

## GEELSTERT 1, NORTHERN CAPE PROVINCE

### COMMENTS AND RESPONSE REPORT

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The Geelstert 1 Basic Assessment (BA) Process was announced on Thursday, 13 July 2020 through the distribution of the process notification letter and a Background Information Document (BID). The letter and BID served to invite Interested and Affected Parties (I&APs) to register their interest in the project and to submit any comments / queries that they might have. All written comments received during the BA process to date have been included in the table below.

The Basic Assessment (BA) Report has been made available for a 30-day review and comment period from **Thursday, 20 August 2020** until **Monday, 21 September 2020**. The Comments and Responses Report (C&RR) will be updated with comments received during the review and comment period and included in **Appendix C9** of the final Basic Assessment Report.

#### LIST OF ABBREVIATIONS / ACRONYMS

BA	Basic Assessment	BAR	Basic Assessment Report
BID	Background Information Document	BMM	Black Mountain Mine
DBAR	Draft Basic Assessment Report	DAEARD & LR	Northern Cape Department of Agriculture, Environmental Affairs, Rural Development and Land Reform
EA	Environmental Authorisation	EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme	HIA	Heritage Impact Assessment
I&APs	Interested and Affected Parties	LO	Landowner
NEMA	National Environmental Management Act	NC DENC	Northern Cape Department of Environment and Nature Conservation
NHRA	National Heritage Resources Act	OoS	Organs of State
SAHRIS	South African Heritage Resources Information System	SAHRA	South African Heritage Resources Agency

## 1. COMMENTS RECEIVED AT THE COMMENCEMENT OF THE BASIC ASSESSMENT PROCESS

NO.	COMMENT	RAISED BY	RESPONSE
1.	<p>While BirdLife South Africa supports the responsible development of renewable energy, we are concerned that the proposed infrastructure lies adjacent to an Important Bird and Biodiversity Area and may infringe on habitat Red Lark - a threatened species with a very restricted range. The proposed site falls within the Koa Dunes ecosystem and is within the core stronghold of the species. The densities of Red Lark are the highest in this core Koa area (0.03 adult birds/ha), compared to the core Loeriesfontein area (0.014) and other areas surrounding these (0.003 – 0.01) (Colyn et al 2020 in prep). We are therefore pleased to note that an avifaunal impact assessment will be undertaken.</p> <p>The maps below show the results of a habitat suitability model for Red Lark in the area (Colyn et al 2020 in prep) – warm areas indicate a higher probability of suitable habitat. We suggest that the output of this model should be used in combination with the results of the avifaunal surveys to guide the location of infrastructure, including fences and roads.</p> <p>BirdLife South Africa will not support the loss or degradation of the red dune habitat and urge that consideration be given to measures that will help secure the long-term protection of this important habitat as this assessment proceeds.</p>	<p>Samantha Ralston-Paton BirdLife South Africa</p> <p>Letter: 24-07-2020</p>	<p>The comments pertaining to the development of Geelstert 1 and the potential infringement of project infrastructure and loss of the Koa Dune Ecosystem raised by BirdLife South Africa are noted.</p> <p>An Avifauna Impact Assessment (<b>Appendix E</b> of the BA Report) has been undertaken which included three site surveys, owing to the sensitivity associated with the Red Lark habitat within the Aggeneys area. The results of the Avifauna Impact assessment indicates that the dune habitat to the south and located outside of the development footprint is considered to be of a very high avifaunal sensitivity, as this supports a healthy resident population of the Vulnerable Red Lark. The adjoining sandy flats habitat also supports the Red Lark, therefore much of the sandy flats presents a buffer between the development footprint for Geelstert 1 and the dune habitat for the Red Lark. This buffer area is of a high sensitivity and is not considered suitable for development. The plains habitat further north of the sandy flats habitat does not appear to support any Red Larks based on the three field surveys undertaken within the area, and since this habitat is widely distributed, it is considered to be of a low sensitivity. The development footprint of Geelstert 1 is solely located within the low sensitivity plains habitat and does not infringe on habitat of the Red Lark as identified during the three field surveys.</p> <p>It must be noted that the Avifauna Impact Assessment does not support the loss of or infringement / development into the Red Lark habitat, which is considered to not be available for development.</p>
2.	<p><b>Interim Comment</b></p>	<p>Natasha Higgitt Heritage Officer</p>	<p>A Heritage Screening Report (<b>Appendix H</b>) has been undertaken for Geelstert 1 and considers the impact of the project on archaeological and palaeontological</p>

