

APPENDIX C8:
Comments and Responses Report

ADDITIONAL FOOTPRINT FOR THE ENGIE SANNASPOS SOLAR PV FACILITY

COMMENTS AND RESPONSES REPORT

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The Scoping and Environmental Impact Assessment (S&EIA) process for the additional footprint associated with the ENGIE Sannaspos Solar Project was announced on **Wednesday, 02 February 2022**. A Background Information Letter (BIL) was distributed and served to invite Interested and Affected Parties (I&APs) to register their interest in the project and to submit any comments / queries regarding the proposed project. The notification of the availability of the Scoping Report for review and comment was included in the notification of the distribution of the BIL.

The Scoping Report was made available for a 30-day review and comment period from **Friday, 04 February 2022** until **Monday, 07 March 2022**.

The EIA Report was made available for a 30-day review and comment period from **Friday, 24 June 2022** until **Monday, 25 July 2022**. All written comments received during the S&EIA have been included in this Comments and Responses Report (C&RR) to be submitted with the final EIA Report to the Department of Forestry, Fisheries and the Environment (DFFE) for their review and decision-making.

The C&RR is included in **Appendix C8** of the Final EIA Report.

NOTE:

All comments captured in the C&RR are verbatim and have not been summarised nor edited for typing or grammatical errors.

LIST OF ABBREVIATIONS / ACRONYMS

ATNS	Air Traffic Navigation Services	I&APs	Interested and Affected Parties
C&RR	Comments and Responses Report	OoS	Organs of State
DFFE	Department of Forestry, Fisheries and Environment	PV	Photovoltaic
DWS	Department of Water and Sanitation	SACAA	South African Civil Aviation Authority
EIA	Environmental Impact Assessment	S&EIA	Scoping and Environmental Impact Assessment
FSR	Final Scoping Report		

1. COMMENTS RECEIVED DURING THE ENVIRONMENTAL IMPACT ASSESSMENT PROCESS

1.1. Organs of State

No.	Raised by	Comment	Responded by	Response
1.	Milicent Solomons Department of Fisheries, Forestry and the Environment Letter dated :27 June 2022	The Draft Environmental Impact Assessment Report (EIAR) received by the Department on 24 June 2022 and the acknowledgement of receipt email dated 28 June 2022, refer. <u>This letter serves to inform you that the following information must be included in the final EIAR:</u> (a) Specific comments <ul style="list-style-type: none"> • Recommendations provided by specialist reports must be considered and used to inform the layout. • Please ensure that all mitigation recommendations are in line with applicable and most recent guidelines. • The final EIAR must provide the technical details for the proposed facility in a table format as well as their description and/or dimensions. • Please ensure that all softcopy maps are clear and legible • Please ensure that the final EIAR complies with the requirements of Appendix 3 of the NEMA EIA Regulations, 2014, as amended. • Please also ensure that the final EIAR includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 3 of the NEMA EIA Regulations, 2014, as amended. 	Tamryn Lee Goddard Environmental Consultant Savannah Environmental	The comment has been acknowledged. Responses to specific comments are provided below. <ul style="list-style-type: none"> • A final Layout map is included in Chapter 7 (Figure 7.3). Recommendations provided by the specialist studies have been used to inform the final layout, including specialist sensitivity data provided by each specialist. • All specialist studies have been undertaken in accordance with the relevant guidelines and protocols and recommended mitigation measures are in line with these. • The technical details for the proposed infrastructure on the additional footprint is included in Table 2.2 of the FEIAR. • Softcopy maps are clear and legible. • The final EIAR complies with the requirements of Appendix 3 of the NEMA EIA Regulations, 2014, as amended, as detailed within the Final EIA Report. • Section 7.6 of Chapter 7 of the FEIAR includes the period for which the Environmental Authorisation is required.

