

APPENDIX C8
COMMENTS AND RESPONSES REPORT



KOTULO TSATSI ENERGY PV3, NEAR KENHARDT, NORTHERN CAPE PROVINCE

(DEA Ref.no.: 14/12/16/3/3/2/2223)

COMMENTS AND RESPONSES REPORT

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The Kotulo Tsatsi Energy PV3 application for Environmental Authorisation was announced on Monday, 17 October 2022. The Background Information Document (BID), distributed on Friday, 17 October 2022, 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. A notification letter accompanied the BID, announced the availability of the Scoping Report for review and comment. All written comments received from the commencement of the Scoping phase to date have been included in this Comments and Responses Report (C&RR).

The Scoping Report was made available for a 30-day review and comment period from **Tuesday, 18 October 2022 to Thursday, 17 November 2022**. The Environmental Impact Assessment (EIA) Report was made available from **Tuesday, 04 April 2023 to Tuesday, 09 May 2023**. All written comments received on the Scoping and the EIA Reports have been included in this Comments and Responses Report (C&RR). The updated C&RR is being submitted with the final EIA Report to the Department of Forestry, Fisheries and the Environment (DFFE) for their informed decision-making.

Meetings were arranged as follows, and the notes for the Record are included in Appendix C7:

- Focus Group Meetings:
 - Namakwa District Municipality and Hantam Local Municipality
 - Affected and Adjacent Landowners
 - Northern Cape Department of Agriculture, Environmental Affairs, Rural Development and Land Reform and the Department of Forestry, Fisheries and the Environment: Forestry
 - DFFE: Directorates Biodiversity Conservation and Protected Areas, Planning & Management, Department of Water & Sanitation, Department of Mineral Resources & Energy, Northern Cape Department of Agriculture and Northern Cape Department of Public Works & Roads
- Key Stakeholder Workshop

NOTE:

In terms of Regulation 44(1) of the EIA Regulations 2014, as amended, please note that the submitted comments, and responses provided at the various virtual Meetings held during the 30-day review period of the EIA Report will be attached as **Appendix C7** of the final EIA Report.

LIST OF ABBREVIATIONS / ACRONYMS

AES	Agricultural Extension Services	EIAR	Environmental Impact Assessment Report
BC	Biodiversity Conservation	ESA	Environmental Sensitive Area
BESS	Battery Energy Storage System	EMPr	Environmental Management Programme
CBA	Critical Biodiversity Area	GN	Government Notice
CMA	Catchment Management Agency	GPS	Geographical Positioning System
CSP	Concentrated Solar Plant	I&AP	Interested and Affected Party
C&R	Comments and Response	KTE	Kotulo Tsatsi Energy
DAERL	to Department of Agriculture, Environmental Affairs, Rural Development and Land Reform	MEC	Member of the Executive Council
DEFF	Department of Environment, Forestry and Fisheries	PoSEIA	Plan of Study for Environmental Impact Assessment
DENC	Department of Environment and Nature Conservation	PV	Photovoltaic
EA	Environmental Authorisation	SACNASP	South African Council for Natural Scientific Professions
EAP	Environmental Assessment Practitioner	SAHRA	South African Heritage Resources Agency
EIA	Environmental Impact Assessment		

