concerns are: 1. Safety and security will be an issue. How will it be ensured? 2. We are farming with exotic game and the main reason we bought the farm is due to its locality. The project will have a negative impact on the business. 3. The towers will have a visual impact.	5-05-2016 Johan van der Colff Adjacent Landowner Trooilaps Pan 20/53 Issue raised at Public Open Day 5-05-2016	1) Impacts relating to safety and security were assessed in the social impact assessment of the EIAr. Mitigation measures proposed can potentially reduce the impact through fencing of the site and having access controlled entrances and exits (refer to Appendix I and L of the revised EIAr). 2) It is anticipated that visual impacts and impacts on sense of place are expected to be of a low significance during the operational phase. 3) The visual impact assessment indicated that there are a large number of homesteads and the urban area of Upington and smaller settlements of Leekrans and Karos within the approximate limit of visibility of the proposed development. Views are likely to be similar to those of the authorised development although a greater extent of the tower will be visible due to the extended height of the structure. Within urban areas, it is also likely that vegetation or buildings will provide a moderating influence. It was therefore concluded that the potential visual impact of the tower will be low (refer to Appendix J of the Ilanga Tower 1 Project – Revised EIAr dated June 2016).
12.	Why do the project personnel never contact us? We are left in the dark.	JC Wanl Adjacent Landowner Issue raised at Public Open Day 5-05-2016	Savannah Environmental, on behalf of Emvelo Holdings Limited, provided written notice of the EIA process and availability of the Scoping and EIA reports for public review to impacted and adjacent landowners and occupiers as per the requirements set out in Regulation 41 of the EIA Regulations, 2014. For the EIA phase of the project, the I&AP notification included the distribution of written notices

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			announcing the availability of the EIA Report for public review on 19 April 2016 (refer to Appendix C5), the placement of site notices and the placement of advertisements in the "Volksblad" newspaper on 27 April 2016 and the "Gemsbok" newspaper on 29 April 2016 (refer to Appendix C2).
13.	I am a concerned farmer. My farm is next to some of the sites. My concerns are: <ol style="list-style-type: none"> 1. Security of our game and property 2. Visual effect, one tower will be right on our doorstep. We bought our farm to be away from all lights. 3. Effect of weather and rainfall temperatures. 	Marius Offer Adjacent Landowner Trooilaps Pan RE/53 Issue raised at Public Open Day 5-05-2016	<ol style="list-style-type: none"> 1) Impacts relating to safety and security were assessed in the social impact assessment of the EIAr. Mitigation measures proposed can potentially reduce the impact through fencing of the site and having access controlled entrances and exits (refer to Appendix I and L of the revised EIAr). 2) The visual impact assessment indicated that there are a large number of homesteads and the urban area of Upington and smaller settlements of Leekrans and Karos within the approximate limit of visibility of the proposed development. Views are likely to be similar to those of the authorised development although a greater extent of the tower will be visible due to the extended height of the structure. Within urban areas, it is also likely that vegetation or buildings will provide a moderating influence. It was therefore concluded that the potential visual impact of the tower will be low (refer to Appendix J of the Ilanga Tower 1 Project – Revised EIAr dated June 2016). 3) The visual impact assessment indicated that it is likely that operational lighting will be required at buildings and security lighting may be required within the trough field. The authorised projects within the greater Karoshoek Valley are extensive and pose a more major

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			<p>risk to the transformation of the night time landscape. The extent of this transformation is not known. If flood lighting is deemed necessary for each plant throughout the hours of darkness then impacts are likely to be significant. However if low level operational lighting is required at buildings then it is likely that each plant will not appear significantly different than the farmsteads that are scattered through the landscape. If the former approach is adopted then floodlighting an additional 200ha of the plant is likely to be noticeable. If however only low level lighting around buildings is required then the additional proposed capacity expansion of Ilanga CSP 3 is likely to have negligible impact on the night time landscape. The visual made the following recommendation which have been included in the revised EIAr and the EMPr:</p> <ul style="list-style-type: none"> » Plan to utilise infra-red security systems or motion sensor triggered lighting; » Ensure that lighting is focused on the development with no light spillage outside the site; and » Keep lighting low, no tall mast lighting should be used. <p>It was therefore concluded that the potential light impact of the tower will be low (refer to Appendix J of the Ilanga Tower 1 Project – Revised EIAr dated June 2016.).</p> <p>There is no scientific evidence available that can prove that the proposed projects will have an effect on the on the rain</p>

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			and weather patterns.
ECOLOGICAL IMPACTS			
14.	How many power lines will be investigated in the EIA process for the grid connection infrastructure?	Samantha De la Fontaine District Ecologist Northern Cape Department of Environment and Nature Conservation: Meeting: 05-05-2016	One 400kV power line and one 132kV power line will be investigated to connect all of the CSP facilities to the Eskom MTS Substation, however several power line route alternatives will be assessed. The preferred power line route will be determined through the EIA process. The preferred point of connection for the facility will be determined by Eskom should the project be awarded preferred bidder status by the Department of Energy.
15.	How many of the Ilanga projects have received preferred bidder status?	Jacoline Mans Chief Forester: NFA Regulation	Ilanga CSP 1 (100MW trough plant) is the only project which has been awarded preferred bidder status by the Department of Energy at this stage.
16.	What is the footprint of the entire Karoshoek Solar Development?	National Department of Agriculture, Forestry and Fisheries	The development footprint of each of the sites vary from between 600ha and 1000ha. The total development footprint is approximately 30 000 ha.
17.	How much vegetation would be cleared in total?	Meeting: 05-05-2016	The entire area within which the infrastructure is placed will be cleared of vegetation.
18.	How will you mitigate impacts on vegetation?	Meeting: 05-05-2016	Areas which are considered to be of very high to high ecological sensitivity are excluded from the development. Relevant permits will be applied for where sensitive areas cannot be avoided. Where required, an offset will be provided to compensate for loss of vegetation.
19.	It should be noted that we will not issue new licenses until the conditions of the first license issued for Ilanga CSP 1 have been met. A condition of the license is that		The delay in submitting the progress reports was due to the fact that construction commenced in October 2015 and the developer had not reached the 6-month point as yet.