No.	Raised by	Comment	Responded by	Response
		<p data-bbox="600 555 875 582">(b) Listed Activities</p> <ul data-bbox="600 592 1263 1358" style="list-style-type: none"> <li data-bbox="600 592 1263 794">• 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. <li data-bbox="600 804 1263 1043">• If the activities applied for in the application form differ from those mentioned in the final EIAR, 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. <li data-bbox="600 1053 1263 1358">• The relevant authorities with jurisdiction in respect of geographically designated areas in terms of GNR. 985 (Listing Notice 3) Activities must be continuously involved throughout the environmental impact assessment process. Written comments (or proof of consultation) must be obtained from the relevant authorities and submitted to this Department. In addition, a graphical representation of the proposed development within the respective 		<p data-bbox="1574 236 2123 544">The Sannaspos PV facility is a Preferred Bidder project under Round 5 of the REIPPP. Construction of infrastructure within the additional footprint will be completed within 12 months of the commencement of construction, which is planned for early 2023. Once constructed, the facility would be operational for 20-25 years.</p> <ul data-bbox="1574 553 2123 1358" style="list-style-type: none"> <li data-bbox="1574 553 2123 724">• Section 4.2.1 of the FEIAR includes all listed activities being applied for that are relevant to the infrastructure (including thresholds) as described in the project description. <li data-bbox="1574 734 2123 1007">• The activities applied for in the Application for EA are the same as those within the Final EIAR. A revised application form was submitted together with the draft EIAR as the SPV name for the applicant had changed. No amended application form is being submitted with the final EIAR. <li data-bbox="1574 1016 2123 1187">• A representation of the proposed development within the respective sensitive geographical areas as defined in Listing Notice 3 (GNR 324) is provided in Chapter 5, (Figure 5.1) of the FEIAR. <li data-bbox="1574 1197 2123 1358">• The relevant authorities have been consulted throughout the EIA process (refer to Appendix C of the FEIAR). Evidence pertaining to the notification to the relevant authorities has been

No.	Raised by	Comment	Responded by	Response
		geographical areas must be provided. Please also ensure that the potential impacts on the affected Critical Biodiversity Areas and Ecological Support Areas are fully assessed in the EIAR.		incorporated into Appendix C4 of the Final EIAR.
		<p>(c) Public Participation</p> <p>(i) Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAR. This includes but is not limited to the Department of Water and Sanitation, the provincial Department of Agriculture, SANRAL, Local Municipality, the District Municipality, the Department of Water and Sanitation (DWS), the South African Heritage Resources Agency (SAHRA), the Endangered Wildlife Trust (EWT), BirdLife SA, the Department of Mineral Resources, the Department of Rural Development and Land Reform, and the Department of Forestry, Fisheries and the Environment: Directorate Biodiversity and Conservation.</p> <p>(ii) Please ensure that all issues raised and comments received during the circulation of the draft SR and draft EIAR from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final EIAR. Proof of correspondence with the various stakeholders must be included in the final EIAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.</p> <p>(iii) A Comments and Response trail report (C&R) must be submitted with the final EIAR. The C&R</p>	Nondumiso Bulunga Public Participation Consultant Savannah Environmental	<ul style="list-style-type: none"> • Comments received from registered I&APs and organs of state, as well as proof of requests for comments are included in Appendix C of the final EIA Report. All correspondence records have been appended to the FEIA. Appendix C4 includes correspondence with the Organs of State (OoS) and Appendix C5 includes correspondence with Stakeholders and I&APs. • All issues raised and comments received are addressed, where relevant within the FEIAR, and are included in the Comments and Responses Report. Changes made to the FEIAR are underlined for ease of reference. • A Comments and Responses Report has been compiled and is included as a separate document to the EIA Report, and is included as Appendix C8 of the FEIAR. • Comments from I&APs are not split and arranged into categories. Comments from each submission has been responded to individually. • The Public Participation Process has been conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014,

No.	Raised by	Comment	Responded by	Response
		<p>report must incorporate all comments for this development. The C&R report must be a separate document from the main report and the format must be in the table format. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as "noted" is not regarded as an adequate response to I&AP's comments.</p> <p>(iv) Comments from I&APs must not be split and arranged into categories. Comments from each submission must be responded to individually.</p> <p>(v) The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations, 2014, as amended.</p> <p>(vi) The EAP is requested to contact the Department to make the necessary arrangements to conduct a site inspection prior to the submission of the final EIAR.</p>		<p>as amended (GNR 326), as well as in accordance with the approved Public Participation Plan (included in Appendix C9 of the FEIA).</p> <ul style="list-style-type: none"> The EAP has contacted the Department to make the necessary arrangements to conduct a site inspection. As the process is nearing the end of the regulated timeframes (i.e. 106 days for submission of the FEIAR), it has been agreed with the case officer that the site visit can be held after the submission of the FEIAR..
		<p>(d) Cumulative Assessment</p> <ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land. Detailed process flow and proof must be provided, to indicate how the specialist's 	<p>Tamryn Lee Goddard Environmental Consultant Savannah Environmental</p>	<p>Section 6.6 of the FEIAR includes an assessment of the cumulative impacts of other similar projects within a 30km radius of the proposed development site including;</p> <ul style="list-style-type: none"> Clearly defined cumulative impacts and where possible the size of the identified impact (indicated and quantified as hectares of cumulatively transformed land). Specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area.

