

UPILENGA PV1 AND ASSOCIATED INFRASTRUCTURE, NORTHERN CAPE

COMMENTS AND RESPONSES REPORT

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The Upilanga PV1 and Associated Infrastructure Basic Assessment Process was announced on Tuesday, 10 July 2020. The announcement letter served to invite Interested and Affected Parties (I&APs) to register their interest in the project and to submit any comments / queries that they might have. The Basic Assessment (BA) Report availability a 30-day review and comment period were announced on 03 August 2020 and the review and comment period was from **Monday, 03 August 2020** until **Friday, 04 September 2020**. All written comments received during the BA process announcement and during the 30-day review and comment period of the BAR have been included in the table below.

A Revised Basic Assessment Report (BAR) has been made available for a 30-day review and comment period from **Wednesday, 11 November 2020** until **Friday, 11 December 2020**. The Comments and Responses Report (C&RR) will be updated with comments received during the review and comment period of the Revised BAR and included in Appendix C6 of the final Basic Assessment Report.

NOTE:

In terms Regulation 44(1) of the EIA Regulations 2014, as amended, please note that the comments raised and responses provided at the various Focus Group Meetings held during the 30-day review period of the Scoping Report has not been captured in this Comments and Responses Report. The notes of the meetings are attached as **Appendix C7**.

LIST OF ABBREVIATIONS / ACRONYMS

BA	Basic Assessment	C&R	Comments and response
C&RR	Comments and Responses Report	DEFF	Department of Environment, Forestry and Fisheries
I&APs	Interested and Affected Parties	EA	Environmental Authorisation
EMPr	Environmental Management Programme	NC DAEARD & LR	Northern Cape Department of Agriculture, Environmental Affairs, Rural Development and Land Reform
NEMA	National Environmental Management Act	NHRA	National Heritage Resources Act
SA CAA	South African Civil Aviation Authority	SAHRIS	South African Heritage Resources Information System
SARAO	South African Radio Astronomy Observatory		

1. COMMENTS RECEIVED DURING BASIC ASSESSMENT ANNOUNCEMENT PHASE

1.1. Organs of State

NO.	COMMENT	RAISED BY	RESPONSE
1.	<p>Please find attached Eskom general requirements for works at or near Eskom infrastructure. Please also find the setbacks requirements guideline for consideration during the planning phase. Please send me KMZ files of the affected properties, proposed layouts and proposed grid connection.</p> <p>Content of Eskom's General Requirements letter dated 24 February 2020</p> <ol style="list-style-type: none"> 1. Eskom's rights and services must be acknowledged and respected at all times. 2. Eskom's rights and services must be acknowledged and respected at all times. 3. Eskom's consent does not relieve the developer from obtaining the necessary statutory, land owner or municipal approvals. 4. Any cost incurred by Eskom as a result of non-compliance to any relevant environmental legislation will be charged to the developer. 5. If Eskom has to incur any expenditure in order to comply with statutory clearances or other regulations as a result of the developer's activities or because of the presence of his equipment or installation within the servitude restriction area, the developer shall pay such costs to Eskom on demand. 6. The use of explosives of any type within 500 metres of Eskom's services shall only occur with Eskom's previous written permission. If such permission is granted the developer must give at least fourteen working days prior notice of the commencement of blasting. This allows time for arrangements to be made for supervision and/or 	<p>John Geeringh Snr Consultant Environmental Management: Land and Rights Eskom Holdings SOC Ltd E-mail: 10 July 2020</p>	<p>Eskom's comments were acknowledged and forwarded to the project team for attention.</p> <p>The requested .KMZ file was e-mailed on 14 July 2020 (proof included in Appendix C6 of the BAR).</p> <p>The EAP acknowledges the comment from Eskom. The project developer has been informed of Eskom's requirements as per these comments.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>precautionary instructions to be issued in terms of the blasting process. It is advisable to make application separately in this regard.</p>		
	<p>7. Changes in ground level may not infringe statutory ground to conductor clearances or statutory visibility clearances. After any changes in ground level, the surface shall be rehabilitated and stabilised so as to prevent erosion. The measures taken shall be to Eskom's satisfaction.</p>		
	<p>8. Eskom shall not be liable for the death of or injury to any person or for the loss of or damage to any property whether as a result of the encroachment or of the use of the servitude area by the developer, his/her agent, contractors, employees, successors in title, and assignees. The developer indemnifies Eskom against loss, claims or damages including claims pertaining to consequential damages by third parties and whether as a result of damage to or interruption of or interference with Eskom's services or apparatus or otherwise. Eskom will not be held responsible for damage to the developer's equipment.</p>		
	<p>9. No mechanical equipment, including mechanical excavators or high lifting machinery, shall be used in the vicinity of Eskom's apparatus and/or services, without prior written permission having been granted by Eskom. If such permission is granted the developer must give at least seven working days' notice prior to the commencement of work. This allows time for arrangements to be made for supervision and/or precautionary instructions to be issued by the relevant Eskom Manager.</p>		