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	<p>we require progress reports to be submitted every 6 months.</p> <p>In terms of issuing an extended license, I will need to know what percentage of vegetation has already been cleared. In addition, I will need a map that will show me what area the extension of the license would be relevant to and the remaining footprint that still needs to be cleared.</p> <p>I suggest that you apply for licenses in phases as they are needed. The licenses are valid for a two-year period.</p>		<p>However, the progress report will be submitted to DAFF shortly.</p> <p>The extension of the license is required to cover the related construction activities namely the construction of the transmission lines and pipeline which would occur after the plant is constructed. It is agreed that future licenses would be applied for in a phased approach.</p>
20.	<p>The cumulative impact of all these projects is a concern to DAFF and DENC. We realise that the site is located within a Renewable Energy Development Zone (REDZ) but nevertheless, the impacts on the <i>Boscia</i> species will be significant and cannot be mitigated. A biodiversity offset may be triggered if more of these projects are awarded preferred bidder status and proceed to construction. Negotiations should be commenced with DAFF: NFA Regulation and DENC if a biodiversity offset is triggered as soon as possible as this may delay the process in obtaining the flora permit and NFA license.</p> <p>A land offset is preferred to ensure that the affected vegetation types are conserved elsewhere. A land offset will need to undergo a formal declaration process under NEMA or NEMPA which is a lengthy process.</p> <p>Licenses are usually issued once we have received written commitment from the developer to implement a land offset.</p>		<p>The project developer plans to implement greening initiatives that will empower local communities by creating potential income streams for communities. Where required, an offset will be provided to compensate for loss of vegetation. This will be implemented in consultation with DAFF and DENC in order to meet their specific requirements in this regard.</p>

NO.	ISSUE/COMMENT	ISSUE RAISED BY	RESPONSE
21.	<p>From DAFF's perspective greening plans are regarded as a mitigation and not an offset. You will note that in the initial license provided you with options to plant trees and/or donate trees to communities.</p> <p>In terms of cumulative impacts, once a development exceeds a certain threshold greening is no longer regarded sufficient. If a biodiversity offset is required, we would like to see a land offset being implemented to create a conservation area. Land offsets can still benefit the community if it is declared a nature reserve and/or the land is donated to the community, communities could build ecotourism facilities/activities.</p> <p>The location of the declared area would need to be negotiated. We would need to understand the vegetation types that the development would impact on and whether a significant contribution to biodiversity conservation is made. If the area within the development footprint is totally degraded, it would not be an appropriate area for a land offset.</p>		<p>A land offset could potentially be located within the Karoshoek Solar Valley development area since the development footprint for these projects would be approximately 6 800 ha of the 25 000ha – 30 000ha. The remaining land would remain undeveloped.</p>
22.	<p>Did you purchase the land or are you leasing it from landowners on a long-term basis?</p>		<p>The farm portion for Ilanga CSP 1 has been secured and the developer plans to purchase the remaining farms outright.</p>
23.	<p>A 20 000 ha nature reserve would make a meaningful contribution to biodiversity conservation.</p>		<p>Comment noted.</p>
24.	<p>Please can you forward me a kml file showing all the CSP projects and related infrastructure?</p>	<p>Samantha De la Fontaine</p>	<p>A kml file showing the CSP projects and related infrastructure was emailed to Samantha De la Fontaine.</p>
25.	<p>The sensitivity map for the Ilanga Tower 1 illustrates an avifauna sensitive area, however, the infrastructure shows that an evaporation pond is planned to be located within that area. The evaporation pond would likely</p>	<p>District Ecologist Northern Cape</p>	<p>Noted, the evaporation pond has been relocated outside of the avifauna sensitive area (refer to the layout map contained in Appendix O of the revised EIAR).</p>

NO.	ISSUE/COMMENT	ISSUE RAISED BY	RESPONSE
	attract the birds to the tower facility. The evaporation pond should be located outside of the avifauna sensitivity area.	Department of Environment and Nature Conservation:	
26.	The sensitivity map for CSP 4 shows an area of high ecological sensitivity. What does this high ecological sensitivity area comprise of? It seems as though the developer is planning to develop on this area.	Meeting: 05-05-2016	The area of high ecological sensitivity has been identified as a pan. The ecology specialist report contained within Appendix D states that it is likely that the pan would be lost to the development as there is little scope for avoidance under CSP development. However, the loss of the pan would not significantly impact the availability of this habitat in the area as there are many larger pans in the broader area.
27.	I noted that a stone age site has been identified on the Ilanga CSP2 site. Have you received permission from SAHRA to remove the stone age site?		SAHRA is being consulted as part of the EIA process. The relevant permits will be applied for to remove the stone age site if the project is awarded preferred bidder status.
28.	<p>1. DEPARTMENTAL MANDATE</p> <p>The Directorate: Forestry Management (Other Regions) in the National Department of Agriculture, Forestry and Fisheries (DAFF) is responsible for implementation of the National Forests Act, Act 84 of 1998 (NFA) and the National Veld and Forest Fires Act, Act 101 of 1998 as amended. The developer must take note of the following sections of the NFA:</p> <p>1.1 Section 12(1): "The Minister may declare –</p> <ul style="list-style-type: none"> (a) A particular tree, (b) A particular group of trees, (c) A particular woodland; or (d) Trees belonging to a particular species, to be a protected tree, group of trees, woodland or species. 	<p>Jacoline Mans Chief Forester: NFA Regulation</p> <p>Department of Agriculture Forestry and Fisheries</p> <p>Letter: 11-05-2016</p>	<p>Comment noted.</p> <p>2.1 COMMENTS ON THE DRAFT EIA REPORT (CSP4)</p> <p>2.1.1 Comment noted. As detailed in the Ecological Impact Assessment (Appendix D, where large numbers of protected tree species are affected, DAFF may request an offset to counter the negative impact of the development on protected tree species. In the current context, the development of this site is likely to result in moderate numbers of <i>Boscia albitrunca</i> and <i>Boscia foetida</i> subsp. <i>foetida</i> being lost. Although each CSP development on its own may not warrant an offset in this regard, the cumulative potential loss of trees in the area is very high and this would certainly trigger such a requirement from DAFF, should several of the</p>

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	<p>1.2 Section 15(1): "No person may –</p> <ul style="list-style-type: none"> (a) Cut, disturb, damage or destroy any protected tree; or (b) Possess, collect, remove, transport, export, purchase, sell, donate or in any other manner acquire or dispose of any protected tree, or any forest product derived from a protected tree, except – <ul style="list-style-type: none"> (i) Under a license granted by the Minister; or (ii) In terms of an exemption from the provision of this subsection published by the Minister in the Gazette on the advice of the Council." <p>1.3 Section 62(2)(c): "Any person who contravenes the prohibition on-</p> <ul style="list-style-type: none"> (i) The cutting, disturbance, damage or destruction of temporarily protected trees or groups of trees referred to in section 14(2) or protected trees referred to in section 15(1)(A); or (ii) The possession, collection, removal, transport, export purchase or sale of temporarily protected trees or groups of trees referred to in section 14(2) or protected trees referred to in section 15(1)(b), or any forest product derived from a temporarily protected tree, group of trees or protected tree, is guilty of a first category offence. <p>1.4 Section 58(1): "Any person who is guilty of a first category offence referred to in sections 62 and 63</p>		<p>developments in the area reach preferred bidder status. Whether or not an offset would be required, would usually be evaluated by DAFF following the walk-through of the final approved development footprint and the establishment of how many individuals of protected trees would be impacted. However, since the development is part of the larger Karoshoek development area, it would be advantageous for the developer to engage with DAFF at an early stage so that the required offsets can be negotiated and developed in a more holistic manner for the wider development and not on a case by case basis. This should include an evaluation of <i>Boscia albitrunca</i> and <i>Boscia foetida</i> population structure and abundance within the wider area and an evaluation of the significance of the affected individuals for the local populations. In most cases, the offset would entail the acquisition, protection and conservation of similarly sized or larger populations within adjacent areas. Alternatively the offset may involve research into the population dynamics or other aspects of the biology of the affected species, aimed at contributing to the future conservation of the affected species.</p> <p>2.2 The statement has been corrected to indicate the following- "A licence is required for any removal of protected trees such as the <i>Boscia albitrunca</i> (Listed species that are known to occur in the area.)"- refer to page 69 of the Revised EIAr.</p>