No.	Raised by	Comment	Responded by	Response
		<p>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> <ul style="list-style-type: none"> ▪ The cumulative impacts significance rating must also inform the need and desirability of the proposed development. ▪ A cumulative impact environmental statement on whether the proposed development must proceed. <p>(e) Specialist Assessments</p> <ul style="list-style-type: none"> • Please include a table in the EIAR summarising the specialist studies required by the Screening Tool, a column indicating whether these studies were conducted or not, and a column with motivation for any studies not conducted. • Specialist studies 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. • 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. • Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable 		<ul style="list-style-type: none"> • Cumulative impacts significance rating and how this has informed the need and desirability of the proposed development. • A cumulative impact environmental statement on whether the proposed development must proceed. <ul style="list-style-type: none"> • Chapter 4 (Table 4.4) provides a summary of the specialist assessments identified in terms of the screening tool and responses to each assessment from the project team considering the development area under consideration. • Each specialist included a detailed methodology within their individual reports as included in Appendix G, Appendix H, and Appendix I of the FEIAR. • There were no limitations with regards to seasonal studies. Limitations of the specialist studies are included in the specialist reports included in Appendix G, Appendix H, and Appendix I of the FEIAR.

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		<p>recommendation and substantiate this with defensible reasons; and where necessary, include further expertise advice.</p> <ul style="list-style-type: none"> • It is further brought to your attention that the Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species) have come into effect. Please note that specialist assessments must be conducted in accordance with these protocols, except where the applicant provides proof to the competent authority that the specialist assessment affected by these protocols had been commissioned before the date on which the protocols came into effect, in which case Appendix 6 of the Environmental Impact Assessment Regulations, 2014, as amended, will apply to such applications. Please indicate in the EIAr whether the protocols were applied. • Please note further that the Protocols require the specialists to be SACNASP registered <p>(f) Environmental Management Programme The EMPr must also include the following:</p> <ul style="list-style-type: none"> • All recommendations and mitigation measures recorded in the EIAr and the specialist studies conducted. 		<ul style="list-style-type: none"> • No contradicting recommendations have been provided during the EIA phase. • Specialist studies were undertaken in accordance with the relevant Protocols. Where required, specialists are appropriately registered. CVs of specialists are included in Appendix M of the FEIAr. <p>The EMPr for the additional footprint associated with this facility is included in Appendix K of the FEIAr and includes:</p> <ul style="list-style-type: none"> • All recommendations and mitigation measures recorded in the EIAr and the specialist studies conducted.

No.	Raised by	Comment	Responded by	Response
		<ul style="list-style-type: none"> • An environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process. • Measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments, and other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants. • In addition to the above, the EMPr must comply with Appendix 4 of the EIA Regulations, 2014, as amended. <p>General</p> <p>Should you fail to meet any of the timeframes stipulated in Regulation 23 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.</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>		<ul style="list-style-type: none"> • An environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process. • Measures to protect hydrological features. • The content of the EMPr adheres to the requirements in Appendix 4 of the EIA Regulations 2014, as amended. <p>This comment regarding timeframes has been noted and the timeframes adhered to in this regard.</p>
2.	<p>Natasha Higgitt</p> <p>South African Heritage Agency (SAHRA)</p> <p>Letter dated: 24 November 2021</p>	<p>Engie Solar Africa (Pty) Ltd [previously known as Solaire Direct Southern Africa (Pty) Ltd] was granted an Environmental Authorisation (EA) for the Sannaspos PV Solar Energy Facility on portion 0 of the farm 1808 Besemkop and portion 0 of the farm 2962 Lejwe, Mangaung Metropolitan Municipality, Free State Province on the 26/06/2013 (Ref: 14/12/16/3/3/2/360). SAHRA provided a Letter on the 17/08/2012, requesting that a Heritage Impact Assessment (HIA) be conducted (https://sahris.sahra.org.za/node/49888). An HIA and</p>	<p>Tamryn Lee Goddard</p> <p>Environmental Consultant</p> <p>Savannah Environmental</p>	<p>The comment has been acknowledged and the recommendations provided accurate in terms of the HIA conducted. No further response is required.</p>