1. COMMENTS RECEIVED ON THE EIA REPORT

1.1. Organs of State

NO.	COMMENT	RAISED BY	RESPONSE
1.	<p>This letter serves to inform you that the following information must be included in the final EIAR:</p> <p>1. <u>Specific comments</u></p> <p>a) The draft EIAR mentions that: <i>'The PV facility is planned to be located within an area previously authorised for CSP project infrastructure, which is adjacent to the authorised Kotulo Tsatsi Energy PV1 and PV2 Facilities as well as the authorised CSP3 facility and associated infrastructure.</i></p> <p>And that:</p> <p><i>The PV infrastructure assessed in this application is in response to the Applicant's need to change the authorised generation technology for the facility located on the farm Portion 2 of Farm Styns Vley 280. That is, a technology change from the previously authorised CSP project infrastructure to PV project infrastructure.</i></p> <p><i>The comments and responses report submitted with the draft EIAR states on page 10:</i> <i>'The Applicant intends on changing the previously authorised CSP project infrastructure to PV project infrastructure. However, previously authorised</i></p>	<p>Azrah Essop Case Officer DFFE</p> <p>Letter: 04 May 2023</p>	<p>The wording used in the CRR of the draft EIAR was ambiguous and has been corrected.</p> <p>The PV facility is planned to be located within an area previously authorised for CSP project infrastructure, which is adjacent to the authorised Kotulo Tsatsi Energy PV1 and PV2 Facilities as well as the authorised CSP3 facility and associated infrastructure. No infrastructure from the previously authorised CSP2 facility (14/12/16/3/3/2/694/2) will be retained for the Kotulo Tstatsi Energy PV 3 project. The EA for this project has lapsed.</p> <p>The PV infrastructure assessed in this application is in response to the Applicant's need to change the authorised generation technology for the facility located on the farm Portion 2 of Farm Styns Vley 280. That is, a technology change from the previously authorised CSP project infrastructure to PV project infrastructure. This supports the Applicant's motivation for the selection of PV as the technology of choice at this location.</p> <p>The solar PV facility will be connected to the grid via a 132kV grid connection solution to the authorised 400kV collector substation (located on Portion 2 of Farm Styns Vley 280 and authorised under DFFE 14/12/16/3/3/2/694).</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p><i>infrastructure will be retained for use for the planned PV facility: The infrastructure that will be retained will include other associated infrastructure such as the grid connection via a previously authorised grid connection solution, which consists of internal grid reticulation and the authorised 400kV substation.'</i></p> <p>Further information is required in this regard relating to the footprint. Clarify whether the developments (i.e. PV and CSP) are located on the same farm portion as well as the same footprint.</p> <p>Please clearly state what infrastructure will be utilised from the authorised CSP EA (14/12/16/3/3/2/694) for the current PV application (14/12/16/3/3/2/2223).</p>		
	<p>b) Clarify whether the aspects of the offsets contained in the EA for the CSP facility impact on this current application for the PV facility.</p>		<p>New specialist studies have been undertaken specifically for the Kotulo Tsatsi Energy PV3 project. All sensitive environments and features have been identified and considered in the optimised PV facility layout. With the application of the mitigation hierarchy, no aspects relating to offsets impact this PV application.</p>
	<p>c) Please ensure that all relevant listed activities are applied for, are specific (down to sub-regulation e.g. Activity 12 (ii)(a)(c) and that it can be linked to the development activity or infrastructure as described in the project description. Ensure to include thresholds of the infrastructure.</p>		<p>All listed activities that have been applied for are specific and can be linked to the development activity and infrastructure as described in the project description. The thresholds of infrastructure has been indicated. Therefore, an updated application form is not required.</p>
	<p>d) If the activities applied for in the application form differ from those mentioned in the final EIAR, an amended application form must be submitted.</p>		<p>The activities applied for in the application form do not differ to the activities mentioned in Table 6.1 of the final EIAR. The facility substation has been included in Listing Notice: Activity 11 (i) and correlates with the description</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>Ensure to include the facility substation in the listed activities table.</p>		<p>indicated in the application form that was submitted with the Draft EIAR. Therefore, an updated application form is not required.</p>
	<p>e) Provide a separate appendix which includes the GPS coordinates, affected properties and SG codes of the preferred alternative. When providing coordinates as part of the information submitted regarding the location of an activity as part of an application for environmental authorisation, such coordinates must be provided in degrees, minutes and seconds using the Hartebeesthoek WGS84 coordinate system as per regulation 5(6) of the NEMA EIA Regulations, 2014, as amended.</p>		<p>GPS coordinates affected properties and SG codes of the preferred alternative have been indicated in Appendix Q of the final EIAR.</p>
	<p>2. <u>Undertaking of an Oath</u></p> <p>a) Please note that the final EIAR must have an undertaking under oath/ affirmation by the EAP.</p>		<p>An undertaking under oath and affirmation of the EAP has been included as Appendix P of the final EIA.</p>
	<p>b) 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 3 of the NEMA EIA Regulations, 2014, as amended, which states that the EIAR must include:</p> <ol style="list-style-type: none"> I. <i>“an undertaking under oath or affirmation by the EAP in relation to:</i> II. <i>the correctness of the information provided in the reports;</i> III. <i>the inclusion of comments and inputs from stakeholders and I&APs;</i> IV. <i>the inclusion of inputs and recommendations from the specialist reports where relevant; and any information provided by the EAP to</i> 		<p>An undertaking under oath and affirmation of the EAP has been included as Appendix P of the final EIA.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p><i>interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties."</i></p>		
	<p>3. <u>Environmental Management Programme</u></p> <p>a) The EMPr must include the following:</p> <ol style="list-style-type: none"> I. All recommendations and mitigation measures recorded in the final EIAR and the specialist studies conducted. II. An environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process. III. 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. 		<p>The EMPr includes all recommendations and mitigation measures recorded in the final EIAR and the specialist studies that have been undertaken for the project.</p> <p>The environmental sensitivity map indicating all environmental sensitive areas and features identified during the assessment process have been included in Section 2.6 of the EMPr.</p> <p>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 have been included in Section 6.2 of the EMPr.</p>
	<p>b) In addition to the above, the EMPr must comply with Appendix 4 of the EIA Regulations, 2014, as amended.</p>		<p>The EMPr complies with Appendix 4 of the EIA Regulations, 2014 as amended.</p>
	<p><u>General</u></p> <p>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.</p>		<p>The period for which the Environmental Authorisation is required is included in Section 10.6 of the final EIA Report. As detailed in Section 2.6 of the final EIA Report, following selection of the project as Preferred Bidder, construction is expected to take 12 to 18 months depending on the choice of technology and the lead time for equipment. Operation of the facility is expected to be 25 years.</p>
	<p>You are further reminded to comply with Regulation 23(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: <i>"The applicant must within 106 days of</i></p>		<p>The timeline as stipulated in the NEMA EIA Regulations, 2014, as amended, are complied with. The FEIAR is submitted to DFFE within 106 days of the acceptance of the scoping report.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p><i>the acceptance of the scoping report submit to the competent authority -</i></p> <p><i>(a) an environmental impact assessment report inclusive of any specialist reports, an EMPr, a closure plan in the case of a closure activity and where the application is a mining application, the plans, report and calculations contemplated in the Financial Provisioning Regulations, which must 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 EIAR 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 23(1)(b) of the NEMA EIA Regulations, 2014, as amended, which states: "The applicant must within 106 days of the acceptance of the scoping report submit to the competent authority – (b) a notification in writing that the documents contemplated in sub-regulation 1(a) will be submitted within 156 days of acceptance of the scoping report by the competent authority or where regulation 21(2) applies, within 156 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 documents, which changes or information was not contained in the original documents consulted on during the initial public participation process contemplated in sub-regulation (1)(a), and that the revised documents contemplated in sub-regulation 1(a)</p>		<p>No significant changes or new information has been added to the final EIAR Report and the EMPr.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p><i>will be subjected to another public participation process of at least 30 days".</i></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>		<p>The final EIA Report is submitted within the prescribed timeframe.</p> <p>The Applicant is aware of the requirements of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended. No activity will commence prior to an Environmental Authorisation being granted by the Department.</p>
2.	<p><u>Recommendations / comments:</u></p> <p>1. The field assessment that informed the plant specialist report took place on 12 December 2021, for 1 day, during a dry period, i.e., changes in the environment / faunal and floral species brought about by differences in seasonality / more wetter periods could have been omitted from the assessment. Furthermore, the field assessment took place > 4 seasons ago (a year and 5 months ago) and numerous changes could have already occurred within the past 17 months. Hence it is advised that the EA be issued on condition that a full walk-through assessment be conducted of the final approved PV development's footprint area, in the appropriate season for this respective area i.e., towards the end of the wet season of the area, that quantifies the protected species that will be impacted on (destroyed and or translocated) during the development of proposed PV facility. This report will be used to inform the permitting process.</p>	<p>Samantha De la Fontaine Production Scientist Grade A: District Ecologist</p> <p>Letter: 03 May 2023</p>	<p>The comment is noted and acknowledged. A recommendation has been included in the final EIAR that a walk-through survey be conducted of the final approved PV development footprint area to inform the permitting process.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>2. The name of this Department should be amended throughout the EIR and specialists' reports [from Department of Environment and Nature Conservation (DENC) to Department of Agriculture, Environmental Affairs, Rural Development and Land Reform (DAERL)].</p>		<p>The name of the Department has been amended throughout the final EIAr and specialists' reports from "Department of Environment and Nature Conservation (DENC)" to "Department of Agriculture, Environmental Affairs, Rural Development and Land Reform (DAERL)".</p>
	<p>3. This Department strongly supports the recommendation in the EMPr regarding fencing of the construction / development area i.e., lower wires of security fence are not electrified and that electrified stands should be placed on the inside of the stands. The Department however strongly suggest that, in addition, daily fence patrols are undertaken to monitor for potential animal mortality caused by electrified fences / security fences along site boundaries.</p>		<p>The support for the recommendation is noted. The EMPr has included the recommendation from the Department for fence patrols to monitor potential animal mortality caused by electrified fences or security fences along the site boundary.</p>
	<p>4. A serious complaint was recently brought under this Department attention regarding heavy dust clouds from a solar development site within the Kenhardt area, notwithstanding the fact that the developer is fully compliant in terms of dust control. The local farming community alleges that their livestock is falling sick because they ingest dust laden plants. The dust clouds, that are especially prevalent during commuting hours, stretches for kilometres and are also affecting the <i>Aloidendron dichotomum</i> trees in the area. Locals are of the opinion that the dust monitoring buckets are placed incorrectly, thus giving a false sense that all is well, when it is not. They are furthermore of the opinion that the prevailing wind direction was not taken into consideration with the placement of the dust monitoring stations. Locals</p>		<p>The comments regarding the potential for dust pollution and secondary impacts to neighbouring livestock grazing activities are noted. The KTE PV3 project will utilise the existing Soafskolk access road as the primary access to the area. In addition, the site is located within the 55000ha properties owned by one landowner. The projects are clustered in one area to minimise the spread of construction -related impacts.</p> <p>The comment regarding water provision for the project is noted. The project does not intend to make use of groundwater. The water requirements for the cluster of projects would be met via the previously authorised piped water solution.</p> <p>The KTE PV3 site is located >70km from the solar development near Kenhardt.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>are also complaining that, even though they do not always have water in their taps, water is still sold by the municipality to solar developers. Furthermore, 3 boreholes have, to date, supposedly dried up since construction of solar developments commenced within the area due to high groundwater consumption affecting neighbouring boreholes. The locals are of the opinion that current construction of the solar developments in the Kenhardt area should be halted / no further solar developments should be allowed in the vicinity of Kenhardt OR and / authorisations should clearly stipulate that access roads must be tarred, and that no groundwater consumption be allowed during construction and operation of such facilities. This Department strongly urges the developer and competent authorities to investigate these matters pertaining to the proposed Kotulo Tsatsi developments in order prevent further exacerbation of the above-mentioned issues. Especially because the proposed development is located close to several ephemeral water bodies (wetlands, rivers, depressions).</p>		
5.	<p>The development is proposed for an area where several large-scale PV (Kotulo Tsatsi PVs 1 and 2) and a concentrated solar development (Kotulo Tsatsi CSP3) are planned. There is a gap in the knowledge regarding heat island effects of solar developments and its potential impacts on local climates/regional climates. Hence, heat island effect monitoring must be included in the EMP as there is a need to understand the heat island effects of solar developments (especially their cumulative impacts).</p>		<p>The Applicant has indicated that they will be undertaking activities that will ensure that the panels are cooled. There is a general perception that the warmer the panels, more electricity will be generated and that the opposite is true i.e. the hotter the panels are, the lower the output of the panels will be. Therefore, by cooling the panels from underneath, the electricity output would have a higher yield.</p> <p>Both the EAP and Applicant are investigating the potential heat island effects that may from the development as there is limited knowledge and a gap in literature.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>6. In addition to the above-mentioned, the following monitoring programmes are requested to be included in the EMPr (for the entirety of the Kotulo Tsatsi 3xPV and 1xCSP projects):</p> <p>a. What faunal species are attracted due to the high concentration of insects attracted by the project / development lights (e.g., attracting bats / birds?)</p> <p>b. Reptile presence and mortalities monitoring (which species, observation frequency, presence of their predators like raptors).</p> <p>c. Bird injuries and mortalities (some species e.g., misjudge the reflection of the panels for water bodies and injure themselves e.g.) of both nocturnal and diurnal species. This applies for panels and fence lines, as well as power lines. Where injured raptors are encountered the birds must be collected and taken to a veterinarian or rehabilitation centre.</p> <p>d. Monitoring data to be recorded in registers and reported on quarterly, collating monthly data. Raw data and photos to be made available upon request from the department (DAERL).</p>		<p>The EMPr provides recommendations on the lighting that should be used for the proposed development which do not attract insects.</p> <p>The monitoring of reptile presence and mortalities is included in the EMPr (refer to Appendix L).</p> <p>The monitoring of bird injuries and mortalities as recommended in the Avifuana Impact Assessment, is included in the EMPr (refer to Appendix L).</p> <p>Provision for registers to monitor and record data is included the EMPr (refer to Appendix L).</p>
3.	<p>Interim Comment</p> <p>SAHRA requests that a letter be provided by a palaeontologist, confirming if the results of the 2015 PIA are still relevant for the current development application.</p>	<p>Natasha Higgitt Manager: SAHRA Letter: 10 May 2023</p>	<p>A letter from the palaeontologist confirming if the results of 2015 PIA are still relevant has been requested and will be provided to SAHRA and DFFE on receipt.</p> <p>Similar confirmation was previously provided on 25 April 2023 for the PV1 project, and he stated that conclusions and recommendations remain unchanged and apply in full to the newly proposed Kotulo Tsatsi PV1 solar energy facility as outlined in the Heritage Impact Assessment by CTS Heritage (2021).</p>

NO.	COMMENT	RAISED BY	RESPONSE
	Should you have any further queries, please contact the designated official using the case number quoted above in the case header.		Should any further enquiries arise, the designated official will be contact and CaseID 21042 will be referenced.