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	<p>may be sentenced to a fine or imprisonment for a period of up to three years, or to both a fine and such imprisonment."</p> <p>1.5 The list of protected tree species under section 12(1) (d) of the National Forests Act, 1998 (Act No. 84 of 1998) was published in GN1161 of 20 November 2015.</p> <p>2. COMMENTS ON THE DRAFT EIA REPORT (CSP 4)</p> <p>2.1 Page 63 of the draft EIA report refer to the NFA under applicable legislation and the need to apply for a Forest Act License to remove protected tree species. The statement is correct for species listed under the NFA such as <i>Boscia albitrunca</i>, but the examples provided refer to Red Listed plant species <i>Pelargonium reniforme</i> subsp. <i>Reniforme</i> and <i>Brachystelma huttonii</i> not protected under the NFA. The examples mentioned require a Flora Permit from the DENC.</p> <p>2.2 Page 67 refers to the Flora Permit requirement under the Northern Cape Nature Conservation Act 9 of 2009 (NCNCA), but failed to mention that Fauna Permits may also be required under the NCNCA, especially with the pan on site that may be destroyed.</p> <p>2.3 Under applicable legislation, no reference was made to the Sub-division of Agricultural Land Act 70 of 1970 (SALA). If the land is demarcated as</p>		<p>2.4 The site is currently zoned as Agricultural land. Under applicable legislation, reference has been made to the Sub-division of Agricultural Land Act 70 of 1970 (SALA). An application to change the zoning will be submitted to DAFF, Registrar of SALA, once the projects have been awarded a preferred bidder status.</p> <p>3. <u>COMMENTS ON APPENDIX D: FAUNA AND FLORA SPECIALIST IMPACT ASSESSMENT</u></p> <p>3.1 & 3.2 Comment noted. The potential requirement for an offset is included within the Ecological Impact Assessment (refer to Appendix D).</p>

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	<p>'agricultural land', it cannot be changed to another land use without the supported recommendation under the SALA. A local authority cannot change the zoning of demarcated agricultural land to any other zoning without a letter from the Registrar of this Act. What is the current zoning of the proposed development site and was an application to change the zoning (if zoned Agriculture) submitted to DAFF, Registrar of SALA, for review?</p> <p>3. COMMENTS ON APPENDIX D: FAUNA AND FLORA SPECIALIST IMPACT ASSESSMENT</p> <p>3.1 The specialist Fauna and Flora Impact Assessment Reports for CSP4 site stated on page 35 there are some individuals of protected species present, especially <i>Boscia albitrunca</i> but in low density across the site and large numbers (100s) would not be affected by the development. Page 19 of the same report stated the main impact would be on <i>B. albitrunca</i> and "as many as a few hundred individuals" would be impacted by the development. The statements contradict each other, nevertheless it is clear there would be an inevitable impact on <i>B. albitrunca</i> and that the development may contribute to cumulative impacts on this species. The Ilanga CSP 4 parabolic trough facility is said to have a footprint of about 200 ha, with the total footprint of the larger 150 MW facility comprising of 680 ha. The current development on its own may not warrant an offset, but the cumulative impacts of the 11 projects already authorised in the Karoshoek</p>		

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	<p>Solar Valley may have significant impacts on the affected ecosystems (some of which comprise of veld types that have been significantly transformed and/or are under-protected) and loss of keystone tree species. The Department is of the opinion that an offset would be triggered, should several of the planned developments in the Karoshoek Solar Valley reach preferred bidder status.</p> <p>3.2 An offset should preferably be land formally declared as a Protected Area or Nature Reserve, of the affected Bushmanland Arid Grassland which is poorly represented in formal conservation areas. The size and location of an offset with time frames for implementation should be determined in consultation with DAFF and the DENC (Ms. Elsabe Swart) who plays a key role in any environmental offsets relating to the Northern Cape Province. The developer(s) are therefore encouraged to act pro-actively by appointing an offset specialist or set up a meeting with the DAFF and DENC to present an offset proposal once preferred bidder status has been obtained. The recommendation of any offset specialist employed may be followed, but all parties involved (including the developer, the DAFF and DENC) must agree on the exact nature, extent and location of the offset in writing.</p>		
29.	<p>Herewith the comments and recommendations for the proposed development:</p> <p>1) No bat monitoring was done for the areas where the Ilanga CSP 1 tower facility is proposed. Strong evidence have surfaced illustrating that bats are at</p>	<p>Elsabe Swart Scientific Manager GR A Research and Development</p>	<p>» Comment noted. A bat specialist was appointed to assess the potential impacts that may be associated with the proposed CSP tower. Mitigations measures to reduce the impacts on bats have already been included within the facility design and have been included in the</p>

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	<p>high risks regarding CSP towers: tower's spray lights and infrastructure provide for roosting and foraging sites where after bats fall victim within the steam outlets (duct system) during normal operation.</p> <p>2) It is advised that the evaporation ponds for Ilanga tower 1 be moved to areas where less bird activity was recorded.</p> <p>3) The Ilanga Solar Thermal Power Plant (DEA Ref. 12/12/20/2056) was awarded a permit for the removal of ~4020 <i>Boscia foetida</i> trees. Mitigation options for this tree species are limited; it is almost impossible to relocate this protected tree (protected under the Northern Cape Nature Conservation Act 9 of 2009) as transplant and germination success is poorly understood. <i>Boscia spp.</i> is also slow growing and very limited information exists regarding tree age, growth rate, etc. With 5 proposed CSP facilities (and additional 2 towers and 1 parabolic through is now in Scoping Phase) within the Karoshoek Solar Development Area (~14000 hectare) thousands of <i>Boscia spp.</i> will still be destroyed.</p> <p>4) <i>Aloe dichotoma</i> (protected under the Northern Cape Nature Conservation Act 9 of 2009) was listed in the specialist studies as potentially occurring within the proposed Karoshoek Solar Development Area. It must be noted that at present there is a moratorium in place in the Northern Cape on the removal of <i>A. dichotoma</i> from the wild due to historic trade related pressures on populations (Proclamation No 968, 1 April 2005). Hence, trees may not be removed until</p>	<p>Support Unit</p> <p>Northern Cape Department of Environment and Nature Conservation</p> <p>Letter: 24-05-2016</p>	<p>revised EIAr and the EMPr for the Ilanga Tower 1 Project. Refer to Appendix L for the Bat Assessment Report.</p> <ul style="list-style-type: none"> » The evaporation ponds for Ilanga Tower 1 have been relocated to an area of lower bird sensitivity - Refer to Appendix P of the Revised EIAr for the revised layout map. » Comment noted. Impacts on this tree species is included within the Ecological Impact Assessment (refer to Appendix D. » It is noted that no <i>Aloe dichotoma</i> trees may be removed as a result of the moratorium in place within the Province. A preconstruction Ecological walkthrough will be conducted and all <i>A. dichotoma</i> individuals within close proximity to the planned facilities will be mapped and the information provided to the DENC. » The requirement for structures (fences) to be erected in such a manner to ease the free movement of wildlife has been included within the EMPr for the project. » Implementation of preventative measures with regard to fauna drowning in evaporation ponds is included as a requirement within the EMPr. As the water within the evaporation ponds is not toxic, there is no risk of faunal poisonings by drinking water from evaporation ponds. » The pipeline proposed for the development falls under a separate application and the issue will be addressed in the relevant reports. There are 2 alternative