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		<p>Palaeontological Impact Assessment (PIA) were submitted to the application on the 11/03/2013 along with the Final Environmental Impact Assessment report. No further comments were provided by SAHRA. These heritage reports will be briefly summarized below.</p> <p><i>Kibili, J. M. 2012. Palaeontological Impact Assessment: Desktop Study. Proposed Sannaspos Photovoltaic (PV) Solar Energy Facilities, Portion 0 of Farm 1808 Besemkop and Portion 0 of Farm 2962 Lejwe of Mangaung Metropolitan Municipality, Free State Province.</i></p> <p>The development area is underlain by the Beaufort Group that consists of sandstone and shale that may contain fossils such as primitive reptiles, therapsids, amphibians, fish, molluscs and plant fossils.</p> <p>Recommendations provided in the report included the following:</p> <ul style="list-style-type: none"> ▪ That a qualified palaeontologist be commissioned to undertake ground reconnaissance of the designated area prior to groundbreaking; ▪ That construction manager(s) report any fossil finds encountered during construction to a qualified palaeontologist who will undertake necessary mitigation procedures in accordance with protocols of the South African Heritage Resources Agency (SAHRA). ▪ <i>Tomose, N. 2012. A Phase 1 Heritage impact assessment study for the proposed photovoltaic (PV) solar energy facilities (in Sannaspos), near Bloemfontein, Free State Province: DEA Ref No:</i> 		

No.	Raised by	Comment	Responded by	Response
		<p>14/12/16/3/3/2/360 (Phase 1); DEA Ref No: 14/12/16/3/3/1/615 (Phase 2).</p> <ul style="list-style-type: none"> ▪ A total of four heritage sites were identified within the development area. These included one surface scatter of Middle Stone Age lithics of low heritage significance, one historical stone shed of high heritage significance, and two cemeteries of high significance. The graffiti is not considered to be a heritage resource. <p>Recommendations provided in the report include the following:</p> <ul style="list-style-type: none"> ▪ It is proposed that the three sites should be preserved in situ and not be disturbed or altered during the Sannaspos Solar Farm construction activities; ▪ Should construction activities come closer to these sites, a buffer of approximately 20m should be retained between graves and construction activities – for example, for Sannas-5 and Sannas-1; ▪ It is recommended that the proposed project construction phase should pay special attention to possible encounter of archaeological resources and sites such as unmarked graves or stone and iron implements (dating to Iron Age and to events of the Second South African War as discussed above); ▪ Should such sites be discovered during the construction phase, construction activities need to be stopped with immediate effect and a professional archaeologist need to be called on site to inspect and investigate the finds and make 		

No.	Raised by	Comment	Responded by	Response
		<p>recommendations on further actions that need to take place to rescue or mitigate the finds. For example, applying for rescue permits with SAHRA-BGG Unit in case of discovery of unmarked graves and SAHRA-APM Unit in case of archaeological and palaeontological remains;</p> <ul style="list-style-type: none"> ▪ To achieve the above two recommendation – it is further recommended that an Environmental Control Officer should be inducted on heritage management before the commencement of construction activities and that he/she should be to take responsibility for heritage sites and resources during the construction phase of the project. <p>It is noted that the recommendations from the above specialist reports were included in the Environmental Management Programme (EMPr).</p> <p>The EA has subsequently been amended to split the PV facility and the associated grid infrastructure into separate EA's (Ref: 14/12/16/3/3/2/360/AM5/1 and Ref: 14/12/16/3/3/2/360/AM5/2).</p> <p>It is noted that the EA granted in 2013 contained the following conditions:</p> <ul style="list-style-type: none"> • 26. A Site Management Plan must be development (sic) for Site Sannas-1 (an informal cemetery of approximately 13 graves oriented east to west, with stone dressing) and Site Sannas-5 (a formal cemetery of approximately 08 graves oriented east to west, with granite dressing and headstones). Both these sites must be fenced and provided with a 		