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	Note: Where and electrical outage is required, at least fourteen work days are required to arrange it.		
	10. Eskom's rights and duties in the servitude shall be accepted as having prior right at all times and shall not be obstructed or interfered with.		The EAP acknowledges the comment from Eskom. The project developer has been informed of Eskom's requirements as per these comments.
	11. Under no circumstances shall rubble, earth or other material be dumped within the servitude restriction area. The developer shall maintain the area concerned to Eskom's satisfaction. The developer shall be liable to Eskom for the cost of any remedial action which has to be carried out by Eskom.		The EAP acknowledges the comment from Eskom. The project developer has been informed of Eskom's requirements as per these comments and has been addressed within the EMPr for the development.
	12. The clearances between Eskom's live electrical equipment and the proposed construction work shall be observed as stipulated by <i>Regulation 15 of the Electrical Machinery Regulations of the Occupational Health and Safety Act, 1993 (Act 85 of 1993)</i> .		The EAP acknowledges the comment from Eskom. The project developer has been informed of Eskom's requirements as per these comments.
	13. Equipment shall be regarded electrically live and therefore dangerous at all times.		
	14. In spite of the restrictions stipulated by Regulation 15 of the Electrical Machinery Regulations of the Occupational Health and Safety Act, 1993 (Act 85 of 1993), as an additional safety precaution, Eskom will not approve the erection of houses, or structures occupied or frequented by human beings, under the power lines or within the servitude restriction area.		
	15. Eskom may stipulate any additional requirements to highlight any possible exposure to Customers or Public to coming into contact or be exposed to any dangers of Eskom plant.		
	16. It is required of the developer to familiarise himself with all safety hazards related to Electrical plant.		

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	17. Any third party servitudes encroaching on Eskom servitudes shall be registered against Eskom's title deed at the developer's own cost. If such a servitude is brought into being, its existence should be endorsed on the Eskom servitude deed concerned, while the third party's servitude deed must also include the rights of the affected Eskom servitude.		

2. COMMENTS RECEIVED DURING BASIC ASSESSMENT REPORT REVIEW PERIOD

2.1. Organs of State

NO.	COMMENT	RAISED BY	RESPONSE
1.	<p>There is a SACAA process whereby permission is applied for wrt obstacles which could pose an aviation hazard. More information can be obtained at http://www.caa.co.za. Click on information for industry 'Obstacles' on the LHS. Forms, Part 139-27 and submit on the form itself.</p> <ul style="list-style-type: none"> Kindly provide a .kml (Google Earth) file reflecting the footprint of the proposed development site including the proposed overhead electric power line route that will evacuate the generated power to the national grid. Also indicate the highest structure of the project & the Overhead electric power transmission line. <p>Please follow up with the Inspectorate if more information is required.</p>	<p>Lizell Ströh Obstacle Inspector PANS-OPS Section Air Navigation Services Department SACAA</p> <p>E-Mail: 03 August 2020</p>	<p>The .KMZ files for the Upilanga Solar Park and PV1 and PV2 development sites were provided on 05 August 2020.</p> <p>The power line connections for PV1 and PV2 are also shown on this KMZ, and will be underground cabling connecting to the authorised CSP sites 1.3 & 1.4.</p> <p>The information provided by the SA CAA regarding application for obstacles which could pose an aviation hazard is forwarded to the applicant for their attention. They will be responsible for the submission of this application once the project proceeds to final design.</p>
2.	Water use authorisation to be applied for where necessary using DWS Regional Office as entry and exit.	<p>Pieter Ackerman Chief Landscape Architect DWS</p>	<p>The EAP acknowledges the comment from DWS. The relevant water uses for the project will be applied for prior to commencement of construction.</p>

NO.	COMMENT	RAISED BY	RESPONSE
		E-mail: 04 August 2020	
3.	<p>a) Listed Activities</p> <p>(i) Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure as described in the project description. Only activities applicable to the development must be applied for and assessed.</p> <p>(ii) If the activities applied for in the application form differ from those mentioned in the final BAR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link https://www.environment.gov.za/documents/forms.</p> <p>(iii) It is imperative that the relevant authorities are continuously involved throughout the basic assessment process as the development property possibly falls within geographically designated areas in terms of numerous GN R. 985 Activities. Written comments must be obtained from the relevant authorities and submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided.</p> <p>b) Layout & Sensitivity Maps</p> <p>(i) Please provide a layout map which indicates the following:</p> <p>a) The proposed facility in relation to the neighbouring facility with associated infrastructure for each development;</p>	<p>Thabile Sangweni Case Officer DEFF</p> <p>Letter: 31 August 2020</p>	<p>The EAP acknowledges the comment from DEFF. Only activities associated with the proposed PV facility and associated infrastructure have been applied for and assessed within the application and the basic assessment report.</p> <p>Should any activities differ in the final BAR, an amended application form will be submitted.</p> <p>Continuous communication with Authorities such as Northern Cape Department of Agriculture, Environmental Affairs, Rural Development and Land Reform, DWS, DEFF: Biodiversity Directorate, SAHRIS and SARAO has been undertaken from the inception of the public participation and basic assessment process. These comments have been documented and responded to within this comments and responses report and will be submitted to DEFF within the Final BAR.</p> <p>(i) a) An updated layout has been provided within Appendix M of the revised BAR depicting the proposed PV 1 in relation to PV2. PV1 & PV2 are also indicated on the Renewable Energy</p>