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	<p>the moratorium is lifted.</p> <p>5) If electrification of the property as security measure is considered, possible electrocution damage to small mammals such as pangolin and tortoises should be taken into consideration. Structures (fences) should be erected in such a manner to ease the free movement of wildlife.</p> <p>6) The following points should be addressed in the EMP: <ul style="list-style-type: none"> » Preventative measures with regard to fauna drowning in evaporation ponds, and » Possible faunal poisonings by drinking water from evaporation ponds. </p> <p>7) The pipeline proposed for the development is proposed for an area through the Endangered Lower Gariiep Alluvial Vegetation [see Appendix A; only 50.3% of this vegetation type was left in 2006 with a conservation target of 31% (Mucina and Rutherford, 2006)]. By implication, this means that this vegetation type will be removed and irreversibly disturbed in order to construct the pipeline if no mitigation efforts are incorporated. In order to avoid that part of this vegetation type be irreversibly disturbed, the pipeline should be proposed for areas that are already disturbed (e.g. agricultural areas).</p> <p>Conclusion & recommendations <ul style="list-style-type: none"> » A bat specialist should be appointed to look into potential bat mortality as a result of the active CSP tower and mitigation efforts should be </p>		<p>positions proposed for the abstraction point, one of which is located within an area where this vegetation type has already been impacted.</p> <p>» As detailed in the Ecological Impact Assessment (Appendix D), where large numbers of protected tree species are affected, an offset to counter the negative impact of the development on protected tree species is required. In the current context, the development of this site is likely to result in moderate numbers of <i>Boscia albitrunca</i> and <i>Boscia foetida</i> subsp. <i>foetida</i> being lost. Although the development on its own may not warrant an offset in this regard, the cumulative potential loss of trees in the area is very high and this would certainly trigger such a requirement from DAFF, should several of the developments in the area reach preferred bidder status. Whether or not an offset would be required, would usually be evaluated by DAFF following the walk-through of the final approved development footprint and the establishment of how many individuals of protected trees would be impacted. However, since the development is part of the larger Karoshoek development area, it would be advantageous for the developer to engage with DAFF at an early stage so that the required offsets can be negotiated and developed in a more holistic manner for the wider development and not on a case by case basis. This should include an evaluation of <i>Boscia albitrunca</i> and <i>Boscia foetida</i> population structure and abundance within the wider area and an evaluation of the significance of the affected individuals for the local</p>

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	<p>proposed and incorporated.</p> <ul style="list-style-type: none"> » No <i>Aloe dichotoma</i> trees may be removed as a result of the moratorium in place within the Province. All <i>A. dichotoma</i> individuals within close proximity to the planned facilities must be mapped and information provided to the DENC. » A Biodiversity Off-set is proposed as a result of the large number of protected tree species that will be impacted with limited mitigation efforts as in the case with <i>Boscia spp.</i> » A Biodiversity Off-set assessment must be done by a specialist to guide negotiations regarding an appropriate off-set. <ul style="list-style-type: none"> • This should include (but not restricted to) a spatial evaluation in terms of the contribution of this development to the 'transformation' of the Gordonia Duneveld, Bushmanland Arid Grassland, Kalahari Karroid Shrubland and Lower Gariep Alluvial Vegetation Types. • Information should be supplied in terms of maps and statistical data. 		<p>populations. In most cases, the offset would entail the acquisition, protection and conservation of similarly sized or larger populations within adjacent areas. Alternatively the offset may involve research into the population dynamics or other aspects of the biology of the affected species, aimed at contributing to the future conservation of the affected species. A Biodiversity Off-set assessment will be conducted by a specialist to guide negotiations regarding an appropriate off-set. The offset assessment will include (but not restricted to) a spatial evaluation in terms of the contribution of this development to the 'transformation' of the Gordonia Duneveld, Bushmanland Arid Grassland, Kalahari Karroid Shrubland and Lower Gariep Alluvial Vegetation Types as requested by DENC. Information will be supplied in terms of maps and statistical data as requested by the department.</p>
AVIFAUNA IMPACTS			
30.	<p>BirdLife South Africa would like to thank you for the opportunity to comment on the above reports. We have chosen to comment on all applications together, as the impacts and issues are similar. We also believe that it is important to have an overview of all the proposed developments in the area, including Ilanga 7, 8 and 9 (currently also the subject of EIAs), as well as the already approved Ilanga Concentrated Solar Power (CSP) facilities.</p>	<p>Samantha Ralston-Paton Birds and Renewable Energy Manager with Simon Gear Policy and Advocacy Manager</p>	<p>Comment noted.</p> <p>Birds & Bats Unlimited Environmental Consultants undertook the avian surveys for the project. Two visits were undertaken. The site visits were timed to maximise the chances of recording as many resident birds and nomadic birds as possible present on site.</p> <p>Such visits were timed therefore to :</p>

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	<p>BirdLife South Africa supports the responsible development of renewable energy. However, birds may be injured or killed at Concentrated Solar Power facilities if they collide with the reflective heliostats or troughs, or with associated infrastructure (e.g. powerlines and fences). CSP tower technology presents an additional risk to birds – they may be burned if they fly through the area of concentrated solar flux. CSP facilities may also impact on birds indirectly by destroying or degrading large areas of habitat, and displacing sensitive species. The latter impact is perhaps the easiest impact to quantify and assess.</p> <p>If solar energy is to be developed without having marked negative impacts on birds, rigorous impact assessment of proposed CSP facilities is critical. We are therefore pleased to note that an avifaunal specialist has been consulted, and that he has broadly followed the recommendations in BirdLife South Africa’s draft Best Practice Guidelines for birds and solar energy. However, only two site visits were conducted (one in the wet season and one in the dry season), as opposed to the four (or more) recommended in our draft guidelines for developments of this nature and scale. While the two site visits were probably adequate to obtain a representative sample of the diversity of species likely be affected by the facility, it may not be adequate to record finer details such as patterns of movement, important habitats, breeding areas, rare species etc. This information could be important if impacts are to be properly understood and mitigated.</p> <p>The avifaunal impact assessment confirmed that the</p>	<p>BirdLife South Africa</p> <p>Letter: 23-05-2016</p>	<ul style="list-style-type: none"> » capture the first breeding peak of resident arid-adapted birds in October-November; and » capture the influx of nomadic birds that arrive with the rains and breed 2-4 weeks later. <p>The site visit conducted by the specialist in October-November 2015 coincided with late spring when many resident arid-species first start to breed (blue above). Furthermore, according to Lepage and Lloyd (2004) who analysed the breeding seasons of all South Africa’s birds (with an emphasis on arid-breeding birds), the top breeding month is October (even for areas which have late-summer rains). The study area fits into the latter category. Most breeding is finished by the winter (June-July).</p> <p>For really arid areas such as that under consideration which have late summer (March) rains, nomadic birds respond to (fly into) areas with rains and breed within 14 days (insectivores) or 32 d (granivores) (Maclean 1969). Therefore, both specialist visits were timed perfectly to record resident (October) and nomadic (March) birds present and breeding in the study area. A summer and winter visit would miss both peaks (refer to Appendix E-1 for the motivation letters from the specialist) thereby potentially resulting in an under-estimation of the potential impacts.</p> <ul style="list-style-type: none"> » Site selection