No.	Raised by	Comment	Responded by	Response
		<p>secure access gate. The fencing must be placed 2m away from the perimeter of the graves. No development is allowed within 15m from the fenceline surrounding the graves.</p> <ul style="list-style-type: none"> • 27. Site Sannas-3 must be documented and a permit must be obtained from the relevant authority for the demolition of this stone shed. • 28. A qualified palaeontologist must be commissioned to undertake a ground reconnaissance before commencement of any construction activities and the construction manager and ECO must report any fossil finds encountered during construction activities <p>As a result of the above EA conditions, a PIA and Heritage Management Plan has been submitted to SAHRA for review (13/09/2021).</p> <p><i>Bamford, M. 2021. Palaeontological Impact Assessment for the proposed Sannaspos Photo voltaic Facility, Farms Lejwe and Besemkop, Free State Province. Site Visit (Phase 2) Report.</i></p> <p>The site visit did not reveal any fossils within the project footprint. A Fossil Chance Finds Procedure should be added to the EMPr.</p> <p><i>Lavin, J. 2021. Heritage Conservation Management Plan for the approved Sannaspos Photovoltaic Facility near Bloemfontein in the Free State Province.</i></p> <p>The HMP contains management procedures for the two cemeteries identified during the HIA process i.e. Site</p>		<p>The comment has been acknowledged. An application for a section 34 permit will be</p>

No.	Raised by	Comment	Responded by	Response
		<p>Sannas-1 and Site Sannas-5, and general Chance Finds Procedures. The HMP includes conservation and management requirements, guidelines for consultation procedures, and a monitoring and site maintenance action plan. The HMP makes note that a section 34 permit must be applied for from Heritage Free State for Site Sannas -3.</p> <p>Currently, Engie Solar Africa has been awarded the preferred bidder status as part of the Renewable Energy Independent Power Producer Procurement Programme (REIPPPP) and require updated comments from SAHRA.</p> <p><u>Final Comment</u></p> <p>As the NEMA EIA process has long since been concluded, SAHRA cannot provide approval or note any objections to the approved Sannaspos PV facility, powerlines and grid infrastructure (Ref: 14/12/16/3/3/2/360/AM5/1 and Ref: 14/12/16/3/3/2/360/AM5/2) in terms of NEMA. The applicant is advised to note and implement the following:</p> <ul style="list-style-type: none"> • The recommendations provided by the heritage specialists during the EIA phase are supported; • The recommendations provided in the Phase 2 PIA and HMP are supported; • No comments are required from the Heritage Free State (HFS) in this regard, however, if a permit in terms of section 34 of the NHRA is required at any point for the development, this must be applied for from the HFS; • If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous 		<p>applied for from Heritage Free State for Site Sannas -3 should this site be directly impacted by the project.</p> <p>The comment has been acknowledged. No response is required.</p> <p>The comments have been acknowledged and the recommendations included into the EMPr for the additional footprint (refer to Objective 4).</p>

No.	Raised by	Comment	Responded by	Response
		<p>ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;</p> <ul style="list-style-type: none"> • If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Ngqalabutho Madida 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; • See section 51 of the NHRA for offences; • The following conditions apply with regards to the appointment of specialists: • With reference to the mitigation work noted above, a qualified archaeologist must be appointed to undertake the work in terms of the permit applied for as noted above; • 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 		

1.2. Key Stakeholders and Interested & Affected Parties

No.	Raised by	Comment	Responded by	Response
3.	No comments have been received			

2. COMMENTS RECEIVED DURING THE SCOPING PROCESS

2.1. Organs of State

No.	Raised by	Comment	Responded by	Response
4.	Pule Joseph Lenong Department of Water and Sanitation (DWS) Email correspondence: 07 February 2022	On behalf of the Provincial Head of the Department of Water and Sanitation: Free State, I hereby would like to acknowledge receipt your e-mail with kindness. The contents are receiving attention. In future, if you do not mind, please send your EIA directly to this office. Mr George Nel is copied here and myself.	Lehlogonolo Mashego Public Participation and Environmental Consultant Savannah Environmental	The comment raised by the DWS has been acknowledged. In addition, George Nel has been added onto the database for all future correspondence.
5.	Lizell Stroh South African Civil Aviation Authority (SACAA) Email correspondence: 07 February 2022	Proposal are NOTED, please find new procedure: whereby ATNS provides the required assessment process, kindly lodge your respected proposed project with ATNS, the approval would be issued by SACAA but all correspondence would be done by ATNS.	Lehlogonolo Mashego Public Participation and Environmental Consultant Savannah Environmental	Attention is drawn to the Conditional Approval for the proposed Sannaspos Solar Photovoltaic (PV), Ref CA8/2/Welkom and CAA_2021_8_258 . Please do let us know should there be any additional requirements and/or aspects to be confirmed.
6.	Sabelo Malaza Department of Forestry, Fisheries and Environment Email correspondence: 03 March 2022	(a) Listed Activities <ul style="list-style-type: none"> • 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. • If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link https://www.environment.gov.za/documents/forms. 	Tamryn Lee Goddard Environmental Consultant Savannah Environmental	Section 4.2.1 of the FSR includes all listed activities being applied for that are relevant to the infrastructure (including thresholds) as described in the project description and as amended for the FSR. An updated application form which lists the same activities as Table 4.1 in Chapter 4 in the FSR has been submitted.