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	<p>As the proposed development is undergoing an EA Application process in terms of the National Environmental Management Act, 107 of 1998 (NEMA), NEMA Environmental Impact Assessment (EIA) Regulations as amended, it is incumbent on the developer to ensure that a <b>Heritage Impact Assessment (HIA)</b> is done as per section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA) as required by section 24(4)b(iii) of NEMA. This must include an archaeological component, palaeontological component and any other applicable heritage components. The HIA must be conducted <b>as part of the</b> EA Application in terms of NEMA and the NEMA EIA Regulations.</p>	<p>and Phillip Hine Manager: archaeology, Palaeontology and Meteorites Unit SAHRA  Letter: 17-08-2020</p>	<p>resources. This report forms part of the BA Report made available for a 30-day review and comment period.</p> <p>The Heritage Report has been undertaken by Jenna Lavin of CTS Heritage.</p>
3.	<p>SAHRA requests that an assessment of the impacts to heritage resources that complies with section 38(3) of the NHRA as required by section 38(8) of the NHRA and section 24(4)b(iii) of NEMA be conducted as <u>part of the EA process.</u></p>		
4.	<p>The assessment must include an assessment of the impact to archaeological and palaeontological resources. The assessment of archaeological resources must be conducted by a qualified archaeologist and the report comply with the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment Reports (see <a href="http://www.asapa.co.za">www.asapa.co.za</a> or <a href="http://www.aphp.org.za">www.aphp.org.za</a> for a list of qualified archaeologists).</p>		
5.	<p>The proposed development is located within an area of low Palaeontological Sensitivity as per the SAHRIS PalaeoSensitivity map. As such, a Chance Fossil Finds Procedure must be developed as part of the EMPr for</p>		<p>A Chance Find Procedure has been included as part of the Environmental Management Programme included as <b>Appendix M</b> of the BA Report.</p>

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	<p>the development (see <a href="https://www.palaeosa.org/heritage-practitioners.html">https://www.palaeosa.org/heritage-practitioners.html</a> for a list of qualified palaeontologists).</p>		
6.	<p>Any other heritage resources as defined in section 3 of the NHRA that may be impacted, such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes must also be assessed.</p>		<p>The Heritage Screening Report (<b>Appendix H</b>) considers all resources of heritage significance located within the Geelstert 1 development area and development footprint.</p>
7.	<p>Further comments will be issued upon receipt of the NEMA EA documents inclusive of appendices.</p>		<p>It is noted that further comments will be submitted on the BA Report.</p>
8.	<p>Please find attached Eskom general requirements for developments at or near Eskom servitudes and infrastructure. Please send me KMZ files of the affected properties, proposed layouts and proposed grid connections.</p> <p><b>Renewable Energy Generation Plant Setbacks to Eskom Infrastructure document was submitted and is included in Appendix C5. The requirements listed below forms part of the document.</b></p> <ul style="list-style-type: none"> <li>» Eskom's rights and services must be acknowledged and respected at all times.</li> <li>» Eskom shall at all times retain unobstructed access to and egress from its servitudes.</li> <li>» Eskom shall at all times retain unobstructed access to and egress from its servitudes.</li> <li>» Eskom's consent does not relieve the developer from obtaining the necessary statutory, land owner or municipal approvals.</li> </ul>	<p>John Geeringh Senior Consultant Environmental Management Land and Rights Eskom Transmission Division</p> <p>E-mail: 19-08-2020</p>	<p>The Eskom general requirements for developments at or near Eskom servitudes and infrastructure document submitted to Savannah Environmental is included in <b>Appendix C5</b>.</p> <p>The requested .KMZ file for Geelstert 1 was e-mailed on 19 August 2020 (refer to <b>Appendix C7</b>).</p> <p>The requirements for development at or near Eskom infrastructure servitudes are noted. These requirements have been submitted to the developer for their attention and consideration for the development of Geelstert 1.</p>