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	<p>sites are being used by a number of species of conservation concern including:</p> <ul style="list-style-type: none"> » Kori Bustard - Near-threatened and possibly breeding at some of the proposed development sites. » Ludwig's Bustard - Endangered and possibly breeding. » Secretarybird - Vulnerable, an unoccupied nest was found on site 4, but only one bird was recorded. » Verreaux's Eagle - Vulnerable, the avifaunal reports suggest that breeding birds were recorded, but no further information is provided. Verreaux's Eagle are unlikely to breed on site, but may breed in rocky cliffs north and east of the proposed development area. » Black Harrier (Endangered) – few details provided in report, possibly an irregular visitor? » Lanner Falcon (Near-threatened) <p>A number of other species, including Rock Kestrel, Black-Chested Snake-Eagle, Northern Black Korhaan, large numbers of Namaqua Sandgrouse, and a number of water birds (attracted to a pan that is just outside the development sites, and the Orange River is further away) may also be affected by the proposed developments.</p> <p>A significant challenge in assessing the impacts of CSP facilities is that there is a large degree of uncertainty with regards to how to predict and mitigate impacts. Confounding factors include that some birds may be displaced and avoid the area, while others may be attracted to the area, drawn to newly created habitats</p>		<p>In determining the preferred site for the proposed facilities within the Karoshoek Solar Valley Development, a 'funnel-down approach' was used and commenced with the consideration of the larger site.</p> <p>The siting of the initial facilities within the broader Karoshoek Solar Valley Development considered various critical criteria (as discussed in Section 2.2.1 of the Revised EIAr), including the sensitivity of the broader site in order to inform the positioning of these facilities (refer to Figure 2.3 of the Revised EIAr), as well as provincial and local planning in terms of renewable energy development. The areas within which these authorised facilities are planned do not infringe on any identified areas of high sensitivity defined in this initial study. In addition, the broader site is located within the identified Solar Development Corridor as defined by the PSDF, as well as within a proposed REDZ for solar development. The siting of these facilities, and consequently that of the Ilanga CSP 3 Project is considered to be acceptable from an environmental perspective.</p> <p>As the Ilanga CSP 3 Project is required to be located immediately adjacent to the authorised Karoshoek Site 4 CSP/ Ilanga LFTT 1 (1 x 100 MW Parabolic Trough) in order to facilitate the development of a 150MW CSP facility (as required by the DoE), no feasible or reasonable site alternatives are available for consideration for this project. In addition, as the site</p>

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	<p>(e.g. evaporation ponds) and possibly mistaking the reflective surfaces for a waterbody.</p> <p>The risk of solar collisions with reflective surfaces (heliostats and troughs) is hard to quantify, but we question the specialist's reliance on the priority list drawn up by the Birds and Wind Energy Specialist Group for wind energy. We suggest that this list may be more useful for predicting the risk of solar flux injuries, but for all technologies there are different factors at play that will affect risk and vulnerability. Flight height, time spent on the wing, and threat status may be more useful factors to use to predict the risk of solar flux injuries, while the propensity for landing on/in waterbodies and low flight heights may be more indicative of the risk of collisions with heliostats and troughs.</p> <p>In addition to the uncertainty resulting from low number of site surveys, and linked to our limited understanding of how to predict impacts, there is also uncertainty surrounding the effectiveness of mitigation. CSP technology is new and most of the proposed mitigation has not been tested, and where it has been used in other contexts it has only been partially effective.</p> <p>Potential mitigation include:</p> <ul style="list-style-type: none"> » Site selection <ul style="list-style-type: none"> ○ While we acknowledge that the applications are to expand existing and approved facilities, no site alternatives were assessed. It has not been demonstrated that alternative locations were adequately assessed for all phases of the development. 		<p>location is constrained by other authorised facilities within the broader Karoshoek Solar Valley Development and environmentally sensitive areas (such as drainage lines on the site), no feasible local siting alternatives were identified.</p> <p>With regards to the risk of solar collisions with reflective surfaces (heliostats and troughs), if species are attracted and collide with the CSP troughs by mistaking them for open water the specialist recommended that innovative bird deterrent techniques are used, such as the Torri lines mentioned in the avian Impact Assessment and Scoping Report (Simmons and Martins 2015).</p> <p>» Layout</p> <p>The avifaunal specialist identified two medium-low sensitive areas and represent sites where one bustard and some displaying korhaans were recorded. The specialist indicated that it is unlikely that bustards bred on site given that they only recorded two birds once in a total of 24 h of observation. No highly sensitive areas were apparent. The specialist proposed two recommendations:</p> <ul style="list-style-type: none"> (i) move the facility away from highly sensitive bird areas (especially feeding/nesting areas or roosts), or (ii) reduce disturbance post-construction to allow birds to re-settle. <p>The specialist indicated that in this case it would be</p>

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	<p>» Layout</p> <ul style="list-style-type: none"> ○ The avifaunal specialist recommended avoiding specific areas (e.g. to mitigate against displacement of bustards and korhaans - assessed to be of high negative significance for many of the proposed sites). While this is included in the mitigation measures outlined in the EIA, and presumably influenced the residual significance rating, this recommendation does not appear to have been incorporated in the final proposed layouts. ○ The avifaunal specialist also recommended placing the proposed facilities as far away as possible from water sources that may attract birds. He also suggests that evaporation ponds should be located at least 1 km away from the heliostat field. Again, this has not been included in the final development layouts. <p>» Habitat management</p> <ul style="list-style-type: none"> ○ Depending on the design, evaporation ponds could provide habitat for some bird species. While this may benefit some species, it could also pose a threat to birds if the water is contaminated. It may also present a risk if birds are attracted to the area as they may be vulnerable to colliding with the heliostats and troughs, or risk being burned by solar flux. We therefore support the specialist's suggestion that evaporation ponds should be 		<p>unnecessary to implement the above mentioned recommendations because few red data species occur on the CSP 3 site.</p> <p>If these recommendations can be followed and prove effective, the specialist concluded that the CSP 3 development can proceed with the least impact to the avifauna of the area.</p> <p>It is not technically feasible to locate evaporation ponds 1km away from the heliostat field for the Ilanga CSP Tower 1 Project. As alternative measure to reduce the impact, the specialist also recommended that the evaporation ponds could be covered with an appropriate material (e.g. by a mesh) to avoid birds nesting on the ponds. This recommendation to cover the evaporation ponds is considered more feasible taking into consideration the extent of the development footprint and the environmental sensitivities identified within in the Karoshoek Solar Development Park.</p> <p>» Habitat management</p> <ul style="list-style-type: none"> ○ Comment noted. The recommendation to cover the evaporation ponds to minimise the risk to birds has been included in the EMPr. ○ No pans were identified within the Ilanga CSP 3 Site development footprint. <p>» Deterrents</p> <ul style="list-style-type: none"> ○ Comment noted.