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	<p>b) The proposed grid infrastructure for each of the above PV facilities. overlain by the sensitivity map;</p> <p>c) All supporting onsite infrastructure e.g. roads (existing and proposed);</p> <p>d) The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected;</p> <p>e) Buffer areas; and, all "no-go" areas.</p> <p>(ii) The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments and existing grid infrastructure.</p> <p>(iii) Google maps will not be accepted.</p>		<p>Development Zone (REDZ) Map and the Upilanga Solar Park map included within Appendix M of the Basic Assessment Report.</p> <p>b) The proposed grid infrastructure i.e. "underground cable connection" of PV1 to the authorised Ilanga CSP site 1.4. has been detailed on the sensitivity map included within Appendix M.</p> <p>c) All supporting infrastructure i.e. the grid connection and access roads (existing and proposed) has been detailed on the sensitivity map for the PV1 facility included within Appendix M.</p> <p>d) A full sensitivity map highlighting areas of ecological sensitivity and watercourses that will be affected by PV1 is included within Appendix M.</p> <p>e) No applicable buffers or no-go zones were identified by specialists for PV1. The secondary alluvial watercourse was classified to be of medium sensitivity. Buffer zone were recommended by the aquatic specialist for any areas identified as high sensitivity.</p> <p>(ii) A cumulative sensitivity map has been included within Appendix M. The cumulative impacts of other renewable energy facilities in the area has been assessed within the report (refer to Section 8 of the report).</p> <p>(iii) The EAP acknowledges the comment from DEFF. Formal maps have been compiled and included in the report.</p>
	<p>c) Alternatives</p> <p>(i) Please note that you are required to provide a full description of the process followed to reach the proposed preferred alternative within the site, in</p>		<p>(i)</p>

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	<p>terms of Appendix 1(3)(1)(h) of the EIA Regulations 2014, as amended, including the following content:</p> <ul style="list-style-type: none"> a) details of all the alternatives considered; b) details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs; c) a summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them; d) the environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects; e) the impacts and risks identified for each alternative, including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts— <ul style="list-style-type: none"> (aa) can be reversed; (bb) may cause irreplaceable loss of resources; and (cc) can be avoided, managed or mitigated. f) the methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives; g) positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that 		<ul style="list-style-type: none"> a) Chapter 3 of the basic assessment report “Project Description and Alternatives” includes details of alternatives considered for the project. b) Detailed of the public participation process undertaken are included in Section 5 of the report and in Appendix B to Appendix C9 of the basic assessment report. This has been undertaken in accordance with the public participation plan followed as approved by DEFF (refer to Appendix C9). c) The Comments and Responses report (Appendix C8) includes issues raised to date on the project. All correspondence with Authorities, Stakeholders, Organs of State and Interested & Affected Parties has been included within Appendices C4- C6 of the basic assessment report. d) Environmental attributes associated with the identified preferred alternatives have been described and assessed within the basic assessment report, Chapters 6 to 8, and assessed within each of the specialist studies appended to the basic assessment report. e) The impacts and risks of the identified preferred alternatives has been assessed within Chapters 7 and 8 of the BA report and within the specialist reports. f) The methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the preferred project alternatives is included in Chapter 5 of the BA Report. g) The assessment of positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects is included in Chapters 7 and 8 of the BA Report.

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	<p>may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;</p> <p>h) the possible mitigation measures that could be applied and level of residual risk;</p> <p>i) the outcome of the site selection matrix;</p> <p>j) if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such; and</p> <p>k) a concluding statement indicating the preferred alternatives, including preferred location of the activity.</p> <p>(ii) Written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 1.</p>		<p>h) Chapter 7 of the basic assessment report includes recommended mitigation measures and the level of residual risk associated with each identified impact.</p> <p>i) The outcome of the site selection process undertaken for the identification of the broader study and development area is included in section 3.3 of the basic assessment report.</p> <p>j) A motivation for not considering alternative development locations is included in section 3.2.2.1 of the basic assessment report.</p> <p>k) A concluding statement indicating the preferred alternatives, including the preferred location of the activity is included in section 3.2.2.1 and 3.2.2 of the basic assessment report.</p> <p>(ii) Chapter 3 of the basic assessment report provides details of feasible alternatives identified and assessed for the project.</p>
	<p>d) <u>Specialist Declaration of Interest</u></p> <p>(i) Specialist Declaration of Interest forms must be attached to the final BAR. You are therefore requested to submit original signed Specialist Declaration of Interest forms for each specialist study conducted. The forms are available on Department's website (please use the Department's template).</p>		<p>Specialist Declarations will be submitted to DEFF with the Final Basic Assessment report.</p>
	<p>e) <u>Specialist Assessments</u></p> <p>(i) The Ecology Impact Assessment report by 3Foxes Biodiversity Solutions (Simon Todd) annexed as Appendix D is noted. As is the requirement of an offset necessitated by the anticipated loss of more than 3000 <i>Boscia albitrunca</i> individual species, which far exceeds the guideline amount of trees</p>		<p>(i) An offset analysis for this species has been undertaken to investigate the need and quantum of an offset to account for the loss of individuals from the current and other proposed Upilanga PV facilities. Refer to Appendix D1 of the Revised Basic Assessment report.</p> <p>(ii) An offset plan has been compiled and is included in Appendix D1 of the Revised BA Report.</p>