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	<ul style="list-style-type: none"> <li>» Any cost incurred by Eskom as a result of non-compliance to any relevant environmental legislation will be charged to the developer.</li> <li>» If Eskom has to incur any expenditure in order to comply with statutory clearances or other regulations as a result of the developer's activities or because of the presence of his equipment or installation within the servitude restriction area, the developer shall pay such costs to Eskom on demand.</li> <li>» The use of explosives of any type within 500 metres of Eskom's services shall only occur with Eskom's previous written permission. If such permission is granted the developer must give at least fourteen working days prior notice of the commencement of blasting. This allows time for arrangements to be made for supervision and/or precautionary instructions to be issued in terms of the blasting process. It is advisable to make application separately in this regard.</li> <li>» Changes in ground level may not infringe statutory ground to conductor clearances or statutory visibility clearances. After any changes in ground level, the surface shall be rehabilitated and stabilised so as to prevent erosion. The measures taken shall be to Eskom's satisfaction.</li> <li>» Eskom shall not be liable for the death of or injury to any person or for the loss of or damage to any property whether as a result of the encroachment or of the use of the servitude area by the developer, his/her agent, contractors, employees, successors in title, and assignees. The developer</li> </ul>		

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	<p>indemnifies Eskom against loss, claims or damages including claims pertaining to consequential damages by third parties and whether as a result of damage to or interruption of or interference with Eskom's services or apparatus or otherwise. Eskom will not be held responsible for damage to the developer's equipment.</p> <ul style="list-style-type: none"> <li>» No mechanical equipment, including mechanical excavators or high lifting machinery, shall be used in the vicinity of Eskom's apparatus and/or services, without prior written permission having been granted by Eskom. If such permission is granted the developer must give at least seven working days' notice prior to the commencement of work. This allows time for arrangements to be made for supervision and/or precautionary instructions to be issued by the relevant Eskom Manager</li> <li>» Note: Where and electrical outage is required, at least fourteen work days are required to arrange it.</li> <li>» Eskom's rights and duties in the servitude shall be accepted as having prior right at all times and shall not be obstructed or interfered with.</li> <li>» Under no circumstances shall rubble, earth or other material be dumped within the servitude restriction area. The developer shall maintain the area concerned to Eskom's satisfaction. The developer shall be liable to Eskom for the cost of any remedial action which has to be carried out by Eskom.</li> <li>» The clearances between Eskom's live electrical equipment and the proposed construction work shall be observed as stipulated by <i>Regulation 15</i> of the <i>Electrical Machinery Regulations of the</i></li> </ul>		

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	<p><i>Occupational Health and Safety Act, 1993 (Act 85 of 1993).</i></p> <ul style="list-style-type: none"> <li>» Equipment shall be regarded electrically live and therefore dangerous at all times.</li> <li>» In spite of the restrictions stipulated by Regulation 15 of the Electrical Machinery Regulations of the Occupational Health and Safety Act, 1993 (Act 85 of 1993), as an additional safety precaution, Eskom will not approve the erection of houses, or structures occupied or frequented by human beings, under the power lines or within the servitude restriction area.</li> <li>» Eskom may stipulate any additional requirements to highlight any possible exposure to Customers or Public to coming into contact or be exposed to any dangers of Eskom plant.</li> <li>» It is required of the developer to familiarise himself with all safety hazards related to Electrical plant.</li> <li>» Any third party servitudes encroaching on Eskom servitudes shall be registered against Eskom's title deed at the developer's own cost. If such a servitude is brought into being, its existence should be endorsed on the Eskom servitude deed concerned, while the third party's servitude deed must also include the rights of the affected Eskom servitude.</li> </ul>		
9.	As per our earlier discussion, can you kindly advise the information required to register on the project database as well as obtaining further information on the projects.	Natalie Schlebush Project Coordinator, Turnkey Systems, International Operations Canadian Solar	<p>During the telephone discussion of 08 July 2020, the I&amp;AP was informed that as soon as the Background Information Document (BID) was available for distribution, it would be forwarded to her as a registered I&amp;AP.</p> <p>The BID was e-mailed on 16 July 2020 (refer to <b>Appendix C6</b> for e-mail trail) and the I&amp;AP has been registered on the project database (<b>Appendix C2</b> of the BA Report).</p>