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	<p>covered (or placed well away from the facility) to minimise the risk to birds. While we note that the EMPr suggests that storage water reservoirs should be covered there is no mention of managing evaporation ponds in a similar manner.</p> <ul style="list-style-type: none"> ○ The EIA suggests possibly “closing down” pans to minimise the risk of solar flux injuries. The impacts of this activity has not been assessed in the EIA and the pros and cons of this approach must be carefully considered. <p>» Deterrents</p> <ul style="list-style-type: none"> ○ The use of bird scaring devices (e.g. prisms) may be effective, but only for a limited suite of species, and there is a risk the birds may become habituated. The suggestion to use of “tori lines” warrants investigation, but at this stage the effectiveness remains uncertain. <p>» Infrastructure management/design</p> <ul style="list-style-type: none"> ○ We support the suggestion that bird-flight diverters should be put on all new spans of powerline to reduce the risk of collisions, especially for species such as bustards. However, it must be noted that this measure is not 100% effective for such species and some risk of collisions will remain. ○ The EIA suggests that the heliostats should be positioned vertically when not in use, arguing that this would lessen the collision risk. However, vertically positioned 		<ul style="list-style-type: none"> » Infrastructure management/design <ul style="list-style-type: none"> ○ Comments noted. <p>All recommendations that were considered feasible as discussed above have been included in the revised EIAR and in the EMPr.</p> <p>The planning for the larger Karoshoek Solar Valley development has been undertaken over a number of years and commenced with a broader feasibility study. The intention of this study was to ensure appropriate planning of the facilities within the broader site in order to maximise electricity production and minimise impacts on the environment.</p> <p>It is agreed that the combined effect of the proposed developments will result in the large-scale transformation of thousands of hectares of land, and will place significant demands on water resources. Potential cumulative impacts associated with the projects within the Solar Valley Development, as well as of other facilities within 30km of the site have been assessed within the EIA Report.</p> <p>The requirements for operational monitoring have been included in all EMPr for the CSP Project proposed in the Karoshoek Solar Development Park. The operational monitoring will extend over the entire facility (i.e. not just the expanded footprint) and will be designed considering the protocols outlined in the Best Practice Guidelines for</p>

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	<p>heliostats could present a collision-risk for low-flying birds, much like the windows of building do. We suggest that heliostats should rather be tilted when being cleaned or when not in use.</p> <ul style="list-style-type: none"> ○ There has been some promising work on minimising the area of solar flux at power tower facilities (e.g. see Walston et al 2015). We suggest that should the development be approved, a similar approach should be adopted. <p>We are of the opinion that it is misleading to include mitigation measures in the assessment, if these mitigation measures are not considered feasible by the developer and have not been included in the final plan. While it would be appropriate to discuss these measures and note why they are not supported, they should not influence the assessed significance ratings “with mitigation” as reported in the EIA. For example, the specialist predicted that impacts on bustards could be reduced from high to medium significance with an altered layout, but this has not been incorporated in the final proposed development plan. The significance rating should therefore remain high.</p> <p>A large number of solar facilities have been proposed in the area, including one that is already under construction (Ilanga 1). This clustering of developments has pros and cons. It presents opportunities to develop a holistic layout that minimises impacts on the environment. For example, the length of new powerlines, roads and fencing required can be</p>		<p>Birds and Solar Energy. The monitoring reports will be submitted to BirdLife South Africa as requested.</p>

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	<p>rationalised, and evaporation ponds could be placed well away from any heliostats and troughs so that birds are drawn away from, rather than attracted to, high-risk areas.</p> <p>Without proper planning for the entire development area (in all phases) it is difficult to assess if setting specific areas aside (as was suggested by the avifaunal specialist) would be effective or desirable, or if some other mitigation could be more appropriate (e.g. compensating for impacts by marking existing un-marked lines with bird flight diverters). BirdLife South Africa questions whether there has been sufficient strategic oversight to properly plan for all phases of this development.</p> <p>The combined effect of the proposed developments will result in the large-scale transformation of thousands of hectares of land, and will place significant demands on water resources. Further, as more and more developments are approved, based on an incomplete understanding of how to assess and mitigate impacts, the risk of unintentional negative impacts increases. We question the wisdom of approving multiple facilities in the face of this uncertainty and suggest that a phased approach, where we can learn from and improve on the design and management of early projects, and more accurately predict the impacts of scaling up the development, would be a more prudent and precautionary strategy.</p> <p>Should these proposed developments be approved, despite the predicted impacts, risks and uncertainties,</p>		

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	<p>BirdLife South Africa suggests that monitoring the impacts on birds at all the operational facilities is imperative. We are pleased to note that this has been included in the EMPr for the new phases of development, but it is not clear what, if any requirements for monitoring have been included in the EMPrs for the already approved facilities. We urge that if it is not already a requirement, monitoring should extend over the entire facility (i.e. not just the expanded footprint) and that this should follow the recommended protocols outlined in the Best Practice Guidelines for Birds and Solar Energy. BirdLife South Africa requests that these monitoring reports are sent to us as this will help us develop a better understanding of the impacts across multiple sites, and will help ensure that recommendations and decisions are based on the best available information.</p>		
WATER USES AND WATER USE LICENSE APPLICATION PROCESS			
31.	<p>The comments provided at this meeting must be considered as comments received from the Department of Water and Sanitation (DWS) on the EIA process. We will sign-off on the minutes which can be included in the final EIA Report. The DWS usually submits standard comments on EIA Reports.</p>	<p>Shaun Cloete Orange Proto CMA Department of Water and Sanitation</p>	<p>Comment noted, the minutes of the meeting were submitted to the DWS as requested. A follow-up email requesting comments from the DWS was sent to Shaun Cloete on 17 June 2016 (refer to Appendix C6). No further comments were received from the DWS to date.</p>
32.	<p>A new administration process is being implemented by DWS where applicants are required to register their intent to submit a water use license application (WULA). A form is required to be completed and returned for each project.</p>	<p>Meeting: 05-05-2016</p>	<p>The project proponent will submit these forms to the DWS as required.</p>
33.	<p>It should be noted that limited water is available in the Orange River, it is in a negative state. However, renewable energy projects are considered as strategic water users and therefore WULAs will be prioritised and</p>		<p>Comment noted. The developer has interest in investigating ways in which to treat and reuse greywater in their project scope considering that the developer is proposing to develop a solar park consisting of several CSP</p>