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	<p>that this Department finds acceptable for loss without an offset.</p> <p>(ii) As such, this Department requires that a biodiversity offset plan detailing all necessary information which will include inter alia the total loss of biodiversity versus the net gain, where the loss will occur and where it will be replaced, be provided in order to be able to make an informed decision on the application.</p> <p>(iii) Furthermore, this Department requires that legal agreements between the applicant and the management authority that will manage the offset area be signed before a decision can be made on the application.</p> <p>(iv) This Department will be guided by colleagues from this Department's Protected Area Management and Biodiversity & Conservation units, as well as the DENC on the offset process. As such, the EAP must ensure that all documents related to this project are also submitted to these commenting authorities.</p> <p>(v) Specialist studies to be conducted must provide a detailed description of their methodology, as well as all other associated infrastructures that they have assessed and are recommending for the authorisation.</p> <p>(vi) The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.</p> <p>(vii) Should the appointed specialists specify contradicting recommendations, the EAP must</p>		<p>(iii) The applicant has agreed to commit to the offset following liaison and agreement on the quantum of the offset to account for the loss of individuals from the current and other proposed Upilanga PV facilities prior to commencement of construction. It is however only possible to enter into a legal agreement on the offset once the project is certain to proceed (i.e. following securing of a PPA or Preferred Bidder Status). An In-principle agreement has been drafted and signed by the applicant to solidify the intention to enter into this legal agreement at the relevant time. This is included in Appendix D2 of the Revised BA Report.</p> <p>(iv) The offset plan and revised Basic Assessment report has been circulated to the DENC and the DEFF's Protected Area Management and Biodiversity & Conservation unit for review and comment. Further to this individual meetings and site visits will be arranged with these authorities to discuss and agree on the way forward for the offset plan.</p> <p>(v) The specialist studies (Appendix D-J) contain detailed descriptions of the methodologies used within each report. All infrastructure for the PV development has been assessed within the specialist reports.</p> <p>(vi) All specialist studies (refer to Appendix D-J) contain detailed descriptions of the limitations and gaps.</p> <p>(vii) No contradicting recommendations were provided by the specialist studies for the PV facility and associated infrastructure.</p> <p>(viii) As per the DEA Screening tool assessment no Electro Magnetic Interference (EMI) or Radio Frequency Interference (RFI) were required for the project. SKA was identified as a stakeholder and provided with the basic</p>

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	<p>clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expert advice.</p> <p>(viii) An indication if Electro Magnetic Interference (EMI) and Radio Frequency Interference (RFI) studies are needed. Furthermore, comments from the SKA office regarding this must be sought.</p> <p>f) Cumulative Assessment</p> <p>(i) Should there be any other similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:</p> <p>(a) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land.</p> <p>(b) Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.</p> <p>(c) The cumulative impacts significance rating must also inform the need and desirability of the proposed development.</p>		<p>assessment report. The comment received from SARO on behalf of SKA is included in this comments and responses report and within Appendix C6 of the revised BA Report.</p> <p>(i) Chapter 8 of the basic assessment report includes an assessment of potential cumulative impacts associated with the proposed project and other similar developments within a 30km radius of the site.</p> <p>a) Cumulative impacts have been clearly defined within each specialist report and within Chapter 8 of the basic assessment report.</p> <p>b) The methodology on how the specialists determined the relevant recommendations, mitigation measures and conclusions regarding cumulative impacts is included within the individual specialists reports for the project included in Appendix D to J.</p> <p>c) The significance ratings provided in Chapter 8 of the basic assessment report (Assessment of Potential Cumulative Impacts) inform the conclusions and recommendations that inform the need and desirability of the project.</p> <p>d) A cumulative impact environmental statement is included in Chapter 8, Section 8.12 of the basic assessment report.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>(d) A cumulative impact environmental statement on whether the proposed development must proceed.</p> <p>g) Undertaking of an Oath</p> <p>(i) The Department has noted that the submitted application form has an undertaking under oath or affirmation by the EAP. However, the aforementioned oath was not included in the draft BAR, but rather an appendix of the application form attached to the BAR. Please note that the final BAR must also have an undertaking under oath/affirmation by the EAP.</p> <p>(ii) Based on the above, you are therefore required to include an undertaking under oath or affirmation by the EAP (administered by a Commissioner of Oaths) as per Appendix 1 (3)(r) of the NEMA EIA Regulations, 2014, as amended, which states that the BAR must include: <i>"an undertaking under oath or affirmation by the EAP in relation to:</i></p> <ul style="list-style-type: none"> <i>a) the correctness of the information provided in the reports;</i> <i>b) the inclusion of comments and inputs from stakeholders and I&APs;</i> <i>c) the inclusion of inputs and recommendations from the specialist reports where relevant; and</i> <i>d) any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties".</i> 		<p>The undertaking of the affirmation by EAP has been included as Appendix N to the Revised Basic Assessment report.</p>