1.2. Interested and Affected Parties

NO.	COMMENT	RAISED BY	RESPONSE
1.	<p>The attached response from AEs was sent to your email on the 21st Nov 2022.</p> <p>Looking at the Bid map is the project cancelled? As none of our queries were answered to this date.</p> <p>Would your client respond to our pertinent questions and concerns?</p>	<p>Mark Caplan Agricultural Extension Services</p> <p>E-mail: 11 April 2023</p>	<p>Follow-up email on comments submitted on the Scoping Report is acknowledged. It was confirmed that the comments submitted on the Scoping Report were responded to and included in the C&RR that was submitted as part of the final Scoping Report, as Appendix C8, to the DFFE. In addition, this C&RR was included in the EIAR which was made available for public review in April 2023.</p> <p>This EIAR is for the Kotulo Tsatsi Energy PV3 project.</p>
2.	<p>There must be a mistake with the dates of the comment period. As I've only received the email advising me of the comment period on the 4th May.</p> <p>So I expect another 30 days that gives AES until 3 June to respond to KTSE planned nuclear facility?</p>	<p>E-mail: 05 May 2023</p>	<p>According to Savannah Environmental's records the I&AP received the notification of the availability of the EIA Report, to which he had responded to via e-mail on 11 April 2023.</p> <p>As a registered I&AP he was duly notified of the commencement of the review period and therefore his request for an extension of the review period was not granted.</p> <p>Should Savannah Environmental receives written comments after the review period has ended, these will be provided to the DFFE as late comment.</p>
3.	<p>With reference to your letter dated 14 April 2023.</p> <p>With reference to your above-mentioned application, I hereby inform you that our Client (OPENSERVE) approves the proposed work indicated on your drawings in terms Section 29 of the Electronic Communications Act 36 of 2005 as amended.</p>	<p>Mantwa Gabaitumele Mvelaphande Trading</p> <p>Letter: 26 April 2023</p>	<p>The information provided by Mvelaphande Trading on behalf of their client OPENSERVE is acknowledged and has been submitted to the applicant for action at the appropriate time.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>Any changes/deviations from the original planning during or prior to construction must immediately be communicated to this office.</p> <p>Our Client (OPENSERVE)'s infrastructure is affected by this proposal and the routes are marked in PINK on attached sketch as accurately as possible. We did our utmost to ensure that we indicate our route as accurate as possible and should you discover any of our cables that are not on the sketch please stop and contact us immediately to arrange a site meeting. Please make use of pilot holes in order not to damage our infrastructure. Therefore, any damages occurred during construction of work will be repaired at the customer's account. Consequently, the following conditions apply:</p> <p>Aerial Plant - At points of crossing, the overhead power lines should cross above the communications lines in accordance with and clearances stipulated in the Occupational Health and safety Act no 85 of 1993, Machinery regulations 20 – Crossings, and Electrical Machinery Regulations 15 – Clearance of Power Lines. If the specifications could not be met, all deviation costs will be for the applicant's account. We also refer to section 25 of Electronic Communication Act 36 of 2005.</p> <p>At points of crossing, the overhead power line should cross over the overhead communication lines with a minimum vertical separation of 0.8 meters.</p>		

NO.	COMMENT	RAISED BY	RESPONSE
	<p>Suitable protection as laid down in section 5 of the Code of Practice should be provided at all important crossings.</p> <p>The crossing of supply lines or overhead service mains directly above or adjacent to communication poles must be avoided if possible. If not clearance of 3 meters must be provided.</p> <p>In order to minimize noise induction into the telecommunication systems, the angle of crossing between the overhead power line and all communication lines, should be as near to a right angle as possible – the following deviation from the right angle being permitted at:</p> <ul style="list-style-type: none"> · Power voltage of 48 kV and higher - 30 degrees · Power voltage of lower than 48 kV - 45 degrees <p>SWER must be as near as 90 degrees as possible</p> <p>Approved on condition that, should it later be found necessary to deviate the existing communication line due to existing noise interference or any other reason whatsoever, the cost of such remedial action shall be repayable.</p> <p>Paragraph 2.4.1 of the Code of Practice stipulates the minimum acceptable horizontal separation between power and the communication lines and where this cannot be met, the design of the power line is also stipulated. This could apply between the attached plans and these requirements should strictly be adhered to.</p>		

NO.	COMMENT	RAISED BY	RESPONSE
	<p>In cases where an underground power cable will run parallel with an existing underground communication cable, a separation as great as possible should be maintained with a minimum separation of 600mm. should the separation be less than 600mm and the power cable are not enclosed in a suitable pipe, a concrete slab must be provided immediately above the power cable for the length of parallelism. If the separation is less than 300mm, additional protection is required by placing concrete slabs between our Client (OPENSERVE) cables/pipes and the power cables.</p> <p>Underground Crossings - At the points where our Client (OPENSERVE)'s existing underground communication cable will be crossed by an underground cable; the latter should be laid a depth of at least 300mm below the communication cable – normally laid at a depth of 600mm. If the power cable is not enclosed in a suitable pipe, protection in the form of a concrete slab should be provided immediately above the power cable for a minimum of 2 (Two) metres on either side of crossing.</p> <p>Calculations have shown that an earth fault on the high voltage Power lines will induce excessive low frequency induction into the Communication lines. As a result of this, the cost to deviate / alter the communication lines to prevent this induction will be for the power provider.</p> <p>Relocations of our Client (OPENSERVE) plant will be done at customer's request and will be a repayable project.</p>		

NO.	COMMENT	RAISED BY	RESPONSE
	<p>Please notify the office within 21 working days from date of this letter of acceptance and if any alternative proposal is available of if a recoverable work should commence, the liaison officer is Mantwa Gabaitumele at tel. no. 0825216813.</p> <p>As important cables are affected, Mr Vivian Groenewald must be contacted at 054 338 6501 /081 362 6738, (2) two weeks' prior of commencement on construction work. It would be appreciated if this office can be notified within 30 days on completion of construction work. Confirmation is required on completion of construction as per agreed requirements.</p> <p>On completion of this project please certify that all requirements as stipulated in this letter have been met. Please note that should any of our Client (OPENSERVE) infrastructure has to be relocated or altered as a result of your activities the cost for such alterations or relocations will be for your account in terms of section 25 of the Electronic Communications Act.</p> <p>This approval is valid for 6 months only, after which re-application must be made if the work has not been completed.</p> <p>Should our Client (OPENSERVE) infrastructure be damaged while work is undertaken, kindly call the Toll-free number 0800203951 immediately.</p> <p>All of our Client (OPENSERVE) rights remain reserved.</p>		

NO.	COMMENT	RAISED BY	RESPONSE
	<p>Mr Vivian Groenewald must be contacted at 054 338 6501 /081 362 6738, Two weeks before any commencement of proposed work.</p> <p><i>The map referenced in the correspondence is attached to the letter and included in Appendix C7 of the final EIA Report.</i></p>		
4.	<p>No objections from a radio perspective.</p> <p>@Morne Van Der Westhuizen [MTN South Africa] Any concerns from a TX point of view?</p>	<p>Carlo Herselman Team Leader – Radio Planning and Quality MTN</p> <p>E-mail: 04 May 2023</p>	<p>The no objections from a radio perspective is acknowledged and no further action required.</p>
5.	<p>No objection from TXM either.</p>	<p>Morne Van der Westhuizen Specialist – Transmission Planning MTN</p> <p>E-mail: 04 May 2023</p>	<p>The no objections from a TXM perspective is acknowledged and no further action required.</p>

2. COMMENTS RECEIVED ON THE SCOPING REPORT

2.1. Organs of State

NO.	COMMENT	RAISED BY	RESPONSE
1.	<p>Based on the information provided in the report, most of the site is considered to be of low sensitivity due to the lower abundance of protected species and dominance of vegetation which is generally an indicator of poor veld condition. However, it has been noted that during the study site assessment, the northern portion of the development area has been demarcated as Critical Biodiversity Area:1, and several species of concern have been recorded for both floral, fauna, and protected forest. It is recommended that these areas must be treated as No-go areas.</p> <p>Furthermore, to minimize possible loss to biodiversity the following recommendation amongst others must be adhered to: Vegetation clearing prior and during construction must be limited to the footprint of the proposed development</p>	<p>Portia Makitla & Mashudu Mudau Case Officers DFFE: BC</p> <p>Letter: 01 December 2022</p>	<p>Refer to the sensitivity map (Appendix O) for the project. It is clearly indicated where the no-go areas are and what is avoided. The optimised layout map has avoided all no-go sensitive areas.</p>
	<p>A map combining the final layout map superimposed (overlain) on the environmental sensitivity map. This map must reflect the proposed infrastructure's location (e.g., BESS).</p>		<p>Please refer to the layout and sensitivity map in Appendix O of the EIA report.</p>
	<p>The 'no-go' areas of the development property must be clearly demarcated and must be excluded from the final layout plan.</p>		<p>The final optimised layout plan for the PV facility is indicated in Appendix O. This map avoids the no go areas.</p>
	<p>Where possible proposed infrastructure must be aligned to the existing development i.e., roads.</p>		<p>Please refer to the layout map for the development (Appendix O).</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>Anti-collision devices such as bird flappers must be installed where power lines cross avifaunal corridors (e.g., grasslands, rivers, wetlands, and dams).</p> <p>A Search and Rescue Plan to remove and relocate Species of Conservation Concern identified within the study area must be developed by a professional and qualified ecologist.</p> <p>Permit from relevant authorities must be obtained prior commencement of any construction activities for the disturbance or removal of any nationally or provincially protected species.</p> <p>Erosion Management Plan, Maintenance Plan and Rehabilitation Plan of natural vegetation must be developed to mitigate on habitat degradation and consider all phases of the development.</p> <p>Rehabilitation Plan must include the ongoing monitoring and maintenance of the surrounding natural vegetation.</p> <p>Alien Invasive Plant Species Management and Rehabilitation Plans must be developed and submitted as part of the final report to mitigate on habitat degradation due to erosion and alien plant invasion.</p> <p>In addition, please note that the Directorate Biodiversity Conservation does not support any development within a very highly sensitive area that will result with significant negative residual impacts after mitigation.</p> <p>In conclusion, the Public Participation Process documents related to Biodiversity EIA for review and queries should be submitted to the Directorate: Biodiversity Conservation at Email; BCAdmin@dffe.gov.za for the attention of Mr. Seoka Lekota.</p>		<p>The avifaunal impact assessment has been prepared for the site with specific mitigation measures (refer to Appendix E).</p> <p>A search and rescue plan are included in the facility EMPR for the project (refer to Appendix L).</p> <p>An Erosion Management Plan, Maintenance Plan and Rehabilitation Plan are included in the facility EMPr (Appendix L).</p> <p>The optimised layout map provided by the Applicant has taken into account all areas of high sensitivity and has avoided all these areas.</p> <p>It is confirmed that the Public Participation Process documents are submitted to BCAdmin@dffe.gov.za.</p>
2.	You may proceed with the environmental impact assessment process in accordance with the tasks	Azrah Essop Case Officer	The EIA report provides an assessment of impacts and mitigation measures for each listed activity. Refer to Table 6.1 of the EIA Report.