No.	Raised by	Comment	Responded by	Response
7.		<p>(b) Public Participation Process</p> <ul style="list-style-type: none"> 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, as amended. 	<p>Lehlogonolo Mashego Public Participation and Environmental Consultant Savannah Environmental</p>	<p>All issues and comments/ queries raised have been incorporated into the C&RR, which will further be updated during the EIA phase.</p> <p>All correspondence records have been appended to the FSR. Appendix C4 includes correspondence with the Organs of State (OoS) and Appendix C5 includes correspondence with Stakeholders and I&APs.</p> <p>The public participation process has been facilitated in accordance with the requirements of the EIA Regulations (2014), as amended and the public participation plan approved by the DFFE on Thursday, 02 December 2022 (included in Appendix C9 of the FSR).</p>
8.		<ul style="list-style-type: none"> A comments and response trail report (C&R) must be submitted with the final SR. The C&R report must incorporate all historical comments for this development. The C&R report must be a separate document from the main report Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as "Noted" is not regarded as an adequate response to I&AP's comments. 	<p>Lehlogonolo Mashego Public Participation and Environmental Consultant Savannah Environmental</p>	<p>A comments and responses report, including all comments received and responses provided is appended to the FSR (Appendix C8).</p>
9.		<ul style="list-style-type: none"> The final SR must provide evidence that all identified and relevant competent authorities have been given an opportunity to comment on the proposed 	<p>Lehlogonolo Mashego</p>	<p>All evidence pertaining to the notification to the relevant authorities and identified stakeholders has been</p>

No.	Raised by	Comment	Responded by	Response
		development; particularly the South African Astronomical Observatory, the Free State Environmental Department, the District and Local Municipalities.	Public Participation and Environmental Consultant Savannah Environmental	incorporated into Appendix C4 and C5 of the FSR and will further be included in the EIA phase.
10.		<p>(c) Specialist Assessments</p> <ul style="list-style-type: none"> Specialist studies to be conducted must provide a detailed description of their methodology, as well as indicate the locations and descriptions of turbine positions, and all other associated infrastructures that they have assessed and are recommending for authorisations. 	Tamryn Lee Goddard Environmental Consultant Savannah Environmental	<p>Each specialist included a detailed methodology within their individual reports as included in Appendix G, Appendix H, and Appendix I of the FSR.</p> <p>There are no turbines as this is a solar PV facility. The position of infrastructure will be included in the final layout during the EIA phase during micro siting of components around environmental sensitivities, where relevant.</p>
11.		<ul style="list-style-type: none"> 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. 	Tamryn Lee Goddard Environmental Consultant Savannah Environmental	There were no limitations with regards to seasonal studies. Limitations of the specialist studies are included in the specialist reports included in Appendix G, Appendix H, and Appendix I of the FSR. This will also be included in the EIA.
12.		<ul style="list-style-type: none"> Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expert advice. 	Tamryn Lee Goddard Environmental Consultant Savannah Environmental	No contradicting recommendations have been provided at this stage in the process. If relevant, this will be addressed during the EIA phase.
13.		<ul style="list-style-type: none"> It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the 	Tamryn Lee Goddard Environmental Consultant	Specialist studies are being undertaken in accordance with the relevant Protocols. Where required, specialists are appropriately registered.