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	<p>h) <u>Details and Expertise of the EAP</u> (i) You are required to include the details and expertise of the EAP in the BAR, including a curriculum vitae, in order to comply with the requirements of Appendix 1(3)(1)(a) of the NEMA EIA Regulations, 2014, as amended.</p> <p>i) <u>Public Participation Process</u> (i) The following information must be submitted with the final BAR: a) A list of registered interested and affected parties as per Regulation 42 of the NEMA EIA Regulations, 2014, as amended; b) Copies of all comments received during the draft BAR comment period; and c) A comment and response report which contains all comments received and responses provided to all comments and issues raised during the public participation process for the BAR. Please note that comments received from this Department must also form part of the comment and response report. (ii) Please ensure that all issues raised and comments received during the circulation of the BAR from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section) in respect of the proposed activity are adequately addressed in the final BAR. (iii) Proof of correspondence with the various stakeholders must be included in the final BAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process must be</p>		<p>Appendix A of the basic assessment report for includes curriculum vitae of the EAP. Section 1.3 of the basic assessment report includes details and expertise of the EAP.</p> <p>(i) a) The list of registered I&APs are included in Appendix C1 of the <u>Revised</u> BAR. Note that contact details of these parties are not included in the public documents in line with the requirements of the POPI Act. These details will be provided to DEFF in the final report. b) Written comments received during the draft BAR 30-day review and comment period are captured in this C&RR and included in Appendix C6 of the <u>Revised</u> BAR. c) The C&RR which contains all the comments received, including those from the DEFF, response provided are included in Appendix C6 of the <u>Revised</u> BAR. (ii) All issues raised and comments received during the 30-day review period of the draft BAR are captured in this C&RR, including that of the DEFF's Biodiversity Section, and adequately address. Comments received during the review period of the revised BAR will be included in the final report to be submitted to DEFF. (iii) Proof of correspondence and notices sent to the various stakeholders, including reminders regarding the review and comment period, are included in Appendices C4 and C5 of the <u>Revised</u> BAR.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.</p>		<p>The Public Participation Process has been conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended (GNR 326), as well as in accordance with the approved Public Participation Plan. The approved Public Participation Plan is included in the <u>Revised</u> BA Report as Appendix C9.</p> <p>The BA Report was made available for a 30-day review and comment period from, Monday, 03 August 2020 until Friday, 04, September 2020. As per the approved Public Participation Plan, the availability of the BA Report was:</p> <ul style="list-style-type: none"> Announced on Radio Riverside 98.2FM, the local community radio station during 12 announcement spots between 07 August 2020 and 03 September 2020 and the schedule has been included in Appendix C2 of the <u>Revised</u> BA Report. <p>The NC DAEA, RD&LR (previously NC DENC), as the commenting authority, and relevant Organs of State were notified that the BA Report can be downloaded from Savannah Environmental's website and could also be sent via other file transfer services i.e. We Transfer, Dropbox, etc. or on CD, on request, from Savannah Environmental.</p>
	<p>e) Environmental Management Programme</p> <p>(i) It is drawn to your attention that for substation and overhead electricity transmission and distribution infrastructure, when such facilities trigger activity 11 or 47 of the Environmental Impact Assessment Regulations Listing Notice 1 of 2014, as amended, and any other listed and specified activities necessary for the realisation of such facilities, the generic Environmental Management Programme, contemplated in</p>		<p>(i) The proposed electricity transmission line for Upilanga PV1 is cabled and therefore proposed underground. There is no overhead electricity transmission proposed for the Upilanga PV1 facility and therefore the generic EMPr is not relevant for this project. The underground cabled electricity infrastructure will connect to the authorised onsite substation at the authorised CSP site 1.4 located north of the site, therefore the generic EMPr is not relevant for the already authorised substation.</p>

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	<p>Regulations 19(4) must be used and submitted with the final report over and above the EMPr for the facility.</p> <p>(ii) There needs to be an EMPr for the facility, the onsite substation as well as the power line, for whichever alternative is chosen.</p> <p>(iii) Further to the above, you are required to comply with the content of the EMPr in terms of Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended.</p> <p>(iv) Please be informed that the following content must be incorporated within the EMPrs as indicated in Appendix 4 of the EIA Regulations 2014, as amended:</p> <p>a) Details of the EAP who prepared the EMPr; and the expertise of that EAP to prepare an EMPr, including a curriculum vitae.</p> <p>b) A map at an appropriate scale which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffers.</p> <p>c) A description of the <u>impact management outcomes</u>, including management statements, identifying the impacts and risks that need to be avoided, managed and mitigated as identified through the environmental impact assessment process for all phases of the development including —</p> <p>(aa) Planning and design;</p> <p>(bb) Pre-construction activities;</p> <p>(cc) Construction activities;</p>		<p>(ii) The preferred Alternative for the grid connection for Upilanga PV1 consists of underground cabling and will connect to the onsite substation on authorised site 1.4. Therefore the proposed PV1 facility does not include overhead electricity infrastructure or an onsite substation. The EMPr for PV1, including the cabling proposed is included in Appendix L.</p> <p>(iii) The EMPr included in Appendix L of the basic assessment report has been compiled in terms of Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended.</p> <p>(iv) The EMPr for the project is included in Appendix L of the basic assessment report. This EMPr includes</p> <p>a) Details of the EAP in Chapter 4 and, Appendix A</p> <p>b) Appropriate maps included in figure 2.4 and 2.5</p> <p>c) Requirements as per comments (aa)-(ee) included in Chapter 5-8</p> <p>Requirements as per comments (d-n) included in Chapter 5-8</p> <p>d) to i) Chapters 7 to 8 include impact management actions and outcomes for each phase of the project life cycle.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>(dd) Rehabilitation of the environment after construction and where applicable post closure; and</p> <p>(ee) Where relevant, operation activities.</p> <p>d) A description of proposed impact management actions, identifying the manner in which the impact management outcomes contemplated in paragraph (d) of Appendix 4 of the EIA Regulations 2014, as amended, will be achieved, and must, where applicable, include actions to –</p> <p>a) Avoid, modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation;</p> <p>b) Comply with any prescribed environmental management standards or practices;</p> <p>c) Comply with any applicable provisions of the Act regarding closure, where applicable; and</p> <p>d) Comply with any provisions of the Act regarding financial provision for rehabilitation, where applicable.</p> <p>e) The method of monitoring the implementation of the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.</p> <p>f) The frequency of monitoring the implementation of the impact management actions contemplated in paragraph of Appendix 4 of the EIA Regulations 2014, as amended.</p> <p>g) An indication of the persons who will be responsible for the implementation of the impact management actions.</p>		