NO.	COMMENT	RAISED BY	RESPONSE
	<p>contemplated in the PoSEIA as required in terms of the EIA Regulations, 2014, as amended.</p> <p>In addition, the following amendments and additional information are required for the Environmental Impact Assessment Report (EIAR)</p> <p>1. <u>Listed Activities</u></p> <p>a) The EIAR must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for.</p> <p>b) The listed activities represented in the EIAR and the application form must be the same and correct.</p> <p>c) The EIAR must assess the correct sub-listed activity for each listed activity applied for. The onus is on the EAP and applicant to ensure that no other activities are triggered, and the correct activities are applied for.</p> <p>2. <u>Public Participation</u></p> <p>a) Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAR.</p> <p>b) Please ensure that all issues raised and comments received during the circulation of the FSR and draft EIAR from registered I&APs and</p>	<p>DFFE</p> <p>Letter: 23 January 2023</p>	<p>The listed activities in the EIA report and application form correspond.</p> <p>All the listed activities that have been applied for have been correctly assessed in Table 6.1 of the EIA Report.</p> <p>All comments received from registered I&APs and organs of state which have jurisdiction in respect of the application during the commencement of the EIA process and those received on the Scoping Report that was made available for a 30-day review and comment period have been included within this Comments and Responses Report, and have been responded to, as required.</p> <p>Copies of all written comments received from registered I&APs and organs of state are included in Appendix C6: Comments Received of the EIA Report and those to be received during the EIA Report 30-day review and comment period will be included in the final EIA Report.</p> <p>All comments received from registered I&APs and organs of state which have jurisdiction in respect of the application during the commencement of the EIA process and those received on the Scoping Report that was made available for</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>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>a 30-day review and comment period have been included within this Comments and Responses Report, and have been responded to, as required.</p> <p>Copies of all written comments received from registered I&APs and organs of state since commencement of the EIA process and those submitted on the Scoping Report are included in Appendix C6: Comments Received of the EIA Report.</p> <p>Proof of correspondence with the various stakeholders and proof of attempts to obtain comments from the Organs of State are included in Appendix C4: Organs of State Correspondence and those received from stakeholders on the project database are included in Appendix C5: Stakeholder Correspondence of the EIA Report.</p> <p>Proof of notification of the availability of the EIA Report is included in Appendix C4: Organs of State Correspondence and Appendix C5: Stakeholder Correspondence of the EIA Report.</p>
	<p>c) A Comments and Response trail report (C&R) must be submitted with the final EIAR. The C&R 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 as indicated in Appendix 1 of this comments letter in chronological order. 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>All written comments received during the commencement of the EIA process and the 30-day review and comment period of the Scoping Report from I&APs and organs of state are captured verbatim and not summarised and has been responded to as applicable and no response provided as "noted".</p> <p>The C&RR has been updated with the comments received from the DFFE (competent authority) on the final Scoping Report.</p> <p>The C&RR has been updated with the comments received from the DFFE (competent authority) on the final Scoping Report.</p> <p>The C&RR is included as a separate report to the EIA Report as Appendix C7: Comments & Responses Report.</p> <p>It can be confirmed that the C&RR is in the applicable table format.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	d) Comments from I&APs must not be split and arranged into categories. Comments from each submission must be responded to individually.		The comments received have not been split and have been captured in date order as received and have been responded to individually.
	e) 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>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 follows:</p> <p>Scoping Phase</p> <ul style="list-style-type: none"> » Site notices were placed on the boundaries of the development site on 19 October 2022 (refer to Appendix C2: Site Notices & Newspaper Advertisements of the EIA Report). » Process notices were placed at the Hantum Local Municipal Offices in Kenhardt on 19 October 2022 (refer to Appendix C2: Site Notices & Newspaper Advertisements of the EIA Report). » The Background Information Document (BID), accompanied by a cover letter was submitted via email to those I&APs identified and the relevant organs of state on 17 October 2022 (refer to Appendix C4: Organs of State Correspondence and Appendix C5: Stakeholder Correspondence of the EIA Report.) » An advertisement announcing the EIA process and availability of the Scoping Report for review and comment was placed in the Gemsbok newspaper on 14 October 2022 (word text as submitted to the newspaper and tearsheet are in Appendix C2: Site Notices & Newspaper Advertisements of the EIA Report) » The availability of the Scoping Report for review and comment was announced by a notification letter, accompanied by the BID, sent to all registered I&APs and organs of state on the project database (refer to Appendix C4: Organs of State Correspondence and Appendix C5: Stakeholder Correspondence of the EIA Report.) <p>During the scoping phase, virtual Meetings were held with various stakeholder groups on 07 November 2022, and notes of the meetings are included in Appendix C7: Minutes of Meetings of the EIA Report.</p>

NO.	COMMENT	RAISED BY	RESPONSE
			<p>The Scoping Report was made available for download on 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 (refer to Appendix C4: Organs of State Correspondence and Appendix C5: Stakeholder Correspondence of the EIA Report.)</p> <p>Impact Assessment Phase</p> <ul style="list-style-type: none"> » An advertisement announcing the EIA process and availability of the EIA Report for review and comment was placed in the Volksblad newspaper on 04 April 2023 (word text as submitted to the newspaper is included in Appendix C2: Site Notices & Newspaper Advertisements of the EIA Report). The tearsheet (proof of advertisement) will be included in the final EIA Report. » The availability of the EIA Report for review and comment was announced by a notification letter sent to all registered I&APs and organs of state on the project database on 03 April 2023 (refer to Appendix C4: Organs of State Correspondence and Appendix C5: Stakeholder Correspondence of the EIA Report.) <p>Virtual Meetings will be held with various stakeholder groups during the 30-day review and comment period of the EIA Report and notes of the meetings will be included in Appendix C7: Minutes of Meetings of the final EIA Report. Should in-person meetings be requested, these will be addressed as applicable.</p> <p>The EIA Report is made available for review and comment from 04 April 2023 to 09 May 2023 and is available for download on 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 (refer to Appendix C4: Organs of State Correspondence and Appendix C5: Stakeholder Correspondence of the EIA Report.)</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>3. <u>Layout & Sensitivity Maps</u></p> <p>a) The EIAR must provide the following:</p> <ul style="list-style-type: none"> • Clear indication of the envisioned area for the solar PV facility, i.e., location of solar PV, Battery Energy Storage System (BESS); powerlines, supporting Infrastructure: main sub-station, operation and maintenance office, weather station, internal roads, parking, offices, staff ablutions and all associated infrastructure should be mapped at an appropriate scale. 		<p>The layout map and optimised layout map clearly indicate the infrastructure of the project.</p>
	<ul style="list-style-type: none"> • Clear description of all associated infrastructure. This description must include, but is not limited to the following: <ul style="list-style-type: none"> o Powerlines; o Internal roads infrastructure; and; o All supporting onsite infrastructure such as laydown area, guard house and control room etc. 		<p>The infrastructure is explained in the EIA report (refer to Chapter 2 of the EIA) as well as in the maps. It is clearly indicated where the infrastructure is located and their dimensions.</p>
	<p>b) An environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process.</p>		<p>All environmental sensitive areas and features are indicated in the sensitivity map.</p>
	<p>c) A map combining the final layout map superimposed (overlain) on the environmental sensitivity map.</p>		<p>An optimised layout overlaid with the environmental sensitivity map has been included in the report.</p>
	<p>4. <u>Specialist assessments</u></p> <p>a) The EAP must ensure that the terms of reference for all the identified specialist studies must include the following:</p> <ul style="list-style-type: none"> • A detailed description of the study's methodology; indication of the locations and descriptions of the development footprint, 		<p>The specialist studies all adhere to the Specialist Assessment protocols.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>and all other associated infrastructures that they have assessed and are recommending for authorisations.</p> <ul style="list-style-type: none"> • Provide a detailed description of all limitations to the studies. All specialist studies must be conducted in the right season and providing that as a limitation will not be allowed. • Please note that the Department considers a 'no-go' area, as an area where no development of any infrastructure is allowed; therefore, no development of associated infrastructure including access roads is allowed in the 'no-go' areas. • Should the specialist definition of 'no-go' area differ from the Departments definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable. • All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA. • Should a specialist recommend specific mitigation measures, these must be clearly indicated. • Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with 		