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		E-mail: 08-07-2020 & 15-07-2020	
10.	<p>Akkommodasie beskikbaar naby geleë plaasposstal wat opgeknop kan word vir meer senior personeel. Ook akkomodasie in Pofadder beskikbaar. (Submitted in terms of Regulation 43(1))</p> <p><b>Translation</b> Accommodation situated near homestead available which needs to be renovated for senior personnel. Accommodation is also available in Pofadder.</p>	<p>Gerhard Visser Landowner</p> <p>Registration &amp; Comment Form: 19-07-2020</p>	<p>It is noted that the I&amp;AP has accommodation available for use by the development team during the development phases of Geelstert 1. The contact details of the I&amp;AP and the services provided have been submitted to the developer.</p>
11.	<p>Verhoogde kriminaliteit in omgewing a.g.v. toestroming van mense is 'n pertinente bekommernis. Sekuriteit op hoof paaie 24/7 is 'n vereiste.</p> <p><b>Translation</b> Crime in the area will increase due to the influx of people is a great concern. Security on all main roads is a requirement 24/7.</p>		<p>The comment raised pertaining a potential rise in crime due to an influx of jobseekers is noted. The Social Impact Assessment (<b>Appendix G</b> of the BA Report) undertaken for the Geelstert 1 identified the influx of jobseekers and change in population as a potential social impact associated with the construction phase. The impact was assessed as being of a low significance with the implementation of the recommended mitigation measures.</p>
12.	<p>Please register me as an I&amp;AP for the DBAR process for the proposed Geelstert PV application.</p> <p>Also, please note the others copied on this email who may also wish to be registered, or who require a dedicated comment opportunity.</p>	<p>Mark Botha Independent Environmental Services Professional</p> <p>E-mail: 12-08-2020</p>	<p>The I&amp;AP was registered on the project database (refer to <b>Appendix C2</b>).</p> <p>Any other party who has an interest in the project was invited to register their individual interest with the PIP team, and request to be added to the project database.</p>
13.	<p>Please could you send through a detailed layout of the application.</p>		<p>The layout map of Geelstert 1 was distributed to the I&amp;AP via email on 18 August 2020.</p>
14.	<p>I note with interest that there are two prior applications over the relevant farm portions which have already been approved and wonder how this new application resonates with that.</p>		<p>The two authorised projects on the same property are known as the Aggeneys 1 and Aggeneys 2 Solar PV facilities. These are located directly north of the proposed Geelstert 1 solar PV facility, and north of the Aggeneys-Aries 400kV line.</p>