NO.	COMMENT	RAISED BY	RESPONSE
	<p>h) The time periods within which the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended, must be implemented.</p> <p>i) The mechanism for monitoring compliance with the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.</p> <p>j) A program for reporting on compliance, taking into account the requirements as prescribed by the Regulations.</p>		
	<p>f) <u>Environmental Impact Statement</u></p> <p>(i) You are kindly requested to include an environmental impact statement which contains —</p> <p>a) a summary of the key findings of the environmental impact assessment;</p> <p>b) a map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers; and</p> <p>c) a summary of the positive and negative impacts and risks of the proposed activity and identified alternatives.</p>		<p>f) An environmental impact statement containing the key findings of the environmental impacts of Upilanga PV1 has been included as section 9.5. of the basic assessment report.</p> <p>g) Sensitive environmental features located within the Upilanga PV1 study area and development area, overlain with the proposed development footprint have been identified and are shown in Figure 9.1 of the basic assessment report.</p> <p>h) A summary of the positive and negative impacts associated with Upilanga PV1 has been included in section 9.4.</p>
	<p>Please also ensure that the final BAR includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 1(3)(1)(q) of the NEMA EIA Regulations, 2014, as amended.</p>		<p>The period for which the Environmental Authorisation is required has been included in the Revised Basic Assessment report.</p>
	<p>You are further reminded to comply with Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: 'Where basic assessment must be applied to an</p>		<p>The EAP acknowledges the comment from DEFF.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p><i>application, the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority -</i></p> <p><i>(a) a basic assessment report, inclusive of specialist reports, an EMPr, and where applicable a closure plan, which have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority"</i></p> <p>Should there be significant changes or new information that has been added to the B/ R or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 19(b) of the NEMA EIA Regulations, 2014, as amended, which states: "<i>the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority — (b) a notification in writing that the basic assessment report, inclusive of specialist reports an EMPr, and where applicable, a closure plan, will be submitted within 140 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the basic assessment report or EMPr or, where applicable, a closure plan, which changes or information was not contained in the reports or plans consulted on during the initial public participation process contemplated in subregulation (1)(a) and that the revised reports or, EMPr or, where applicable, a closure plan will be subjected to another public participation process of at least 30 days".</i></p>		<p>As an offset plan has been compiled for the project and incorporated into the basic assessment report and the EMPr as per the recommendations of competent authorities, the basic assessment report and EMPr has been subsequently revised and has therefore been subjected to another public participation process of at least 30 days as per subregulation (1)(a).</p>

NO.	COMMENT	RAISED BY	RESPONSE
4.	<p><u>Herewith the comments for the proposed developments:</u></p> <p>1.1. It is estimated that approximately 3000 <i>Boscia albitrunca</i> trees will be impacted (destroyed) by the development as per the specialist's report. The species is dually protected by both the Northern Cape Nature Conservation Act (Act No. 9 of 2009) and the National Forest Act (Act No. 84 of 1998). According to this department's records, approximately 769 <i>B. albitrunca</i> (DENC flora harvesting permits: ODB 1413/2014 & ODB 2654/2016) has already been destroyed through the construction of the Ilanga CSP 1 development which includes a 1-hectare substation, an access road, pipeline, storm water canal and a 132 kilovolt powerline, all of which form part of the Upington Ilanga Solar Park. Furthermore, about 3998 <i>Boscia foetida</i> (provincially protected species; DENC flora harvesting permits: ODB 1413/2014, ODB 3051/2015 & ODB 2654/2016) has also been destroyed during the construction of the former development(s).</p> <p>1.2. Substantial amounts of <i>Boscia</i> spp. are being destroyed in the Gordonia region due to developments and this is of great concern as mitigation options for <i>Boscia</i> spp. are extremely limited i.e. the genus is extremely slow growing and cannot be easily trans-located (it is almost impossible to relocate adult trees) and germination success is poorly understood. Also, very limited information exists regarding tree age, growth rate, etc. With several developments proposed for Ilanga Solar Park (~14 000 hectare) thousands of <i>Boscia</i> spp. will still be destroyed.</p>	<p>Ms. E. Swart Scientific Manager: Grade B Research and Development Support Unit</p> <p>DENC</p> <p>Letter: 04-09-2020</p>	<p>The EAP acknowledges the comment from DENC.</p> <p>The EAP acknowledges the comment from DENC.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	1.3. The specialist's suggestion that an offset analysis process should be incorporated to account for the irreversible loss of the said protected species is thus strongly supported.		As per the recommendations of the specialist and the competent authority, an offset analysis has been undertaken for the project and the Upilanga Solar Park as a whole and incorporated into the basic assessment report and EMP. The Offset Plan has been attached as Appendix D1 of the revised basic assessment report.
	1.4. The offset analysis should take into account cumulative impacts of the Ilanga Solar Park developments (and all of its associated infrastructure i.e. power lines, pipeline, road construction, etc.).		The offset plan included in the revised BA Report considers the cumulative impacts of the PV projects and the Upilanga Solar Park as a whole.
	1.5. The offset analysis should also illustrate, from a landscape level perspective and ecosystem conservation status context, that the Ilanga Solar Park do not threaten the ecosystems' conservation status, ecological functionality on a landscape level and will not cause fragmentation of ecosystems (the vegetation units associated with the development can be used as ecosystems).		The offset plan has considered ecosystem status and conservation contribution of the proposed offset.
	1.6. It is advised that the proponent appoints a qualified offset specialist to do a land offset proposal / investigation in consultation with the DEFF (national department and regional Forestry section) and the DENC.		A qualified offset specialist has been appointed to undertake the offset analysis and plan compilation. This has been included within the Final Basic Assessment report.
	2. As per the specialist's reports, the region favours local avifaunal diversity. It is thus proposed that, as a result of the high number of species of conservation concern in the area of interest, a lack of comparable results from other similar developments in South Africa to meaningfully assess avian mortality at renewable energy facilities and the cumulative impact of the conglomerate of developments (PV, CSP, etc. that are proposed and already in operation) and associated		Previous avifauna monitoring on the site (undertaken by Birds and Bats Unlimited in 2016 over 2 seasons) recorded large Sociable Weaver nests on site. No other sensitive breeding or roosting sites of any red-listed species were recorded. A pre-construction survey will be undertaken to confirm if communal roosting and breeding sites of red-listed species are present at the site at that time, and appropriate mitigation measures will be implemented.