NO.	COMMENT	RAISED BY	RESPONSE
	<p>defendable reasons; and were necessary, include further expertise advice.</p>		
	<p>b) 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 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>The specialist studies is prepared in accordance with Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998 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.</p>
	<p>c) The screening tool output:</p> <ul style="list-style-type: none"> • The screening tool and the gazetted protocols (GN R320 of 20 March 2020 and GN R 1150 of 30 October 2020) require a site sensitivity verification to be completed to either confirm or dispute the findings and sensitivity ratings of the screening tool. 		<p>The specialist studies include a sensitivity verification to confirm or dispute the screening report ratings. A sensitivity verification assessment has been included in the EIA as Appendix K</p>
	<ul style="list-style-type: none"> • It is the responsibility of the EAP to confirm the list of specialist assessments and to motivate in the assessment report, the reason for not including any of the identified specialist studies including the provision of photographic evidence of the site situation. <u>The site sensitivity verification for each of the recommended studies, as per the protocols, must be compiled and attached.</u> 		<p>All specialist studies identified by the DFFE Screening have been included in the EIA Report (refer to Appendix D – J). Furthermore, a site sensitivity verification assessment has been included in Appendix K of the EIA report.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>d) Additionally, the protocols specify that an assessment must be prepared by a specialist who is an expert in the field and is SACNASP registered for e.g.an aquatic assessment must be prepared by a specialist registered with SACNASP, with expertise in the field of aquatics sciences.</p>		<p>The specialist studies have been conducted in accordance with Government Notice No. 320 of 20 March 2020 (i.e., "the protocols"), and Government Notice No. 1150 of 30 October 2020 (i.e., protocols for terrestrial plant and animal species). The report compilers/reviewers are registered with SACNASP.</p>
	<p>e) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and were necessary, include further expertise advice.</p>		<p>The appointed specialists do not specify contradicting recommendations.</p>
	<p>f) Please include a table that shows the proposed studies and the relevant specialists carrying out the study. In addition, a summary should be included of the specialist's recommendations in terms of the alternatives that are preferred based on the findings of their study.</p>		<p>A table that shows the proposed studies and the relevant specialists carrying out the study has been included in Section 6.6 of the EIA report.</p> <p>Specialist's recommendations have been included in Table 6.4.</p>
	<p>General Kindly expand on the applicant's intention with the existing EA for Kotulo Tsatsi CPS 2 i.e. (DFFE Ref.: 14/12/16/3/3/2/694/2). The status of this EA must be taken into consideration and must be demonstrated to this Department whether the applicant intends to lapse this EA.</p>		<p>The PV facility is planned to be located within an area previously authorised for CSP project infrastructure, which is adjacent to the authorised Kotulo Tsatsi Energy PV1 and PV2 Facilities as well as the authorised CSP3 facility and associated infrastructure. No infrastructure from the previously authorised CSP2 facility (14/12/16/3/3/2/694/2) will be retained for the Kotulo Tsatsi Energy PV 3 project. The EA for this project has lapsed.</p> <p>The PV infrastructure assessed in this application is in response to the Applicant's need to change the authorised generation technology for the facility located on the farm Portion 2 of Farm Styns Vley 280. That is, a technology change from the previously authorised CSP project infrastructure to PV project infrastructure. This supports the Applicant's motivation for the selection of PV as the technology of choice at this location.</p>

NO.	COMMENT	RAISED BY	RESPONSE
			The solar PV facility will be connected to the grid via a 132kV grid connection solution to the authorised 400kV collector substation (located on Portion 2 of Farm Styns Vley 280 and authorised under DFFE 14/12/16/3/2/694).
	The applicant is hereby reminded to comply with the requirements of Regulation 45 of GN R982 of 04 December 2014, as amendment, regarding the time allowed for complying with the requirements of the Regulations		The Applicant was reminded to comply with the requirements of Regulation 45 of GN R982 of 04 December 2014, as amendment, and is aware this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).
	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.		The Applicant is aware of the requirements of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended. No activity will commence prior to an Environmental Authorisation being granted by the Department.

3. COMMENTS RECEIVED DURING THE SCOPING PHASE AND SCOPING REPORT 30-DAY REVIEW PERIOD

3.1. *Organs of State*

NO.	COMMENT	RAISED BY	RESPONSE
1.	<p>With reference to your above- mentioned application, I hereby confirm that the proposed work installation is approved in terms of Section 29 of the Electronic Communications Act No. 36 of 2005 as amended.</p> <p>No infrastructure of our Client (Openserve) will be affected by this proposal. We did our utmost to ensure that we indicate our route as accurate as possible and should you discover any of our cables that is not on the sketch please stop and contact us immediately to arrange a site meeting. In the event that our cables are exposed and damaged/stolen by a third party the damages will be repaired at the customer's account. Please make use of pilot holes in order not too damage our infrastructure. Therefore any damages occurred during construction of work will be repaired at the customer's account.</p> <p>Although we are not affected by this proposal, Mr Vivian Groenewald must be contacted at telephone number 081 362 6738 from our Network Field Services. Two (2) weeks prior to commencement of proposed work.</p> <p>Approval of the proposed route is valid for six months. If construction has not yet commenced within this period, then the file must be resubmitted for approval.</p> <p>Any changes/deviations from the original planning during or prior to construction must immediately be communicated to this office.</p> <p>On completion of this project, please certify that all requirements as stipulated in this letter have been met.</p>	<p>Chris Schutte Mvelaphande Trading (Telkom SOC Ltd Service Provider)</p> <p>Letter: 26 October 2022</p>	<p>It is noted that no infrastructure of Openserve will be affected by this facility.</p> <p>The details as contained in the correspondence have been provided to the Applicant for further action, as may be required.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>Please note that should any of our Client (Openserve) infrastructure has to be relocated or altered as a result of your activities the cost for such alteration or relocation will be for your account in terms of section 25 of the Electronic Communication Act.</p> <p>Mr Vivian Groenewald must be contacted at telephone number 081 362 6738. Two (2) weeks prior to commencement of proposed work. It's important that all services are shown on site before construction starts.</p> <p>Approval of the proposed route is valid for six months. If construction has not yet commenced within this period, then the file must be resubmitted for approval. Any changes / deviations from the original planning during or prior to construction must immediately be communicated to this office.</p>		
2.	<p><u>This letter serves to inform you that the following information must be included in the final SR:</u></p> <p>5. Competent Authority Clarify the reason for this department being the competent authority in terms of S24C of NEMA. This must be expanded on and updated in the application form as well as the report.</p> <p>6. Listed Activities</p> <p>a) It is noted that the proposed solar facility does not fall within any renewable energy development zones.</p> <p>b) Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure (including thresholds) as described in the project description. Only activities (and sub-activities) applicable to</p>	<p>Azrah Essop Case Officer DFFE</p> <p>Letter: 02 November 2022</p>	<p>The Minister of the Department of Forestry, Fisheries and the Environment (DFFE) has been determined to be the Competent Authority according to Government Notice No. 779 published in Government Gazette No. 40110 dated 01 July 2016. This was explained in Section 6.2.1. of the Scoping report. The reasons have also been included in Section 1.2 of the final Scoping Report, and the application form updated.</p> <p>Noted. The site does not fall within a REDZ.</p> <p>All relevant activities applied for in the application for Environmental Authorisation and included in the Scoping Report are specific to the Kotulo Tsatsi PV3 Facility and can be linked to the development activity or infrastructure in the project description.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>the development must be applied for and assessed.</p>		
	<p>c) Please include the capacity of the proposed onsite substation and powerline(s) in the project description under Activity 11 LN1</p>		<p>Table 6.1 of the final Scoping Report has been updated to include the capacity of the proposed on-site substation and power line in the project description under Activity 11 LN1. The capacity has also been added in the application form.</p>
	<p>d) It is imperative that the relevant authorities are continuously involved throughout the environmental impact assessment process, as the development property possibly falls within geographically designated areas in terms of Listing Notice 3 Activities. Written comments must be obtained from the relevant authorities (or proof of consultation if no comments were received) and submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided.</p>		<p>All relevant authorities will be continuously involved throughout the Scoping and EIA Phases. Comments and/or proof of consultation will also be included in the Draft EIAR.</p> <p>A map indicating the development area within the respective geographical areas as per Listing Notice 3 has been included as Figure 8.1, Figure 9.1 and Appendix D of the FSR.</p>
	<p>e) 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.dffe.gov.za/documents/forms.</p>		<p>Activities applied for in the application form do not differ from those mentioned in the final Scoping Report.</p>
	<p>7. Layout & Sensitivity Maps</p> <p>a) Please provide a layout map which indicates the following:</p> <ul style="list-style-type: none"> • the PV development area; • Position of all infrastructure e.g. panels, BESS, substations, grid connection etc.; • Permanent laydown area footprint; 		<p>Within the identified development area, a facility layout will be defined for assessment in the EIA phase. The layout map and the sensitivity map will be prepared in accordance with this requirement.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<ul style="list-style-type: none"> • All supporting onsite infrastructure e.g. roads (existing and proposed); • Substation(s) and/or transformer(s) sites including their entire footprint; • Connection routes (including pylon positions) to the distribution/transmission network; and • All existing infrastructure on the site. • The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected; • Buffer areas; and, • All "no-go" areas. 		
	<p>b) The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments and existing grid infrastructure. All available biodiversity information must be used in the finalisation of the map and infrastructure must not encroach on highly sensitive areas as far as possible.</p>		<p>The facility layout that will be defined for assessment in the EIA phase will be overlain with a sensitivity map and a cumulative map, in accordance with this requirement.</p>
	<p>c) Ensure that similar colours are not used to differentiate between infrastructure. i.e. items must be easily distinguishable in the Legend.</p>		<p>All maps and legends clearly indicate different infrastructure and features and have been included in Appendix O of the final Scoping Report.</p>
	<p>d) Google maps will not be accepted for decision-making purposes.</p>		<p>All Google Earth maps have been replaced in the final Scoping Report.</p>
	<p>8. Project Overview:</p> <p>a) It is mentioned on page 4, that 'The development area was previously authorised for the development of Concentrated Solar Power (CSP) technology (DEFF Ref: 14/12/16/3/3/2/694/2), known as Kotulo Tsatsi Concentrated Solar Plant</p>		<p>Further information on the development areas that was previously authorised for CSP infrastructure has been provided in Section 1.1. of the final Scoping Report.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>2. However, this project is no longer being considered for the site as the development of CSP no longer forms part of the energy mix of the Country as indicated in the IRP.' The proposed development lies within an area previously authorised for CSP project infrastructure, kindly provide further information where possible in this regard.</p>		
	<p>b) Kindly clarify whether the grid connection is part of this application or whether existing infrastructure will be utilised. Section 8.2. states that the grid will not be reassessed, however, it is included in project infrastructure and the listed activities.</p>		<p>The grid connection infrastructure forms part of this application and will be assessed in the EIA process. Section 8.2 has been updated, and the incorrect sentence removed.</p>
	<p>9. Public Participation Process</p> <p>a) Please ensure that all issues raised and comments received on the draft SR from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section: BCAdmin@dfpe.gov.za), 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>		<p>All comments received from registered I&APs and organs of state which have jurisdiction in respect of the application during the commencement of the EIA process and those received on the Scoping Report that was made available for a 30-day review and comment period have been included within this Comments and Responses Report, and have been responded to, as required.</p> <p>Copies of all written comments received from registered I&APs and organs of state are included in Appendix C6: Comments Received of the final Scoping Report.</p> <p>Proof of correspondence with the various stakeholders and proof of attempts to obtain comments from the stakeholders on the project database are included in Appendix C5: Stakeholder Correspondence of the final Scoping Report.</p> <p>Proof of correspondence with organs of state and proof of attempts to obtain comments are included in Appendix C4: Organs of State Correspondence of the final Scoping Report.</p>