No.	Raised by	Comment	Responded by	Response
		<p>National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. Please note that specialist assessments must be conducted in accordance with these protocols.</p>	<p>Savannah Environmental</p>	
14.		<p><u>(d) Cumulative Assessment</u></p> <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> » Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land. » Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project. » The cumulative impacts significance rating must also inform the need and desirability of the proposed development. 	<p>Tamryn Lee Goddard Environmental Consultant Savannah Environmental</p>	<p>Section 6.7 of the FSR includes a plan of study for the EIA phase. Cumulative impacts will be fully assessed and considered in the EIA phase and will include;</p> <ul style="list-style-type: none"> • Clearly defined cumulative impacts and where possible the size of the identified impact (indicated and quantified as hectares of cumulatively transformed land). • Specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area. • Cumulative impacts significance rating and how this has informed the need and desirability of the proposed development. • A cumulative impact environmental statement on whether the proposed development must proceed.

No.	Raised by	Comment	Responded by	Response
		» A cumulative impact environmental statement on whether the proposed development must proceed.		

2.2. Key Stakeholders and Interested & Affected Parties

No.	Raised by	Comment	Responded by	Response
1.	<p>Lehlohonolo Lenkoe Land occupier/ Trust beneficiary</p> <p>Telephonic correspondence: 09 December 2021</p>	<p>I see there were site notices placed on a farm that we live on and there are issues we would like to raise.</p>	<p>Tumelo Mathulwe Public Participation Consultant Savannah Environmental</p>	<p>As discussed, during our phone call, you were informed of the site notices placed on the farm fences and wanted to raise comments that you have. There is a dispute between yourself and a party that is using your land for his own benefit and the matter has been taken to the relevant authorities however it is lost in the system. Please can you provide us with the Farm name, number, and the portion for us to determine whether the farm in question is one that is affected by the project. (an LPI code/surveyor general code would also be useful). Furthermore, please could you forward us the details of the parties mentioned for Savannah to consult with.</p>
2.	<p>Peter Mojalefa I&AP</p> <p>Email correspondence: 04 January 2022</p>	<p>I would just like to find out what is the correct name of the mention farm, Lejwe, which as mentioned as being in, the Sannaspos area, as mention in on the map of the environmental impact study, that is on the farm gates going to Rusfontein dam. Where is Lejwe located? As non one in the Sannapos area is aware of a farm called Lejwe.</p>	<p>Nicolene Venter Public Participation & Social Consultant Savannah Environmental</p>	<p>The farm in question is farm Lejwe 2962 which lies directly adjacent to farm Basemkop 1808 on the South side of the N8 near Sannaspos.</p> <p>Please see attached locality map, farm portion map and google earth image below for further clarity. The exact co-ordinates are: 29°11'55.94"S; 26°34'41.21"E. Please do not hesitate to contact us should you require any further clarifications or have any additional questions regarding the project.</p>

No.	Raised by	Comment	Responded by	Response
3.	Lehlohonolo Lenkoe Land occupier/ Trust beneficiary Email correspondence: 07 February 2022	Good day lejwe farm is follow under alleta trust beneficiary are Puseletso Elisa Ntomane cell 065 917 8152/Tshidiso George Ntomane cell 068155 9308 email Tshidiso Ntomane @gmail.com./Moramang Victor Ntomane cell 073 431 7374 email mvntomane7@gmail.com/July Ntomane 083 218 6655 we request meeting with you or or WhatsApp group so we talk about this metar	Tamryn Lee Goddard Environmental Consultant Savannah Environmental	The comments raised have been acknowledged and necessary and further engagement with the representatives was facilitated through the WhatsApp group and direct engagement.
4.	Lehlohonolo Lenkoe and Trust Beneficiaries (Victor Ntomane, Tshidiso Ntomane, Puseletso Ntomane and Sebonda)	Who is the person responsible for the signing of the landowner consent?	Lehlogonolo Mashego Public Participation and Environmental Consultant Savannah Environmental	The queries have been acknowledged and further engagement has been facilitated with the responsible parties; telephonic consultation, a WhatsApp group, project document references and opportunity to engage with the Public Participation team throughout the commenting period. With regards to the landowner consent, the query has been resolved between the applicant, party that signed the landowner consent as well as the beneficiaries. The necessary steps have been followed to ensure that clarity is provided, and the EIA phase will further provide an opportunity for consultation on any outstanding aspects to be clarified. The need for alternative consultation mediums will further be implemented in the EIA phase as deemed necessary.
5.	Land occupiers/ Trust beneficiary	How will the beneficiaries benefit from the development?		
6.	WhatsApp correspondence: 07 – 10 February 2022	Where will the solar panels be placed?		
7.		What is the planned security protocol to be implemented?		
8.		We require a meeting to be able to address the landowner queries and development.		