NO.	COMMENT	RAISED BY	RESPONSE
	<p>infrastructure within the area of interest that bird mortality as well as bird species richness and density within and around the Ilanga Solar Park (e.g. the boundary zone, adjacent untransformed land, etc.) be monitored during the lifespan (pre-construction through to operational phases) of the development (see Visser, 2016). The monitoring project should be based on scientifically rigorous research designs drafted by an external specialist and the information should be provided to both the provincial and national conservation authorities</p>		<p>Post-construction monitoring with the aid of video surveillance, particularly if there are high collision rates has been included within the mitigation measures and EMPr for the project.</p>
	<p>3. The amount of water needed for the development and the Ilanga Solar Park at large is of major concern (e.g. Upilanga PV1 alone would require 10 000m³ of water during the 18-month construction period, and approximately 5 000m³ of water per year over the 20-year operational lifespan)! It is highly advised that measures to minimise the projects water requirements must be investigated and be in place prior to construction.</p> <p>Linked to the water availability, the impact of the extraction of these amounts of water on the flow regime of the Orange river must be incorporated into the impact assessment, and its impacts on the Orange River Mouth. Although this is downstream impacts, the development is contributing to the environmental impacts being experienced downstream all the way up to the Orange River Mouth. Similarly other consequences of reduced flow could occur, like increased black fly problems</p>		<p>No water will be abstracted from the Orange River for the Upilanga PV1 development. Water for the construction phase of the development will be trucked in for the construction phase and shared with with the operational Karohoek CSP One facility located north of the proposed project site which already has a Water Use License for abstraction from the Orange River.</p> <p>Unlike CSP facilities solar PV facilities use modest amounts of water for the operational phase for cleaning of PV panels.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	4. A detailed walk-through report should be submitted with permit applications for the removal of protected species.		A detailed walkthrough will be undertaken prior to construction and will be submitted together with the permit for removal of protected species for the project. This requirement is included within the project EMP.
	5. The majority of the second paragraph under Compliance Requirements on page 104 of Upilanga PV 1's DBAR should be deleted. It should be noted that <i>Vachellia erioloba</i> is not protected under the Northern Cape Nature Conservation Act (only <i>B. albitrunca</i> and <i>B. foetida</i>) and that the NFA is not provincial legislation, but national legislation.		This has been addressed within the compliance requirements on page 104 of the revised basic assessment report and updated accordingly.
	<p><u>Some additional remarks to take into consideration:</u></p> 1. The impact of CSP, parabolic and PV plants on pollinators is a concern. The developments are within an agricultural hub of the Northern Cape and the impact of these developments on direct death (e.g. when flying into solar flux / heat beams) and indirect impacts through local heat island effects (e.g. influencing the activity period of pollinators like honey bees that have a temperature range within which they are active) must be addressed and monitored.		1. It must be noted that there is no solar flux / heat beams associated with PV facilities. Review of international studies available online ¹ do not indicate negative impacts on pollinators. The indication is that there is the potential for solar facilities to provide habitat for such insects provided that appropriate mitigation and management of site is implemented. As the biodiversity offset has been undertaken (Appendix D1) for the remaining land portions for the Upilanga Solar park as a whole to account for the number protected species to be impacted by the development (<i>B. albitrunca</i> and <i>B. foetida</i>), the offset will result in the conservation and protection of <i>Boscia albitrunca</i> which supports a number of pollinators.
	2. Together with bird, bat, reptile etc. species, the impacts on pollinators have an impact on the ecosystem and food chains at large as well. The extent of such impacts is key to ensure that it is not disruptive to such and extent that ecosystem collapse or alteration occurs (linked to cumulative impact).		The implementation of the offset will assist in the conservation of the <i>Boscia albitrunca</i> which support a multitude of pollinators in the areas thereby ensuring the impacts to the ecosystem and disruption to the food chain is minimised.

¹ <https://www.scientificamerican.com/article/solar-farms-shine-a-ray-of-hope-on-bees-and-butterflies/> and <https://cleantechnica.com/2018/08/14/solar-farms-can-become-pollinator-habitats-help-save-the-bees/>