NO.	COMMENT	RAISED BY	RESPONSE
			<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 follows:</p> <ul style="list-style-type: none"> » Site notices were placed on the boundaries of the development site on 19 October 2022 (refer to Appendix C2: Site Notices & Newspaper Advertisements of the final Scoping Report). » Process notices were placed at the Hantum Local Municipal Offices in Kenhardt on 19 October 2022 (refer to Appendix C2: Site Notices & Newspaper Advertisements of the final Scoping Report). » The Background Information Document (BID), accompanied by a cover letter was submitted via email to those I&APs identified and the relevant organs of state on 17 October 2022 (refer to Appendix C4: Organs of State Correspondence and Appendix C5: Stakeholder Correspondence of the final Scoping Report.) » An advertisement announcing the EIA process and availability of the Scoping Report for review and comment was placed in the Gemsbok newspaper on 14 October 2022 (word text as submitted to the newspaper and tearsheet are in Appendix C2: Site Notices & Newspaper Advertisements of the final Scoping Report) » The availability of the Scoping Report for review and comment was announced by a notification letter, accompanied by the BID, sent to all registered I&APs and organs of state on the project database (refer to Appendix C4: Organs of State Correspondence and Appendix C5: Stakeholder Correspondence of the final Scoping Report.) <p>Virtual Meetings were held with various stakeholder groups on 07 November 2022, and notes of the meetings are included in Appendix C7: Minutes of Meetings of the final Scoping Report.</p> <p>The Scoping Report was made available for download on 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 (refer to Appendix C4:</p>

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			<p>Organs of State Correspondence and Appendix C5: Stakeholder Correspondence of the final Scoping Report.)</p>
	<p>b) 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 and the format must be in the table format as indicated in Annexure 1 of this comments letter.</p>		<p>All written comments received during the commencement of the EIA process and the 30-day review and comment period of the Scoping Report from I&APs and organs of state are captured in this C&RR which is included as a separate report to the final Scoping Report (refer to Appendix C8: Comments & Responses Report of the final Scoping Report).</p> <p>It can be confirmed that the C&RR is in the applicable table format.</p>
	<p>10. Specialist Assessments to be conducted in the EIA Phase</p> <p>a) It is noted, under section 8.2. that the applicant intends to utilise previous specialist information conducted through the assessment for Kotulo Tsatsi CSP2. It is acceptable to use this information as a basis point for current specialist assessments, however, specialist assessments produced for Kotulo Tsatsi PV3 must be specific to the current project. Specialist studies must not be older than 5 years for you to use it for the current project.</p>		<p>Specialist reports from suitably qualified specialists will provide specialist EIA reports for inclusion in the EIAR.</p>
	<p>b) Specialist studies to be conducted must provide a detailed description of their methodology, as well as indicate the locations and descriptions of PV arrays, and all other associated infrastructures that they have assessed and are recommending for authorisations</p>		<p>Specialist studies will provide a detailed description of their methodology, locations and descriptions of PV arrays and all other associated infrastructures. These assessments will be included in the EIAR.</p>
	<p>c) 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>Any limitations to the assessments will be indicated and included in the EIAR.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>d) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and were necessary, include further expertise advice.</p>		<p>Reasonable recommendations will be provided in the EIAR should there be any contradicting recommendations from the specialists.</p>
	<p>e) 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 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. Please note further that the protocols require the specialists' to be registered with SACNASP in their respective field.</p>		<p>Specialist studies will be undertaken by suitably qualified and registered specialists in accordance with the minimum standards of sections in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and in Government Notice No. 1150 of 30 October 2020.</p>
	<p>f) Additionally, the protocols specify that an assessment must be prepared by a specialist who is an expert in the field and is SACNASP registered for e.g.an aquatic assessment must be prepared by a specialist registered with SACNASP, with expertise in the field of aquatic sciences.</p>		<p>Assessments will be conducted by suitably qualified and registered specialists in line with protocols and minimum standards.</p>
	<p>g) The screening tool output:</p> <ul style="list-style-type: none"> • The screening tool and the gazetted protocols (GN R320 of 20 March 2020 and GN R 1150 of 30 October 2020) require a site 		<p>A site verification will be undertaken to either confirm or dispute the findings of the DFFE screening tool. The site verification report will be included in the EIAR and/or specialist reports.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>sensitivity verification to be completed to either confirm or dispute the findings and sensitivity ratings of the screening tool.</p> <ul style="list-style-type: none"> • Site sensitivity verifications for all the identified specialist studies (according to the screening tool) must be provided. • The screening tool (Application form) identifies thirteen (13) Specialist reports. It is the responsibility of the EAP to confirm this list and to motivate in the assessment report, the reason for not including any of the identified specialist study including the provision of photographic evidence of the site situation. <u>The site sensitivity verification for each of the recommended studies, as per the protocols, must be compiled and attached.</u> If the findings of the site verification differed from the screening tool and was found to be of a different sensitivity level, then a compliance statement would be acceptable. • Please include a table in the report, summarising the specialist studies required by the Department's Screening Tool, a column indicating whether these studies were conducted or not, and a column with motivation for any studies not conducted. Please note that if any of the specialists' studies and requirements/protocols recommended in the Department's Screening Tool are not commissioned, motivation for such must be provided in the report per the requirements of the Protocols. 		<p>The DFFE screening has been used as a guide to determine the required specialist studies. A motivation will be included in EIAR should studies not be considered necessary.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>h) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and were necessary, include further expertise advice.</p>		<p>Reasonable recommendations will be provided in the EIAR should there be any contradicting recommendations from the specialists.</p>
	<p>11. Cumulative Assessment</p> <p>It is noted that the PV facility is planned adjacent to the authorised Kotulo Tsatsi Energy PV 1 and PV2 and occurs within an area previously authorised for CSP project infrastructure. Kindly ensure to expand on this in the scoping and EIA reports.</p>		<p>Further information the authorised PV1, PV2 and CSP projects has been included in Section 8.4 of the final Scoping Report.</p>
	<p>12. Environmental Management Programme</p> <p>The EMPr must include the following:</p> <ul style="list-style-type: none"> It is drawn to your attention that for <u>substation and overhead electricity transmission and distribution infrastructure</u>, 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, must be used and submitted with the final report over and above the EMPr for the facility i.e. separate EMPr for the substation, powerline and the facility. 		<p>A facility EMPr will be completed and will comply with Appendix 4 of the of the EIA Regulations, 2014, as amended.</p> <p>The EMPr for the substation and the EMPr for the overhead power line will be compiled using the generic EMPr template</p> <p>All three (3) EMPrs will be included in the EIAR.</p>
	<ul style="list-style-type: none"> 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>The facility EMPr will comply with Appendix 4 of the EIA Regulations, 2014, as amended and will be included in the EIAR.</p>
	<p>General</p>		<p>The Scoping Report has been subjected to a 30-day review period and the final Scoping Report is submitted within the prescribed timeframe of the Regulations.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that: <i>S&EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a scoping report which has 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>You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of SRs in accordance with Appendix 2 and Regulation 21(1) of the EIA Regulations 2014, as amended.</p>		<p>The Final Scoping Report complies with the requirements of Appendix 2 and Regulation 21(1) of the EIA Regulations 2014.</p>
	<p>Further note that in terms of Regulation 45 of the EIA Regulations 2014, as amended, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).</p>		<p>The submission of the final Scoping Report complies with the prescribed timeframes of the EIA Regulations.</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>		<p>The Applicant acknowledges that no activity may commence prior to receipt of the Environmental Authorisation.</p>