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15.	Please note further, that portions of the farms Bloemhoek and Aggeneys have either been formally set aside as biodiversity offsets by Black Mountain Mine for the Gamsberg project, or are managed as nature reserves contributing to biodiversity targets in this landscape.		The portions of the farms Bloemhoek and Aggeneys have not been formally set aside as biodiversity offsets by Black Mountain Mine for the Gamsberg project, nor are managed as nature reserves contributing to biodiversity targets in this landscape. Where further details regarding the offset areas can be provided, this input would form part of the assessment reporting.
16.	Please advise your client that if any of the sensitive biodiversity features are to be impacted, that a significant biodiversity offset is likely to be required, which has bearing on project location, layout and viability.		Simon Todd, the ecologist who has assessed the Geelstert 1 project, advised that he is aware of the offset requirements associated the EA for the Gamsberg Mine and that this offset includes several properties, the nearest of which is the farm Achab which includes the large ridge east of the Gamsberg itself, northeast of the Bloemhoek property. The PV projects are confined to the Bloemhoek property. The farm Aggeneys 056 is traversed by the Geelstert Grid Connection grid corridor, and while owned by the mine, the ecologist has confirmed that this is not an offset property. It is acknowledged that the deep sands of the Koa River valley are important for the Red Lark from a conservation perspective, and have been flagged as such in the Ecological Impact Assessment ( <b>Appendix D</b> of the BA Report) relevant to Geelstert 1. The PV project avoids infringement on sensitive areas, habitats and features within the area and have been reported to be located predominantly within areas of low sensitivity. There are features and areas of a high sensitivity present within the grid connection corridor of the Geelstert Grid Connection which need to be avoided, however these features and the associated buffers will be spanned by the power line infrastructure. As sensitive features are avoided by the planned PV facilities, the need for an offset was not identified to be required.
17.	I urge your client to engage frankly with the various regulators and landowners in this region prior to committing further to this process, and also to undertake a grid connection and capacity study upfront to determine whether additional connections can be accommodated (given the large number of existing approved projects).		Technical considerations such as the grid connection and capacity study form part of the project feasibility work undertaken by the developer. As not all authorised projects have been awarded preferred bidder status, the connection to the grid is offered to the next project which is awarded preferred bidder.

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18.	<p>Please send me the layouts of Geelstert 1 &amp; 2 (as well as Aggeneys 1 &amp; 2 and Bloemhoek PV projects if you have them).</p> <p>Simon does not have all the relevant offset components to hand - in addition to the offset properties were a range of set asides and commitments. These include large portions of Aggeneys and Bloemhoek</p> <p>I would need to interrogate the layouts to ensure that they do not conflict. Please also copy Koos and Pieter from BMM and the DENC officials</p>	E-mail: 18-08-2020	<p>The layout maps of the Geelstert 1, Geelstert 2 and the Geelstert Grid Connection projects were sent as requested on 18 August 2020 via email. The locality map for the three Geelstert projects, putting their locations within the Aggeneys area into perspective, was also submitted.</p> <p>The cumulative map (also attached to above-mentioned e-mail) provided an indication of the locations of the Aggeneys PV projects within the Bloemhoek property. It is important to note that the 'Bloemhoek PV projects' referred to by the I&amp;AP no longer hold valid environmental authorisations (email trail included in <b>Appendix C6</b>).</p>
19.	<p>I can confirm that there is no conflict with the BMM offset and set aside areas.</p> <p>Would be useful to keep the two DENC officials copied on all future applications in Namaqua district that Savannah may be involved with.</p>		<p>Feedback confirming that the project development area does not conflict with the BMM offset areas is acknowledged.</p> <p>The PIP team confirm that the Department of Agriculture, Environmental Affairs, Rural Development and Land Reform (previously NC DENC) is the commenting authority for the project and accordingly is automatically registered on the project database.</p>
20.	<p>I have also had a look and agree that they fall outside the offset geographical areas. The regional context of the development will of course still require review. <i>(E-mail addressed to Mr Mark Botha in comment number 11 above)</i></p>	<p>Conrad Geldenhuys Production Scientist Grade B: Botanist Research and Development Support Section NC DENC</p> <p>E-mail: 19-08-2020</p>	<p>It is acknowledged that the NC DENC is in agreement with the conclusion that the project falls outside of the offset areas related to the Black Mountain Mine and the Gamsberg Mine.</p>
21.	<p>Please register me.</p>	<p>Dieudonne Ngneutedem I&amp;AP: Upington</p>	<p>Registration as I&amp;AP on project database was confirmed on 18 August 2020 per e-mail.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	I got code 10 drivers license and pdp. And am just waiting to passed out for my code 14 license. Am looking for anything even if it's a general worker post.	E-mail: 17-08-2020	