NO.	COMMENT	RAISED BY	RESPONSE
	3. Baseline data and monitoring of birds, migrating bats, pollinators, etc. will be important components to incorporate.		The baseline data and monitoring of bird and bat species has been considered within the ecological and avifauna assessments undertaken as per Appendix D and Appendix E of the basic assessment report.
	4. When assessing options for a Biodiversity Offset the aforementioned concerns will have to be considered and incorporated into the assessments to ensure the offset properties will not be impacted by the developments.		The implementation of the offset will assist in the conservation of the <i>Boscia albitrunca</i> which support a multitude of pollinators in the areas thereby ensuring the impacts to the ecosystem and disruption to the food chain is minimised.
	5. The proposed corridor to manage landscape fragmentation is supported, and it is urged that some technical thinking and deliberation goes into it to ensure that it is of sufficient size (and appropriately located) to facilitate connectivity and ecosystem function.		The offset plan compiled for the project includes consideration of these aspects.
5.	<p>The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR and EMPr:</p> <p>38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed development;</p> <p>38(4)b – The recommendations of the specialists are supported and must be adhered to. No further additional specific conditions are provided for the development;</p> <p>38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed</p>	<p>Natasha Higgitt Heritage Officer South African Heritage Resources Agency</p> <p>Phillip Hine Manager: Archaeology, Palaeontology and Meteorites Unit South African Heritage Resources Agency</p>	<p>This has been addressed on Page 53 of the EMPr.</p> <p>The recommendations of the specialist are included in the BAR and EMPr</p> <p>This has been addressed on Page 53 of the EMPr.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;	Letter: 02 September 2020	
38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;	This has been addressed on Page 53 of the EMPr.		
38(4)d – See section 51(1) of the NHRA;	The EAP acknowledges the comment from DEFF.		
38(4)e – The following conditions apply with regards to the appointment of specialists: i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;	This has been addressed on Page 53 of the EMPr.		
The Final BAR and EMPr must be submitted to SAHRA for record purposes;	The final Basic Assessment report will be submitted to SAHRA as requested.		
The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.	The decision on the application will be communicated to SAHRA.		

NO.	COMMENT	RAISED BY	RESPONSE
6.	In order to fully determine the level of risk on interference to the SKA Infrastructure Territory, SARAO requires an inventory of electrical equipment that will be deployed at the facility.	Mr Selaelo Matlhane Spectrum & Telecommunication Manager South African Radio Astronomy Observatory (SARAO) Letter: 04 September 2020	The comments from SARAO are acknowledged and the specific requirements communicated to the applicant.
	Based on the location, spectral density at the facility should not exceed -46 dBm/Hz in order to fall within the Karoo Central Astronomy Advantage Areas Regulations compliance limits.		
	Based on other recently assessed solar PV projects in the vicinity, we have determined that the risk level is from low to medium. Each project is, however, unique and dependent on electrical equipment installed (or proposed) and subsequent radiated emissions.		The low to medium risk associated with the project is noted. A list of electrical equipment will be submitted to SARAO to evaluation.
	SARAO does not object the projects but would appreciate if an inventory of electrical equipment could be provided at a later stage, so that re-assessment can be undertaken and a EMI control plan should be put in place if the emissions exceeds the compliance limits.		The no objection from SARAO is noted. A list of electrical equipment will be submitted to SARAO to evaluation.
7.	The following recommendations must be considered in the final report:	Mr. Seoka Lekota Control Biodiversity Officer Grade B: Biodiversity Conservation DEFF Letter: 04 September 2020	The Plant Rescue Plan for the proposed development site is included in Appendix L(d) of the BA Report.
	» Search and rescue plan for the identified Species of Conservation Concern (SCC) must be submitted as part of the final report;		
	» Permits from the relevant authorities must be obtained prior to commencement of any construction activities for the removal or disturbance of any TOPs, Red Data listed or Provincially protected species;		As per the specialist recommendations and the EMPr (Appendix M), permits from the relevant authorities must be obtained prior to commencement of construction activities for the proposed project.
	» Erosion and Alien Plant Species Management Plan, Rehabilitation Plan must be submitted as part of the final report to mitigate on habitat degradation due to erosion and alien plant invasion; and		These plans are included in Appendix L(c) and L(f) as appended within the EMPr (Appendix L) for proposed PV facility.

NO.	COMMENT	RAISED BY	RESPONSE
	» Sensitive areas in close proximity to the development footprint must be demarcated as no-go area i.e. drainage features, pans and quartz patches.		No sensitive no-go areas were identified within the project footprint as per the specialist studies (Appendix D-J). Secondary alluvial water courses and minor drainage lines that were either fragmented or contained no riparian zones were identified within the project footprint and were determined to be of Moderate sensitivity. No pans or quartz patched were identified within the project footprint.
	The final report must comply with all the requirements as outlined in the Environmental Impact Assessment (EIA) guideline for renewable energy projects and the Revised Best Practice Guideline for Birds & Solar Energy for assessing and monitoring the impact of solar power generating facilities on birds in Southern Africa		The basic assessment report and the avifauna assessment (Appendix E) comply with the requirements as outlined in the Environmental Impact Assessment (EIA) guideline for renewable energy projects and the Revised Best Practice Guideline for Birds & Solar Energy for assessing and monitoring the impact of solar power generating facilities on birds in Southern Africa.

2.2. Interested and Affected Parties

NO.	COMMENT	RAISED BY	RESPONSE
1.	Please see below details for the upcoming development project.	Angelo Douwie Director Kaofeli Services (Pty) Ltd E-mail: 29 August 2020	E-mail acknowledged and as no specific details regarding to which project his query is applicable to, Savannah Environmental responded to e-mail request whether I&AP wants to be registered on the project database to receive process and updated project information.
	It's the Ilanga 2 project apparently at karoshoek and also any other new projects around upington etc...	E-mail: 17 September 2020	Confirmation of interest in project acknowledged.
	Please find attach company profile for upcoming Upilanga PV 1 project and Upilanga PV project 2.	E-mail: 22 September 2020	The I&AP was informed that as per the Environmental Impact Assessment (EIA) Regulations, 2014, as amended, that formal registration on a project database is required. Therefore, Savannah Environmental cannot do a 'blanket' registration on projects and requested that he informs the project team that he can be formally registered on the project database.