3.2. Interested and Affected Parties

NO.	COMMENT	RAISED BY	RESPONSE
1.	<p>Navrae oor: Solar Voltaic scoping report for facility includes linear infrastructure, PV1, PV2 & PV3, SW Kenhardt, vir Kotula Tstatsi Energy (Pty)</p> <p>With respect to the above application(s) to apply for access to, inspect the farms; Styn's Vley 280, ect. for suitable grazing camps, in the Hantam & Namakwa district municipalities (as advertised in the Gemsbok koerant 14 Oct' 22). AES is an affected party (that provides services to farms in the area, requests the following information as part of Environmental and Human Rights. Would you reply accurately to these questions so they become public knowledge, some require data from Kotula Tstatsi Energy (KTE) personnel;</p> <p><u>Water usage</u></p> <p>A. Who is the adjudicator in the application for a water use license for PV1, PV2 & PV3 plus facilities? Can you provide contact details of the Dept Water affairs and or CMA.</p> <p>How much water are the combined projects of PV1,PV2 & PV3 planning to use from;</p> <ol style="list-style-type: none"> 1) Underground reserves 2) The Gariep River (possibly by the municipal pipeline <p>What is the minimum amount of potable water, that PV1,PV2 & PV3 (are combined), utilize a year,</p>	<p>Mark Caplan EAP Agricultural Extension Services (AES)</p> <p>Letter: 21 November 2022</p>	<p>Reference to the Kotulo Tsatsi PV1 and PV2 projects are not applicable to this project. The Kotulo Tsatsi PV1 and PV2 applications received EAs in July 2021 and October 2017 respectively.</p> <p>The Department of Water and Sanitation will be the responsible authority for the Water Use License Application. The contact details can be obtained from the DWS site https://www.dws.gov.za/</p> <p>Approximately 10 000m³ of water per year may be required over a 12 to 18-month period during construction, and approximately 50 000m³ of water per year may be required per year over the 25-year operational lifespan of the project.</p> <p>Due to the location of the site, it is proposed that the project will utilise and develop its own water provision services based on the fact that these services</p>

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	<p>during part of the project construction & maintenance activities?</p>		<p>do not reach the project site. Accordingly, construction water may need to be sourced from a local municipal supply.</p>
	<p><u>2.51. Project Footprint</u> The size, extent and location of the footprint is part of a process, that should be re-evaluated given the ecological and social impacts of other solar arrays construction projects, in the Northern Cape, that have become unsustainable. For the negative effects on social dynamics & ecological integrity outweigh so called benefit of industrialization.</p>		<p>During the EIA Phase a development footprint will be defined within the larger development area. This will be based on sensitivity data from various specialist that will be undertaken assessments of the development areas according to the Minimum Standards as required by the DFFE.</p> <p>All the specialist assessments will consider the cumulative impacts of the development by considering authorised Solar PV projects with the area.</p>
	<p><u>2.5.7 Recycling of waste & broken infrastructure pg 20</u> The dorps of Keimoes, Kenhardt and Brandvlei, do not yet have sufficient solid waste recycling facilities. Where are metals containing toxic elements such as, aluminum, cadmium, lead, mercury & others, to be removed to (Bloemfontein? or the SW Cape?) for recycling?</p> <p>Are depots for recycling, ferrous metals, plastics (of all types), glass, used engine oil, hazardous chemicals, to be set up in any of the local towns? Explain where.</p> <ul style="list-style-type: none"> How much does KTE budget for various phases (construction, maintenance & decommissioning) for preventing & cleaning up oil & hydraulic leaks from drilling and other combustion machinery on site? 		<p>Investigations into waste management during the construction, maintenance and operational phases are currently underway. The findings will determine the type of waste management required for the project as well as the budget. Based on this, a waste management plan, which will form part of the EMPr will be compiled and will be included in the EIAR.</p>
	<p><u>Wastewater treatment</u> An alternative to chemical toilets should be considered as petrol & diesel costs, are costly. Also fewer motors on the roads results in fewer incidences with itinerant wildlife and fewer accidents with other vehicles and birds.</p>		<p>Wastewater treatment will be required to meet DWS standards. Based on the pros and cons of different on-site facility sanitation systems as well as experience from previous projects, the use of chemical toilets is a preferred alternative. This will be indicated in the EMPr.</p>

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	<p>3.2.1 <u>Fundamentally different alternatives</u></p> <p>The need for solar generated electricity is primarily in urban areas and hence alternatives to PV1,PV2 & PV3 need to be found in those urban areas, where the demand is. For these reasons;</p> <p>The impacts on the biodiversity have proven to be highly negative in terms of species abilities to navigate, adverse affects around human habitation and linear infrastructure such as road & train networks. Currently many birds, mammals, reptiles, and amphibian species are not able to cross over roads with the amount of traffic. The construction phases of the solar array projects have brought more vehicle, faster drivers, stubborn, reckless fast moving drivers from outside the Noord Kaap province. The impact on abundance and distributions of many small mammals particularly the striped pole cat (<i>Actonyx striatus</i>), Black footed cat (vulnerable), Serval (near threatened), Honey Badger (near threatened¹).</p> <p>Rehabilitation costs to restore biodiversity levels are need to be calculated carefully, in the feasibility analysis of any venture. For instance, plant assemblages are require viable seed, nutrient specific micro sites for germination & establishment, the climatic conditions also need to be favourable. If the facility is closed during a drought, restoration of the vegetation communities may take as long as 30-50 years. While animals who are important for moving nutrients and dispersing seeds many be in very</p>		<p>Alternatives have been assessed during the Scoping Phase and have been included in Chapter 3 of the final Scoping Report. Any additional alternatives based on the need and desirability of the project as well as specialist findings from their assessments will be included in the EIAR.</p>

¹ The statutes of these animals and many others has not be accurately assessed since 2020

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	<p>short supply, how is the ecosystem to self-replicate into the future?</p> <p><u>Chapter 4</u></p> <p>4.3 Pg 35. Table 4.1. SIP, bottom point on page, strictly speaking "green energy" is just from photosynthesis. This project used fossil fuels, to reach the location on many times. It is just a regular industrial energy project.</p> <p>Pg 36. In Table 4.1. Climate Change Bill 2018, last point, is incorrect, Cognisance, is required to understand that fossil fuels need to be phased out from all KTE project operations. The project has been planned using fossil fuels, the project needs to be built with other sources of energy, to keep with sustainable development objectives. Just collecting & replacing the chemical treatment of water facilities & and recycling solid waste on site is going to require a solar powered truck. All employees and contractors on the site would require solar powered vehicles for the last statement to be correct.</p> <p>Pg 37. Northern Cape, climate change policy, MEC's address correctly notes that the northern Cape's arid ecosystems are extremely vulnerable to climate change driven desertification. This project is going to accelerate desertification in the Kenhardt & Brandvlei regions by altering key ecosystem processes (such as disturbance of nurse plants in areas, where plant establishment requires micro shaded and moist sites. Another scenario; less</p>		<p>Comments noted. Kotulo Tsatsi Energy PV3 will make use of renewable energy technology, and which will contribute positively towards reducing South Africa's GHG emissions and ensure compliance with all applicable legislation and permitting requirements. In addition, by making use of PV technology, Kotulo Tsatsi Energy PV3 would have reduced water requirements when compared with some other generation technologies.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>rainfall would require more dependence on the Gariep river.</p> <p><u>Chapter 5</u> There may be a need from humans in the region for, cash (to buy food and pay for services), skill transfers. For example, Afrimat's management on another solar construction project, prefers foreign born Africans, to be the site foreman. Manager of construction crew is person needs to be found from the region, to allow a better skill transfer and less social friction.</p> <p>A. Leave their companies bakkies running at fuel stations while filling up with petrol. B. capture single women from local taverns & intern them in construction camps as sex slaves. C. drive drunk, reckless driving at night, D. don't apply for fishing licenses for the Gariep river. E. are rude to local people, insensitive to cultural norms especially on the weekends. F. waste companies' money by over using bakkies and emitting unnecessary exhaust fumes when they could walk & leave less of a disturbance.</p> <p><u>Regarding company's sustainable objective and environmental ethics</u> Has KTE installed photo-voltaic panels in their offices and homes? What are KTE's previous operating credentials? What percentage of heavy metals (from equipment), plastic and paper waste, is recycled at 1) head office? 2) Suppliers of all the equipment to be transported to site?</p>		<p>A Social Impact Assessment will be undertaken as part of the EIA process and will look into the aspects of human capital, skills transfers and employment opportunities within the local communities.</p> <p>Issues such as safety and security and in-migration of workers will also be assessed. The comments are noted and will be directed to the specialist for consideration in the EIA phase.</p> <p>The developer's objective is to assist in the country's energy crisis by generating clean/renewable energy that will feed into the national grid and assist in the country's energy crisis.</p>

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	<p>3) Logistic & engineering firms that are proposed to have work on the development envelope?</p> <p>Where are the solar panels, inverters, batteries procured from? and what are the environmental standards of the various companies?</p> <p>What sorts current or past vegetation (& aquatic ecosystems) restoration projects is KTE engaged in. Send evidence if they have restored land or polluted waterways or vleis.</p> <p><u>Chapter 6.</u> When are the public participation meetings to be held in Keimoes, Kenhardt & Brandvlei? Send out notices at least a month in advance. Where villages & farmers can hear about the indirect and direct cumulative impacts of unsustainable industrialization! Uneducated people need to hear about, water resource sharing and communal livestock opportunities, that have been offered in english only to certain politically correct cartels.</p> <p><u>Chapter 7.</u> 1. A map of the soils (Fig7.2) for CSP2 overlaid with the vegetation communities (Fig 7.3), Another map with the site plan for the panel arrays, ect.. overlaid over Fig 7.3 2. A map that shows the ESA's & the CBA's overlaid with the site plan.</p>		<p>An Engineering, Procurement and Construction (EPC) Contractor will be appointed once Environmental Authorisation has been obtained. A reputable service provider that complies with environmental standards will be used for the procurement of the infrastructure.</p> <p>KTE has not been engaged in past vegetation and/or aquatic ecosystem restoration projects.</p> <p>Public participation meetings i.e. in person, will be held during the impact phase as detailed environmental, including social, assessments and mitigation measure, as and where applicable, will be shared with the community members in close proximity to the development site. The date/s, time and venue/s of these meetings will be advertised, and notification letters will be sent to the registered I&APs, and through consultation with the Ward Councillors to ensure the information is shared and communicated as widely as possible.</p> <p>The project information and environmental findings may be presented in Afrikaans at these meetings.</p> <p>However, it needs to be noted that the report and appendices will be available only in English.</p> <p>Qualified and SACNASP registered specialists will undertake the Soil Potential Assessment, Terrestrial Biodiversity Assessment, and Avifaunal Assessment to determine the local and regional setting of the development area. Impacts will be identified, and the hierarchy of impacts mitigation will be applied. All Specialist studies to be undertaken will be included in the EIAR.</p>