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	water will be provided. The DWS urges developers to investigate ways in which to treat and reuse water in their project scope.		facilities.
34.	In terms of the WULA, power lines and pipe lines will trigger Sections (c) and (i) of the National Water Act (Act No. 36 of 1998). The blown down going to the evaporation pond will trigger Section 21(h) of the National Water Act. The designs for the evaporation ponds are to be included in the WULA.		Comment noted, the relevant listed activities will be applied for as part of the WULA.
35.	How will sewerage be managed on the site?		Chemical toilets will be used during the construction phase. Closed septic tank systems will be installed for use during the operation phase.
36.	The Municipality's waste water treatment facilities are constrained and will not have sufficient capacity to take on sewerage. Developers are advised to develop solutions to reduce and treat waste.		The project proponent will consider ways in which to reuse and recycle water from the evaporation ponds for other uses such as cleaning and ablution facilities in order to reduce their footprint on the water they plan to abstract from the river. The applicant aims to establish public private partnerships (PPPs) with the relevant stakeholders to develop a new waste water treatment plant should more of their projects receive preferred bidder status from the DoE.
37.	Is the ground water resource sufficient for these projects?		Hydrological pump tests have been undertaken and these have demonstrated that the ground water is insufficient for these projects.
HERITAGE IMPACTS			
38.	Savannah Environmental (Pty) Ltd was appointed by Emvelo Holdings (Pty) Ltd to conduct an Environmental Impact Assessment (EIA) process in support of an Environmental Authorisation Application for the proposed Ilanga CSP 4 Facility, near Upington, Northern Cape Province. The EIA was conducted in terms of the National Environmental Management Act, 1998 (NEMA)	Natasha Higgitt Heritage Officer South African Heritage Resources Agency	Comment noted. The following conditions as recommended by SAHRA have been incorporated into the EMPr and the draft EIAR: » There are no shallow pans and depressions that contain seasonal water located within the CSP 4 site. » An Archaeological Walk-Down of the impact footprint

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	<p>and the EIA Regulations, 2014. The proposed Ilanga CSP 4 project will consist of an area of approximately 200 ha with infrastructure such as parabolic troughs, internal access roads, power plant/power island, power line, water abstraction point, water treatment plant, lined evaporation ponds, workshop and office buildings. Heritage Contracts and Archaeological Consulting was appointed to conduct the Archaeological Impact Assessment (AIA).</p> <p>Van der Walt, 2016. Archaeological Impact Assessment Report for the Proposed Establishment of the Ilanga CSP 4 Project, near Upington, Northern Cape Province</p> <p>Several surface occurrences of Middle Stone Age (MSA) and Late Stone Age (LSA) were recorded within the proposed development area, however these sites were given a low heritage significance rating and do not require any further mitigation measures.</p> <p>Recommendations provided in the report include the following:</p> <ul style="list-style-type: none"> » Shallow pans and depressions that contain seasonal water may incorporate archaeologically significant materials and should be avoided; » The impact area should be subjected to a walk-down prior to construction and if any sites are identified that are of significance these sites can be preserved or mitigated; and » If during construction any possible finds such as stone tool scatters, artefacts or bone and fossil remains are made, the operations must be stopped and a qualified archaeologist must be 	<p>Letter: 24-05-2016</p>	<p>must be completed prior to construction by a qualified archaeologist. If heritage resources are identified, the impacts to the heritage must be assessed and mitigation measures recommended. A Walk-Down report detailing the results of the study must be submitted to SAHRA for comment. No construction may occur without comments from SAHRA;</p> <p>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. If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Itumeleng Masiteng/Mimi Seetelo 012 320 8490), must be alerted immediately. A professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required.</p>

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	<p>contacted to assess the find.</p> <p>Final Comment</p> <p>The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit accepts the submitted AIA and promotes the recommendations included in the report. The following additional conditions must be included in the Environmental Management Programme (EMPr):</p> <ul style="list-style-type: none"> » An Archaeological Walk-Down of the impact footprint must be completed prior to construction by a qualified archaeologist. If heritage resources are identified, the impacts to the heritage must be assessed and mitigation measures recommended. A Walk-Down report detailing the results of the study must be submitted to SAHRA for comment. No construction may occur without comments from SAHRA; » Comments provided in the issued Interim Comment dated 15/01/2016 pertaining to Palaeontological resources are still valid; and » 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. If unmarked human burials are uncovered, the SAHRA Burial Grounds and 		

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	<p>Graves (BGG) Unit (Itumeleng Masiteng/Mimi Seetelo 012 320 8490), must be alerted immediately. A professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required.</p>		

COMMENTS RECEIVED: SCOPING PHASE

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I&AP REGISTRATIONS AND PUBLIC PARTICIPATION PROCESS			
39.	Please add me as interested and affected party.	Jaco Strauss Director: Projects IT5 Siviel Email: 16-11-2015	Mr Strauss was registered as an Interested and Affected Party (I&AP) on the project's database.
40.	Your company is currently conducting an Environmental Impact Assessment for the Proposed Development of Karoshoek Sonvalleipark. Please could you forward me the BID for this application and register me as an Interested & Affected party?	Melanie Miles Content Researcher Leads 2 Business Email: 16-11-2015	Ms Miles was registered as an I&AP on the project's database. A copy of the background information document was emailed to her.
41.	Please register BirdLife South Africa as an I&AP on this project using my details below.	Simon Gear Policy & Advocacy Manager BirdLife SA Email: 20-11-2015	Mr Gear of BirdLife SA was registered as an I&AP on the project's database.
ACKNOWLEDGMENTS RECEIVED FROM ORGANS OF STATE			
42.	Hereby our acknowledgment to your proposed work. Our reference number is CUP0747-15 for future referencing.	Amanda Bester Wayleave Management Telkom Email: 16-11-2015	Acknowledgment noted, no response required.
43.	Please find attached Eskom requirements for works at or near Eskom infrastructure.	John Geeringh Senior Consultant Environmental Management Eskom GC: Land	Eskom's requirements for works at or near Eskom infrastructure are noted. The information received from Eskom has been provided to the project developer.

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		Development Email: 24-11-2015	
44.	<p>The Department confirms having received the draft Scoping Report for environmental authorisation of the abovementioned project on 23rd November 2015. As required in terms of the Environmental Impact Assessment Regulations, 2014.</p> <p>The application has been assigned the reference number NC/NAT/ZFM/KHA/KAR4/2015. Kindly quote this reference number in any future correspondence in respect of the application. Please note the responsible officer is going to be Mr Ordain Riba.</p>	<p>Ms L. Tools-Bernado EIA: Administrator</p> <p>Northern Cape Department of Environment and Nature Conservation</p> <p>Letter: 26-11-2015</p>	<p>Acknowledgment noted. Mr Ordain Riba was registered on the project's database.</p>
COMMENTS RECEIVED FROM THE DEPARTMENT OF ENVIRONMENTAL AFFAIRS			
45.	<p>The draft Scoping Report (SR) dated November 2015 and received by this Department on 18 November 2015 refers.</p> <p>This Department has the following comments on the above-mentioned application:</p> <ul style="list-style-type: none"> i. Please ensure that all relevant listed activities are applied for, are specific and that it can be linked to the development activity or infrastructure as described in the project description. ii. If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be 	<p>Thabile Sangweni Case Officer and Coenrad Agenbach Deputy Director: Strategic Infrastructure Developments</p> <p>Letter: 08/12/2015</p>	<ul style="list-style-type: none"> i. Application has been made for all relevant listed activities. Section 4.2 (Table 4.1) of the Final Scoping Report provides a description of how the project description links to each activity applied for. ii. All relevant listed activities applied for in the application form are the same as those assessed within this FSR. iii. All issues raised and comments received during the circulation of the Draft Scoping Report from registered I&APs and organs of state have been included in the FSR (refer to Appendix C6 – Comments Received and Appendix C7 – Comments and Responses Report). Proof of correspondence with all stakeholders is provided in Appendix C4 and C5 of the report. The Public Participation Process