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	<p>3. As the KTE, PV project has impacts at the regional level, that translates into possible catchment level. Descriptions of the migration movements of birds and mammals in the larger Kenhardt district are required. Surveys must take into account, itinerant, indigenous birds & animals of conservation importance, that may not reside in the area but that move back & forth to at a particular season. Including what troops of Chacma baboons are currently foraging over all the selected farms, within 70-80km radius of the farm's boundaries. Particularly rare and endangered itinerant birds, need to be monitored that range from Preiska to the western side of Brandvlei and from Keimoes to the foot of the Hantam hills, in the south.</p>		<p>ESA and CBA areas are proposed to be avoided by the development envelope, as indicate din Figure 9.1. The facility layout map will be included in the EIAR.</p>
	<p>Pg. 101 Various Amphibian & reptile species (9 of the former & 25 of the later were potentially recorded for the locality) range over the regional area. Can Savannah Environmental determine the approximate populations in the region, that includes PV1, PV2 & PV3. To avoid cumulative impacts on these species can the field zoologist. Look at an area 35-40km's radius from the centre of the PV's site?</p> <p>As mammals are also itinerant over a larger range than reptiles. What are their seasonal and yearly distribution patterns over a larger area, 70-80km's radius of the centre of the PV site? Pg 103 includes maps showing the ESA's and CBA's, these were overlain with other species movement data, to arrive at Fig 9.1. pg 137. How can the site plan (a.k.a development envelope minus a 35m buffer zone), be adjusted to incorporate biodiversity offsets. So that for instance, areas on adjacent farms that</p>		<p>The comment relates to flora and fauna. A Terrestrial Biodiversity Assessment (inclusive of flora and fauna) will be undertaken by a suitably qualified and registered Specialist. Potential impacts will be identified, and associated mitigation measures will be provided. The Assessment will be included in the EIAR.</p>

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	<p>are of lesser biological importance can be traded for areas that have high conservation of biodiversity priority?</p> <p>The valley floor see Fig 7.3 should receive no impact!!</p> <p>Pg 120, The table of, nature of impacts, extent needs a number!!</p> <p>Also the cumulative loss of habitat has regional effects, that should be adjusted.</p> <p>The avifaunal consultant states that rare & threatened Raptors and Bustards should receive higher priority to live. Sending a message to those people in the city wishing to recharge their cell phones, install photo-voltaic panels on their houses and offices.</p> <p><u>Cumulative Impacts</u> pg. 127 & 128, have a table that indicates the areas that could be potentially lost to both, livestock agriculture, biodiversity conservation, and future sustainable use alternatives. That is a regional impact!!</p> <p>8.4.1 pg 131 An analysis of the embodied energy costs of such a project need to be calculated. To start what amount of fossil fuels are currently used to move KTE's employees motor vehicles & aircraft around, Gauteng? To project sites?</p> <p>What is the anticipated diesel and petrol volumes to be used during the planning, construction, maintenance and decommissioning of PV1, PV2 & PV3? As Climate change actions, requires reducing GHG emissions in the short term.</p>		<p>The methodology for the evaluation of Issues Identified through the Scoping Process is provided in Section 6.5.3.</p> <p>The methodology to be used in the EIA phase to determine the significance of impacts is detailed in section 10.6.</p> <p>The specialist studies that will be undertaken will consider cumulative impacts of the project and associated mitigation measures will be provided. The Assessment will be included in the EIAR.</p> <p>Comment noted.</p> <p>The embodied energy is the total amount of energy consumed for the construction of the project. The analysis of the project life cycle is outside of the scope of the EIA.</p> <p>Kotulo Tsatsi Energy PV3 will make use of renewable energy technology, and which will contribute positively towards reducing South Africa's GHG emissions and ensure compliance with all applicable legislation and permitting requirements.</p>

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	<p>Cleaner energy - The manufacturers of the PV equipment also need to use cleaner technologies, to prevent the emissions of toxic metals, such as aluminium, cadmium, lead, mercury out of the factories. As cleaner technology requires better filters inside the industrial processes that generated technological gadgets for industry, military and domestic uses Another pertinent question to the DME is what are the end users of the solar generated energy doing with the electricity. Industries both nationally and internationally need to be screened, evaluated and monitored to reduce their wastage of electricity!! Also Sending South African metallic ores to china and other countries that generate electricity from coal need to be halted, in order to cut CO₂ emissions.</p> <p>Climate change models do predict higher ambient temperatures for the region, this would result in creased wildfires if alien and or pioneer grasses were to be the dominant vegetation cover. Fires release carbon hence the revegetation planning after project decommissioning must be done by local vegetation restoration experts. At all costs fire temperatures must be kept low to avoid damage to the soil (and associated biological life), plants and animals.</p> <p>9.4 Fatal flaws The PV1,PV2 & PV3 project is too large to not have many fatal flaws, in a area where, indigenous palatable, plant growth is very slow, hence vegetation restoration shall require over 10 years of consistent gardening. Many of the environmental flaws also occur off the site, such as processing of additional toxic waste that is an output</p>		<p>The Scoping Phase of the project has determined that the project is not a fatal flaw.</p> <p>The Developers objective is to assist in the country's energy crisis by generating clean/renewable energy that will feed into the national grid and assist in the country's energy crisis. Rooftop installations for a 480MW project would be</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>from the manufacturing process of solar panels. One of the flaws is that the company did not consider focusing on installing PV panels, on roofs in existing urban areas, such as Upington & Kimberly (even retrofitting retailers in smaller towns such as the spar). Existing roofing provides adequate space for malls and offices (underneath) to host & service PV facilities for powering the electricity demands of shoppers.</p>		<p>challenging. Rooftop installations should be pursued, however, this is not the scope of this project.</p>
	<p>10.4 <u>Consideration of Alternatives</u> KTE should rather concentrate on retrofitting existing buildings in urban areas. This reduces the transaction costs and transformation costs to an almost pristine environment!</p>		<p>Alternatives have been assessed during the Scoping Phase and have been included in Chapter 3 of the final Scoping Report. Any additional alternatives based on the need and desirability of the project as well as specialist findings from their assessments will be included in the ElAr.</p>
	<p><u>Additional Questions from AES</u></p> <ul style="list-style-type: none"> • How much money and human resource budget is set aside (in a ethically managed Trust) for rehabilitation to allow successful farming after decommissioning of the photovoltaic arrays? 		<p>The Human Resource Budget will be determined and finalised once Environmental Authorisation has been issued.</p>
	<ul style="list-style-type: none"> • How flexible is KTE in working out a proper sampling time scheduling? Given the critical seasons that birds and animals are mating and nesting, are too be quiet times. What is the highest decibel noise emitted from KTE's drilling and site engines? In this regard, how does Savannah environmental personnel, plan to prepare the Environmental Safety officers for the site, given that there may be cultural & ethical differences between him/ her and the prospecting geologist and contractor teams? 		<p>An EMPr will be formulated with different roles and responsibilities for the construction, operational and maintenance personnel. The EMPr will also include any monitoring requirements as well as the frequency.</p>
	<ul style="list-style-type: none"> • What sort of compensation is offered to villages & farmers; for construction & maintenance activities that hinder; farming operations, current and future 		<p>The designing and planning of the project aims at ensuring that not farming operations are hindered. Furthermore, measures will be implemented to ensure that water quality and wild, animal and bird breeding is not compromised.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>water quality, & wild animal & bird breeding successes?</p> <p>When are you holding the first the I&AP meeting in Brandvlei en Kenhardt after the specialist studies are completed, stuur kennisgewings in Afrikaans.</p>		<p>Public participation meetings i.e. in person, will be held during the impact phase as detailed environmental, including social, assessments and mitigation measure, as and where applicable, will be shared with the community members in close proximity to the development site. The date/s, time and venue/s of these meetings will be advertised, and notification letters will be sent to the registered I&APs, and through consultation with the Ward Councillors to ensure the information is shared and communicated as widely as possible.</p> <p>The project information and environmental findings may be presented in Afrikaans at these meetings. However, it needs to be noted that the report and appendices will be available only in English.</p>
2.	<p>We are very excited about the Kotulo Tsatsi Project in our vicinity.</p> <p>Hoërskool Martin Oosthuizen (Kakamas) is the closest High School and hostel for the learners of Kenhardt, Brandvlei, Keimoes and surrounding areas.</p> <p>If possible, please can you provide me with contact details of the HR department or the person that are responsible for the BEE-projects of the Kotulo Tsatsi Energy project?</p>	<p>Ilze Pieterse Teacher Martin Oosthuizen Highschool (Kakamas)</p> <p>E-mail: 03 November 2022</p>	<p>Support for the project is noted. The Developer has been informed of this request and will make contact for further engagement in this regard.</p>