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	<p>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</p> <p>iii. Please ensure that all issues raised and comments received during the circulation of the SR 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 SR. Proof of correspondence with the various stakeholders must be included in the final SR. 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.</p> <p>iv. The specialists studies conducted must be specific to each of the sites applied for. The specialist must provide recommendations and mitigation measures specific to each site and the EAP must provide mitigation measures; an assessment and recommendations for each site as well as the cumulative impacts for each of the facilities.</p> <p>v. Scoping specialist studies, if applicable, must be submitted to the Department with the final</p>		<p>has been conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014 (refer to Chapter 4, Section 4.4.2 of the scoping report)</p> <p>iv. Specialist studies undertaken are specific to each site applied for and provide recommendations specific to the site under consideration. The main EIA Report provides mitigation measures, an assessment and recommendations for each site as well as the cumulative impacts for each of the facilities.</p> <p>v. Scoping specialist studies forms part of the FSR and are included in Appendices D-L.</p> <p>vi. Cumulative impacts for this project have been assessed in the scoping report (refer to Section 6.6). No fatal flaws have been identified.</p> <p>vii. A list of the specialist consultants who will conduct the specialist assessments is included in Section 8.5 of the scoping report.</p> <p>viii. The Final Scoping meets the requirements of Appendix 2. This is detailed in Table 1 (page iv) of the final scoping report.</p> <p>ix. Identified alternatives for the proposed activity that are feasible and reasonable, including the advantages and disadvantages that the proposed activity or alternatives will have on the environment and on the community that may be affected by the activity is included in Chapter 3 of the scoping report.</p> <p>x. A traffic assessment study to determine the specific traffic needs during the different phases of project</p>

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	<p>SR.</p> <p>vi. This Department requires a cumulative impact assessment to be undertaken in the final SR to determine potential fatal flaws.</p> <p>vii. The Department requests the EAP to include the specialist consultants who will conduct the specialist assessments.</p> <p>viii. This Department requests the EAP to familiarise themselves with the requirements of Appendix 2 of GNR 982 of the EIA Regulations, 2014 and ensure that the final SR submitted to this Department for consideration meets the requirements in terms of identifying, assessing and providing mitigation measures of the impacts on the alternative and preferred sites.</p> <p>ix. Please provide a description of any identified alternatives for the proposed activity that are feasible and reasonable, including the advantages and disadvantages that the proposed activity or alternatives will have on the environment and on the community that may be affected by the activity as per Appendix 2 GN R. 982 of 2014. Alternatively, you should submit written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 2.</p> <p>x. A significant amount of materials and equipment will be delivered to the site during the construction phase of the development.</p>		<p>implementation will be undertaken in the EIA phase of the project.</p> <p>xi. The details of the EAP who prepared the report and their expertise to carry out Scoping and Environmental Impact assessment procedures is included in Section 1.4 of the scoping report.</p> <p>xii. The final scoping report submitted to the Department complies with all the requirements in terms of the scope of assessment and content of Scoping reports in accordance with Appendix 2 and Regulation 21 (1) of the EIA Regulations, 2014 (refer to Table 1 (page iv) of the final scoping report).</p> <p>xiii. Comment noted, no response required.</p>

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	<p>The EIAR must include a traffic assessment study. The study must determine the specific the specific traffic needs during the different phases of implementation.</p> <p>xi. In accordance with Appendix 2 of the EIA Regulations 2014, the details of-</p> <ul style="list-style-type: none"> (i) The EAP who prepared the report; and (ii) The expertise of the EAP to carry out Scoping and Environmental Impact assessment procedures; must be submitted. <p>xii. 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 Scoping reports in accordance with Appendix 2 and Regulation 21 (1) of the EIA Regulations, 2014.</p> <p>xiii. Further note that in terms of Regulation 45 of the EIA Regulations 2014, 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).</p> <p>You are hereby reminded of Section 24F of the National Environmental Management Act, Act No 107 of 1998, as amended, that no activity may commence prior to an environmental authorisation being granted by the Department.</p>		

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IMPACTS ON INFORMATION COMMUNICATION TECHNOLOGY			
46.	<p>We have no systems in the area but note that we did not receive any application for any part of the Karoshoek Solar Valley Development.</p>	<p>Leonard Shaw Specialist: Network Transformation and Planning Telkom Email: 17-11-2015</p>	<p>It is noted that Telkom has no links running through the proposed project site. A formal application will be submitted by the applicant.</p>
47.	<p>I hereby inform you that our client (Telkom SA SOC Ltd) approves the proposed work indicated on your drawings in terms of Section 23 of the Electronic Communication Act. No. 36 of 2005 as amended.</p> <p>No infrastructure of our Client (Telkom SA SOC Ltd) will be affected by this proposal.</p> <p>Although we are not affected by this proposal, Mr Vivian Groenewald must be contacted from Telkom's Network Field Services before commencement of work.</p> <p>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 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.</p>	<p>Amanda Bester Wayleave Management Telkom Letter: 22-11-2015</p>	<p>The need for notification prior to construction and as built plans is acknowledged by the project developer.</p>
WATER USE LICENSE APPLICATION PROCESS			
48.	<p>The Department of Water & Sanitation (DWS) hereby</p>	<p>Ms C Schwartz</p>	<p>It is noted that the water use license application submitted</p>

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	<p>acknowledges receipt of the above mentioned application received on 5 May 2015. This application will only be reviewed as a water use license application in the event that the applicant is awarded preferred bidder status.</p>	<p>Orange Proto-CMA Department of Water and Sanitation Letter: 28-07-2015</p>	<p>by the applicant will be considered if the project is awarded preferred bidder status by the Department of Energy (DoE).</p>
49.	<p>The Department of Water & Sanitation (DWS) hereby acknowledges receipt of your draft scoping report for the proposed establishment of the Ilanga CSP 4 Project, near Upington, Northern Cape Province. The department has reviewed the document and the comments are as follows:</p> <ul style="list-style-type: none"> i. Please note that the proposed activity in terms of Section 21 (a), (b), (c), (i) and (h) of the National Water Act (Act 36 of 1998) requires a water use authorisation. Therefore the applicant is required to submit a water use license application to this Department. ii. Please indicate how stormwater will be managed on site. iii. Any spillage of any hazardous materials including diesel that may occur during construction and operation must be dealt with and reported to this Department with 24 hours. iv. Due to the high number of renewable energy projects that are taking part in the Department of Energy [DOE] bidding process, this Department [DWS] will only process applications for water use authorisations received from developers who have attained preferred bidder status. Developers who wish 	<p>Ms C Schwartz Orange Proto-CMA Department of Water and Sanitation Letter: 30-11-2015</p>	<ul style="list-style-type: none"> i. The Department of Water and Sanitation's requirements have been noted and submitted to the applicant. An application for a Water Use License will be submitted by the Developer to the Department. ii. A stormwater management plan on how stormwater will be managed on site will be designed for the site and included in the EMPr in the EIA phase. iii. Comment noted. This requirement will form part of the EMPr document of the project. iv. It is noted that the Water Use License application will be processed only once the project receives Preferred Bidder Status from the Department of Energy.

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	to submit applications for water use authorisations must however proceed to do so, with the understanding that their applications will be processed as soon as we have confirmation of their status with the DOE.		